

- Prepared for hearing
- Clarification after reading our brief:
 - Will testify about generally well accepted principles in memory. Foundational principles, some derived from Loftus, well accepted in literature
 - Not an expert on memory
 - Key principles are in agreement
 - LR has gone to a training by Loftus
- Very difficult to distinguish grooming/non-grooming ex ante -> models require conscious intention, but context matters. Grooming is not a single act, it's a series of behaviors
- Described articles
 - "Observing Coercive Control" by Duron, Johnson, et al.
 - 2009 study by Leclerc, et al.
 - "Toward a Universal Definition of Childhood Grooming" in June 2021 in Deviant Behavior by Winters. She looks at criteria in literature, not common tactics or definitions. Responds to Bennett & O'Donohue
 - "Validation of the Sexual Grooming Model of Child Sexual Abusers" in 2020 in J. Child Sexual Abuse by Winters
- Bennett and O'Donohue
 - list 13 specific exemplars of grooming
 - Captures commonalities and tactics in literature as well as measurement problems
 - Agrees that there's no universally agreed upon definition but there are a variety of tactics that appear consistently, etc. Studies use slightly different definitions, but core is there -> general consensus that these behaviors are part of dynamic of childhood sexual abuse, which is different than a settled definition
 - Grooming is much easier to recognize after the fact. Very nature is that the offender is hiding grooming as its happening.
 - There are studies where people have trouble understanding hypos on the page. But the way to do it is to identify replicated commonalities. Can't give a test.
 - Interrater reliability – whether or not separate individuals agree on how to code behaviors
 - Does not agree with Bennett & O'Donohue opinion about whether grooming should be used in forensic settings.
 - In such settings, does not take anything at face value but can apply grooming to understand descriptions of events
 - Reasonable experts can disagree about points in literature without undermining the existence of commonalities
 - Some gaps pointed out by Bennett & O'Donohue have since been fixed
- Pointing to an article does not mean that LR agrees with every point in the article
- Dietz, "Grooming and Seduction": provided b/c history of use of the term, pointed to ways in which different labels have been used to describe similar types of behavior

- Building trust between child and adult is often very positive, but in grooming process, it's established for the purpose of sexual abuse and exploitation
- LR was in grad school before grooming was really a widely taught thing.
- Sandusky case is really when it came into the public eye
- In context of the dynamics of the abuse, many talk about the ways trust was built over time, etc.
- In forensic practice, grooming comes up in context of (1) figuring out if someone was abused, and (2) for limitations purposes, when someone should have reasonably connected past abuse to later consequences
- Expertise is interpersonal violence, not "grooming" specifically, but grooming is a piece of interpersonal violence
- "Grooming" is a commonly accepted term, the tactics/strategies underlying them are well established
- In forensic practice, don't evaluate for "grooming" per se.
- Not a myth that perpetrators target vulnerable victims. Supported by studies, e.g. offender studies. Winters, "Stages of Sexual Grooming" discusses this.
 - Winters did a study in 2016 about whether participants could recognize grooming behavior *without abuse* and the answer was no. But the literature is derived from retrospective perspectives
 - This means there is some hindsight bias but doesn't contradict studies about what has and has not happened/what they have and haven't done.
- Education and training included learning about higher risk groups, and has seen it in her practice. High degree of consistency.
- Third parties: opinions primarily based on experience. When there's a relationship of coercive control, the beneficiary of the control doesn't matter. Another example is gangs targeting younger people.
 - Third party could be used to disarm/normalize, or one person using coercive control to benefit someone else. Latter exists in coercive control literature.
- Does not use the term grooming by proxy, doesn't think it's a term that's used
- Loftus herself teaches that inconsistencies are common in normal memory
- Research shows that if there's a trusting/caregiving relationship between perpetrator and victim:
 - Less likely to label abuse as abuse
 - Less likely to disclose
 - Can occur because afraid of shame, confusion, worried about losing benefit, other things.