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September 17, 1998.

Judith Ablett-Kerr QC
Dunbar House Chambers
21 Dunbar Street
P. O. Box 46
Dunedin
NEW ZEALAND

Re: Peter Ellis

Dear Ms. Ablett-Kerr:

I have now had the opportunity to read all the written materials sent to me regarding the trial and conviction of Mr. Ellis and I am in the process of preparing a fuller report on the children's accounts, their elicitation, and their evaluation by the courts.

Among the materials I have reviewed closely are four documents prepared by Dr. Parsonson: a) The interviewing of children: Effects of question form, props, question repetition and repeated interviews on the accuracy of children's reports. A review and commentary in respect of the Christchurch Civic Creche interviewing and interviewers; b) Children's memory: A brief review of development; c) Retractions of allegations of abuse by children; and d) Comment on the probability of contamination of disclosures obtained from children in the case of R. v. Ellis.

In my opinion, the four documents provide an accurate summary of the empirical and scholarly literature available at the time that Dr. Parsonson wrote his reports. Although I use some terminology differently and could point to more recent research than that cited by Dr. Parsonson, I believe that his conclusions are accurate and consistent with more recent research, as well as that cited in his reports.

Please note that this letter is written on my personal stationery because, as a government scientist at the National Institutes of Health, I am legally prohibited

from writing such letters of evaluation in my official capacity, presumably for fear that you (or other readers of the letter) might interpret my letter as official governmental endorsement of the opinions expressed herein. In case you harbor such fears or illusions, I hasten to point out that the opinions expressed above are mine alone, and do not necessarily reflect those of the Institutes, the Department of Health and Human Services, or the U. S. Government.

Please feel free to contact me if you need any further information.

Sincerely, yours,

Michael E. Lamb PhD