

When police discursive violence interacts with intimate partner violence: Domestic Violence as a risk factor for police-induced false confessions

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Abstract. *Linguists analyzing the practices of American-style police interrogation have revealed the discursive attributes of police interrogation that can, often unwittingly, induce false confessions from suspects. Further, psychologists have identified a number of factors that can make particular subjects of police interrogation especially vulnerable to false confessions under interrogation. This article suggests that women who have been victims of serial domestic violence may be a heretofore unrecognized class of those particularly vulnerable individuals. Because the psychodynamics of American-style police interrogation so closely parallel the psychodynamics of intimate terroristic domestic violence, victims of domestic violence may react to police interrogation with the same coping strategies – accommodation and acquiescence – that they resort to in attempting to avoid battering. In the context of police interrogation, that would potentially lead to false confessions. Collaborative research by linguists and psychologists is needed to mitigate this possibility for miscarriages of justice.*

Keywords: *Domestic violence, police interrogation, false confession.*

Resumo. *Linguistas que analisam as práticas de interrogatórios policiais ao estilo americano revelaram os atributos discursivos dos interrogatórios policiais capazes de induzir, muitas vezes de forma inconsciente, confissões falsas por parte dos suspeitos. Por outro lado, psicólogos identificaram uma série de fatores que tornam determinados sujeitos de interrogatórios policiais especialmente vulneráveis a confissões falsas sob interrogatório. Este artigo sugere que as mulheres vítimas de violência doméstica em série podem ter vindo a ser, até agora, uma classe não reconhecida dessas pessoas particularmente vulneráveis. Uma vez que a psicodinâmica dos interrogatórios policiais ao estilo americano estabelece um paralelo tão próximo com a psicodinâmica da violência doméstica terrorista na intimidade, as vítimas de violência doméstica podem reagir aos interrogatórios*

policiais adotando as mesmas estratégias – acomodação e aquiescência – que usam para procurar evitar o espancamento. No contexto dos interrogatórios policiais, isso poderá conduzir potencialmente a confissões falsas. É necessária investigação colaborativa de linguistas e psicólogos para mitigar esta possibilidade de erros judiciais.

Palavras-chave: *Violência doméstica, interrogatórios policiais, confissões falsas.*

Introduction

In a criminal case, a confession by the accused has traditionally been seen as convincing proof of guilt. Yet, in recent years, hundreds of cases in the United States have come to light in which it has been conclusively shown that the people convicted were innocent but had falsely confessed their guilt during police interrogation (Garrett 2011: 14-44). Often these innocent suspects recanted their confessions as soon as they were out of the interrogation room. Unfortunately, however, fact-finders overwhelmingly believe confessions even when they are quickly recanted and even when there is abundant objective evidence that the confession is untrue (Kassin and Sukel 1997; Appleby *et al.* 2013; Leo 2009). False confessions thus constitute a major source of miscarriages of justice in which innocent people are convicted and punished for crimes they did not commit.

How is it possible that so many people end up falsely confessing in the course of police interrogation? An examination of prevailing American police interrogation practices uncovers distinctive discursive aspects of that form of interrogation that can engender false confessions. While many cases of false confessions involve individuals with no recognized risk factors making them especially vulnerable to the potential for police coercion (Leo 2009; Kassin *et al.* 2010; Ainsworth 2018), psychologists have been able to identify a number of types of suspects who are particularly vulnerable to police pressure—juveniles (Redlich *et al.* 2004; Owen-Kostelnik *et al.* 2006), the intellectually disabled (Clare and Gudjonsson 1995; Everington and Fulero 1999), and those with certain forms of mental illness (Redlich 2004). The question this article will explore is whether women who have been subjected to repeated episodes of domestic violence are another identifiable category of persons placed at higher risk of being coerced into falsely confessing under American-style police interrogation practices.

The discourse of American police interrogation

How police interrogations proceed today in the United States is radically different from the procedures typically used in the early years of the twentieth century. At that time, police commonly used violence and threats of violence to procure confessions—what came to be known as the ‘third degree’ (Kauper 1932). However, beginning in the 1930s, those practices were about to be challenged. The Wickersham Commission, appointed by President Herbert Hoover to study problematic aspects of law enforcement practices, concluded that the use of physical coercion during police interrogation was endemic, and it strongly condemned the practice (Report 1931). At about the same time, the United States Supreme Court was presented with a series of appeals in which extreme brutality amounting to torture had been used to squeeze confessions from defendants where there was little if any evidence of guilt beyond the purported confessions. (see, e.g., *Brown v. Mississippi* 1936). The members of the Supreme Court were deeply disturbed about

the extreme violence used by police to procure confessions, leading them to hold that police use of violence or threats of violence during interrogation was unconstitutional. Henceforth, any so-called confession resulting from such police behavior would be inadmissible in court.

This legal ban on violence during interrogation created a crisis in policing. If violence and even threats of violence were now constitutionally prohibited, how could confessions be obtained? After all, the police argued, criminals were unlikely to simply volunteer their guilt. The time was ripe for an alternative means of interrogation that would successfully result in confessions being obtained without crossing constitutionally prohibited lines against the use of violence. Polygrapher John Reid believed that he had the answer. He agreed that violence should have no place in modern police interrogation practices. Instead, he developed a technique – now widely referred to as the Reid method of interrogation – that utilized psychological tactics to induce confessions. The Reid method of police interrogation turned out to be extremely effective in leveraging confessions, and rapidly became the accepted method of police interrogation throughout the United States (Leo 2008). The Reid method of interrogation was promulgated through the publication of police interrogation manuals used in police training throughout the United States (e.g. Inbau *et al.* 2013), as well as in Reid’s proprietary training classes – training classes that his consulting firm says have been completed by more than a half million law enforcement personnel since 1974 (<http://www.reid.com>). The influence of Reid-method interrogation is by no means limited to the United States. It has increasingly been exported worldwide to police agencies seeking to modernize their interrogation practices. The website for John E. Reid and Associates boasts that its interrogation methods are “the most widely used approach to questioning suspects in the world.”

Eliminating the routine use of police violence in interrogation was a laudable goal of the Reid method of interrogation. But it came at a cost—aspects of the Reid method of interrogation, while demonstrably effective in getting confessions from criminals, are unfortunately also effective in getting coerced confessions from the innocent. At its essence, the Reid method of interrogation operates by maintaining complete discursive domination by the police interrogator, creating unbearable psychological pressure on the subject of the questioning, with confession seen as the sole relief available (Ainsworth 1993: 286-288, Leo 2008: 112-114).

A typical Reid method interrogation (Buckley 2012; Trainum 2016) begins with the physical isolation of the suspect from family and counselors, in a starkly bare interrogation room in which the police can exert full control over the environment of the interrogation. As an FBI Bulletin article by three experienced law enforcement officers conceded (Boetig *et al.* 2006: 1), the use of isolation is “a carefully calculated strategy” during interrogation. Ideally, Reid training recommends, the interrogation room should have a one-way mirror through which other officers can observe the suspect for signs of fatigue, anxiety, and confusion during the interrogation, all of which can be taken advantage of to procure a confession.

The police interrogator is instructed to display an air of complete confidence—that they know the suspect is guilty and that they have the evidence to prove it. Any attempts by the suspect to assert innocence are to be discounted, and ideally, blocked entirely. Questions asked by the suspect are to be ignored, and any attempt by the suspect to

contest the police preferred narrative of the crime is to be prevented. The interrogator response to protestations of innocence is to assert that the police are positive that the suspect is guilty, and any resistance to that conclusion is futile. Further, the suspect should be reminded that failure to acknowledge guilt will lead inexorably to terrible consequences—the death penalty, in any case where there is any possibility that it could be sought, or a lengthy prison sentence if the death penalty isn't an option. Prison can be referred to in all its many horrors, including separation from family for years on end. The consequences of denial of guilt must be made to seem utterly unacceptable to the person undergoing the interrogation.

The suspect should be told that the point of the interrogation is not to get information to solve the case, but only to give the suspect a chance to explain why they committed the crime. After all, the interrogator will tell the suspect, the police already have abundant evidence conclusively proving guilt. That evidence of guilt should be shared with the suspect to create further demoralization and hopelessness, making continued denial seem pointless. The Reid method recommends that the interrogator carry a large binder of papers into the interrogation with the suspect's name prominently displayed on the cover, again creating the impression that the police have a vast trove of evidence against the suspect.

Suppose, however, that the police are not actually in possession of much hard evidence against the suspect, or perhaps they have none at all. In those cases, the Reid method counsels, it is fine to concoct pretended evidence of guilt – falsely claiming that the suspect was identified by witnesses, or that their DNA or fingerprints were found at the scene, or that a co-defendant is prepared to testify against the suspect if the case goes to court. This kind of deception has taken on a more and more important role in police interrogation, after the U.S. Supreme Court blessed the use of fake evidence as constitutionally permissible (*Frazier v. Cupp* 1969). The Court did so because, in its opinion, false evidence might bluff a guilty person into confessing but presented no danger of false confessions by the innocent. However, an analysis of the large number of cases in the United States – now well over 2000 – in which there is conclusive proof that a defendant was wrongly convicted, provides chilling evidence that the Supreme Court was sadly mistaken. Between 15 and 20 percent of all of these now exonerated defendants did, in fact, falsely confess under police interrogation (Leo 2009: 332). Contrary to the Supreme Court's sanguine assumptions, confronting suspects with fake evidence does indeed appear to pose a danger to the innocent of inducing a false confession. Unfortunately, the Supreme Court's endorsement of police use of lies and fabricated evidence has encouraged an extensive use of this tactic in contemporary American police interrogation.

Reid recommended that the beginning of the interrogation process be highly confrontational in nature, making direct accusations of the crime and exaggerating the legal consequences of non-cooperation. But, as the resistance of the suspect begins to wear down over time, the tenor of the interrogation should switch to one in which confession is portrayed as a solution to the dire consequences that the police have just set out. The moral seriousness of the offense can be downplayed in this phase of the interrogation, either by blaming the victim or possible accomplices, or by suggesting mitigating factors that would likely lead anyone in the suspect's situation to take the actions that they did. The legal consequences of admitting guilt are to be minimized

in this phase as well – Reid suggested that it is even permissible to lie to the suspect about the legal consequences of an admission, such as claiming that if the suspect didn't handle the gun, they aren't really at risk of prosecution, despite the police knowledge that such an admission will in fact them subject to full accomplice liability.

These minimization techniques – what you did would have been done by anyone in your situation, what you did really isn't very blameworthy, and the legal system is unlikely to impose any serious penalties under these circumstances—are particularly persuasive to the innocent suspect. Innocent suspects are likely to be legally naïve and inclined to trust the picture that the police portray as to the consequences of their agreeing with the police version of the crime. In fact, one of the most horrifying and effective tactics in interrogation (Leo 2009) is to suggest to the suspect that they don't seem to the police interrogator to be a 'criminal type,' and the fact that they are actually a decent, law-abiding person is probably why they cannot remember committing the crime. That is, the interrogator will suggest that the traumatic memory of committing the crime is being repressed by the suspect. Combine a suggestion that the suspect is likely to be repressing the memory of the crime with lies about physical evidence that the police supposedly have proving their guilt, and an exhausted suspect is very likely to agree that they must have committed the crime. In fact, exhaustion itself is part of the Reid technique (Leo 2009). Beginning an interrogation late in the evening and continuing it for many hours is recommended. Physical and emotional exhaustion are allies to the interrogator in wearing down suspect resistance to confession (Blagrove 1996).

Physical and discursive control and dominance are the hallmarks of the Reid method of interrogation, and when deployed in incommunicado interrogation, often for many hours at a time, these methods are highly effective in getting suspects to confess. The question is not whether guilty suspects often confess under Reid method interrogation – no doubt they do—but whether innocent people as well often cave under the psychological pressure of this kind of interrogation, and whether researchers can better identify those who may be particularly at risk for coerced confessions. In particular, I am suggesting that the discursive strategies employed by Reid-trained interrogators may be especially problematic in interrogations of victims who have suffered repeated episodes of a controlling type of domestic violence.

Intimate terroristic violence as a category of domestic violence

Researchers studying domestic violence have come to appreciate that 'domestic violence' as a conceptual category describes a variety of very different situations in which violence can occur in intimate relationships. Not surprisingly, the consequences for and reactions of domestic violence victims differ markedly depending on the type of domestic violence that has occurred. The researcher Michael Johnson (Johnson and Ferraro 2000; Johnson 2006, 2011) created an influential typology of domestic violence. He disaggregated domestic violence types into four categories: 1) situational couple violence, in which violence occurs in the context of a particular episode of a dispute or argument, but where violence is not part of a pervasive dynamic within the relationship; 2) intimate terroristic domestic violence, in which repeated violence is part of a larger pattern of partner assertion of control over the victim; 3) responsive domestic violence, in which the act of violence in question is in defensive response to earlier or simultaneous acts of violence by the partner; and 4) mutually violent intimate relationships, in which both partners to the relationship respond to personal crises, both within and outside the

intimate relationship, by resorting to the use of violence. Intimate terroristic domestic violence is the kind of violence that this article is primarily addressing. Because the violence in intimate terroristic domestic violence is part of a larger pattern of controlling behavior by the batterer, the violence in this kind of domestic violence is recurrent and tends to escalate in frequency and severity. Intimate terroristic domestic violence is typically the kind of domestic violence that propels victims to seek refuge in battered victim shelters (Holtzworth-Monroe 2000; Johnson and Ferraro 2000; Johnson 2011).

It is this form of domestic violence – intimate terroristic domestic violence – that is a likely risk factor for women victims who later undergo Reid-style police interrogation. I intentionally use the word “women” to refer to victims of intimate terroristic violence. This is not to say that men cannot be victims of domestic violence (Milardo 1998; McHugh 2005) or that domestic violence does not occur in gay and lesbian relationships (Lundy and Levant 1999; Renzetti and Miley 2014). However, researchers have shown that, within the category of intimate terroristic domestic violence, it is women who are the overwhelming majority of victims of that particular kind of domestic violence (Johnson and Ferraro 2000; Weston *et al.* 2005; Johnson 2011). Because the use of gender-neutral language is one way in which women’s lives and experiences are rendered invisible in academic discourse – and indeed, in the greater world outside the academy – I choose to highlight the disproportionate significance of intimate terroristic violence in the lives of women by using gendered language in this discussion.

Victim response to intimate terroristic domestic violence

Domestic violence as a phenomenon was largely ignored by researchers in psychology and criminology until the feminist movement of the 1970s insisted that domestic violence was an aspect of patriarchy that was important to study in order to eradicate it. In the 1970s, psychologists studying domestic violence (see, e.g., Walker 1977) explained why women in battering relationships were often unable to exit their abusive relationships, due to what the researchers called ‘learned helplessness.’ That is, they argued that women suffering repeated acts of domestic violence recognized that they had no ability to prevent that recurrent violence, and thus that victims learned to become passive recipients of violence, unable to take affirmative actions to protect themselves. Subsequent research (e.g. Gondolf and Fisher 1988; Peterson *et al.* 1993; Walker 2009), however, tells us that the story is far more complex than that. Victims of intimate terroristic domestic violence are not merely passive recipients of violence – they are instead active agents in developing specific strategies to attempt to prevent or to mitigate recurrences of violence (Gondolf and Fisher 1988; Schneider 1992; Mahoney 1994; Peled *et al.* 2000). The agency of women subjected to intimate terroristic violence is a kind of bounded or circumscribed agency, given the power dynamics and external resources that limit their choices, but it is a kind of agency nonetheless, a “mobilization of resources for survival” (Schneider 1993: 395). As Elizabeth Schneider (1993: 395) observed, “victimization and agency...are interrelated dimensions of women’s experience” in the context of domestic violence. In fact, the kind of limited agency of intimate terrorism victims can be seen as similar to that of most suspects undergoing Reid-style interrogation – it is obviously misleading to describe the responses of interrogated suspects as unfettered free-will choices, but it is equally misleading to see their actions as irresistibly compelled by the dominant interrogator.

Victims of intimate terroristic violence become hyper-sensitive to detecting situations that could escalate into violence by their partner. Having recognized the danger signs of incipient violence from past experience of being battered, these women then try to reduce the potential for violence through various coping strategies (Follingstad *et al.* 1988; Lempert 1996; Valentiner *et al.* 1996; Clements and Sawhney 2000; Goodman *et al.* 2003; Waldrop and Resick 2004; Street *et al.* 2005; Lewis *et al.* 2006) that they develop to mitigate the violence they anticipate. Women who experience intimate terroristic violence have thus been shown to be far from passive; they instead often do take active, affirmative steps to try to interrupt and de-escalate that cycle of violence to the best of their ability. Those active strategies to head off violence include accommodation and conforming to the wishes of the violent partner. One typical sign in a cycle leading to potential violence is when the victim is blamed or accused of some sort of misbehavior by the batterer. Responding by denials only serves to further infuriate the batterer, adding to the likelihood of immediate violence. A more effective coping response for victims is to attempt to interrupt the cycle by acquiescing in what the batterer wants rather than to maintain innocence of the substance of the batterer's accusations.

Researchers of intimate terrorist violence have learned, as these women know, that violence inflicted by intimate terrorist partners occurs within a larger overall pattern of the assertion of partner control over the victim (Stets 1988; Umberson *et al.* 1998; Anderson *et al.* 2003; Dutton and Goodman 2005; Lewis *et al.* 2006; Johnson 2006). Resistance to that control is often a trigger for partner violence, so victims of intimate terrorism must attempt to placate the batterer without overtly challenging his control (Goodman *et al.* 2003). An important way in which batterer control is asserted and made harder to resist is through the batterer's intentional isolation of the victim from family or friends who might support the victim in breaking the grip of the intimate terrorist (Anderson *et al.* 2003; Waldrop and Resick 2004; Jacobson and Gottman 1998). Controlling who the victim can see and interact with, where the victim can go, what financial resources the victim is allowed to access—in short, controlling every external aspect of the victim's life—depends critically on the intimate terrorism victim being made to feel that she has no one whom she can depend on to help her resist the batterer's control. Without isolation of the victim, the batterer's control over her is potentially assailable, so isolation plays a critical role in the maintenance of intimate terrorism.

Intimate terrorism as a risk factor for false confessions

Note the parallels between the psychodynamics of intimate terroristic domestic violence and the discursive structure of the Reid method of police interrogation: Intimate terrorist domestic violence is about control over the victim of the violence; Reid-style interrogation is premised on the interrogator maintaining complete control over the physical and discursive aspects of the interrogation. Intimate terroristic domestic violence episodes often begin with the batterer making accusations against the victim; the Reid method of interrogation frames the initial moves by the interrogator as a series of accusations against the suspect. Batterers in intimate terroristic relationships try to isolate victims from family and friends who might help the victim resist the control of the batterer; Reid interrogation isolates suspects from anyone who could counsel or assist them in responding to police interrogation. Victims of intimate terroristic domestic violence often cannot physically exit as a potentially violent episode develops; the Reid

method of interrogation traps the suspect in the back room of a police station from which any attempt to escape would seem impossible. Victims of intimate terroristic violence learn that violence can sometimes be headed off by placating the batterer and conforming to his wishes; the Reid method of interrogation explicitly tells the suspect that cooperation and confession will bring the psychologically intolerable interrogation to an end and will result in leniency.

The more we learn about survivors of intimate terrorist domestic violence, the more obvious it becomes that the use of the Reid method of interrogation – particularly when wielded by male police officers – simply recapitulates the psychodynamics of domestic abuse. It cannot be a surprise, then, if the victim of intimate terroristic domestic violence turns to one of the very coping mechanisms that enable her continued day-to-day survival when she is confronted with police practices that so closely mirror the dynamics of intimate terrorism. Indeed, if you set out to develop an interrogation method that would perfectly replicate the psychodynamics of intimate terroristic domestic violence, it would look a lot like the techniques of Reid interrogation described here.

Being a victim of intimate terroristic domestic violence is thus quite likely to be a significant risk factor in inducing coerced, and potentially false, confessions under the Reid method of interrogation. This would accord with the results of other research on vulnerabilities caused by victimization. For example, research has shown that women and men who experience violence in a domestic context differ in the later psychological consequences of that experience. Whereas male victims did not manifest a sense of undermined personal control in other life contexts outside the relationship, women victims of domestic violence displayed a lessened sense of personal control in other aspects of their lives as well as in the context of intimate relationships (Umberson *et al.* 1998). Perhaps this difference between male and female victims is due to the different nature of the experience of domestic violence that men and women tend to have. Research has shown that women experience intimate terroristic violence vastly more frequently than men do—and intimate terroristic violence is the form of domestic violence most likely to erode one's sense of personal control (Johnson and Ferraro 2000; Johnson 2006, 2011). Even considering cases of non-intimate terroristic domestic violence, where the proportion of male victims is greater than it is in intimate terrorism, women suffer comparatively more frequent violence and more serious injury caused by that violence than male domestic violence victims experience (Weston *et al.* 2005; Grice 1975; Johnson 2006). It would not be surprising, then, that the psychological consequences of domestic violence as actually experienced would result in greater psychological harm to women victims. Because women victims have been shown to often experience a lessened sense of personal control in general in their lives as a result of their victimization in domestic violence, such a lessened ability to exert personal control would make them even more vulnerable than the average suspect undergoing the coercive control techniques inherent in Reid-style interrogation.

Other research (Gudjonsson *et al.* 2008; Drake *et al.* 2015) has shown a significant link between bullying and the likelihood that someone will confess falsely to a crime. The government of Iceland annually conducts a comprehensive survey of junior college students under the auspices of the Icelandic Centre for Social Research on many aspects of their lives and experiences. To date, more than 11,000 individuals have taken the survey. Among the survey questions, subjects are asked about their experience

with physical and psychological bullying and also about their experiences with police. Researchers have discovered a strong correlation between self-reports of having been subjected to bullying and self-reports of having confessed falsely to a crime under police questioning. This research corroborates that victimization, particularly victimization with both physical and psychological dimensions, appears to increase vulnerability for false confessions in police interrogation.

Why vulnerability of domestic violence victims during police interrogation matters: The invisible ‘domestic violence to prison’ pipeline

It might seem beside the point to ask whether women who experience intimate terroristic violence might be at risk in Reid-style police interrogation. After all, domestic violence victims are crime victims, not criminal suspects. As crime victims, they presumably should not be subjected to the guilt-presumptive interrogation used with criminal suspects. In theory, this is true. However, there is considerable evidence that certain kinds of crime victims – rape victims and victims of domestic violence – may sometimes be treated by police as though they were suspects rather than victims. Rape victims report having their credibility questioned by police, being blamed for anything that happened to them, and even subjected to Reid-style hostile interrogation to pressure them to recant their complaints (Yung 2017: 219). Surveys of domestic violence victims about their experiences in reporting their abuse to the police, too, have revealed instances where some police officers express skepticism of women’s reports of violence and are dismissive of their need for police protection, in some cases expressly encouraging victims to minimize or even completely recant their reports of domestic violence (Leisenring 2012; Crowe and Murray 2015). Criminologists using attitudinal surveys of police officers have attributed the hostility with which some police treat rape and domestic violence victims as traceable to aspects of police culture which perpetuate misogynistic myths about allegations of violence by women (Belknap 1995; Toon and Hart 2005; O’Dell 2007; Trujillo and Ross 2008; Gover *et al.* 2011; Twis *et al.* 2018). Given the persistence of these attitudes among some officers despite decades of police training on domestic violence, this may explain why domestic violence victims may be sometimes subjected to Reid-style interrogation tactics, with the goal of procuring, not false confessions, but false recantations. False recantations by victims in such cases represent another source of police-induced miscarriage of justice.

Even aside from instances in which Reid-style interrogation is inappropriately used in questioning domestic violence victims, there is another reason why vulnerability of domestic violence victims to certain police interrogation tactics warrants concern. Today’s domestic violence victim may well become tomorrow’s criminal suspect. Researchers have long observed that a very high proportion of women incarcerated in the criminal justice system are known to have histories of prior victimization in domestic violence (Gilfus 1992; Raeder 1993; Jacobs 1999; Moore 2003; Jordan *et al.* 2008; DeHart 2008; Salisbury and VanVoorhis 2009; Brennan *et al.* 2012; Nuytiens and Christiaens 2016). Kathleen Daly, in an empirical analysis of the life histories of female prisoners, showed what she called “women’s pathways” that channel women in a gendered way into the criminal justice system; chief among these gendered pathways was the experience of prior intimate partner violence (Daly 1992). Despite that well-

established correlation, the criminal justice system seldom overtly recognizes the ways in which intimate terroristic violence results in what we might call a 'domestic violence to prison' pipeline. This pipeline operates in multiple channels. For example, women victims of intimate terrorism often report that their abusers threaten and coerce them into participating in crimes initiated by the abuser (Gilfus 1992). Yet, the criminal law in countries including the United States (Blake 1994), Canada (Shaffer 1999), and New Zealand (Nouri 2015) generally fails to consider abusive partner coercion in judging the criminal culpability of these women victims unless a specific threat of harm is articulated by the abuser at the time of the criminal acts of the woman. Her history of serial abuse and her recognition that the intimate terrorist will not hesitate to use violence to compel her participation in his crimes is seldom enough under the law to exculpate her under the duress doctrine. Being a victim of intimate terrorism can propel women into the criminal justice system in other ways, too; they may use drugs to dull the pain of their experience of intimate terrorism, or they may sell drugs or their bodies to get the resources needed to try to escape or, failing that, at least to achieve a measure of independence from the abuser (Gilfus 1992; Jacobs 1999; Moore 2003; DeHart 2008). Once domestic violence victims enter the 'domestic violence to prison pipeline,' and become enmeshed in the criminal justice system, they encounter police and police interrogation just as male criminal suspects do. However, their history of intimate terroristic violence may well make them especially vulnerable to Reid-style interrogation in ways that those with no such history are not.

Perhaps the link between victimization in intimate terroristic violence and special vulnerability in police interrogation has gone unstudied precisely because intimate terrorism is largely suffered by women. Studies of almost every aspect of the criminal justice system have focused on males, while women have been comparatively ignored and invisible in the literature on the criminal justice system (Jacobs 1999; Belknap 2014). Feminist criminologists have long critiqued mainstream criminology for either ignoring women altogether or constructing them as pathological in their femininity (see, e.g., Rausche 1974; Smart 1977; Naffine 1987 2015; Daly and Chesney-Lind 1988; Britton 2000; Bloom *et al.* 2004; Chesney-Lind and Pasko 2013). Nor is the absence of women's experiences in being accused of crime limited to the work of criminology scholars. Exonerations of wrongfully convicted individuals are overwhelmingly and disproportionately of men, even given their greater numbers within the ranks of the criminally convicted. Debra Parkes and Emma Cunliffe (2015) have decried the relative absence of women among those exonerated for wrongful convictions, suggesting that women's lives and experiences cause them to be vulnerable to wrongful convictions in different ways and for different reasons than men are likely to be wrongfully convicted. They suggest that activists working to unmask wrongful convictions may fail to identify female erroneous convictions because they are looking for typically 'male' patterns in exonerating evidence.

As this article has outlined, linguists and psychologists studying police interrogation have shown how certain interrogation tactics can inadvertently lead to police-induced false confessions, especially for arrestees with heightened psychological vulnerability to those tactics. Yet currently there has been no research on whether women subjected to intimate terroristic domestic violence are, due to that experience, more susceptible to police-induced false confessions. If women's actual life experiences were given full

consideration by researchers, public policy experts, and the law, the question of how the discursive attributes of Reid style interrogation could put many women at special risk from coercive police power would be a prime subject for collaborative examination by psychologists and linguists. Police induced false confessions can result in serious miscarriages of justice—the innocent are punished for crimes they did not commit, while the guilty may evade justice. Police induced false recantations by crime victims likewise frustrate justice and put victims at risk of continued victimization. Therefore, continued research is needed to provide a fuller picture of the conditions under which false confessions and recantations are obtained by police. Such research should include attention to potential factors, such as a history of domestic violence victimization, that could lead to police-induced false confessions, if we are to have a criminal justice system that is truly fair and equitable for all.

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