



- Opinions and conclusions are based upon 30 years plus of education, training, and experience in field of psychology
- There are decades of published and unpublished scientific work in field of forensic and clinical psychology, psychological assessment, trauma psychology, interpersonal violence, and dynamics and impact of childhood sexual abuse
- Impossible to identify specific works or treatises representing all of accumulated education, knowledge, and experience
- Has read published works on complex trauma, psychological assessment and issues relating to forensic assessment, psychological trauma, interpersonal violence, childhood sexual abuse
- Has also read published personal accounts of individuals who have been abused; literature about cultural competency and why that's important in conducting forensic evaluation
- To point to one specific book, journal, or article would not be fair or accurate answer
- Working in field for 30 plus years; information gleaned in process of assessing and providing treatment to survivors of childhood sexual abuse as well as work in forensic arena, numerous continuing education programs attended by experts in the field
- Can give examples of certain articles or if making particular statements on particular topics, can provide sources, as well as identify peer reviewed research supporting position; example: National Crime Victim Survey – used to look at prevalence data or underreporting of sex crimes
- Opinions not exclusively based on peer reviewed literature but 30 plus years of education, training, and experience in clinical and forensic realms
- Commonly known that perpetrators tend to target individuals who they feel they are going to be most successful in grooming and gaining compliance
 - In most instances of child sexual abuse, the sexual encounters come later in the process of a relationship and that relationship is something that has been established over time
 - Perpetrators tend to identify children or individuals with particular needs for warmth or affection, identify the needs of that individual, and target kids for whom they believe have a way to manipulate or fulfill those needs
 - Perpetrators often target children who lack supervision because need to get access
 - Perpetrators often put themselves in position where have a great deal of access; begin slowly and gradually testing boundaries to see how kids respond; kids who put up barriers or withdraw or who perpetrator doesn't think will be successful with, will move on and move to child with whom will be able to engage in abuse
- Grooming is process by which perpetrator wins over the intended target victim. Begin to first identify individual and work to establish relationship with that person and increase access

- Sometimes means developing relationships with person's parents or other people in that person's life so can continue to build trust
- Over time perpetrator tends to move standard for what is and is not acceptable or deviant such that child begins to slowly and incrementally rely more and more on perpetrator's definitions of right and wrong
- Example: less typical that perpetrator on first interaction with individual immediately moves toward aggressive sexual assault; more likely that first begin a relationship; might take kid out for ice cream, lavish with presents, spend time together; maybe in some of those interactions start talking about sexual activity so becomes normal; breaking down barriers by talking about sex; then maybe show pictures or artwork about sexual activity, maybe do hugging and touch to normalize contact; over time incrementally advance towards ultimate end goal of sexual abuse
- High degree of variation based not only on individual characteristics of perpetrators and victims, but also based on specific circumstances; sometimes it is a crime of opportunity and may be about what is happening in a particular moment; high degree of variability
 - Sometimes grooming process can take long time; sometimes it doesn't and it's quick process
 - Violent sexual assault and violent rape is less common among abusers of children
 - Violence and force are not the same; without gaining permission, adult may engage in sexual touch that they haven't physically threatened; that is nonconsensual but not obtained by threats of violence; compliance not given due to threats of violence;
 - Often kids in that situation are shocked, confused, unsure of what has happened; may have conflicting feelings because perpetrator is someone they trust and rely on but engaging in sexual abuse
 - Adult who wants to manipulate a child into doing something is at a major advantage in terms of their ability to do so
 - Sexual abuse can be accomplished by leading child to believe a particular behavior is totally acceptable and normal
- Abusers of child victims are more likely to engage in grooming behaviors and to cultivate a relationship with victim to ensure compliance as well as silence
- Vast majority of sexual assault across age span is committed by someone known to the victim
- Extremely common for abuse to occur multiple times because abuse occurs in context of an established relationship
 - Sexual abuse may escalate over time; perpetrator may move from sexual touch to oral contact to intercourse
 - Often times victims of sexual assault maintain attachment and use coping strategies, such as disassociation, to put abusive parts out of their mind and focus on the attachment and ways in which the relationship meets their needs
 - Attachment in context of child sexual abuse – adult creates situation in which a child comes to care for them; adult communicates to child that they care for the child in return; engage in behavior especially initially designed to increase trust and cause child to be dependent on them for certain needs (*e.g.*, financial, attention, basic needs, meals); over time child comes to care deeply about person in spite of fact that person is sexually abusing them; perpetrator often works quite hard to

maintain that connection and ensure subsequent compliance with demands and silence

- Child – anyone below the age of consent
- Sexual abuse – nonconsensual sexual touch
 - Nonconsensual: when someone has said no, someone too incapacitated because of drugs or alcohol, someone below the age of consent
- Trauma defined as exposure either by directly experiencing or witnesses severe bodily injury harm, death, or sexual violence; criterion for PTSD
- Sexual violence is broader term that encompasses sex abuse, sexual harassment, childhood sexual abuse, inappropriate unwanted non-consensual behavior; term that is used to define trauma in DSM-V
- Kind of behavior perpetrator engages in or offers may vary depending on the age; perpetrator is often quite skilled at figuring out what intended target needs or wants
 - For example, adolescents often like to be treated as older than they are; sometimes offered access to alcohol, drugs, sense of belonging, physically flattered
 - For young child, perpetrator might offer toys or games or secret fun time;
 - Underlying concepts are the same but ways in which it is carried out can differ depending on the age of the individual
- Abuser of adolescent female victim might identify the adolescent's vulnerabilities (figure out if she is lonely or feels unattractive) or determine if she doesn't have access to certain material things (*e.g.*, items, meals, education, connection to jobs/internships, money, vacations trips); may put self in position of being a close friend of adolescent
- Adolescent female victim who is being abused may go back because she is connected or attached to the person doing the abuse; continues to return in spite of the abuse because she has come to trust, rely upon, and care for the individual
 - As true of many children, adolescents, and adults, she may not recognize that what is happening to her is abusive; may come to believe in a special relationship with individual and that individual truly cares about her
 - For adolescent, certain kinds of touch can be pleasurable even if abusive in nature;
 - At other times, may be afraid of consequences of saying no; may feel have little options or nowhere else to go; may be in need of material goods being provided or that may get in trouble if what happened is disclosed; may be fearful of getting perpetrator in trouble; number of reasons can vary
- Whether a female victim of sexual abuse returns multiple times to her abuser as opposed to a single instance of abuse depends in part on the relationship
 - If someone is in a relationship with person who is abusing them, it is far more likely that sexual abuse is something that will occur repeatedly and over the course of time
 - Where individual is a child, the onus for how often child is brought back into sphere of perpetrator lies with the adult, the perpetrator
 - When there is close connection/relationship or some kind of dependency or fear, those factors are designed to keep person engaged in relationship so perpetrator can continue to abuse them
- Effects of child sexual abuse on adolescents
 - Often times child and adolescent victims blame themselves

- Adolescents in particular filled with self-blame and shame because have false sense of responsibility or feeling that they are somehow to blame particularly if there was coercion and not force;
- Host of psychological difficulties associated with childhood sexual abuse, including but not limited to eating disorders, post-traumatic stress disorder, physical difficulties, chronic headaches, problems with weight, substance use
- Young adolescent girls typically engage in other forms of risky sexual behavior following sexual abuse
- All child and adolescent victims of sexual abuse are at increased risk of re-victimization
- Being sexually abused creates vulnerability identified by subsequent perpetrators; people who have been sexually abused, particularly by someone with whom have close personal relationship, are taught over time to ignore internal warning system; may not perceive subsequent red flags or grooming behaviors
- If emotional and sexual abuse has evoked difficulty with shame, low self-worth, may increase vulnerability to subsequent abusers and perpetrators; engaged in other kinds of high risk behaviors that place them in high risk settings, may make more vulnerable
- Impact of childhood sexual abuse on victims into adulthood
 - Opportunity cost because spending time with adult who becomes center focus of their world so not engaging in developmentally appropriate or normal social activities
 - May not have ability to develop appropriate skills on how to handle anger or regulate emotion or have more normal or healthy relationships with same age peers
 - Many of coping strategies that survivors of sexual abuse develop include compartmentalization, suppression, denial, or not recognizing that were abused; sometimes it is not until adulthood that someone realizes that what happened to them was abuse and begins lengthy process of making connections between abuse suffered as a child and adult challenges
- Extremely common for survivors of all kinds of sexual abuse to not label experiences as sexual abuse
 - For that reason, in scientific field on experiences, talk about behaviors
 - If do survey and speak with 100 individuals and ask if they have been raped, they say no; if continue to talk to those individuals and ask if they have been forced to have sex against their will or had sex after saying no, or they were too drunk, they say yes to those kind of behaviors; when ask college men if they have raped or sexually assaulted a woman, they say no; if asked if they ever pushed a woman to have sex after she said no, will say yes, but say that's not rape
- Victims of childhood sexual abuse sometimes remain friendly with abusers into victims' adulthood
 - Documented in literature and seen in own clinical practice
 - Depends on how old the victim is when become involved with perpetrator, how much perpetrator has insinuated themselves into victim's life, to what degree victim believes conduct is abusive
 - If believe expression of care, then abuse might continue into adulthood until person encounters some new information or person to help recognize

- Fear of ending relationship with perpetrators also a factor; may be significant consequences for person separating from person who has harmed them; to initiate separation may result in significant loss of part of victim's life (*e.g.*, fear of public shaming or blaming, financial loss)
 - May be forced to confront that relationship was abusive overall which is challenge to ways in which coped
- Rape myths: false beliefs that are commonly held by individuals that are presented in media (news, television, movies) associated with what rape is. Examples:
 - Rape myth that rape occurs as a result of violent attack perpetrated by a stranger; vast majority are perpetrated by someone known to the victim
 - Tend to put lot of blame on rape victim (that what a victim was wearing or drinking or circumstance in which she found herself somehow caused rape to occur); only person responsible for perpetrator's behavior is perpetrator and those assisting perpetrator
- Delayed disclosure
 - Vast majority of sexual assaults and rapes are not reported
 - Studies done using national samples inquire about a range of experiences people have had and ask if certain things have happened and whether reported to law enforcement agency or another individual
 - Studies looking at crimes reported to agency (*e.g.*, numbers in National Crimes Victim database are far lower than incidents of sexual assault)
 - Children often are led to believe that something bad will happen if they disclose; depending on age of child, wouldn't occur to child to go to law enforcement agency; typically disclosure made because brought to some other adult's attention who then brings to attention of law enforcement
 - Unlikely that make disclosure because may perceive that they or perpetrator will get into trouble if disclose; perpetrator may tell victim that bad things will happen if they tell or that positive thing getting out of relationship (separate and distinct from abusive relationship) will cease; if getting certain needs met, disinclined to cut relationship off if have dependency or attachment
- Limited disclosure or delayed disclose is very common
 - Extensive scientific literature supports idea that individuals who are harmed as kids don't come to disclose or come to an awareness of how they were harmed until later in life
 - adults don't become aware that their experiences were abusive or if abusive, degree to which harmed or negatively impacted, until later in life
 - Disclosure is not an all or nothing phenomenon; often see incremental disclosure where people tell bits and pieces of what is happening but not full story
 - Kids may share information with a peer but less likely to go to an adult
 - That is part of what the grooming process accomplishes; perpetrator becomes a trusted and relied upon person in child's life because it has likelihood of reducing disclosure
- Incremental disclosure depends in part on how safe the victim feels with person disclosing to, how voluntarily they are making the disclosure; certain psychological factors may prevent victim from accessing memories of full extent of what happened to them all at once

- May be experiencing great deal of shame or self-blame so may not want to reveal pieces of information that feel is more shameful or afraid in getting in more trouble
- May still feel in love with person who is hurting them; may desire to protect that person or others; may try to deliberately or unconsciously avoid sharing information all at once
- If information shared by someone who is a child, ability to trust other adults may already be impaired;
- Impact of sexual abuse during adolescence on memory of abuse
 - Memory for any event, traumatic or otherwise, is not a video screen; comprised of multiple components
 - Initially encoding of the memory (what is encoded in someone's circumstances)
 - In traumatic circumstances, only thing person pays attention to are what is most salient/big picture, not details
 - Then look at how it is stored (in short term and long term memory)
 - When talk about disclosure later in life, talking about retrieving memory
 - Natural forgetting can happen over time; may forget even if encoded; during traumatic event, if someone is disassociating (escaping in minds because can't escape in bodies), those individuals may not remember specific details; remember key individuals involved, but likely not able to provide clear chronological report including all of the details; part of it is because that is how memory works
 - Few of us can give accurate report of what happened long ago; memories can blur together and can be grouped
 - Remember general act, things that are most relevant and salient
 - With traumatic memory in particular, adrenaline and cortisol in context of fear and trauma cause people to narrow focus of attention so likely to tune into most salient and relevant things; less likely to attend to details
 - What is extraneous detail for one person may be very salient detail for another person
- Expect memories of survivors of child sexual abuse who experience multiple instances of abuse to be impacted by abuse occurring multiple times
 - If someone is abused by a variety of different people over the course of time, majority of individuals will remember key facts associated with that traumatic experience, who person was
 - May not remember specific details about what month it was or where occurred if multiple assailants and multiple acts
 - Very common for victim's memories to run together if perpetrator abused victims multiple times over years; what is most relevant is that person is doing this behavior multiple times over time; may be able to remember some of places where happened, but very common for memories of similar occurrences to jumble together
- In process of grooming, how common for there to be someone who assists primary abuser in grooming but not necessarily the abuse itself; how presence of someone who helps in grooming process facilitating the sexual abuse
- Documented cases in literature of individuals who assist the primary perpetrator in the grooming process and facilitate the sexual abuse but do not necessarily participate in abuse themselves

- Abuse with multiple perpetrators occurs, not unusual
- Multiple perpetrators don't have to engage in physical sexual abuse (*e.g.*, fraternity house, alcohol spiked, number of people get a drunk girl to a particular bedroom; someone else assaults her)
- Sometimes individuals use other people as a way to break down someone's defenses to help them appear to be a more safe and trusted individual
- Involved in a case where perpetrator frequently had one of his younger assistants who he had also sexually abused over course of many years but who was now an adult with him when he would connect with other young boys; presence of young man who made it seem ok to be there
- If multiple adults engaging in sexual conversation around child, adds to idea that this is appropriate, this is what adults do; helps create false sense of security on part of child that what is happening is ok, normal, acceptable
- Based on years of experience working with individuals, know that young children in particular often feel more comfortable in the presence of a woman; adolescent girls might bring a friend with them if they are going out with a guy or group of guys; sense of security that there is someone else like them
- Factors that could help disarm intended victim
 - Person helping perpetrator shares a common interest with the perpetrator and functions to make an introduction or serve as bridge; that person may hold certain qualities that victim is known to respond positively to; person might possess certain skills in terms of ability to make initial connection; person might serve to normalize what might be otherwise viewed as inappropriate or deviant behavior
- Vast majority of sex crimes committed by men and vast majority of victims are girls and women. However, sexual abuse also occurs in same sex relationships, women are capable of and have committed heinous sex abuse crimes and have been active perpetrators of child sexual abuse even though statistically in lesser number than male perpetrators
- LR has not met or interviewed victims in this case
- LR is aware of multiple news reports about Epstein and Maxwell as his longtime companion
- LR is aware of allegations by some victims that Maxwell was present for or participated in or knew about the abuse
- LR has seen photographs of Epstein and Maxwell on the news with celebrity figures (*e.g.*, Trump, Clinton, Prince Andrew)
- LR is aware that there have been multiple documentaries and podcasts and interviews with various people
 - LR read some articles that raised questions about the initial plea deal that Epstein negotiated in Florida
 - LR saw one of documentaries about Epstein on Netflix (*Filthy Rich*)
 - Heard some episodes of podcast called *Seeking Justice*; not sure which episodes
 - Reviewed those before retained as expert witness
- Relevant to LR and her profession; helpful to be aware of popular culture
- Information provided today was based on LR's knowledge, experience, training
- LR was asked to avoid viewing or reviewing media reports about the case to the extent possible