

McAllister Transcripts

People v. Coronado

- Boulder, J. Klein
- Δ: PD Kristin Johnson
- Π: Amy Okubo
- Shreck hearing
- 12/7/07 (p. 434)
- ALMOST ALL REPORTS OF SEXUAL ABUSE ARE DELAYED. AND THEY ARE DELAYED FROM SOMETIMES DAYS OR WEEKS TO MANY YEARS, DEPENDING ON THE TYPE OF ASSAULT. (446/Tr. 16)
- *Child* reporting is a process (distinguished from adult). (447-48/Tr. 17-18)
- MOST SEX OFFENDERS DON'T USE OVERT AGGRESSIVE PHYSICAL VIOLENCE DURING A SEXUAL ASSAULT. AND EVEN PEOPLE WHO SEXUALLY ASSAULT ACQUAINTANCES WHO ARE ADULTS WILL TYPICALLY NOT INJURE SOMEONE OR USE A WEAPON. THEY OFTEN ONLY USE THE AMOUNT OF FORCE NECESSARY TO HOLD SOMEONE DOWN. (462/Tr. 32)
 - *Q = We have the Hollywood version of a sex assault as being something with overt violence and aggressive physical violence, but you would agree that most sex offenders do not use overt, aggressive, physical violence during a sexual assault.*
 - *You would agree that people who sexually assault acquaintances will not typically injure someone.*
 - *Use only the amount of force necessary to hold someone down.*
- BECAUSE WHEN MATERIALS STORED IN THE AMYGDALA RATHER THAN THE CORTEX, IT DOES NOT HAVE TIME LINE (470/Tr. 40)
 - *She can't testify to this sort of thing.*
- THE RESEARCH ALWAYS CLEARLY INDICATES THAT TYPE TWO TRAUMA OR LONG TERM REPETITIVE EXPOSURE IS MOST LIKELY TO CAUSE THE MOST SERIOUS NEGATIVE TRAUMA REACTIONS. (472/Tr. 42)
- Q. AND JUST BECAUSE THEY APPEAR ASYMPTOMATIC DOES NOT NECESSARILY MEAN THERE IS NO TRAUMA IN THEIR LIFE?
A. IT ACTUALLY TYPICALLY INDICATES MORE SERIOUS TRAUMA BECAUSE IT INDICATES THE USE OF DISSOCIATION OR THE DISSOCIATIVE SET OF COPING BEHAVIORS. (474/Tr. 44)
 - *So if there are no symptoms, you can tell that the abuse was worse.*
- XE
- Just consulting and testifying since 2004. No counseling. (480/Tr. 50)
- Not seen patients since 2000. (481/Tr. 51)

- Over 90% for prosecution. (482/Tr. 52)
- Not currently hold any professional license. (485/Tr. 55)
- SO I THINK IT'S MOST IMPORTANT TO MAKE SURE THAT THERE IS INDEPENDENT VERIFICATION BEFORE YOU SAY SOMETHING AS A CONSISTENT FINDING BECAUSE WE DO HAVE SOME CONCERN ABOUT NOT EVERY SINGLE VICTIM IN THE WORLD WILL HAVE -- WILL OR EVERY SINGLE PERSON WHO IDENTIFIES AS A VICTIM WILL THERE BE A FINDING THAT THERE HAS BEEN ACTUAL ABUSE. (486/Tr. 57)
- 2/20/08 (496)
 - *Issues regarding need for expert testimony and public perception. Look at recent study on reporting rates and public perception.*
- Q. LET'S TALK A LITTLE BIT MORE ABOUT THE DELAY ISSUE. YOU SAID THAT ALMOST ALL SEX ASSAULT REPORTS ARE DELAYED?
A. YES.
Q. IS THAT ACCURATE?
A. THAT'S ACCURATE. (521/Tr.26)
- Q. AND -- RIGHT -- AND DISSOCIATIVE RESPONSES YOU WOULD MORE LIKELY SEE IF SOMEONE HAD LITTLE CAPACITY TO ESCAPE THE SITUATION?
A. THAT'S ACCURATE. (537/Tr. 42)
- THE STANDARD STATE RATES FOR MY DEGREE WHICH ARE \$80 AN HOUR FOR TESTIMONY AND \$40 AN HOUR IF I HAVE TO WAIT TO TESTIFY.
Q. OKAY. AND WAS THERE ANY COST ASSOCIATED WITH YOUR CONSULTATION WITH MS. OKUBO ABOUT THE CASE?
A. THE TIME THAT I ACTUALLY SPENT TALKING WITH HER AND HER ASKING ME ABOUT GENERAL AREAS THAT SHE WANTED TO KNOW WHAT I MIGHT TESTIFY ABOUT WOULD BE CHARGED AT THE \$80 AN HOUR RATE, BECAUSE I'M ACTUALLY WORKING WITH HER. (547-48/Tr. 52-53)
- Re-Direct
- When overt violence involved, less self-blame, less trauma. (553-54/Tr8-59)
- Trial
 - 5/7/08 (1066/Tr. 120 – McAllister start at 1184/Tr. 119)
 - Not testify to specifics of case, not familiar with specifics.
 - YOU SAID YOU'VE TESTIFIED AT LEAST 75 TIMES. DO YOU KNOW HOW MANY OF THOSE TIMES HAVE BEEN FOR PROSECUTORS?
A. THE LARGE MAJORITY OF TIMES.
Q. HAVE YOU TESTIFIED SOME FOR DEFENDANTS?
A. YES. RARELY IN DOMESTIC VIOLENCE CASES. (1196/Tr. 131)

- VICTIMS TYPICALLY ARE VERY RETICENT ABOUT REPORTING. EVEN IF THEY DO REPORT, THEY TYPICALLY INITIALLY TELL SOMEONE THEY CARE ABOUT WHO MIGHT ENCOURAGE THEM LATER TO REPORT TO AUTHORITIES. THAT'S HOW MOST REPORTS HAPPEN. MOST VICTIMS DELAY REPORTING FOR MANY, MANY YEARS. AND, IN FACT, ONLY ABOUT SIXTEEN, POSSIBLY UP TO EIGHTEEN OR NINETEEN PERCENT OF ANY SEX ASSAULT VICTIMS EVER REPORT TO AUTHORITIES. THE LARGE MAJORITY OF SEXUAL ASSAULTS ARE NEVER REPORTED TO ANYONE. (1203/Tr. 138)
- WHAT THE LITERATURE ABOUT TRAUMA SAYS IS THAT PEOPLE'S RECALL OF WHAT ACTUALLY HAPPENED TO THEM IS TYPICALLY VERY CONSISTENT AND STRONG. BUT BECAUSE IT'S STORED AS THOSE THINGS, LIKE PICTURES OR PHYSICAL SENSATIONS, AND IT'S NOT SUBJECT TO VOLUNTARY RECALL AND DISMISSAL, IT MAY COME UP IN PIECES, IT MAY NOT BE ATTACHED TO THE COGNITIVE THINGS THAT WE THINK OF IN TERMS OF BEING ABLE TO EXPLAIN IT IN DETAIL OR BEING ABLE TO THINK ABOUT EXACT DATES, TIME FRAME. (1243/Tr. 178)
 - *So this explains getting timeline wrong, but not explain getting penetration or lack of penetration wrong. In fact, that runs counter to what you say.*

In the Interest of D.P.L.

- Jefferson County, J. Boatright
- II Retseck
- Δ Seibold, Gillio
- Trial, 4/2/08 (begin Adobe 3/Tr. 124)
- Not testify to specifics of case, not familiar with specifics.
- Reason not licensed bc of problems with Qs that dangerous to clients. (126-27)
- Typically called for π. Have testified for Δ a few times in DV cases, “but primarily for the prosecution.” (132)
- Paid \$80/hr on stand or written materials and \$40/hr to wait to testify. (132)
- Good defense voir dire on being administrator not clinician. (133-148)
- Says was “strictly a psychotherapist” when at the Assault Survivors Assistance Program. (142, 144)
 - *This was 1989-1997. What is/was law on unlicensed social worker practicing psychotherapy. She never have a license. What was the law at the relevant time?*
- Half the time I get reports, half the time I don’t. (152)
- Most victims of sex assault never report. 16-19%. (153)
- Most common thing after sexual assault is to pretend like it didn’t happen, like things are normal. Pseudoadjustment. (157)
- On memory: “what you see in the research literature is that things come back a little at a time.” (159). (See also 160)
 - *Here, things come and go. Memory great up front. Gets worse. Then better. Then worse.*
- Not get A to Z description of traumatic event at the very beginning. That’s a more rare experience of trauma and reporting of trauma. (161)
- XE Q about doing research and having direct contact with person. A: “Yes when you’re doing direct work a requirement is that you have interpersonal contact, that you meet the person, interview them, sometimes there’s testing.” Need to do that to form opinions and “to form any sort of diagnosis.” (165)
- “In a crisis situation you might meet with someone once but you wouldn’t made a determination about what was going on with somebody in one visit.” (165)
- Want to rule out things that might skew observations. (165)
- Other things that could mirror trauma. (166)
- Practiced as clinical SW and psychotherapist although not licensed. (168)
- No certs other than eye movement one. (169-70)
- Experience with sex assault Vs comes primarily from clinical experience. (171)
- Q: And every time you’ve testified as an expert in a sexual assault case it’s been on behalf of the prosecution, correct?

A: That's correct. (172)

- Would be unethical to diagnose someone without having met them. (174)
- Scientific method, lack of control groups (175-179)
 - *Maybe get Penrod to comment on this? Affidavit?*
- Flood with adrenaline and epinephrine. Fight, flight, freeze. (181)
 - *Inconsistent with sitting and smoking cigarettes?*
- Not memory expert. (186)
- Certain symptoms not necessarily mean victim.

Q: And that's part of the reason as a clinician you would have had to sit down and meet with someone?

A: Yes. And more than once. (188)

- DOJ report saying that 25% of sex assault cases referred to FBI, DNA excluded primary suspect. (190)
- False reports = 2-8% (198)
 - *This is a great number for us. Let's the jury know that false reports do exist. 2-8% sounds like reasonable doubt to me.*
 - *For closing: That means that if each of you made an allegation, one of you would be a liar.*
- False reports (200)

People v. Irin Daniels

- II Saleebey
- Δ Meilstrup
- Shreck hearing, 1/13/11 (McAllister starts at 12)
- “I initially trained with Lenore Walker.” (27)
- Talk about who Lenore Walker is. (28)
- “Domestic violence is identified in my field as a pattern of behavior utilized by one intimate partner against another intimate partner to establish power over and control of the other partner’s behavior over time.” (28-29)
- Establish control over time. (29)
- Description of DV. (29-32)
- “And in most cases, violence starts on the very low end of psychological or emotional abuse. And over time increases in severity of the violence, and the situations where violence occurs happen more close together.” (29-30)
 - *Here, the two incidents of violence are almost a year apart.*
- DV victim only call police very close to acute battering incident where V may be afraid for own safety, safety of children, may believe can get offender help. (32)
- “while people have good memory for the core event of what happened to them, they typically report what happened to them accurately immediately after” (38)
- Question link between drugs and violence? (40)
- “Yes, I would always discuss recanting when I, if I did a general domestic violence training, because it is a very common behavior for victims, and it’s something that people don’t always expect.” (48)
- Q: Do you work frequently with the District Attorney’s Office?
A: In expert testimony, I testify multiple times a year. So probably between one and two times a month. In very rare cases, more than that, and sometimes not at all, but averaging out. (55)
- Q: Okay. Have you ever testified for the defense?
A: A couple of times, yes.
Q: Okay. And what were those circumstances?
A: Domestic violence cases. I think I would actually have to go back and check my—I think domestic violence cases exclusively. (57)
- Q And that training [APRI] was specifically for prosecutors, is that right--
A Prosecutors and—
Q --prosecuting offices?
A --and their—and their, yeah, and sometimes their victim advocacy staff. (61)
- In determining reliability of report, “You would want to look at consistency of the report. You always have to in domestic violence circumstances, research says this, understand

that both victims and offenders minimize the violence. ... But the most thing is that victims don't talk about it, or minimize when they talk about it." (68)

- Acknowledges that it is possible that an individual would make up a story to get their husband or boyfriend in trouble. (69)
- "We do know that offenders tend to look relatively reasonable and normal immediately after an explosion." (73)
- Indicates that DV offenders who are violent outside home are those with prefrontal lobe injuries. (73)
- Q: (by Ms. Meilstrup) And I might have asked you this already, do you believe women make allegations of abuse up?

A: Yes, I believe some have, yes.

Q: Okay. And what are some of the reasons why they may make up allegations?

A: In my experience, the most common reason is because they feel like they've been wronged in some other way. It's important to understand though when you're talking about false allegations in domestic violence, the likelihood of those is low. Reporting is low, so the likelihood is low to begin with.

Q: Okay.

A: But it does happen. (79)

People v. Shannon Johnson

- Jefferson County, J. Enquist
- II Stavig, Tingle
- Δ Reiff, Simms
- Shreck hearing, 5/30/07
- “Actually domestic violence is identified in the literature for offenders and victims as a pattern of behavior that is directed by one intimate partner against another for the purpose of establishing power and control over that partner.” (9)
- Cites Lenore Walker as first to define cycle of violence (10)
- Women pick fights with abuser as means of controlling when the explosion happens (15)
 - *But in our case, when she attacked him, there was no explosion.*
- Talks about when try to leave may be the most dangerous time for V. Offenders so distressed about V leaving that will threaten to kill V to stop that V from leaving or harm someone else they care about. (17-18)
 - *But in our case, YM says that SV raped her in order to get her to not want to come back.*
- After battering incident, batterers look good, calm, rational. (18-19)
 - *Angela Michael describes SV as upset, right?*
- Trauma and reaction to trauma from Katrina different source of trauma than in DV relationship. (28-29)
 - *Said in other trx that saw lots of DV sufferers (300?) in Katrina folks.*
- Expertise based on observation, medical research (including brain scans), other kinds of social science research like tracking people over time, tracking behavior (54)
- “Any individual factor by itself can't be an indicator because it might mean something else if you look at a larger pattern or it might be a part of a different kind of pattern or larger pattern.” (55)
- “I would not make an assumption based on any single piece of information in any way and I wouldn't assess trauma certainly for somebody that I hadn't personally met.” (58)
 - *Hasn't she assessed trauma here?*
- Not use control groups in DV scenarios for ethical reasons. (72)
 - *Makes sense, but then has to call into question validity of findings.*
- Q. (By Ms. Reiff) With regard to the domestic violence cycle, can the cycle be observed in a relationship that is verbally abusive but falls short of being physically abusive?
A. At times it can, if it's very controlling, yes. (77)
 - *In our case, say that cycle observed despite lack of physical abuse. So must be “very controlling.” However, control is really from YM.*
- DV requires an “ongoing pattern of behavior that establishes control.” (80)
- “If something happens one time I wouldn't classify it as domestic violence. If somebody had a difficult bad patch, I wouldn't expect to see controlling behaviors. You might see

conflicted behaviors, you might see people not getting along, there might be a lot of arguing or fighting. I wouldn't expect to see controlling of one partner by the other in a bad patch in a reasonable relationship. So, yes, I expect domestic violence to require ongoing patterns of the use of power and control techniques by one partner against another over time.” (81-82)

- Why not examine alleged victims: “My understanding is that I am most often asked to testify when there is information that I have about a set of behaviors or set of symptoms that the general public has misinformation about, but that I have information about, and that typically jurors can decide whether the information that I present to them about that set of information is helpful in their assessment of the facts of the case. So I am, as I understand it, here to assist jurors with information that most people in our cultural don't have accurate information about.” (99)
- Do 5-25 cases a year for DA.
- Get called several times a year by defense attorney, “and typically when they interview me they don't want to use me.” (100-01)
- Testified twice for defense, fairly long ago. One was DV situation; one was child protection situation. (101). One ten years ago, other 4-5 years. (102). One was battered woman defense, other wasn't. (102)
- “And so even in the most serious domestic violence situations the violence starts on a low level and escalates over time which is why the situations are so dangerous because they don't decrease in violence or dangerousness, typically they increase over time. Start at a low level and get more dangerous as time passes.” (113)
 - *So wouldn't be consistent with DV situation – as opposed to just crazy relationship – to have first incidence of violence be threat to kill accompanied by choking act. And then second incidence be rape, hitting, and actual choking.*
- “They go through multiple cycles where there is a blaming of them, the tension gets greater. The violence is slightly worse, not terrible right away, and the offender continues to blame and they continue to feel if they change, the offender won't get upset and behave that way. It's very common that they start on a low level, the cycle begins on a much lower level and over time it increases.” (114)
- “Typically if I am looking at verbal abuse it wouldn't be just bad communication or rude comments, it would be things that are targeted at either blaming a victim for the offender's behavior or belittling or humiliating a victim or angry remarks that are threatening in nature.” (116)
- Trial, 6/5/07
- “So periodically I do either consult with or testify for the defense, but it's much more rare than testifying for the prosecution.” (8)
- Voir dire on lack of studies, hands on in recent years. (starts at 8)

- Compare cycle of violence to psychological torture and technique called “occasional indulgence” (25)
- Isolation from friends and family (25)
- Incidents when V attempting to leave are most serious (26-27, 35)
- Honeymoon stage gets shorter after physical violence starts to escalate. “And then you will see more explosive battering incidents, and shorter honeymoon periods as the violence escalates over time.” (28)
 - *Then that no explain huge time gaps between alleged physical violence here.*
- Alcohol and drugs (30-31)
- Typically offenders more calm after they have exploded. (36)
 - *Need to get from Angela Michael that SV was frantic.*
- Afterward offenders very kind, conciliatory. (36)
- Trying to ensure that victim doesn’t leave. (37)
 - *Here, YM claims that SV said he raped her because that is the only way he could get her to leave and not come back. Totally inconsistent with DV cycle. Get this from Dr. Walker.*
- “Well, typically what we see with people who have been traumatized is they will disclose parts of their experience a little at a time. They often don't have a direct timeline. They don't have an A, B, C, D, E, because that's a cognitive function.” (52)
 - *Here, YM immediately gives the officer on the scene a coherent account, with a clear timeline of what she claims happened.*
- Dissociation (54-55)
- XE (begin 59)
- Consider self more of an advocate than a neutral expert. “I would consider myself an advocate against violence.” “Against domestic violence.” (56)
- Since 2004 made living primarily as consultant and trainer and expert witness. (59)
- Testify for DAs office fairly regularly. (59)
- Twice for Δ. Once was self-defense battered woman. (60)
- Cycle, V try to placate offender during tension-building stage and some in honeymoon stage. (62)
 - *Attacking him or saying “fuck you” not placating.*
- During tension-building phase, V try to accept responsibility for all the problems in the relationship. (62)
 - *Not here. She constantly blaming him.*
- “Q Nowhere in this or in your testimony does it indicate that victims of domestic violence typically blame the other party -- offender party for the problems in the relationship in this tension-building phase?
A In the tension-building phase that's not typical. It's not unheard of, but it's not typical.” (62-63)

- DV cycle of violence repeats itself. Whole premise is that there is a pattern of repetition. (63)
- There are couples who are just volatile couples. (63)

People v. Adam Kennedy

- Adams, J. Phelps
- II: Goddard, Hofiz
- Δ: PD Lanzen
- Motions hearing, 10/5/07
 - Called by Δ for purpose of showing that McAllister testimony won't be helpful to the jury.
 - Judge ends up excluding McAllister bc she is not familiar with this case and bc she cannot tie her knowledge, etc. to fact of this case. "Because what I heard Ms. McAllister say is, well, this doesn't really prove anything or disprove anything. And if it doesn't prove anything or disprove anything, I have attempted to find the value. I can't place my finger on where the value is as relates under 702 to assisting the triers of fact in finding out what truly happened." (36) "I believe it's going to be more confusing than anything to the jury if Ms. McAllister would testify." (37)
- Worked with people who have made false accusations. (7-8)
- "immediate outcry is very, you know, unlikely, even when other people are present. And so I would have said that's the most unlikely sort of outcry." (12)
- "most people don't understand they need to look at anything bigger than the immediate time around the assault" (18)
- "very typical non-stranger assault in that physical force -- what was used -- and only the amount that's needed to complete the assault is what most offenders typically use." (28)
- Literature "over and over again" says that people do not have accurate information about acquaintance rape. (29-30)
 - *Need to find that recent study!*

People v. Eric L. Brown

- El Paso County, J. Samelson
- II Billek, Pearson
- Δ Cynthia Jones, Todd Johnson
- Trial, 2/17/06
- Testified easily over 50 times (12)
- Reason for blind expert (14)
- Easily half the times testified have been without reviewing case materials. (14)
 - *Odd, because all of the transcripts we have are of her blind.*
- “sexual assault is a serious , serious crime that creates horrific trauma for victims , and it creates trauma despite the fact that there often aren't additional serious injury or weapons used” (15) “people who experience sexual trauma have kind of on the high end but very typical serious trauma responses .” (15)
 - *Use this maybe as a last chapter of cross to contrast with the lack of horrific trauma indicators seen here.*
 - *Trauma symptoms*
 - *Stronger the trauma the stronger the symptoms.*
 - *People who experience sexual assault have typical trauma responses.*
 - *Typical, serious trauma responses.*
 - *On the high end of the range of serious trauma responses.*
 - *Sexual assault, when it really happens, is a serious, serious crime.*
 - *Real sexual assault creates horrific trauma for victims.*
 - *Creates horrific trauma even if no serious injury.*
 - *Creates horrific trauma even if no weapon used.*
- Most victims fear seriously for their life. (15)
- Offender has “complete control over what happens to them [victim] physically. And that’s a terrifying experience to be profoundly helpless and not in control of our [our?] own body.” (16)
- Overriding emotion that V of sexual assault would feel is “extreme fear and powerlessness.” (17)
- Characteristic of trauma is to continue to be terrified of things that they think are going to happen again. (20)
 - *Then not seek out the thing that caused the trauma, right?*
- V continue contact with offender in effort to have some sort of control over what’s happening to them. (23)
 - *But in DV context, V have no control. So this model can be made to fit any scenario.*
- Immediate report only in cases with serious physical injury. (24)

- Initial report not include lot of detail. Hear least distressing things first. Sometimes weeks before hear most shameful parts of sexual assault, like oral or anal assault, even to therapist much less to someone not know in law enforcement or medical report. (27)
 - *Whereas here we get details to male cop on scene and male doctor at hospital.*
- Research verifies that you have very likely kind of comes out in pieces with small bits of information, and over time someone may be able to tell more and more of what happened. (27-28)
 - *Not here.*
- And it's another symptom of trauma that while material is still experienced by a victim as traumatic, they don't always have voluntary recall over all of the information . And sometimes they're avoiding thinking about it so much that it doesn't even come into their consciousness.” (28)
- “It's a rare person who experiences a serious trauma who can go through every detail immediately with complete recall and not too much emotion, to shut down and avoid some of the information.” (28)
- Re how V’s communicate the crime that happened: “In my experience , victims will do almost anything to avoid very specific detail.” (36)
 - *Ms. Y gives very specific details to Lutkin. Also does written report.*
- The more detail you have, the closer they are to the distress they experienced during the trauma. So that is another reason for avoiding until they can tolerate. (37)
- Even in therapeutic setting can take months before someone can tell what happened during a sexual assault in great detail. (37)
- People in primary relationships who experience any kind of violence – adults and teenagers – are not likely to tell people close to them for a long period of time that something is getting worse. People who perceive that they’re going to be blamed are the least likely to tell anyone. (38)
- Pseudo adjustment phase = “large amount of time” after assault during which V tries to act like things are normal, try to establish sense of control and normalcy. (39) Literature says can be from several days to several years post-trauma.
 - *Not several minutes.*
- XE (39)
- Study patterns of how people react. (43)
- Have reviewed research and information about false reporting. (44)
- False reporting does happen. (44)
- False reporting of sexual assault does happen. (45)
- Common themes about false reports. (45)
 - *Not get into common themes.*
- Individuals have own individual motivations for saying the things they say. (45)
- Unethical to diagnose without meeting. (46)

- Rare person who could relate details immediately. Based on research and own experience. For sexual assault. (47-48)
- May be specific pieces of information, but not likely to be complete in sequential time order like somebody telling all the details of a whole story. More likely to have little bits and pieces. (48)
- Rare to have no detail, rare to have lots of detail. (48)
- Immediate reporting = within a few hours after the assault when the V is first away from the offender. We consider it immediate reporting if V reports within the first couple of days. (49)
- False reporting in sex no more frequent than for other crimes. Rarest when point to specific individual can name. (50)
- Most commonly make report when caught in other situation to get out of trouble. (52)
- Re-D (55)
- DV = pattern of power and control ... (55)
- Primary motivation of sex offenders is power and control. (56) Sexual arousal only for sadists. (56)
- Juror Qs (59)
- Reasons for false report = something they think going to get in trouble for, that they are trying to cover up for by saying that sexual assault happened. (60) Don't name specific individual. (61)
 - *Need to deal with this. Not expert on false reporting. Not done research. Certainly don't treat people who admit to false reporting. Read some literature. Know that it exists. At 2-8%. Just like with any other crime. Any individual can have his or her own motivations.*
- Sexual assault is on the high end of trauma. (62)
- Trying to cover up what doing is "one of the reasons they can be false reporting." (64)

People v. James McDaniel

- Jefferson County, J. Villano
- II Storey, Sargent
- Δ Ann Roan
- Motions hearing, 12/12/96
- Treated between three and five thousand victims of trauma. (2-3)
 - *As of 1996? Is that the same number given later?*
-