

- People who are sexually assaulted have higher likelihood of having PTSD
- PTSD is an acute disorder – some of the symptoms involve distress when encounter reminders + efforts to avoid
- Leap: it's highly unlikely they would engage in ongoing relationship/wear clothing/recreate sexual assault event (re Dietz's portion of defense expert notice)
 - No evidence to support that leap. That conclusion is not in the article
 - What is a sexual assault survivor "unnecessarily recreating a sexual assault event" – they aren't the ones recreating the events. Not clear what that means. Sexual assault is not created by the victim.
 - Ignores an entire body of literature regarding sexual assault in the context of an ongoing relationship, which is the vast majority of CSA cases.
 - Whether adult-child or adult-adult, b/c of the attachment, not at all unusual to maintain a relationship
 - Both of those relationships also involve elements of coercive control, so perpetrator keeps victim in relationship -> pattern of neutral or positive interactions fulfilling some need interspersed with episodes of violence/assault/etc.
 - So control is not fully with the victim
 - Pimp-prostitute literature and betrayal trauma literature
- PTSD can also include engaging in impulsive, high-risk behaviors. CDC data/psych lit, particularly during adolescence: engaging in risky sexual behavior is common consequence of CSA
- PTSD: contact causes distress, but it's not necessarily true that that leads to behavioral avoidance. Lots of reasons people stay in distressing situations. In order to meet the criteria for PTSD, you need at least one of the Criterion C behaviors, but "efforts to avoid" doesn't mean you don't have interactions with the perpetrator
 - Keeping up the relationship can be a form of minimization and denial. Can relate to self-blame/shame, which is another PTSD component. May also be convinced it's not abusive at the time and come to understand later (e.g., adult convinces minor it's not abusive).
 - There is a literature in the DSM about delayed-onset PTSD
 - Rape myth literature – maybe if I'm nice they will leave me alone
 - Dr. Jennifer Freyd – betrayal trauma literature – looks precisely at how people can be in relationships with perpetrators. It's adaptive not to acknowledge/know about the abuse
- Not sure about literature about not wearing perpetrator's clothes, but has seen patients say "the abuser gave me this fancy clothing, why should I have to give that up"
- People will avoid if they are safe, there are no negative consequences, they can control, but plenty of people don't for other reasons

- Dietz is assuming that just b/c something would elicit intense distress means they won't do it, and that is erroneous
- People studied in the article are help-seeking in some way. Selection bias: if have delayed-onset PTSD, e.g., not seeking help within a week. Also, significant % had prior incident.
 - P. 10, second column. They are not studying delayed onset PTSD
- PTSD is cued, but what cues distress is highly subjective. Maybe wearing clothes won't do it.
- Avoidance is one of the six factors needed to show PTSD. He's putting a lot of weight on that one factor

Other topics:

- Bennett article:
 - Has no error rate
 - Does lots of things well, like conceptualizing what is/is not grooming, reviews variety of literature, outlines how important it is to have a clear/cogent understanding
 - Article's opinion about grooming not appearing to meet the *Daubert* standard was not the main focus, a side comment. LR values the review but not the opinion. Does not presume to have an opinion on *Daubert* – she is an expert on the literature and the field.
 - It's well studied - lots of articles on the subject
- Dietz:
 - Whether grooming occurred, not hinging on credibility of individuals. Wide qualitative studies describing similar tactics and MOs
- The Duron article talks explicitly about dynamics of coercive control across multiple types of victimization. Nothing about coercive control requires the perpetrator to be the beneficiary
- Adolescents are less likely to disclose, but children in intact families are more likely to disclose. The intellectually disabled are often targeted, as said in Pathways article, kids from single-parent homes. Indicates that those vulnerabilities increase risk. Trafficking literature: vulnerable/poor/needy.
 - Not clinical lore – within the prevalence data
 - Research with offenders: they say they identify as much.
 - It's about child's circumstances, not specifically personal characteristics of child
- Pathways article: no error rates, no studies, and authors simply say these are “potential pathways to false allegations” – hypothesizing. They say rates are very low.
 - LR doesn't know the journal, but we could look up the impact factor
- Something can be generally accepted, peer reviewed, etc. without having a known error rate.
- LR has been provided with the following materials: defense motion to exclude Rocchio testimony (redacted information regarding offense conduct); Gov't opposition to defense, as filed (only *Daubert* section, redacted information regarding offense conduct), and Gov't Exhibits A and B; defense reply (*Daubert* section, redacted information regarding offense conduct); defense expert notice (sections on Dietz and Loftus only)