

TURNER:: Hello and welcome back to Wisconsin Law in Action, a podcast where we discuss new and forthcoming scholarship at the University of Wisconsin law school professors. I'm your host, [Kris Turner 00:00:15]. My guest today is professor Keith Findley. Thank you for joining us today, professor Findley.

PROF. FINDLEY:: My pleasure. Thank you.

TURNER:: Professor Findley is here today to discuss his recent work, including two articles that were published in the 2018 Seton Hall Law Review from the experts, inference and innocence symposium issue. Those two articles are the science and law underlying post-conviction challenges to shaken baby syndrome convictions, response to professor [Winkelried 00:00:39], and reducing error in the criminal justice system. Additionally, professor Findley served as the coach here on the Madison Police Department Policy and Procedure Review Ad Hoc committee, which released its recommendations earlier this year. Well, I've talked enough, I think. So let's try and interview Professor Findley now. To begin, let's hear a little bit about your professional background, what led you to writing about criminal justice issues?

PROF. FINDLEY:: Well, my scholarly interest actually grew out of a practice orientation. I began my career sort of it in a mixed role between practice and teaching, and I was a clinical professor, clinical instructor here at the UW Law School in a program called the legal assistance to institutionalized persons program where I was supervising law students engaged in representing criminal defendants and people convicted of crimes in prisons around the state. After a few years of doing that, I actually left and became a public defender. So I saw firsthand through both of those experiences sort of what the criminal justice system was all about, how it treated people. And after six and a half years of doing that, I came back to the Law school again in the clinics, and this time created the Wisconsin Innocence Project, which in 1998 was only the third such a project in the country. At that time we were still sort of in the very beginning stages of awareness of innocence consciousness in this country.

PROF. FINDLEY:: We were sort of emerging from this era in which we sort of believed that wrongful convictions were surely there because it's a human system, but they had to be freakishly rare, so anomalous is to be of no concern. My work with the Innocence movement sort of opened my eyes to the fact that actually there's a lot of error in the criminal justice system and there are a lot more innocent people in prison than we had thought, and that it's not just the product of anomalies or individual human errors, but it's actually the result of a lot of systemic features baked into the way we do criminal justice in this country. And so the more I worked on that, the more I became interested in sort of those big picture systemic questions, and that led to starting to do research, and that led to writing and publication. And eventually that led to me making the move from the clinical track to the tenure track so that I could spend more time in research and writing, primarily focused on error in the criminal justice system.

TURNER:: And here we are today. It's a talk just about that.

PROF. FINDLEY:: Yes.

TURNER:: Excellent. So one topic you've ever not extensively as shaken baby syndrome, can you explain what that term is and why it's so often a point of contention in the courtroom?

PROF. FINDLEY:: Sure. Shaken baby syndrome, which the pediatricians now prefer that we call abusive head trauma, is a medical legal hypothesis that children who are injured, who suffer serious brain injury often but not always without external signs of harm must have been injured through an abusive process. The original hypothesis was that it had to have been violent, shaking the [inaudible 00:03:55], the parent or caregiver finally shook the child who, because infants have a disproportionately large heads and weak neck muscles, the head would flop back and forth making the brain slosh around inside the brain, rupturing bridging veins, tearing axons and causing ultimately serious brain injury and oftentimes death without leaving any external signs of injury.

PROF. FINDLEY:: That hypothesis has been expanded now to abusive head trauma to accommodate new evidence suggesting; number one perhaps shaking alone cannot generate sufficient forces to do this and also two, that impact certainly does. So the new term encompasses that. But basically it's a hypothesis that doctors looking at primarily these brain injuries sometimes associated with a few others and no other evidence can determine not only what the medical conditions are that the child suffers from, but also the conduct, and indeed mental state of an external third party so that they can determine that the child was abused and that it occurred not accidentally but with some criminal state of mind.

TURNER:: That's an amazing development to say. You can actually extrapolate from the injuries, the criminal state of mind of who was involved.

PROF. FINDLEY:: And that's part of what underlies all of the controversies here because, there's controversies about the underlying science, whether it's ever been validated, but also controversies about the proper role of the medical expert when they enter into the legal arena where the ultimate determination of mental state and conduct of a third party is not that of the doctor but of the jury. And so there's a lot of debates raging about the validity of the medical assumptions because frankly they'd never been scientifically validated. And then the role of the expert in the courtroom.

TURNER:: Right. It's high stakes and there's a lot of people that have a strong opinion about what is going on here.

PROF. FINDLEY:: Yeah. It's really remarkable how strong and bigger opinions are and it's particularly in the medical world that the physicians have sort divided into these polar camps where they despise one another and can barely communicate.

TURNER:: It just shows you how passionate people are about how important this as the whole thing is-

PROF. FINDLEY:: Well, sure. You're talking about some very hot button issues including the health and safety of most vulnerable members of our communities, babies and young children.

TURNER:: Right. I have a seven month old at home, so I completely understand why this is such a hot button issue [crosstalk 00:06:25] I would want it investigated fully in the right way.

PROF. FINDLEY:: Yeah. On the other hand, you can imagine as a parent if your child were to die, what a hot button issue would be if the authorities were to turn around and say, "And you killed that child." When you know you didn't.

TURNER:: Yeah. Right.

PROF. FINDLEY:: It's devastating either way.

TURNER:: Hopefully I did not find myself in that situation.

PROF. FINDLEY:: I certainly hope that for you, Chris.

TURNER:: I'll find a good criminal [crosstalk 00:06:47] I think we may know a few around here.

PROF. FINDLEY:: We can probably connect you.

TURNER:: Right. Thank you. I'll appreciate it. Oh, with that turning towards the two symposium issues first, you're reducing error article focuses on challenging some previously established methods that were designed to reduce harm. In that article, you find that many of the underlying assumptions would actually increase the harm to the innocent in an effort to imprison the guilty. What are your recommendations in that article to reform criminal justice?

PROF. FINDLEY:: First, a little background about that. I was invited to write a response to some work done by professor [Larry Loudon 00:07:19], who was essentially making the argument that the focus on wrongful convictions has distracted us from what he views to be a more serious problem, that is the acquittal of the guilty, and so his prescription or his diagnosis in prescription we're too lenient and that our system gives too much to criminal defendants and lets too many go free. And therefore to his prescription then is that to address this problem, he was suggesting some tweaks to the system, more than tweaks major overhauls, that would make it easier to convict more people such as reducing the burden of proof in some cases, afraid of things like that, that he was trying to justify then unbalance would produce less aggregate harm.

PROF. FINDLEY:: So my piece responds to that and sort of tries to go through and explain how his perception about the weighing of the various harms of wrongful convictions in what he calls wrongful acquittals sort of misses the mark. But I take it as an opportunity to go beyond that, and really take on what I think is a misperception that is conveyed in his article. And that is that there was inevitably and always a trade off between protecting the innocent and freeing too many guilty people. The public safety and protecting the innocent are at odds with one another in every instance. And instead I tried to make the point which I've made before in some other work as well, that really the ultimate goal here is accuracy, and if we focus on accuracy in our criminal investigations and adjudications, that actually is a win-win, there's no trade off there at all.

PROF. FINDLEY:: If we're improving the diagnosticity of our processes presumably, and I think quite truthfully, we can better convict the guilty while at the same time better protecting the innocent. And so I look in that paper through that lens, look at some of the standard list of recommendations that emerged from the innocence literature. Things like improving eye witness identification procedures, things like changing the way police interrogate to minimize the risks of false confessions, improving forensic sciences. All of those kinds of reforms, if we understand them properly, are reforms that will simply make our eye witness identifications more reliable or to ensure that when we get confessions they are truthful and don't steer us away from the real perpetrator. And so I take this as an opportunity to sort of reframe the debate about, it's not about trade offs, it's about let's look for the most reliable system we can do both.

TURNER:: Yeah, I think a lot of people will say that it's either you get everyone that's guilty in jail, or in prison, sometimes you catch some innocent people but we got the guilty people in there. Whereas other people will say, no, that's not the wrong way, and these are just diametrically opposed viewpoints, you're kind of rising above them saying, we can fix both of these at the same time because it's a win-win if you're more accurate overall.

PROF. FINDLEY:: That's right.

TURNER:: That's great. I wish I could refer to any arguments with that, it sounds like a great proposal.

PROF. FINDLEY:: Well, I'm glad to hear that.

TURNER:: So let's talk about your second article on the symposium issue, this one talks about the use of scientific evidence in abusive head trauma cases. The article especially looks at shifted science that can change the consensus view on the effects of abusive head trauma and how they are challenged post-conviction. What do you suggest as a solution where shifting medical opinions impact legal decisions?

PROF. FINDLEY:: This is a really complicated question because there's so many components that they got-

TURNER:: I had a hard time even getting that out of my mouth.

PROF. FINDLEY:: There's so many different components to the answer here. Part of it is just simply understanding, to one degree the nature of the shaken baby syndrome, abusive head trauma prosecutions. These are really remarkable prosecutions, almost unparalleled in criminal justice world given that they are prosecutions, the kind that I'm talking about that are entirely science dependent, that is the entire case rises or falls with the validity of the science. The physician is called upon to diagnose what's wrong with the child, what caused it. So the physician will come in and say, this child has brain injury, it was caused by shaking or shaking with impact or whatever it may be, so that's the, "What?" Right? So that's the actus reus in the terms of the law. And they will then talk about the mental state as well.

PROF. FINDLEY:: And it had to have been done with such force that it could not have been accidental, therefore it had to be knowing, intentional, reckless, whatever the requisite mental state is, the mens rea. And then the final component of the criminal prosecution is, well, who did it? Right? We know what happened and we know what mental state the person did, then who did it. And here the physician actually pretty much fills the field with there as well because physicians would traditionally testify that a child so injured would not be capable of any lucidity. The child would become immediately common toast, flacid and unresponsive. And therefore, the last person with the child is the one who did it. So there's your whole case right there. No other evidence needed, right? The only other case that approximates that, that I can think of is the Old Arson cases where the Arson expert would come in and essentially do the same thing.

PROF. FINDLEY:: So these are cases where the science is really the whole thing, and therefore we have to make sure that we get the science right. And here when you look at the research here, because it's so very hard to study the effects of shaking an infant, that you don't have to think very hard to realize that you can't do randomized controlled studies where you shake some children or better some children and see what happens, right?

TURNER:: Let's not do that.

PROF. FINDLEY:: Let's not do that. Because of that though, the research base is really quite weak, and it has never been really adequately validated. And so over the last nearly 20 years, constant evolutions in the scientific literature has raised all kinds of challenges to every one of those three legs of this three legged stool that we've been talking about. We know now for example, that a whole lot of things other than shaking or impact can cause the telltale signs that previously were associated exclusively to abuse. We know that it's bio mechanically unlikely, the shaking can do it. We know that it turns out that short distance falls can cause

this, so it doesn't have to be the massive kinds of force that physicians used to believe. It can in fact be accidental, and therefore the mens rea element is gone. And we now know that in many of these cases there is in fact a lucid interval of minutes, hours, even days, and therefore we can't time it very long.

PROF. FINDLEY:: So the science is shifting, and all of this is contentious. All of this is debated hotly in the medical community. But what this paper was about was responding to a claim that you have to be able to come in and prove. In order to overturn a conviction, you have to come in and prove that the original scientific hypothesis was wrong or to prove some alternative cause. And what this paper was talking about was actually that's a misapplication, that's a misunderstanding of what the standard is and indeed what the standard ought to be, because when a conviction rests so heavily on scientific evidence and that science shifts, even if that shift is just one to raise uncertainty where previously the jury was told there was no uncertainty, that might be enough to create the reasonable doubt that, that needs to be reexamined.

PROF. FINDLEY:: So to answer your question, finally, what do we do about this? Number one, we need better science. That's not just shaken baby, but there runs the gamut. All of the forensic disciplines that have been used in our criminal cases, we know there's not just for me and critics of the scientific world, but we know this from a work by the national academy of sciences, the nation's eminent scientific authority in 2009 that published a groundbreaking report basically confirming that none of the pattern matching disciplines, fingerprints, bite marks, hair analysis, shoe prints, ballistics, none of those except DNA testing have much of a scientific foundation.

TURNER:: Wow.

PROF. FINDLEY:: That was echoed again in 2016 by the president's council of advisors on science and technology in their report to president Obama. So we know that the scientific foundations are, we need more research, we need to make sure that upstream of the courtroom, the science that it's used to convict or exonerate people is actually good solid reliable science. The next thing we need is courts to actually implement the demands of Daubert versus Merrell Dow, the case that requires courts to screen out inadequately validated and unreliable scientific evidence. The empirical record has been that the courts have failed miserably on that. In criminal cases, they do a much better job of screening out invalid, and in civil cases where money is at stake, but where life and liberty are at stake, the courts have failed utterly.

PROF. FINDLEY:: Part of that is because of [inertia 00:17:17], we've been relying on this stuff for so long. Part of that is because judges and lawyers are scientifically illiterate. I say that not as an insult, but it's simply an assertion that, "Hey, look, most of us went to law school because we don't do science." Right?

TURNER:: Numbers can be scary [crosstalk 00:17:32]

PROF. FINDLEY:: And so part of that is because the defense bar has failed until recently to learn the science and to make the aggressive challenges. So in any event, part of the response courts have to be more aggressive in screening out bad science, both to make sure that the bad science never gets in the courtroom, but also to apply the pressure to force the forensic disciplines to get their act together, to produce the science, to make it admissible so that it will be reliable both for convicting the guilty and equating the innocent. And then the next thing we have to do is we have to recognize in a post-conviction context, and this is really what this paper was about, that when a conviction rests on scientific propositions and those scientific propositions are then undermined or seriously questioned in ways that a jury never had the chance to consider, the system has to be flexible enough to recognize that and dispense with, there's very prominent notion of finality that otherwise makes it almost impossible to overturn convictions.

PROF. FINDLEY:: We've got to understand that when you rest on science, science is never final. Science is always contingent, evolving, changing, correcting itself. And when the law rests on it, the law tends to put a greater emphasis on finality. But when the law rests on science, we have to adapt the scientific understanding that this could change. [crosstalk 00:19:01] And when it does change, we got to change with it.

TURNER:: That's a very dangerous thing to have the law resting while the science is moving, the science is underlying the law, [crosstalk 00:19:08] law falls behind and now someone is convicted on bad, signs on this case is just more broadly bad evidence. And when you discussed inertia, I think that's a very powerful argument here because people are so used to saying, well, we've got their fingerprints, we've got their hair and what have you, and they're just so used to it that their inertia, they're in the right that's what to use, and that's just what it is.

PROF. FINDLEY:: Oh well, when you think about inertia in a legal context, it's not just the natural inertia that we all human beings all sort of are affected by, but inertia is another way of saying precedent. And that is something that the legal system depends upon, right? It's an aspirational aspect of what we do. And so that's why this is so difficult is because we're saying to the legal system, your typical mode of operating, relying on precedent and leaving settled things alone has to yield when you're talking about dispositions that rest on something that is inevitably and always shifting.

TURNER:: And that'll be very challenging for a lot of people. But it is something that is, if you are convicted on bad science, I would want to be able to bring that up in a post-conviction world and say this is no longer valid, we have to overturn that precedent, and that would be very difficult to maybe allow a lot of people in the legal world like that-

PROF. FINDLEY:: If it's like a system of criminal justice, then getting it right has to ultimately be the goal. And sometimes getting it right means you dispense with finality.

TURNER:: Right. Doing the hard work to get it right.

PROF. FINDLEY:: Right.

TURNER:: So I think I know the answer to this next question. Were there any challenges that you encountered during the research or writing process?

PROF. FINDLEY:: Well, yeah. There are always challenges to doing this. And so, probably the biggest challenge in this context is simply dealing with the polarized nature of these issues, they're so contentious that navigating that field is a challenge. But more than challenges I would say that these are presented opportunities for learning, right? Like every time you write a paper, you do the research, you learn. And that's certainly been the case here.

TURNER:: Challenge is another word for education-

PROF. FINDLEY:: That's right.

TURNER:: ... that's why, you're feeling challenged is because you're learning something [crosstalk 00:21:18] That's why I'm gleaming this away from all my professors in faculty. [crosstalk 00:21:23] So both of these articles are responses to scholarship from other professors, what responses have your articles received so far?

PROF. FINDLEY:: Well, they were, both responses to scholarship by other professors. The first one was actually a symposium where Larry Loudon was presenting, and so we were there in the same room and it was a very cordial debate. And so the response from him was certainly quite cordial and professional, but from others has been really largely, want to say, to sort of reaffirm the notion that ... What I was saying made perfect sense, so I'm very gratified by that. The other one is actually the more interesting tale I think, and that is because it was a response to a paper written by professor Winkelried who is one of the luminaries in the field of evidence law. And it was a sort of a friendly criticism of what he'd written because it was largely agreeing with what he had said but sort of digging a little deeper on this one issue about shifted science and particularly in shaken baby cases.

PROF. FINDLEY:: I think his response has been, again, very professional but I think really quite appreciative of engaging in the debate. The bigger response and it has been that those people ... Keep in mind, this is one paper in a series that I've written on this topic, so I'll sort of lump them all together in this room. The response as one would expect for those who are critics of the shaken baby hypothesis has been great appreciation and a lot of citations, that kind of thing because it's useful to them. From those who are defenders of the hypothesis, I can't say this is a direct response, but I think it's in part a response but there has been a continuing evolution of additional scholarship or additional publication of articles, engaging in the kinds of things that I was writing about there.

PROF. FINDLEY:: And some of that literature has gone so far as to try to sort of marginalize anyone who criticizes the shaken baby syndrome, abusive head trauma, a hypothesis and to, I think quite cynically and inaccurately try to suggest that there is actually no dispute at all when the literature and the litigation replete with this. So it's the kind of thing you would expect when entering into what something that should be an objective scientific inquiry that has become politicized and you get the kind of political response you would expect [inaudible 00:24:11]

TURNER:: Fraught with people that don't want to engage or just wanting to directly challenge in other ways? It sounds like you've had some very cordial engagements though as well, which is great.

PROF. FINDLEY:: Oh, absolutely. Some very cordial engagements. So I'm also not so cordial, that goes with the territory-

TURNER:: Right. That's to be expected here, and sometimes if you don't get that when you write a more controversial, not controversial, but something that's out there that could be controversial and you don't hear anything, maybe that's a bad science. So I'll take it as a good science that [crosstalk 00:24:36]

PROF. FINDLEY:: That's right. At least it's making some sort of an impact in the world, which is what I'm hoping for. I'm not writing just to satisfy my own curiosity, I hope to make an impact in the world.

TURNER:: Right, and I decide to say that you are.

PROF. FINDLEY:: Wow, that's very kind.

TURNER:: With that let's turn to the last piece that we're going to talk about here. So the recommendations from the Madison Police Department Policy and Procedure Review. First, why was this Ad Hoc committee created?

PROF. FINDLEY:: So the city of Madison has a long and proud tradition of progressive policing, and we can be very thankful for that here in the city and very proud of what our police department has done. That is not to say, always the police department is without its challenges, its problems. And those challenges and problems came to a head within the last four or five years in the era in which nationwide the public was beginning to take note of police uses of force, deadly force primarily against unarmed black men, young black men, and Madison had a couple of those. And the community became alarmed and was concerned about use of force, use of deadly force about racial disparities, because whatever one may say about the politics here, the reality is the community has enormous racial disparities and that includes the criminal justice system starting with the police and going all the way through sentencing.

PROF. FINDLEY:: And so there are large segments of the community, particularly communities of color and other minority groups that were very distrustful of the police, they were sort of in what was perceived as a crisis of confidence in those quarters. And so the Madison common council decided to do something about it, and they created what they call this Ad Hoc committee. It's a long title, I don't even remember what all the words are, but it's basically Ad Hoc Community Review, everything about the Madison Police Department. But it was really motivated by these concerns about lack of trust in minority communities, in low income communities and about use of force. Those were the dominant forces behind it. And the committee began its work, was it three or four years ago?

PROF. FINDLEY:: I guess it was probably four years ago, just about. Hired a consulting firm out of California to do an in depth review of the police department. Received their report about two years ago with 146 specific recommendations for reform, and since then the committee has been working. For the last two years I've been co-chair of that committee and we've been going through every one of those recommendations, reviewing them, engaging with the police department, with community members, and then taking recommendations from other members of the community in total. And so in this past September, the committee finally issued its final report finding a lot of things that are being done right, finding other areas where improvements could be made and ultimately issuing 177 specific recommendations that are written up in this lengthy report that we've just published.

TURNER:: So obviously 177 recommendations, that is a lot of recommendations. Are there any specific ones that you most hope that police department adapts?

PROF. FINDLEY:: Yeah. Sort of the centerpiece of our recommendations is the recommendation for the city to create an office of an independent monitor that answers to a civilian review board. And the reason this is the centerpiece of our recommendations is because the idea behind this is both theoretical and practical. The theoretical is that in a free and democratic society, when the citizens yields some of their autonomy, some of their independence to a police force, that we give extraordinary powers to lock us up, to stop us, to search us, to shoot us if need be, right? And in a free and democratic society, therefore the people should and must be the ones to control how they are policed.

PROF. FINDLEY:: And the most direct way we can do that we thought was through an independent monitor outside the police department who's there to review everything they do, who answers to a civilian review board, so that it is really the people who are reviewing and bringing to light what's going on and making recommendations for changes. So that's sort of the theoretical side of it. The more practical is, that if there's a breakdown in trust, which there has been in some communities, the best way we thought to repair that would be to create a direct link between those communities and the police department in a way for their voices to be heard in the way the police department is run, and that's why there's civilian review board. So that does that.

PROF. FINDLEY:: And the final reason why we thought this was so important is that, we didn't want this to be a report where 177 recommendations go sit on a shelf somewhere. And I must say that Madison Police Department is great credit, it has not sat on the shelf. The police department has already implemented a lot of those recommendations on its own initiative. But to ensure that the rest of them are implemented and to re ensure that this is not just a one off, but rather an ongoing process where we're continuing to scan the police department and look for problems and make recommendations, we thought we needed someone who is responsible for assessing the police department's progress towards meeting these goals, reshaping those goals, resetting them whatever, and that needs to be an independent authority, and that's what we thought the [inaudible 00:30:11] So in other words, in order to effectuate all of the other recommendations we made, we thought it was critical to establish this office as an independent monitor with a civilian review board.

TURNER:: Right. Provides a much stronger link for communication between those who have lost their faith and trust in the police department, with the police department themselves-

PROF. FINDLEY:: And a mechanism for accountability to make sure that the police department is doing everything the city wants it to be doing [crosstalk 00:30:34] not because of lack of trust, but because people are busy, things get lost. There're needs to be a constant reminder, a constant presence there to make sure that everything is going as it should be.

TURNER:: And it is very easy for a lot of people to say that all of those the police found, who are they accountable to and kind of get disgruntled about that, this would provide an opportunity to say, well, that's who they are accountable to and they can kind of keep tabs and keep [crosstalk 00:30:56]. Do you believe some of these recommendations could be adopted by police departments across the country?

PROF. FINDLEY:: Oh, absolutely. I identified number one priority but there is a lot of recommendations in there about training and revising standards on use of force, use of deadly force on how to respond to people in mental health crises. These are all recommendations that are out there in the policing literature, that are being debated elsewhere. I took this report which was committee written, I was part of that committee who wrote it and I posted it online in my scholarship, what began in part because I thought it does in fact provide a lot of good information and a blueprint that a lot of other communities could look to as they try to address the policing issues in their communities as well.

PROF. FINDLEY:: So absolutely, and much of this is stuff that has been tried elsewhere, the independent monitor sometimes called an independent auditor, that's a model that's being created in other places. In some places it worked well, in others they just worked not very well at all. We paid attention to that, and look to what are the features that make it work well, what are the features that make it less

effective and try to incorporate the former into ours. So I hope that it can be something that will be useful to other communities.

TURNER:: Let's try to shifting science from the abusive head trauma, the way that the police are monitored in communicating with the independent monitoring is something that changes, [crosstalk 00:32:23] I'm sure you want to try it, and make sure it stays up to date then?

PROF. FINDLEY:: Yeah.

TURNER:: See I'm connecting this all [crosstalk 00:32:27]

PROF. FINDLEY:: Just bringing and making all these connections I hadn't thought of yet.

TURNER:: I just saw it after these interviews. So you mentioned you posted the report online. Where can people find more about your work?

PROF. FINDLEY:: Well, I would say that the two best places to go would be to my webpage at the UW law school website. So just [www.law.wisc.edu](http://www.law.wisc.edu) and then click on my faculty link. The other place to go is to my SSRN listing, so just go to [ssrn.com](http://ssrn.com) and search for my name and you'll find most of this stuff there that's available for download.

TURNER:: And we'll make that even easier by posting links to your SSRN page, onto the Repository page that has all your publications.

PROF. FINDLEY:: That's right. I should have mentioned, but you can probably answer that question better than I can about where to find stuff on the Repository.

TURNER:: That's true, but I want to give you the opportunity first. Well, thank you very much for joining us today, professor Findley. As always, we'll be sure to link to professor Findley scholarship on our podcast page. A big thank you to professor family for being here today to discuss not one but three recent publications, you have run the marathon of our podcasting for this time. Those three publications again are the science, law underlying post-conviction challenges to shaken baby syndrome convictions, a response to professor Winkelried reducing error in the criminal justice system, those are both published in the Seton Hall Law Review and the Madison Police Department's Policy and Procedure Review, Ad Hoc committee final reports.

TURNER:: And thanks to all you listeners out there for listening and subscribing to the Wisconsin Law in Action podcast. Professor Findley scholarship, his links right below this podcast on our website at [wilawinaction.law.wisc.edu](http://wilawinaction.law.wisc.edu), that'll take you to his SSRN page and to his page on the university of Wisconsin law school Repository. You can subscribe to the Wisconsin law in action podcasts in the Apple, iTunes store, Stitcher, or Google play, or find our full archive at [wilawinaction.law.wisc.edu](http://wilawinaction.law.wisc.edu). Thanks again for listening and join us next time as

professor Tonya Brito sits down with me to discuss their new article about the Child Support Debt Bubble. Until then, happy research.