

- Way look for scientific consistency and reliability has more to do with looking at consistency of findings across time, settings, various research methodologies, different populations
- Only way to get known error rate is through randomized sampling; can't do when studying sexual abuse and grooming
- After reviewing versions of the defense submissions and the Government's opposition, LR noted that the defense repeatedly indicate that LR's testimony is based on her personal experience with patients and that she presumes all patients are telling truth; testimony not based exclusively or primarily on experiences with patients; based on LR's expertise – area of expertise is clinical and forensic psychology with focus on traumatic stress and interpersonal violence
- Field in which LR has conducted research, received training, written publications, led trainings
- Years and experience treating patients, training and keeping up with topics, training others on topics; publishing, presenting, communicating with peers
- Bennet and O'Donohue article – 2014 article; included article in materials sent because article lays out that although term grooming has evolved over time, grooming refers to a peer reviewed well studied well established body of literature that has looked into tactics, strategies, MO, types of behaviors that offenders engage in to procure and seduce victims
- Study of experiences of victims of child sexual abuse as well as study of behaviors of sexual offenders are both recognized fields of scientific study with numerous peer reviewed articles, chapters, and books; research has consistently demonstrated that childhood sexual abuse itself is not isolated event itself, but rather a process that progresses and develops over time; research since at least 1980s has studied and reliably identified types of strategies used by offenders and referred to those strategies as tactics, crime scripts, modus operandi, seduction, grooming
- In addition, research has studied what do offenders report doing in order to gain compliance from victims and there have been studies from victims saying what experiences have happened to you; consistency between the reports of those two groups
- Defense concludes that because LR works with victims means that she doesn't have expertise in offender; expertise in traumatic stress and interpersonal violence; research establishes that when relationship exists between victim and offender in which sexual abuse occurs that is referred to as interpersonal violence, also referred to as betrayal trauma; entire body of literature that points to betrayal trauma as having more significant negative effects and specific types of outcome
- Scientific reports in victim literature relating certain types of offender behaviors to certain consequences and difficulties in victims; no way to study victim literature without studying reports of what offenders have done
- Defense refers to fact that she did not provide supporting evidence about grooming by proxy; not aware of that as a scientifically valid term; allegation that nothing to support idea that one person engage in coercive or manipulative behaviors for purposes of

procuring that person for sexual abuse by another is erroneous; entire body of literature looking at behavior of pimps, sex traffickers, cult recruiters; in all those cases, study and scientific literature around individuals engaging in particular strategies and techniques for purpose of criminal activity on part of a third party

- Coercive control: strategy for establishing dominance, well studied in literature; true that oftentimes coercive control is conducted through use of intimidation, threats, and violence, because it is about attaining and maintaining control over another individual, if physical force is not necessary, it is not used
- Disclosure: relationship dynamics between victim and perpetrator often can contribute to delayed disclosure; not saying that it is because of grooming that there is delayed disclosure; when refer to relational dynamics, two peer reviewed bodies of literature –
  - Betrayal trauma: coping strategies that individuals engage in to block out/minimize/reduce awareness of abuse when to know that information would threaten loss of relationship or benefits gained by relationship; shame, fear of being blamed, getting into trouble, getting perpetrator into trouble; literature about why adolescents most likely to engage in delayed disclosure or not reporting;
    - Jennifer Fried – significant lab research on betrayal trauma; cognitive psychologist
  - Mary Koss – research on hidden rape; research where ask individuals about variety of types of behaviors, including forcible rape; when describe it as opposed to using word, describing rape but won't use word; research documenting that many rape and sexual assault survivors do not label experiences as such
- Memory and cognition are part of training as clinical psychologist; memory for traumatic events and ways in which individuals recall traumatic events and describe events and factors that influence amount of information they provide, detail they provide are well within expertise; what LR does as a clinician; Jim Hopper is scientist in this area
- When doing forensic evaluations, sees other side, sees crime reports, police interviews, grand jury testimony, etc.
- Ross Chite – website about recovered memory project in which identifies and keeps database of cases of recovered memory where there has been clear and legally accepted corroboration that things happened