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PART A

IN THE DISTRICT COURT OF CLEVELAND COUNTY  
STATE OF OKLAHOMA

FILED / In The  
Office of the Court Clerk  
APR 26 2019

STATE OF OKLAHOMA, ex rel.,  
MIKE HUNTER,  
ATTORNEY GENERAL OF OKLAHOMA,

Plaintiff,

v.

PURDUE PHARMA L.P., *et al.*,

Defendants.

Case No. CJ-2017-816

Judge Thad Balkman

William C. Hetherington  
Special Discovery Master

In the office of the  
Court Clerk MARILYN WILLIAMS

**DEFENDANTS' MOTION TO EXCLUDE TESTIMONY OF  
DR. SUSAN SHARP AND BRIEF IN SUPPORT**

**REDACTED VERSION**

THIS DOCUMENT WAS FILED IN ITS ENTIRETY APRIL 23, 2019,  
UNDER SEAL PER COURT ORDER DATED APRIL 16, 2018

## MOTION

The Defendants move this Court for an order excluding the testimony of the State's purported expert witness, Dr. Susan Sharp, pursuant to 12 O.S. §§ 2702-2705. Dr. Sharp seeks to testify about the impact of parental opioid addiction and opioid-related incarceration. But all of her testimony should be excluded because it is not the product of reliable methods reliably applied to sufficient facts or data specific to those subjects. Nevertheless, if Dr. Sharp is permitted to testify at all, her testimony should be limited in two important ways. First, she should not be permitted to offer any opinions that are based on data sets that have not been produced to the Defendants in this litigation. Second, she should not be permitted to testify concerning [REDACTED] [REDACTED] because [REDACTED] is not a proper subject matter or reliable basis for the supposedly "expert" opinions that she intends to offer. The Defendants thus respectfully request that their Motion to Exclude be granted, and for such other and further relief as the Court deems just and proper.

## BRIEF IN SUPPORT

In support of this Motion, the Defendants show the following:

### I. INTRODUCTION

Dr. Sharp, a sociologist, seeks to testify as an expert about the impact of parental opioid addiction and opioid-related incarceration. Her testimony should be excluded in its entirety for one simple reason: she has not studied or researched that subject *at all*. Her experience and expertise instead are in studying the effects of parental substance abuse and substance-related incarceration on children and families generally. Dr. Sharp has not focused her research on the effects of opioids, let alone on prescription opioid medications, or on any other specific substance.

Yet that is the subject upon which she apparently intends to opine at trial. Although she has occasionally gathered data on her subjects' use of different substances, she has *not* analyzed those data for the purpose of validating the applicability of her general opinions to the specific subject of opioids. Similarly, although she claims to have reviewed research by other academics that would support the application of her own research to the specific subject of opioids, she was unable at her deposition to identify even a single piece of research to support her opioid opinions. Put simply, Dr. Sharp has offered no reliable basis for the specific opinions that she intends to offer in this case, and they should be excluded from trial entirely.

Even if the Court concludes that it can overlook this glaring flaw in Dr. Sharp's testimony, however, it should nevertheless curtail Dr. Sharp's testimony in two important ways. First, Dr. Sharp should not be permitted to rely upon data sets that are in her possession, but that have not been produced and are not publicly available to the Defendants. Pursuant to Oklahoma's discovery rules, this Court expressly directed the State to produce that data. The State did not. And without access to the underlying data upon which Dr. Sharp is apparently relying, the Defendants have no reasonable way to meaningfully test Dr. Sharp's analysis or conclusions. Second, Dr. Sharp should not be permitted to rely upon [REDACTED] [REDACTED] That is not expert opinion, but the say-so of a layman. Dr. Sharp's testimony thus should be strictly limited to the sociological data and methods that are appropriate subjects of expert opinion. The Defendants' Motion to Exclude should be granted.

## II. LEGAL STANDARD<sup>1</sup>

Expert testimony is admissible only if it satisfies several prerequisites, two of which are relevant here. See *Kumho Tire Co. v. Carmichael*, 526 U.S. 137, 147 (1999); *Daubert v. Merrell Dow Pharm., Inc.*, 509 U.S. 579, 589 (1993); *Christian*, 2003 OK 10, ¶8, 65 P.3d at 598. First, the expert must be qualified by “knowledge, skill, experience, training or education” to offer the *specific* opinion in question. 12 O.S. § 2702; see *Alexander v. Smith & Nephew, P.L.C.*, 98 F. Supp. 2d 1287, 1292-93 (N.D. Okla. 2000). Second, the testimony must be reliable, meaning (a) the opinion is “based upon sufficient facts or data,” (b) it is “the product of reliable principles and methods,” and (c) “[t]he witness has applied the principles and methods reliably to the facts of the case.” 12 O.S. § 2702; accord *Nelson*, 2016 OK 69, ¶13, 376 P.3d at 217. The party offering the expert testimony—here, the State—has the burden of showing, by a preponderance of the evidence, that the testimony is admissible. *Christian*, 2003 OK 10, ¶23, 65 P.3d at 603.

An opinion that is based only on speculative assumption and not supported by reliable data must be excluded. See, e.g., *Guidroz-Brault v. Mo. Pac. R.R. Co.*, 254 F.3d 825, 829 (9th Cir. 2001) (expert may not rely on “unsupported speculation and subjective beliefs” (citing *Daubert*, 509 U.S. at 590)). A court thus must closely inspect how the expert arrives at her conclusions and exclude “opinion evidence that is connected to existing data only by the *ipse dixit* of the expert.” *Gen. Elec. Co. v. Joiner*, 522 U.S. 136, 146 (1997). Under these standards, Dr. Sharp’s testimony is inadmissible.

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<sup>1</sup> Because Oklahoma’s statutes governing expert testimony, 12 O.S. §§ 2702, 2703, 2704, and 2705, parallel the language of Federal Rules of Evidence 702, 703, 704, and 705 in all relevant respects, both state and federal jurisprudence on the subject is instructive. See, e.g., *Nelson v. Enid Med. Assocs., Inc.*, 2016 OK 69, ¶¶10-61, 376 P.3d 212, 217-31; *Christian v. Gray*, 2003 OK 10, ¶9, 65 P.3d 591, 598-99.

### III. ARGUMENT

#### A. All Of Dr. Sharp's Testimony Should Be Excluded Because She Has No Qualifications Or Reliable Basis For Opining About Opioids Specifically

An expert's opinion is admissible if and only if she has both the qualifications and a reliable basis to offer *that particular opinion*. Here, despite being designated to testify as an expert concerning "[t]he impact of parental *opioid* addiction and/or *opioid*-related incarceration on the lives of children and families in Oklahoma," Ex. A, Dec. 21, 2018 State's Expert Disclosure of Dr. Susan Sharp, Ph.D. ("Sharp Disc.") 1 (emphasis added), Dr. Sharp has never specifically researched or studied the use of, abuse of, addiction to, or incarceration related to opioids, Ex. B, Apr. 10, 2019 Deposition of Susan F. Sharp, Ph.D. ("Sharp Dep.") 33:19-34:1 (Q: "None of your current research addresses opioid addiction, correct?" A: "Correct, not specifically." Q: "Reviewing your CV, you've not authored any books or articles specific to opioid addiction, have you?" A: "That would be correct."). Rather, all of her research has focused on the effects of substance abuse or substance-related incarceration *generally*.

Indeed, Dr. Sharp specifically admits that her "ultimate conclusion is not drug specific." *Id.* at 95:6-9. And when asked about the State's description of her opinions in its disclosure of Dr. Sharp as an expert in this case, she volunteered that "it actually could just say 'drug related,' but since the lawsuit is about opioids, the term 'opioids' is in there." *Id.* at 81:12-18. In other words, the State seeks to apply Dr. Sharp's research concerning the effects of addiction to, and incarceration related to, a wide variety of legal and illegal drugs—including methamphetamine, cocaine, crack, alcohol, and heroin, all of which Dr. Sharp specifically mentioned as included within her studies—to the much narrower categories of prescription-opioid addiction and incarceration related to prescription opioids. But rather than filling the obvious analytical gap between

Dr. Sharp's research and the State's desired testimony with some reliable facts or data, the State seeks to transform Dr. Sharp's opinions by simply replacing the word "drug" with "opioid," based only on the truism that "the lawsuit is about opioids." There is no basis in law, logic, or social science for the State to make such an analytical leap.

In an effort to fill the obvious analytical gap in her testimony, Dr. Sharp testified at her deposition that she reviewed literature published by others to determine whether academics had identified "any differences in the impact of opioid use versus other kinds of drugs on children and families." *Id.* at 57:22-58:3. She testified that the "majority" of the literature that she reviewed found no difference in the effect of substance abuse related to the specific substance abused. *Id.* at 58:5-10. However, despite testifying that she reviewed so much research on this subject that "there would be many, many, many pages of just listing titles that looks at alcohol specific, that looks at opioids specific, that looks at methamphetamine," *id.* at 70:14-25, she could not identify *even a single opioid-specific study* that she reviewed to prepare her opinions in this opioid-specific litigation, *see id.* at 71:1-3 (Q: "Which of those articles that discuss opioid addiction are listed in Exhibit 4?" A: "I'm not sure if I put any in Exhibit 4."); *id.* at 71:24-72:6 (Q: "You said that there's considerable literature out there in the world, many, many, many pages of just listing titles that looks at . . . opioid specific, [] can you identify any specific literature that looks at opioids that you've reviewed?" A: "I'd have to go home and look on my computer and see what all I have saved on computer.").

In short, Dr. Sharp admits that she has no opioid-specific expertise, and while she claims that opioid-specific literature exists to support applying her more general conclusions specifically to opioids, she has failed to identify any such literature. In the absence of some identifiable and reliable facts, data, or methodology to fill the analytical gap in her proffered testimony, Dr.

Sharp's opinions are "connected to existing data only by the *ipse dixit* of" Dr. Sharp herself, and therefore are inadmissible. *Joiner*, 522 U.S. at 146; *see also, e.g., Ex. C, Shank v. Whiting-Turner Contracting Co.*, No. 17-CV-446-JED-FHM, 2018 WL 6681223, at \*2 (N.D. Okla. Dec. 19, 2018) ("analytical gap" in expert's testimony is "sufficient basis to exclude expert testimony under *Daubert*").

**B. Even If Dr. Sharp Is Permitted To Testify, She Should Be Precluded From Offering Any Opinions Based On Data Sets That Were Not Produced By The State And Are Not Publicly Available**

The State has not produced some of the data on which Dr. Sharp's opinions purportedly are based. That failure violates Oklahoma's discovery rules. It violates this Court's express directive. And it violates the black letter rule of evidence that an expert must provide a reliable basis for her opinions. The State's failure is unacceptable, and the Court should redress it by barring Dr. Sharp from offering any opinions based on that data if she is permitted to testify at trial.

At her deposition, Dr. Sharp relied upon multiple data sets that have not been produced to the Defendants and that Dr. Sharp testified are not publicly available in either her own publications or elsewhere. For example, she brought to her deposition a two-page summary (marked as Exhibit 3 to her deposition) of new analyses that she ran on data sets that are in her possession. *See Ex. B, Sharp Dep.* 44:13-46:14. Dr. Sharp confirmed that none of the data sets underlying these new analyses were included in her published reports or studies on those data sets. *See id.* at 62:8-21.<sup>2</sup> She also confirmed that neither the data sets nor the questionnaires from which the data sets were compiled have been produced in this litigation. *See id.* at 96:25-97:20. As a result, the

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<sup>2</sup> Dr. Sharp confirmed at her deposition that, while she intends to opine that opioid use among incarcerated women increased between 2004 and 2014, she does not intend to opine on the cause of that supposed increase. *See, e.g., Ex. B, Sharp Dep.* 63:3-9, 66:24-67:5.

Defendants have no way of testing the soundness of either Dr. Sharp's conclusions or her interpretation of those conclusions.

Dr. Sharp testified, for example, that there was an increase in opioid use among the incarcerated population that she studied, but no similar increase in methamphetamine use. *See id.* at 56:7-20. If Dr. Sharp believes that this comparison is somehow relevant to the opinions that she intends to offer, the Defendants are entitled to access the data and underlying questionnaires in order to evaluate the reliability of her analysis.

Similarly, Dr. Sharp testified that portions of her anticipated opinions are based on data from the Department of Corrections and a "Dr. Pitman," who she says managed the Department of Corrections' data. *See id.* at 74:5-75:3. But Dr. Sharp testified that both the Department's data and Dr. Pitman's data have been removed from the Department's website and are no longer accessible. *See id.* at 74:23-75:1, 75:14-76:16. Thus, the Defendants are again left with no means to challenge Dr. Sharp's analysis or conclusions.

That prejudicial outcome is intolerable and unfair. Worse yet, it violates Oklahoma's evidence rules and an order of this Court. The Oklahoma Discovery Code dictates that the State must disclose, among other things, "the substance of the facts and opinions to which [its proffered] expert is expected to testify." 12 O.S. § 3226(B)(4)(a)(3). And in September 2018, this Court specifically directed the State to "disclose information for expert witnesses set forth in 12 O.S. § 3226(B)(4)(a)(3)" by December 21, 2018. *See generally* Ex. D, Sept. 11, 2018 Order. But the State has never provided those data.

The State's tactical decision to flout this Court's order should not be tolerated. Courts regularly exclude an expert witness's testimony where the party proffering that witness fails to provide the factual bases for her opinion. *See, e.g.,* Ex. E, *Kern River Gas Transmission Co. v.*



*6.17 Acres of Land, More or Less, in Salt Lake Cty.*, 156 F. App'x 96, 102 (10th Cir. 2005) (expert's testimony properly excluded where only incomplete expert report was provided); *Ex. F, Nw. Pipeline Corp. v. Ross*, No. C05-1605RSL, 2008 WL 1744617, at \*9-10 (W.D. Wash. Apr. 11, 2008) (excluding plaintiff's expert's opinions due to plaintiff's untimely disclosures); *Koppell v. N.Y. State Bd. of Elections*, 97 F. Supp. 2d 477, 481 (S.D.N.Y. 2000) (“[T]his Court grants plaintiffs’ motion to strike Dr. Chapin’s report on the grounds that . . . defendants have failed to provide adequately the bases of Dr. Chapin’s opinions . . .”).<sup>3</sup>

Exclusion is likewise the appropriate remedy here. Without producing the data on which Dr. Sharp supposedly relied, the State has not and cannot satisfy its *Daubert* burden of demonstrating that there is a reliable basis for her opinions. And Oklahoma law specifically provides that, when a party fails to comply with a court’s discovery order, the court may “make such orders in regard to the failure as are just,” including “prohibiting the [disobedient] party from introducing designated matters into evidence.” *Barnett v. Simmons*, 2008 OK 100, ¶15, 197 P.3d 12, 18 (citing 12 O.S. § 3237(B)(2)). Given the State’s brazen disobedience of Oklahoma’s rules and this Court’s directive, justice requires the exclusion of at least some of Dr. Sharp’s testimony here. *See Ex. G, Wise v. C.R. Bard, Inc.*, No. 2:12-CV-01378, 2015 WL 521202, at \*8 (S.D.W. Va. Feb. 7, 2015) (granting motion to preclude expert from relying on unproduced personal data sets). No other remedy would be sufficient at this late date. Trial is just weeks away. Even if the State belatedly produced the data on which Dr. Sharp relies, the Defendants would be severely

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<sup>3</sup> Given the similarities between the Oklahoma Discovery Code and the Federal Rules of Civil Procedure, Oklahoma courts look to both Oklahoma and federal cases when interpreting Oklahoma’s discovery rules. *See, e.g., Hall v. Goodwin*, 1989 OK 88, ¶7, 775 P.2d 291, 293; *State ex rel. Protective Health Servs. v. Billings Fairchild Ctr., Inc.*, 2007 OK CIV APP 24, ¶18, 158 P.3d 484, 489-90; *McCoy v. Black*, 1997 OK CIV APP 78, ¶6, 949 P.2d 689, 692.

prejudiced because they would not have time to evaluate the data, let alone re-depose Dr. Sharp before trial. The Court should thus exclude all of Dr. Sharp's affected opinions.

■ [REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

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[REDACTED]

[REDACTED]

[REDACTED]

**IV. CONCLUSION**

For all these reasons, the Court should grant the Defendants' Motion to Exclude and issue an order barring the State from introducing any testimony by Dr. Sharp or, in the alternative, barring Dr. Sharp from offering any testimony that is based either on any data sets that were not produced by the State or [REDACTED]

Dated: April 23, 2019

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**CERTIFICATE OF MAILING**

Pursuant to 12 O.S. § 2005(D), and by agreement of the parties, this is to certify on April 23, 2019, a true and correct copy of the above and foregoing has been served via electronic mail, to the following:

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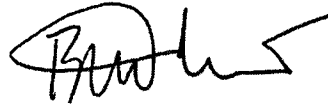
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AND ORTHO-MCNEIL-JANSSEN  
PHARMACEUTICALS, INC. N/K/A/  
JANSSEN PHARMACEUTICALS, INC.**

# EXHIBIT A

**Exhibit T - Dr. Susan F. Sharp, Ph.D.**

**A. Dr. Sharp is expected to testify about the following subject matters:**

- The impact of parental opioid addiction and/or opioid-related incarceration on the lives of children and families in Oklahoma.

**B. Dr. Sharp is expected to testify about the following facts, and/or opinions:**

According to both official Department of Corrections data and self-report data from incarcerated women, the two most common reasons for female incarceration in Oklahoma are 1) possession of a controlled substance and 2) trafficking or manufacturing of a controlled substance. Children of incarcerated and addicted women are quite likely to experience a number of adverse childhood experiences or "ACEs." ACEs include physical abuse, sexual abuse, emotional abuse, emotional neglect, physical neglect, living with someone with a mental health problem, living with someone with a substance abuse problem, someone in the household going to prison, parental separation or divorce, and living with or witnessing violence toward the child's mother. The high likelihood that children will experience a number of ACEs in turn increases the likelihood that the children will suffer from depression and physical health problems and even develop substance abuse problems themselves as they age. Children of opioid-related incarcerated parents are 3 times more likely to become addicted themselves, are more likely to have health problems, mental health problems, depression, suicide attempts and drop out of school.

**C. The summary of the grounds for each opinion is as follows:**

- The basis for the testimony Dr. Sharp is expected to offer is her education, knowledge, experience, training, and familiarity with the relevant research/studies.

- Dr. Sharp has a doctorate in sociology from the University of Texas-Austin, where she specialized in criminology and medical sociology, particularly as both relate to addiction.
- The majority of her research since 1996 has focused on the impacts of addiction and incarceration on the children of drug offenders, especially of women offenders. Dr. Sharp has performed multiple studies on the impact of incarceration on women and their families and has spent years interviewing the caregivers of the children of incarcerated mothers, including conducting the Oklahoma Study on Incarcerated Women and Their Children for the Oklahoma Commission on Children and Youth (2004, 2005, 2007, 2008, 2009/10, 2014).
- As a researcher, Dr. Sharp also stays relatively current on research related to the issues of addiction and of the impact of addiction and incarceration on families, including the Adverse Childhood Study or ACE Study (Felitti et al., 1998).
- Dr. Sharp also has many years of experience as a licensed chemical dependency counselor (LCDC) in the state of Texas, where she worked directly with children as part of a long-term adolescent treatment program.

**D. Dr. Sharp's Compensation**

Dr. Sharp is not seeking compensation for her time spent in preparation or for expert testimony.

**E. Dr. Sharp's Qualifications**

Dr. Sharp's qualifications are reflected in the *curriculum vitae* attached as Exhibit T-1.

**F. Dr. Sharp's Publications**



A list of Dr. Sharp's recent publications is contained in the *curriculum vitae*, see Exhibit T-1.

**G. Dr. Sharp's Prior Testimony**

Dr. Sharp has not testified or been deposed as an expert in previous litigation within the previous four (4) years.

# **EXHIBIT T-1**

**CURRICULUM VITAE**  
**SUSAN F. SHARP**  
**Professor of Sociology**

University of Oklahoma  
Department of Sociology – KH 321  
Norman, OK 73019  
Phone: (405) 325-2829  
Fax: (405) 325-7825

Home: 2416 Lone Oak Dr.  
Norman, OK 73071  
(405) 701-3013

e-mail: ssharp@ou.edu

**EDUCATION**

- Ph.D.** University of Texas, 1996  
Sociology. Dissertation: *Not for Men Only: Women, Injecting Drug Use, and AIDS*, supervised by Debra Umberson, Ph.D.
- M.A.** Texas Tech University, 1982  
Sociology. Thesis: *Courtroom Interaction: An Analysis of Label-Application and Label-Rejection*, supervised by C. Eddie Palmer, Ph.D.
- B.A.** Texas Tech University, 1980, cum laude, Sociology

**AREAS OF SPECIALIZATION**

Gender, Deviance and Crime  
Gender & Criminal Justice System  
Death Penalty

**TEACHING INTERESTS**

Women and Crime  
Death Penalty  
Research Methods (Qualitative and Quantitative)  
Criminal Justice System

**APPOINTMENTS**

- 2017 - David Ross Boyd/Presidential Professor Emerita  
2013-2016 David Ross Boyd Professor of Sociology  
2011 Acting Director, Women's and Gender Studies  
2009-Present L. J. Semrod Presidential Professor  
2007-Present Professor of Women's Studies and Sociology, University of Oklahoma  
2002-2007 Associate Professor, University of Oklahoma  
2003-2007 Graduate Liaison, Department of Sociology, University of Oklahoma  
1996-2002 Assistant Professor, University of Oklahoma  
1994-1996 Instructor, University of Texas (Statistics; Introduction to Sociology)  
1993-94 Teaching Assistant to Dr. Mark Warr, Criminology, University of Texas  
1988-89 Instructor of Sociology, South Plains College  
1981-82 Graduate Instructor (Current Social Problems), Texas Tech University; Tutor (Statistics)

**PROFESSIONAL MEMBERSHIPS**

- 1995-2010 American Sociological Association  
2001-present Academy of Criminal Justice Sciences  
1996-present American Society of Criminology  
1998-2002 Mid-South Sociological Association  
2000-2002 Society for Applied Sociology  
1996-present Southwestern Social Science Association

***Other Related Experience***

- 1993-94 Drug Counselor, Shoal Creek Hospital  
1992-93 Counseling Supervisor, *New Vision Chemical Dependency Program* at Kyle Prison  
1989-91 Program Director, Lavender Center for Adolescents, Austin Rehabilitation Center  
1987-89 Alcohol & Drug Counselor, Lubbock Regional MHMR

## **AWARDS AND HONORS**

- 2016 Lifetime Achievement Award, Division on Women and Crime, American Society of Criminology
- 2014 Faculty Research Award, Women's & Gender Studies, University of Oklahoma
- 2013 David Ross Boyd Professor, University of Oklahoma
- 2013 Evelyn Gilbert Unsung Hero Award, ACJS Section on Women and Minorities
- 2012 Social Justice Award, Center for Social Justice, University of Oklahoma
- 2011 Cora Richey Mann Inconvenient Woman of the Year Award, Division on Women and Crime, American Society of Criminology.
- 2011 University of Oklahoma Student Association's Outstanding Faculty Award
- 2009 Kinney-Sugg Outstanding Professor, College of Arts & Sciences
- 2009 L.J. Semrod Presidential Professor
- 2008 Nominated for the Hindelang Award for Outstanding Book, American Society of Criminology
- 2008 Saltzman Award, Division on Women and Crime, ASC
- 2007 Kenneth E. Crook Outstanding Faculty Award, OU College of Liberal Studies
- 2005 University of Oklahoma Good Teaching Award
- 2005 ING Faculty Member of the Game
- 2004 Phil Wahl Abolitionist of the Year, Oklahoma Coalition to Abolish the Death Penalty
- 2003 Rufus G. Hall Faculty Award, College of Liberal Studies, University of Oklahoma
- 2000 Most Inspiring Faculty Award, Student Athlete Scholar Awards, University of Oklahoma
- 1999 University of Oklahoma Junior Faculty Research Fellowship
- 1998 OU Student Association President Teaching Excellence Award
- 1996 Student Paper Competition Winner, Sociologists' AIDS Network, American Sociological Association
- 1995 Phi Kappa Phi
- 1980 Outstanding Undergraduate Paper, MSSA
- 1969 National Merit Scholar

## **PROFESSIONAL EXPERIENCE**

### ***Teaching***

COURSES TAUGHT: Sociology of Deviance; Sociology of Gender; Graduate Seminar in Deviance and Social Control; Introductory Sociology; Social Problems, Crime and Delinquency; Sociology of Gender and Health; Alcohol, Drugs and Society; Senior Capstone in Criminology; Sociology of Gangs; The Death Penalty in Oklahoma and the U.S.; Honors Course in Sociology of Deviance; Graduate Seminar in Advanced Research Methods; Graduate Seminar on Women & Crime; Graduate Seminar in Criminal Justice, Graduate Seminar in Qualitative Methods; Seminar on the Death Penalty; HR Gangs, Drugs & Violence: HR Multiculturalism; HR Cultural Diversity; HR 12 Step Recovery Process; various courses in LSTD Social Sciences & Criminal Justice, SOC/WGS 3983 Women, Girls and Crime; WGS 3220 Race, Class & Gender, LSCJ5353 Women & Crime

### ***Research***

- 2016 The Constitution Project: Oklahoma Death Penalty Evaluation
- 2016 - Evaluation of Friends for Folks Program
- 2014 Oklahoma Study of Incarcerated Women and Their Children 2014
- 2012- S-CAP Program evaluation
- 2005-2010 Oklahoma Study of Incarcerated Women and Their Children, 2004-2009, PI
- 2003-2009 Co-Principal Investigator, Comparative study of deviance in Japanese and U.S. college students
- 2001-2003 Oklahoma Site Co-Supervisor, Capital Jury Project, Northeastern University
- 2000 Consultant to Oklahoma State Department of Health, Project on Assessment of Women's Programming Needs in Oklahoma Prisons
- 1999-2002 Faculty Sponsor, Sociology Doctoral Students' Project: University Students & Deviance
- 1998-1999 Principal Investigator, Body Image among College Women
- 1997-1998 Principal Investigator, Gender Differences in Effects of Parental Incarceration
- 1995-1996 Research Assistant, Project on Domestic Violence, University of Texas at Austin
- 1981 Departmental Research Assistant, Texas Tech University

## **PUBLICATIONS**

### **Books (Peer-Reviewed):**

- 2003 Sharp, Susan F. *The Incarcerated Woman: Rehabilitative Programming in Women's Prisons* (Edited collection). Upper Saddle River, NJ: Prentice-Hall
- 2005 Sharp, Susan F. *Hidden Victims: The Effects of the Death Penalty on Families of the Accused*. Rutgers University Press.
- 2014 Sharp, Susan F. *Mean Lives, Mean Laws: Oklahoma's Women Prisoners*. Rutgers University Press,
- 2017 Associate Editor, *Encyclopedia of Corrections*, Wiley-Blackwell (Forthcoming 2016)
- 2016 Co-Editor. (Susan F. Sharp, Susan Marcus-Mendoza, Kathleen Cameron, Elycia S. Daniel-Roberson, editors), *Across the Spectrum of Women and Crime: Theories, Offending and the Criminal Justice System*. Carolina Academic Press

### **Peer-Reviewed Articles (italicized student co-authors):**

- 1982 Sharp, Susan F. "Adamchak's Ideal Family Size: A Research Note." *Sociobiology*.
- 1998 Sharp, Susan F. "Relationships with Children and Needle- Risk Behaviors Among Female IDUs." *Deviant Behavior* 19: 3-28.
- 1998 Sharp, Susan F. & Susan Marcus-Mendoza, et al. "Gender Differences in the Effects of Parental Incarceration on Families of Offenders" *Journal of the Oklahoma Criminal Justice Research Consortium*, volume 4.
- 2000 Sharp, Susan F., Adrienne Braley, & Susan Marcus-Mendoza. 2000 "Focal Concerns, Race & Sentencing of Drug Offenders." *Free Inquiry* 28(2):3-16
- 2001 Sharp, Susan F. & Susan Marcus-Mendoza. 2001. "It's A Family Affair: The Effects of Incarceration on Women and Their Families." *Women and Criminal Justice* 12 (4), 21-49
- 2001 Sharp, Susan F., Toni L. Terling, & Leslie A. Atkins. 2001. "Purging Behavior In A Sample Of College Females: A Research Note On General Strain Theory and Female Deviance." *Deviant Behavior* 22: 171-188
- 2001 Terling-Watt, Toni L. & Susan F. Sharp. "Gender Differences in Strains Associated with Suicidal Behavior Among Adolescents." *Journal of Youth & Adolescence* 30(3):333-348
- 2001 Sharp, Susan F. & Trina Hope "The Professional Ex- Revisited." *Journal of Contemporary Ethnography*, volume 30 (67), December 2001, pp. 678-703
- 2002 Terling-Watt, Toni L., Susan F. Sharp and Leslie Atkins. "Race Differences in Strains Associated with Suicidal Behavior Among Adolescents." *Youth & Society* 34:232-256
- 2002 Brewster, Dennis & Susan F. Sharp. "Educational Programs & Recidivism: Another Look." *The Prison Journal*, 82(3):314-334
- 2003 Terling, Toni L., Susan F. Sharp, & Leslie A. Atkins. "The Relationship between Personal Control and Disordered Eating Patterns Among College Females." *Journal of Applied Social Psychology*, 32(12):2502-2512
- 2005 Sharp, Susan F., Dennis R. Brewster, and Sharon Redhawk Love. "Disentangling Strain, Personal Attributes, Affective Response and Deviance: A Gendered Analysis." *Deviant Behavior* 26:122-157
- 2006 Sharp, Susan and Kristen Hefley. "This is a Man's World, or So It Would Seem in the Journals." *Critical Criminology*, 15, pp. 3-18.
- 2007 Sharp, Susan F., Meghan McGhee, Trina Hope and Randall Coyne. "Predictors of Support for Banning Juvenile Executions," *Justice Quarterly*. 24/1, pp. 133-155
- 2008 Spivak, Andrew and Susan F. Sharp. "Inmate Recidivism as a Measure of Private Prison Performance." *Crime & Delinquency*, 54/3, pp. 482-508..
- 2008 Kobayashi, Emiko, Susan F. Sharp & Harold G. Grasmick. "Gender and Deviance: A Comparison of College Students in Japan and the United States." *Deviant Behavior*, 29(5):413-439.
- 2009 Fukushima, Miyuki, Emiko Kobayishi and Susan Sharp. "Bond to Society, Collectivism, and Conformity: A Comparative Study of Japanese and American College Students." *Deviant Behavior* 32(5): 435-466.
- 2010 Kobayashi, Emiko, Harold R. Kerbo and Susan F. Sharp. "Differences in Individualistic and Collectivistic Tendencies Among College Students in Japan and the United States." *International Journal of Comparative*

- Sociology*, 51(1/2),59-84.
- 2010 Kobayashi, Emiko, Ronald L. Akers and Susan F. Sharp. "Attitude Transference In Criminal And Deviant Behavior: A Comparative Study In Japan And The United States" *Deviant Behavior* 32(5): 405-439.
- 2010 Kobayashi, Emiko, Alexander T. Vazsonyi, Pan Chen and Susan F. Sharp. "A Culturally Nuanced Test of Gottfredson and Hirschi's 'General Theory': Dimensionality and Generalizability in Japan and the United States." *International Criminal Justice Review*, 20(2), 112-131.
- 2011 Conner, Sonya G., Jennifer Hartsfield and Susan F. Sharp. "Differential Effects of Childhood Abuse on Pathways into Delinquency: A Retrospective Study of Incarcerated Women." *International Journal of Crime, Criminal Justice and Law* 4(1-2):123-141.
- 2012 Sharp, Susan F., B. Mitch Peck and Jennifer Hartsfield. "Adverse Childhood Experiences and Substance Abuse Among Women Prisoners: A General Strain Theory Approach." Invited article, special edition of the *Journal of Criminal Justice* 40: 202-211
- 2012 Worthen, Meredith G. F., Susan F. Sharp, and Forrest Rodgers. "Gay and Lesbian Attitudes toward the Death Penalty: The Roles of Empathy and Political Beliefs." *Criminal Justice Review* 37(2): 239-261
- 2014 Worthen, Meredith G. F., Forrest R. Rodgers and Susan F. Sharp. "Expanding the Spectrum of Attitudes Toward the Death Penalty: How Nondichotomous Response Options Affect Our Understanding of Death Penalty Attitudes." *Criminal Justice Review* 39:1-22.
- 2015 Tedor, Miyuki, Susan F. Sharp and Emiko Kobayashi. A Cross-Cultural Examination of the Disjuncture between Aspirations and Expectations/Perceived Outcomes: Strain and Academic Deviance in the United States and Japan. " *Sociological Inquiry*.
- 2015 Stearns, Ami, Susan F. Sharp and Ann M. Beutel. "Women as Political Bodies in the International Speeches of Margaret Sanger." Accepted. Forthcoming *Feminist Formations*.
- 2017 Hartsfield, Jennifer, Susan F. Sharp and Sonya Conner. "The Impact of Cumulative Sexual Abuse on Mental Health Outcomes for Incarcerated Women." *Dignity* 1(1).
- 2017 Radelet, Michael, Glenn Pierce and Susan F. Sharp. 2017. "Race and Death Sentencing for Oklahoma Homicides Committed between 1990 and 2012." *Journal of Criminology and Criminal Law*, 107, 101-124.
- 2017 Jones, Melissa S., Meredith G.F. Worthen, Susan F. Sharp and David A. McLeod. 2017. "Bruised Inside Out: The Adverse and Abusive Life Histories of Incarcerated Women as Pathways to PTSD and Illicit Drug Use." *Justice Quarterly* (forthcoming).
- 2017 Jones, Melissa S., Meredith G.F. Worthen and Susan F. Sharp. 2017. "Broken Hearts and Battered Lives: Adverse and Abusive Life Histories and Externalized Responses to Anger as Pathways to Illicit Drug Use Among Incarcerated Women." *Women and Criminal Justice* (forthcoming)
- 2018 McLeod, David A., Melissa S. Jones. Susan F. Sharp, & Leah Gatlin. *Violence & Victims*, forthcoming,
- 2018 Jones, Melissa S., Meredith G. F. Worthen, Susan F. Sharp & David A. McLeod. Life as She Knows it: The Effects of Adverse Childhood Experiences on Intimate Partner Violence Among Women Prisoners. *Child Abuse & Neglect*, forthcoming.

### Other Articles

- 2004 Sharp, Susan F. "Women Prisoners and Their Children: A Growing Problem." Invited article, Family Therapy Magazine

- 2005 Sharp, Susan F. "Feminist Criminology: The Relationship Between Policy, Practice and Research." Invited article, *Women, Girls and Criminal Justice Newsletter*.
- 2006 Sharp, Susan F. "Its Not Just Men Anymore: The Criminal Justice System and Women in the 21st Century." Invited article, *The Criminologist*, March/April 2006
- 2008 Spivak, Andrew L. and Susan F. Sharp. "Inmate Recidivism as a Measure of Private Prison Performance," p. 85. Research brief. *Oklahoma Style Criminal Justice*. Published by the 2008 Oklahoma Academy Town Hall.
- 2008 Sharp, Susan F. "Oklahoma's Incarcerated Women," pp. 137-141. *Oklahoma Style Criminal Justice*. Published by the 2008 Oklahoma Academy Town Hall.
- 2016 Sharp, Susan F. "Women in Prison." Oxford Bibliographies.

### Book Chapters

- 1999 Sharp, Susan, Susan T. Marcus-Mendoza, Robert Bentley, Debra Simpson, & Sharon Love, "Gender Differences in the Impact of Incarceration on the Children & Families of Drug Offenders." In K. Train & M. Corsianos (Eds.) *Interrogating Social Justice: Politics, Culture and Identity*. Toronto: Canadian Scholars' Press Inc.
- 2000 Umberson, Debra, Kristi Williams, and Susan F. Sharp. Invited chapter in *Handbook of Medical Sociology*. "Medical Sociology & Health Psychology." Prentice-Hall.
- 2003 Sharp, Susan F. "Mothering in Prison: Issues in Parent-Child Contact." In *Female Prisoners in the United States: Programming Needs, Availability, and Efficacy*, edited by Susan F. Sharp. New York: Prentice-Hall.
- 2003 Sharp, Susan F. "Where Do We Go From Here?" In *Female Prisoners in the United States: Programming Needs, Availability, and Efficacy*, edited by Susan F. Sharp. New York: Prentice-Hall.
- 2003 Sharp, Susan F. and M. Elaine Eriksen. "Imprisoned Mothers and Their Children." Pp 119-136 in Barbara Zaitzow and Jim Thomas (eds.), *Women in Prison: Gender and Social Control*. Boulder, CO: Lynn Rienner Publishers.
- 2008 Sharp, Susan F. "Victimization in a Sample of Incarcerated Women." Invited chapter in *Female Crime Victims: Reality Reconsidered*, Prentice-Hall, Venessa Garcia (ed.).
- 2008 Sharp, Susan F. "Feminist Criminology." Invited chapter in *21st Century Criminology: A Reference Handbook*, J. M Miller (ed.), Sage Publications.
- 2010 Sharp, Susan F. "Wanda Jean Allen" in *Women & Crime*, Carolina Academic Press, **invited chapter, accepted, publication of volume delayed.**
- 2010 Sharp, Susan F. "Preparing for Retirement." Pp. 132-141 in Emily Lenning, Sara Brightman and Susan Caringella (eds.), *A Guide to Surviving a Career in Academia: Navigating the Rites of Passage*, Routledge, **invited chapter.**
- 2016 Sharp, Susan F. "Wanda Jean Allen: A Case of Multiple Marginality." In *Across the Spectrum of Women and Crime: Theories, Offending and the Criminal Justice System* (ed. By Sharp, Marcus-Mendoza, Cameron and Daniel-Roberson). Carolina Academic Press.
- 2016 Sharp, Susan F. and Juanita Ortiz. "Staying Out or Going Back: The Experiences of Female Offenders." In *Across the Spectrum of Women and Crime: Theories, Offending and the Criminal Justice System* (ed. By Sharp, Marcus-Mendoza, Cameron and Daniel-Roberson). Carolina Academic Press
- 2016 Sharp, Susan F. "Hidden Victims: The Families of Those Facing the Death Penalty." In *Death Penalty and Its Victims*. United Nations Office of the High Commissioner on Human Rights.

### Encyclopedia Entries

- 2000 Sharp, Susan F. "Alcoholism Treatment and Family Relationships." *Encyclopedia of Criminology and Deviance*.

- 2000 Sharp, Susan F. "Alcoholism and Alcohol Abuse." *Encyclopedia of Women & Crime*.
- 2003 Sharp, Susan F. "Capital Punishment." *Encyclopedia on Prisons and Correctional Institutions*. Sage.
- 2003 Sharp, Susan F. "Mothers in Prison." *Encyclopedia on Prisons and Correctional Institutions*. Sage.
- 2012 Sharp, Susan F. "Feminist Theory" in *Encyclopedia of Social Deviance*, edited by Heath Copes and Craig Forsyth. Sage Publications.
- 2012 Sharp, Susan F. "Twelve Step Programs" in *Encyclopedia of Social Deviance*, edited by Heath Copes and Craig Forsyth. Sage Publications.
- 2013 Sharp, Susan F. "Feminist Criminology and Gender Studies" in *Encyclopedia of Social and Behavior Sciences*, 2<sup>nd</sup> edition. Elsevier.
- 2016 Sharp, Susan F. "Stephanie Covington" in *Encyclopedia of Corrections*, Wiley-Blackwell.
- 2016 Sharp, Susan F. "Sister Helen Prejean" in *Encyclopedia of Corrections*, Wiley-Blackwell.
- 2016 Sharp, Susan F. "John Irwin" in *Encyclopedia of Corrections*, Wiley-Blackwell.
- 2016 Sharp, Susan F. "Patricia O'Brien" in *Encyclopedia of Corrections*, Wiley-Blackwell.

#### **Reports:**

- 1997 Sharp, Susan F. and Susan Marcus-Mendoza. Report to the Oklahoma Department of Corrections: "A Preliminary Analysis of Gender Differences on the Effects of Parental Incarceration."
- 1998 Marcus-Mendoza, Susan T. and Susan F. Sharp. Report to the Oklahoma Sentencing Commission. "The Impact of Incarceration on Families in Oklahoma: Implications for Policymakers."
- 2004 Report to the Oklahoma Commission on Children and Youth and the Oklahoma State Legislature, Incarcerated Mothers and Their Children, Phase I.
- 2005 Report to the Oklahoma Commission on Children and Youth and the Oklahoma State Legislature, "Incarcerated Mothers and Their Children, Phase II."
- 2005 Report to the Oklahoma Commission on Children and Youth and the Oklahoma State Legislature, "Incarcerated Mothers and Their Children, Phase III."
- 2006 Report to the Oklahoma Commission on Children and Youth and the Oklahoma State Legislature, "Incarcerated Mothers and Their Children."
- 2007 Report to the Oklahoma Commission on Children and Youth and the Oklahoma State Legislature, "Incarcerated Mothers and Their Children, 2007." With Jennifer Hartsfield, Sonya Conner and Marcus Wolf.
- 2008 Report to the Oklahoma Commission on Children and Youth and the Oklahoma State Legislature (2007), "The Real Cost of Incarcerating Mothers :Study of Incarcerated Women and Their Children."
- 2008 Report to the Oklahoma Commission on Children and Youth and the Oklahoma State Legislature (2008), "Breaking the Cycle of Violence: Study of Incarcerated Women and Their Children."
- 2009 Report to the Oklahoma Commission on Children and Youth and the Oklahoma State Legislature
- 2012 Final Report of the Legislative Task Force on Children of Incarcerated Parents, made to Oklahoma Commission on Children and Youth, January 27, 2012.
- 2014 Oklahoma Study of Incarcerated Mothers and Their Children, 2014. Published through Oklahoma Commission on Children and Youth.

#### **Book Reviews:**

- 1999 *Rural Radicals: Righteous Rage in the American Grain*, *Rural Sociology*.
- 2000 *No Safe Haven*. *Gender & Society*.
- 2000 *Misconceiving Mothers*. *Deviant Behavior*.

#### **Articles in Progress:**



"Childhood Adversity and Intimate Partner Violence: The Mediating Influence of PTSD in a Sample of Women Prisoners."  
 Melissa S. Jones, B. Mitchell Peck, Susan F. Sharp, and David. A. McLeod. Under review, *Journal of Interpersonal Violence*.

**Grants and Funding:**

2014 George Kaiser Family Foundation, \$6000  
 2014 College of Arts and Sciences Travel Assistance Program Grant, \$1052  
 2013 Research Council, University of Oklahoma, \$8668  
 2012 College of Arts & Sciences, Faculty Enrichment Grant, \$700  
 2012 Vice-President for Research, Research Council Grant, \$700  
 2012 Study of Incarcerated Parents – Oklahoma, Submitted to National Institute of Justice, \$500,000, not funded  
 2011 Survey of Incarcerated Fathers, OCCY, \$2200  
 2009 Study of Living Conditions of Children of Incarcerated Mothers, OCCY, \$3800  
 2008 College of Arts & Sciences, Faculty Enrichment Grant, \$1200  
 2008 Vice-President for Research, Research Council Grant, \$1200  
 2006 Strain & Resiliency Factors Associated with Substance Abuse Among AI/AN, joint proposal with the Choctaw Nation, not funded  
 2004 Oklahoma Commission on Children and Youth, \$8000, Study of the Effects of Incarceration on Children of Female Prisoners  
 2002 College of Arts & Sciences, \$684  
 2002 Vice-President for Research \$684  
 2000 University Research Funds, Vice President for Research, University of Oklahoma, \$964.00  
 1999 Junior Faculty Research Grant, University of Oklahoma, \$6000.00  
 1999 Instructional Technology Grant, College of Arts & Sciences, \$2800.00  
 1999 Faculty Development Grant, Principal Investigator, \$476.00  
 1998 Policy report on families of offenders, Oklahoma Sentencing Commission, Co-Principal Investigator, \$1000.00.  
 1997 Faculty Development Grant, Co-Principal Investigator, \$360  
 1997- 98 Oklahoma Department of Corrections, 3/97 - 7/97 and 1/98 - 4/98. A Preliminary Analysis of Gender Differences in the Impact of Imprisonment on Children & Spouses of Drug Offenders, \$6549.00 and \$1950.00  
 1997 Junior Faculty Research Grant, College of Arts and Sciences, OU, \$6000.00

**PAPERS PRESENTED AND PARTICIPATION ON PANELS**

**Professional:**

2017 Presenter, "Oklahoma's Children of Prisoner Mothers." Oklahoma Department of Humans Services Practice and Policy Lecture, May 17, 2017.  
 2016 Presenter, "The Effects of the Death Penalty on Families of the Accused," Capital Punishment, Wrongful Convictions and the Web of Impact panel, American Society of Criminology Meetings, New Orleans, LA  
 2016 Discussant, Celebrating Ten Years of *Feminist Criminology*: Looking Back and Looking Ahead at Feminist Criminological Scholarship. American Society of Criminology Meetings, New Orleans, LA  
 2016 Chair and presenter, "Moving from Associate Professor to Full Professor." American Society of Criminology Meetings, New Orleans, LA  
 2014 Author, Author Meets Critics Session, American Society of Criminology, 11/19/14  
 2014 Presenter, Roundtable on "Imagine a World without Prisons." American Society of Criminology, 11/20/14  
 2014 Chair, Session "Looking Back, Looking Forward: 30 years of Feminist Criminology." American Society of Criminology, 11/21/14  
 2014 Mental Illness and Criminal Justice, panel member, November 14, 2014  
 2014 Keynote Speaker, GED Graduation, Dr. Eddie Warrior Corrections Center, October 29  
 2014 Overview of Children of Incarcerated Parents Advisory Group and Recent Research, present to Child Death Review Board, Oklahoma Commission on Children and Youth, June 19, 2014

- 2014 Panelist and Moderator, "Beyond the Numbers: Female Incarceration in Oklahoma", University of Oklahoma
- 2014 Panelist, "Sweethearts of the Prison Rodeo," Osher Life-Long Learning, University of Oklahoma
- 2014 Panelist, "The War on Drugs" Symposium, presented by the Center for Social Justice, University of Oklahoma 1/23/2014
- 2013 Keynote Speaker, Oklahoma Baptist Convention, Women's Auxiliary, Lawton, OK 10/21/2013
- 2013 Keynote Speaker, Oklahoma Women's Coalition, Oklahoma City, OK10/9/2013
- 2013 OETA Oklahoma Forum Panel, 6/20/2013
- 2013 Keynote Speaker, Social Welfare Action Alliance National Conference, June 7, 2013
- 2013 Justice Studies Association, 5/30/2013, "Restorative/Transformative Justice Models for Family Reintegration" (with Susan Krumholz).
- 2012 Invited Lecture, "Qualitative Research Methods," Seminar On Social Research, Sociology Department, 11/29/12
- 2012 Critic, Author Meets Critics Panel, *Life After Death Row*, **American Society of Criminology** Meetings, 11/17/2012
- 2012 Presenter, Susan F. Sharp & Juanita Ortiz, "Staying Out or Going Back: Re-Entry Experiences of Women Prisoners," **American Society of Criminology** Meetings, 11/16/2012
- 2012 Roundtable, Jennifer Hartsfield and Susan F. Sharp, "Diagnosing the Past," **American Society of Criminology** Meetings, November 15, 2012
- 2012 Presentation to Big Brothers/Big Sisters of Oklahoma, 8/16/2012, "Children of Incarcerated Parents"
- 2012 Presentation to Little Light Ministries Board, 8/2/2012, "Children of Incarcerated Parents"
- 2012 Presentation to Epworth Village Women's Coffee Club, 5/23/2012, "Incarcerated Mothers and Their Children"
- 2012 Presenter, "Ethics and the Efficacy of the War on Drugs," Oklahoma Alcohol and Drug Abuse Counselors" Conference, March 30, 2012
- 2012 Federal Public Defenders Office, Oklahoma City, "Oklahoma's Women Prisoners: Problems and Progress," March 8, 2012
- 2011 Presenter, Roundtable on Teaching Sensitive Topics, **American Society of Criminology**, November, 17, 2011
- 2011 Presenter, Roundtable on Incarcerated Mothers and Children, **American Society of Criminology**, November, 16, 2011
- 2011 Presenter, Death Penalty Educational Day. State Capitol
- 2011 Presenter, Mother's Day Service Unitarian Universalist Church, Norman
- 2011 Presentation, Red Dirt Women & Power Class, April 22, 2011
- 2011 Presenter, National Association of Social Workers Oklahoma State Conference, America and the Death Penalty, March 28, 2011
- 2011 Presenter, Federal Prosecutor's Office, Oklahoma City, Incarcerated Women and Their Children, March 30, 2011.
- 2011 Keynote Speaker, Oklahoma Chapter of Amnesty International, Stillwater, OK, 2/26/2011
- 2011 Speaker, Oklahoma State University, 2/23/2011, Oklahoma's Incarcerated Women
- 2011 Speaker, State Post Adjudication Review Advisory Board, 2/18/2011
- 2011 Speaker, University of Tennessee at Chattanooga, The Death Penalty, 2/7/2011
- 2010 Presentation, Oklahoma CASA
- 2010 Presentation, Oklahoma State Legislature social services subcommittee, 9/14/2010
- 2010 Presenter, International Teaching Assistant Training Day, 8/11/10
- 2010 Keynote Speaker, Intergenerational Incarceration, Oklahoma Re-Entry.
- 2010 Organizer, Symposium, "Wrongful Convictions: Working Towards Solutions." Bell Courtroom of the School of Law, University of Oklahoma, 4/30/2010
- 2010 Panelist, Sweethearts of the Prison Rodeo, WGSA, OMU Beard Lounge, OU, 4/26/2010
- 2010 Presentation, "Reframing Criminal Justice: Restorative Justice in the Criminal Justice Classroom." Academy of Criminal Justice Sciences, February 26, 2010, San Diego

- 2010 Presentation, "Diagnosing the Past, Consequences for the Future." Jennifer Hartsfield, Susan F. Sharp & Susan Marcus-Mendoza. Academy of Criminal Justice Sciences, February 26, 2010, San Diego
- 2010 Presenter, Complex Dialogues on Incarcerated Women, 1/26/2010, Oklahoma Christian University
- 2009 Presentation, "A Case Study of an Institutional Response to Stalking," **American Society of Criminology**, November 4, 2009, Philadelphia
- 2009 Presentation, "," **American Society of Criminology**, November 6, 2009, Philadelphia
- 2009 Session Chair, "What Do I Do Now?" **American Society of Criminology**, November 5, 2009, Philadelphia
- 2009 Session Chair, "Gendered Pathways," **American Society of Criminology**, November 6, 2009
- 2009 Presentation, Oklahoma Educational Studies Association, 5/2/09, "It's Just a Shame: Educational Levels of Incarcerated Women in Oklahoma."
- 2009 Guest lecturer, Oklahoma State University, Graduate Seminar in Sociology of Education 4/13/09 and Race and Reproduction, 4/14/09
- 2009 Judge, Oklahoma Social Innovation Challenge , University of Tulsa, 4/10/09
- 2009 Moderator and Panelist, "Don't Look Away," event on Violence Against Women co-hosted by Women's Studies Program and Xenia Institute, April 2, 2009
- 2008 Sharp, Susan F. "The State of Feminist Criminology I: Mainstream Theories." **American Society of Criminology**, November 2008.
- 2008 Hartsfield, Jennifer, Susan F. Sharp and Susan Marcus-Mendoza. The Role of Relationships and Victimization in Female Offending. **American Society of Criminology**, November 2008.
- 2008 Sharp, Susan F., Susan Marcus-Mendoza and Jennifer Hartsfield. "The Relationship Between Abuse, Mental Health and Incarceration." Presented at the Academy of Criminal Justice Sciences Meeting, March 2008, Cincinnati.
- 2008 Sharp, Susan F. "Teaching About Capital Punishment" Roundtable. Presented at the Academy of Criminal Justice Sciences Meeting, March 2008, Cincinnati.
- 2008 McGhee, Meghan and Susan F. Sharp. "Two Strikes and You're Dead." Presented at the Academy of Criminal Justice Sciences Meeting, March 2008, Cincinnati.
- 2008 Marcus-Mendoza, Susan, Susan F. Sharp and Jennifer Hartsfield. "Interventions for Women in Prison and upon Release: Research, Practice and Activism." Association for Women in Psychology. March 23 2008, San Diego.
- 2008 Sharp, Susan F. "Female Incarceration in Oklahoma: Why Such a Punishment Mentality?" Presentation at Women's Legislative Day, March, 2008.
- 2007 Sharp, Susan F. and Susan Marcus-Mendoza. "Trauma Counseling with Oklahoma Women Prisoners." Women Offenders Taskforce, Governor's Transformation Advisory Board Criminal Justice Workgroup
- 2007 Marcus-Mendoza, Susan, Jennifer Hartsfield and Susan F. Sharp. "Dealing With the Fallout." **American Society of Criminology**, November 2007.
- 2007 Sharp Susan F. Participant, "New Faculty Workshop." **American Society of Criminology**, November 2007.
- 2007 Marcus-Mendoza, Susan and Susan F. Sharp. "Trauma Counseling in Incarcerated Women." June 2007
- 2007 Sharp, Susan F., "Incarcerated Mothers and Their Children," University of Michigan, Women at the Margins Series
- 2007 Sharp, Susan F., University of Oklahoma Faculty Speaker Series, Walker Tower, April 26, 2007
- 2007 Sharp, Susan and Tosha Morris. Collateral Damage: The Effects of Maternal Incarceration on Children. Southwest Social Science Meetings.
- 2006 Sharp, Susan F. Teaching Race, Gender & Crime. **American Society of Criminology** meetings, November, 20
- 2005 Sharp, Susan F., Meghan McGhee and Dennis Williams. "Fairness versus Wrongful Convictions: Contradiction in Public Opinion." **American Society of Criminology**, Toronto
- 2005 New Faculty Professional Development Workshop, Division on Women & Crime, **American Society of Criminology**, Toronto
- 2005 Meet the Editors, American Society of Criminology, Toronto
- 2005 Sharp, Susan F., Meghan McGhee and Dennis Williams. "Making Sense of Nonsense." Oklahoma Sociological Association

- 2004 Sharp, Susan F. and Kristen Hefley. "This is a Man's World, or So It Would Seem in the Journals." Presented at the **American Society of Criminology Meetings**.
- 2003 Sharp, Susan F., Hallie Stephens and Sharla Colbert. "A Gendered Analysis of Strain." Presented at the **American Society of Criminology Meetings**.
- 2002 Sharp, Susan. "Invisible Victims." Presented in Presidential Session at the **American Society of Criminology Meetings, Chicago**.
- 2002 Sharp, Susan. "The Effects of the Death Penalty on Families of Offenders." Presented at the Pacific Sociological Association Meetings, Vancouver, BC, April 19.
- 2000 Sharp, S. and S. Marcus-Mendoza. Female Inmates in Oklahoma: Issues in Sentencing, Transfers, and Parenting. American Society of Criminology, (ASC), San Francisco.
- 2000 Marcus-Mendoza, S., & Sharp, S. (2000). The pitfalls of conducting research with marginalized populations: A study of women inmates and the effects of their incarceration on their families. Presented at the annual Women in Psychology Conference, Salt Lake City.
- 1999 Sharp, Susan F., **American Society of Criminology Meetings**. "Self-Control and Female Deviance."
- 1999 Marcus-Mendoza, S. and Sharp, S. F. 38th International Congress on Alcohol, Drugs and Other Dependencies, paper presented, "Intergenerational Patterns of Violence and Addiction in Families of Incarcerated Drug Offenders." Vienna, Austria.
- 1999 Chair, Graduate Student Paper Section, Southwestern Social Science Association Meetings, San Antonio, Female Inmates and Their Families." Washington, D.C.
- 1999 ACJS Meetings, paper presented. "Gender Differences in the Impact of Incarceration on Children and Families of Drug Offenders, Albuquerque, NM.
- 1998 **ASC Meetings, Chair, Panel on Women and Prison.**
- 1998 **ASC Meetings, paper presented.** "It's A Family Affair: The Effects of Incarceration on Mid-South Sociological Association Meetings. "Issues in Qualitative Research with Deviant Populations." Lafayette, LA,
- 1998 Chair of Panel on Grants and Funding, Student Affairs Committee. Presented at the American Society of Criminology, San Diego,
- 1997 "A Preliminary Analysis of Gender Differences in the Impact of Imprisonment on Children and Spouses of Drug Offenders." Presented at the Oklahoma Criminal Justice Research Consortium Meetings,
- 1997 "Trends in Psychiatric Diagnoses." Presented with Hank Vandenberg at the Southwestern Social Science Association Meeting, New Orleans, March.
- 1996 "Women, Injecting Drug Use and AIDS: The Social Bond and Needle-Risk Behaviors." Presented at the Southwestern Social Science Association Meeting, Houston, Texas.
- 1982 "The New Mexico State Penitentiary Riot: Davies' J-Curve Hypothesis Tested." Presented at the SSSA, Dallas, Texas.

### **COMMITTEES AND PROFESSIONAL ACTIVITIES:**

- 2017 External review, promotion to full, University of Regina
- 2015- **Board member, ReMerge**
- 2015- **Board member, Friends for Folks**
- 2016 Oklahoma's Incarcerated Women, AAUW of Central Oklahoma.
- 2016 Town Hall Meeting, OCU Law School, Presenter, Oklahoma's Women Prisoners, August 23, 2016
- 2016 Presentation, Incarcerated Women in Oklahoma and Their Children, UCC Norman, 5/1/2016
- 2016 Presentation, Ventures, Criminal Justice Reform, First Christian Church, Norman, OK, 4/3/16
- 2016 Presentation, NASW Oklahoma State Conference, "The Death Penalty: Myths, Facts, Current Reality and Opportunities," 3/4/16
- 2016 Presentation on "Oklahoma's Women Prisoners, Cleveland County Democrats, 2/19/16
- 2015 Presenter, Rehabilitation vs. Incarceration Panel, University of Central Oklahoma, 10/28/2015

2015 Presentation to Oklahoma Women's Commission Alternatives to Incarceration Committee, 9/21/2015

2015 Presenter, Oklahoma State Legislature, Interim Study on Women and Incarceration, 9/16/2015

2015 Presenter, Criminal Justice Reform Panel, Informed Citizens' Discussion Group, University of Oklahoma, 9/2/2015

2015 Presentation, West Wind Unitarian Universalist congregation, 1/25/2015

2015 External review, promotion to full, Arizona State University

2015 External review, promotion to full, Wright state University

2015 External review, promotion to full, University of North Carolina-Greenville

2015 External reviewer, tenure and promotion, University of Texas-Arlington

2015 External reviewer, tenure and promotion, Louisiana State University

2015 Manuscript review, *Criminal Justice & Behavior*

2015 Manuscript review, *Journal of Interpersonal Violence*

2015 Manuscript review, *Feminist Criminology* (3 manuscripts)

2015 Manuscript review, *Criminal Justice Studies* (2 manuscripts)

2015 Manuscript review, *Deviant Behavior* (4 manuscripts)

2015 Manuscript review, *Violence Against Women*

2015 CAPITOL Ideas, filming, Norman High School, April 8, 2015

**2015 Panel member, Scholars' Strategy Network Panel on Community Engagement, 4/6/15**

2015 Rose State Women's Leadership Conference, Presenter

**2015 Keynote Speaker, Oklahoma Commission on the Status of Women**

2015 Presentation, Incarcerated Women, First Christian Church, Norman, OK, 3/1/2015

2015 Presentation, S-CAP, Re-Entry, League of Women Voters, Norman, OK

**2014 Co-Chair, Division on Women and Crime 30<sup>th</sup> Anniversary**

2014 Reviewer, *Violence against Women*

2014 Reviewer, Elton S. Carter Award for Excellence in a Master's Thesis, University of Nebraska-Omaha

2014 Pre-revision Review, *DeathQuest*, Routledge

2014 Promotion dossier reviews, Arizona State University and Rutgers University

2014 Manuscript review, *Aggression and Violent Behavior*

2014 Review, *Teaching Criminology at the Intersections*, Routledge

2013- Continuing Education Council

2013-2015 Committee A, Department of Sociology

2013-2015 Graduate Admissions Committee, Sociology

**2013- Associate Editor, *The Criminologist***

2014 Dixon Scholarship Committee Chair

2013 Manuscript review, *Qualitative Sociology*

2013 Manuscript review, *Crime & Delinquency*

2013 Manuscript review, *Deviant Behavior* (5)

2013 Manuscript review, *Feminist Criminology*

2013 Book manuscript review, University of California Press

**2013-14 Guest Co-Editor, Special DWC 30<sup>th</sup> Anniversary Issue of *Feminist Criminology***

2013 Book manuscript review, University of California Press

2013 Manuscript review, *Journal of Contemporary Ethnography* (2)

2013 Pre-medical school interviews

2013 Pre-dental school interviews

2013 Dixon Scholarship Committee

2013-2015 Chair, Joseph K. Lester Foundation Board (renamed S-CAP, Inc.)

2012-14 Social Justice Committee member, Women's and Gender Studies

2012-13 Editorial Board, *Encyclopedia of Social Deviance*, Sage

2012-14 State of Oklahoma Children of Incarcerated Parents Advisory Board, Co-Chair

2012 Book manuscript review, Lexington Press

2012 Book manuscript review, University of California Press

2013 Book manuscript review, Oxford University Press  
 2012-2014 College of Arts and Sciences Executive Committee  
 2012 Manuscript review, *International Journal of Comparative and Applied Criminal Justice*  
 2012 Manuscript review, *Criminology*  
 2012 Manuscript review, *Justice Quarterly*  
 2012 Manuscript review, *Journal of Family Issues*  
 2012 Manuscript review, *Deviant Behavior*  
 2012 Review of research proposal for Central Michigan University  
 2012 Presentation to the Oklahoma Commission on Children and Youth commissioners, 1/17/2012  
 2011 Review of book manuscript, New England Universities Press  
 2011 Board of Advisors, Brave Woman  
 2011 Board of Advisors, Lighthouse Ministries  
 2011 Review, tenure and promotion dossier  
 2011 Review. Promotion dossier to full professor  
 2011 Review of manuscript, *Criminology*  
 2011 Review of manuscript, *Journal of Women, Politics & Policy*  
 2011 Review of manuscript, *Violence Against Women*  
 2011 Review of manuscript, *Feminist Criminology*, 2  
 2011 Review of manuscript, *Deviant Behavior*, 3  
 2011 Review of manuscript for book, Lynne Rienner Publishers  
 2011 Review of manuscript for book, Sage Publications  
 2011 Review of manuscript for book, Oxford University Press  
 2012-2013 **Program Co-Chair, 2013, American Society of Criminology**  
 2011- Board Member, East Main Place Homeless Program  
 2011-2012 Legislative Task Force on Children of Incarcerated Parents, State of Oklahoma  
 2010-2013 **Executive Board, American Society of Criminology**  
 2010 Reviewer, dossier for full professor, University of Missouri, Kansas City  
 2010 Reviewer, dossier for full professor, University of Central Florida  
 2010 Reviewer, Central Michigan State grant proposal  
 2010 Presenter, Career Day for WGS students, March 30, 2010  
 2010 Provosts' dissertation prize committee for humanities  
 2010 Review of manuscript, *Justice Quarterly*, 2 manuscripts  
 2010 Review of manuscript, *Journal of Contemporary Ethnography*  
 2010 Review of manuscript, *Feminist Criminology*, 4 manuscripts  
 2010 Review of manuscript, *Deviant Behavior*, 3 manuscripts  
 2009 **Chair, Outstanding Paper Award, *Feminist Criminology*, Division on Women and Crime, American Society of Criminology**  
 2009-2010 Chair, Graduate Committee, Women's & Gender Studies  
 2009-2011 Member, Dean's Executive Committee, College of Arts & Sciences  
 2009 4/10/2009, University of Tulsa, competition judge, Social Innovation Challenge  
 2009 Guest lecturer, Oklahoma State University  
 2009 2/11/2009 Brown Bag Presentation to Women's Studies, "Pathways into Crime of Oklahoma's Women Prisoners"  
 2009 Reviewer, Tenure dossier  
 2009 Reviewer, Full professor dossier  
 2009 Reviewer, *Crime & Delinquency*, 2 manuscripts  
 2009 Reviewer, *Deviant Behavior*, 4 manuscripts  
 2009 Reviewer, *Journal of Youth & Adolescence*, 1 manuscript  
 2009 Reviewer, *Justice Quarterly*, 1 manuscript  
 2009 Reviewer, *Feminist Criminology*, 5 manuscripts  
 2009 Reviewer, Book proposal, Lynne Rienner Press X2  
 2008-2010 Committee A, Women's & Gender Studies Program  
 2008 Book proposal review, NYU Press  
 2008-2009 **Associate Editor, Division on Women and Crime Newsletter**

2009, 2010 Nominee, Executive Board, American Society of Criminology  
 2008-2010 Fellow, Xenia Institute, Norman, OK  
 2008-2011 Campus Tenure Review Committee, University of Oklahoma  
 2008 **Outstanding Paper Award Committee Chair, Division on Women and Crime, American Society of Criminology**  
 2008-2010 Program Committee, Academy of Criminal Justice Sciences  
 2007-2008 **Outstanding Paper Award Committee, American Society of Criminology**  
 2008 Reviewer, *Justice Quarterly*, 2 manuscripts  
 2008 Reviewer, *Violence Against Women*, 1 manuscript  
 2008 Reviewer, *Criminal Justice Review*, 1 manuscript  
 2008 Reviewer, *Journal of Research in Crime & Delinquency*, 2 manuscripts  
 2008 Reviewer, *Feminist Criminology*, 10 manuscripts  
 2008 Reviewer, *Deviant Behavior*, 8 manuscripts  
 2008 Reviewer, *Gender Issues*, 1 manuscript  
 2008 Reviewer, tenure dossier  
 2007- Member, Governor's Transformation Advisory Board Criminal Justice Workgroup  
 2007-present **Associate Editor, *Deviant Behavior***  
 2007-present **Deputy Editor, *Feminist Criminology***  
 2006-2008 Committee A, Department of Sociology  
 2007 Reviewer, Book, New York University Press  
 2007 Reviewer, Book, Universities of New England Press  
 2007 Reviewer, *Criminology*, 1 manuscript  
 2007 Reviewer, *Criminology & Public Policy*, 1 manuscript  
 2007 Reviewer, *Deviant Behavior*, 5 manuscripts  
 2006 Reviewer, *Critical Criminology*, one manuscript  
 2006 Reviewer, *Journal of Offender Rehabilitation*, one manuscript  
 2006 Review, book proposal, Routledge Press UK  
 2006 External Reviewer, Tenure & Promotion (3)  
 2006 Oklahoma Task Force on Mental Health & Substance Abuse  
 2006 Referee, Guggenheim Foundation  
 2006 Task Force on Incarcerated Women in Oklahoma  
 2006 Panelist, Oklahoma Women's Summit, April 28, 2006, State Capitol  
 2006 Presentation, Oklahoma State-OKC Campus, Capital Punishment in Oklahoma  
 2006 Reviewer, National Science Foundation, one proposal  
 2006 Reviewer, *Deviant Behavior*, 3 manuscripts  
 2006 Reviewer, *Crime, Law & Social Change*, 1 manuscript  
 2006 Reviewer, book manuscript, *The Death Penalty*, Roxbury Press  
 2006 **Editorial board member, *Crime, Punishment, and the Law***  
 2005-2007 **Editor, *Feminist Criminology***, Sage Publications (journal of the Division on Women and Crime of the American Society of Criminology, launched 2005)  
 2005-2008 Honors Council Member, University of Oklahoma  
 2005 Presentation to the Oklahoma Board of Corrections on Incarcerated Mothers.  
 2005-2006 Executive Committee, Faculty Senate  
 2005 Visiting Lecturer, University of Massachusetts-Dartmouth, March 2005  
 2005 Panelist, Issues Day, March 31, 2005, St. Mary's Hall, San Antonio, Texas  
 2005-2007 Executive Committee, College of Arts and Sciences  
 2004-2006 Faculty Senator  
 2003-2007 Graduate Liaison, Department of Sociology, University of Oklahoma  
 2004-2009 Faculty Fellow, College of Liberal Studies  
 2003-2004 Executive Committee, College of Liberal Studies, University of Oklahoma  
 2004 Review of book, *Confronting Gangs*, Roxbury Press.  
 2004 Review of book, *Death Penalty in America*, Roxbury Press.  
 2004 Review of book, *Race and Crime*, Sage Publications.  
 2004 Review of manuscript, *Deviant Behavior*, three articles  
 2004 Review of manuscript, *Criminal Justice & Policy*, two articles  
 2004 Review of manuscript, *Justice Quarterly*

2004-2006 Review of three tenure dossiers  
 2004 Presentation to Oklahoma Mensa Society, Death Penalty in Oklahoma  
 2003 Presentation to Human Relations Chemical Dependency class on women, drugs & crime  
**2003-2005 Chair, Division on Women and Crime, American Society of Criminology**  
 2003 Member of IMPACT Committee of the Oklahoma Conference of Churches  
 2003 Presentation to legislative committee interim study on costs of capital punishment,  
 10/16/2003  
 2003 Visiting Scholar in Residence, Penn State Altoona, October 13-14, 2003.  
 2003 Presentation to Tulsa Public Defenders' Office on jury selection, October 10, 2003.  
 2003 Panel participant and workshop leader on capital punishment, Oklahoma Conference of  
 Churches Legislative Strategy Day, October 6, 2003  
 2003 Presentation to the Task Force on Incarceration of Women. 10/1/2003  
 2003 Presentation to Drug Policy Forum of Oklahoma, February 12  
 2003 Workshop, The Death Penalty, OK Conference of Churches' Day at the Legislature, 2/11  
 2003 Panelist, Freedom & Security, Oklahoma Conference of Churches'  
 Day at the Legislature, February 11  
**2003 Chair, External Awards Committee, Division on Women and Crime, American  
 Society of Criminology**  
**2002 Chair, Outreach Committee, Division on Women and Crime, American Society of  
 Criminology**  
 2002-03 College of Arts and Sciences Committee for Support of Teaching and Research  
 2002-2004 Chair, Oklahoma Coalition to Abolish the Death Penalty  
 2001-05 Alvin Terrell Dixon Scholarship Committee, College of Arts & Sciences  
 2001 Discussant, Section on Rehabilitative Programs, American Society of  
 Criminology Meetings  
 2001 Panel member, Death Penalty, Cameron University  
**2001-03 Executive Counselor, Division on Women and Crime, ASC**  
 2001 City of Norman Police Department, Public Relations Training 7/30-8/3/2001  
 2001 Guest Lecturer, Human Relations 5100, Grief Death & Dying, 6/26/2001  
 2001 Board Member & Vice Chair, Oklahoma Coalition to Abolish the Death Penalty  
 2001 Interview with NBC Nightly News, 4/17/2001  
 2001 Panel on Death Penalty, Criminal Justice Club, Univer. of Central Oklahoma, 4/10/2001  
 2001 Panel on Death Penalty, St. Andrew's Episcopal Church, Lawton, OK, 4/3/2001  
 2001 Panel on Death Penalty, 2<sup>nd</sup> Annual Oklahoma Buddhist Conference, 3/31/2001  
 2001 Guest lecture, Sociology of Gender  
 2001 Women's Studies Brown Bag Presentation, 10/10/2000  
 2000 Keynote speaker, Family Voices of Oklahoma, 9/12/2000  
**1999-2001 Editor, Newsletter for Division on Women & Crime, American Society of Criminology**  
 2000 Workshop for Oklahoma Conference of Churches  
 2000-2002 Culture Diversity Training, Norman Police Academy  
 2000 Session Chair, Honors Research Day, University of Oklahoma, April 8, 2000  
 1999-2002 Member, Task Force on Women and Prison, American Society of Criminology  
 1999-2001 Alternate, Provost's Committee on Women's Issues, University of Oklahoma  
 1998-2000 Member, Committee on Instructional Technology, Arts & Sciences, OU  
 1998-2002 Alpha Kappa Delta Faculty Sponsor  
 1999 Presentation to Families in Crisis, April 13, 1999, Oklahoma City  
 1999 Session Chair, Honors Research Day, University of Oklahoma, April 10, 1999  
 1999-2002 Reviewer, *Gender & Society*, *Free Inquiry in Creative Sociology*, *Deviant Behavior*, *Criminology*  
 1997-1999 Member, Committee A, Department of Sociology  
 1998-2001 Member, Candidate Screening & Selection Committee  
 1997-2001 Member, College of Arts and Sciences Computer Advisory Committee  
 1997-2002 Member, Graduate Studies Committee, Department of Sociology  
 1997-1998 Member, Student Affairs Committee, American Society of Criminology.  
 1997 Evaluator, Conference on Public Strategies for Private Prisons, OKC, November 2-4, 1997  
 1997 Annotated Bibliography, invited, for inclusion in *Theories of Deviance*, 5<sup>th</sup> edition,  
 edited by Stuart H. Traub and Craig B. Little. Itasca, IL: Peacock.



1996-97 University of Oklahoma, Campus Disciplinary Board  
 1996-97 University of Oklahoma, Adopted Faculty, Couch Center  
 1996-97 Reviewer, *Journal of Health and Social Behavior*  
 1996-97 Text Reviewer, Peacock Publishers

## **STUDENT MENTORING AND ADVISING:**

### **Sociology**

2000-2007 Faculty Mentor, McNair Scholars: Kim Riggs, Mary Monetatchi, KeYonna Wynn  
 1996-1999 Undergraduate Advising, University of Oklahoma  
 1999- Supervisor, Honor's Research, Cassandra Osteen, Deanna Rieder, Jeremy Flaming; Kelley Saylor, Diane Eason, Lara Gabbard, Tiffany Davis, Shelby McKinzey, Mary Wiles, Jessica Currie; Kynsey Lira, Diamond Andress, Jackson Oldham  
 2014- Doctoral Committee Chair, Melissa Jones, projected defense 4/2018  
 2014 Doctoral Committee Chair, Renee Phillip, projected defense 4/2018  
 2006- Doctoral Committee Chair, Barbara Ann Borden, **completed 9/2014**  
 2011- Doctoral Committee Chair, Ami Steams, **completed 5/2014**  
 2009-2014 Doctoral Committee Chair, Forrest Rodgers, **completed 7/2012**  
 2006-2009 Doctoral Committee Chair, Miyuki Fukushima, **completed 5/2009**  
 2008-2011 Doctoral Committee Chair, Jennifer Hartsfield, **completed 4/2011**  
 2004-2010 Doctoral Committee Chair, Juanita Ortiz, **completed 6/2010**  
 2003- 2011 Doctoral Committee Chair, Brenda Duverney Chappell, **completed 7/2011**  
 2004-2008 Doctoral Committee Chair, Meghan McGhee, **completed 4/2008**  
 2006-2007 Doctoral Committee Chair, Dennis Williams, **completed 12/2007**  
 2002-2006 Doctoral Committee Chair, Kristen Hefley, **completed 3/2006**  
 2001-2005 Doctoral Committee Chair, Hallie Stephens, **completed 7/2005**  
 2003-2005 Doctoral Committee Chair, Marguerite Keesee, **completed 7/2005**  
 2001-2004 Doctoral Committee Chair, Nicholas Dean, **completed 4/2004**  
 2002-2004 Doctoral Committee Chair, Sharla Colbert, **completed 8/2004**  
 1998-2002 Doctoral Committee Chair, Shawna Cleary, **completed 8/2002**  
 2001-2002 Doctoral Committee Chair, Dennis Brewster, **completed 9/2002**  
 2000-2001 Doctoral Committee Chair, Sharon Love, **completed 6/2001**  
 1997-2001 Doctoral Committee Chair, Nancy Sonleitner, **completed 3/2001**  
 1996-present Doctoral Committee Member: Vivian Carter, Shannon Carey, Alicia Limke, Markus Smith, Shannon Rios, Neal McNabb, Jenel Taylor, Corie Hammers, Jason Dunnington, Courtney Charish, Tara Shaw, Deanna Galvan, Derell Cox, Burle Steelman, Amber Cannon; Jenna Thomas, Kimberly Murray, Summer Jackson, Shannon Andersen, Jenna Thomas, James Mouser, Marshall Schmidt, Nancy Gonzalez  
 2013 Chair, Master's Committee, Melissa Jones, **completed 4/2014**  
 2009 Chair, Master's Committee, Emily Pain, **completed 4/2010**  
 2009 Chair, Master's Committee, Tiffany Davis, **completed 7/2010**  
 2009 Chair, Master's Committee, Ami Reeves, **completed 4/2010**  
 2008 Chair, Master's Committee, Emily Beer, **completed 4/2009**  
 2008 Chair, Master's Committee, Adrienne Brune, **completed 4/2009**  
 2007 Chair, Master's Committee, Sonya Conner, **completed 4/2008**  
 2007 Chair, Master's Committee, Jennifer Hartsfield, **completed 2/2008**  
 2007 Chair, Master's Committee, Katrina Matthews, **completed 4/2008**  
 2007 Chair, Master's Committee, Renee Phillip, **completed 4/2008**  
 2006 Chair, Master's Committee, Tosha Morris, **completed 12/2007**  
 2006 Chair, Master's Committee, James Mouser, **completed 4/2007**  
 2004 Chair, Master's Committee, Meghan McGhee, **completed 4/2004**  
 2003 Chair, Master's Committee, Jannina Darling, **completed 11/2003**  
 2003 Chair, Master's Committee, Kelly Woods Wright, **completed 5/2003**  
 2002 Chair, Master's Thesis Committee, Teressa Sorenson, **completed 4/24/2002**  
 2001 Chair, Master's Thesis Committee, Hallie Stephens, **completed 4/2001**  
 2001 Chair, Master's Thesis Committee, Cori Powell McComber, **completed 8/2001**

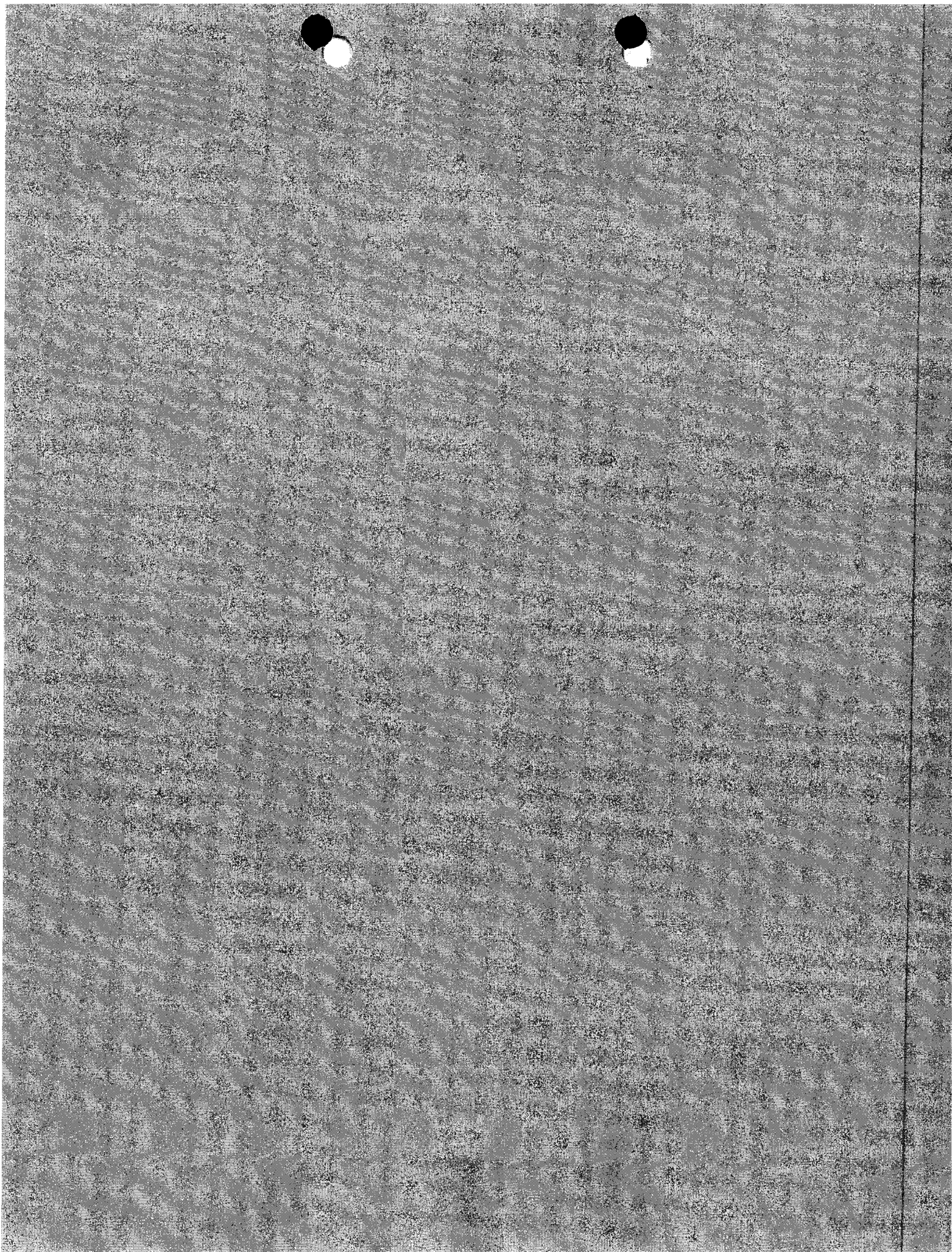
2000 Chair, Master's Thesis Committee, Laura Pointon, **completed 8/2000**  
 1999 Chair, Master's Thesis Committee, Dennis Brewster, **completed 1/2000**  
 1999 Chair, Master's Thesis Committee, Debra Simpson, **completed 8/2000**  
 1998 Chair, Master's Thesis Committee, Melissa Close, **completed 5/1998**  
 1997 Chair, Masters' Thesis Committee, Janetta Cox, **completed 6/1997**  
 1996-present Master's Committee Member, Kevin Morgan, Kim Kramer, Robert Bentley, Susanne Gebauer, Troy Elkins, Sharla Colbert, Shannon Carey, Kyle Gibbett, Jason Lawson, Miyuki Fukushima, Brian Head, Rachel Jones, Adrian Silva, Jennifer Cosgrove, Evan Chowning, Robinne Farrell, Abby Baker, Amy Miller  
 2004-2011 Doctoral Committee Chair, Laura J. Pointon, dropped out 7/2011  
 2004-present Doctoral Committee Chair, Kozetta Woodfork (withdrew)  
 2002-2004 Doctoral Committee Chair, Debra Simpson (withdrew for health reasons)  
 2002-2006 Chair, Master's Committee, Elaine Eriksen (quit)  
 2001 Chair, Master's Thesis Committee, Mary Monetatchi (quit)  
 1997-1998 Chair, Master's Thesis Committee, Beverley Blalock (quit)

### College of Liberal Studies

2001- Supervisor, Liberal Studies Study-In-Depth, R. Wagner, A. Rogers, M. Parker, P Caskill, M. Williams, K. Buffington, J.D. Davis, N. Rizzo, L. A. Lavers, G. McDonald, M. Motes; Michael Reeves, Ray Cook, Julie Summers, Amber Webb, Michael Smith, Kristi Olson, Tommy Sturdivant, Warren Garner, Lisa Everett, Arlene Fuchs, Jessica Hewitt, Renee McCoy, Ray Habrock, Beverly Long, Gina Merrell, Sandra Scott, Seth Davis, Vivian Pope, Megan Molidor, Tamika Bell, Elaine Williams  
 2011 Chair, CLS Master's Committee: Imelda Goosby, **completed**  
 2011 Member, CLS Master's Committee: Linda Brown, **completed**  
 2015 Member, CLS Master's Committee, Kevin Donovan  
 2015 Member, CLS Master's Committee, Erin Yeo  
 2007 Chair, Master's Committee, Amie Smith, CLS

### Organizational Leadership Ph.D.

2016-2017 Organizational Leadership, Doctoral Committee Chair, Marc Maxwell, **completed 2017**  
 2015- Organization Leadership Doctoral Committee Chair, Lisa Williams  
 2015- Organizational Leadership Doctoral Committee Chair, Lorie Khatod  
 2011-21017 Organizational Leadership Doctoral Committee Chair, Joseph Martinelli, **completed 2017**  
 2009-2016 Organizational Leadership Doctoral Committee Chair, Mark Hinds  
 2012-2016 Organizational Leadership Doctoral Committee Chair, Thom Acton  
 2007-2013 Organizational Leadership Doctoral Committee Chair, Ingrid de los Angeles, **completed 7/23/2013**  
 2007-2012 Organizational Leadership Doctoral Committee Chair, Lisa Fisher, **completed, April/2012**  
 2007-2010 Organizational Leadership Doctoral Committee Chair, Michael Pierce, **completed 12/2009**  
 2011-present Organizational Leadership Doctoral Committee Member: William Strauss, Robert Albino, Daniel Brush, Allen Cannon, Lisa Williams, Yasmin Rosa, Felicia Moore, Lindsey Bibus, Michelle Langderhen  
 2007-2013 Organizational Leadership Doctoral Committee Chair, Janeka Jones, stepped down



# **EXHIBIT B**

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IN THE DISTRICT COURT OF CLEVELAND COUNTY  
STATE OF OKLAHOMA

STATE OF OKLAHOMA, ex rel.,  
MIKE HUNTER, ATTORNEY GENERAL  
OF OKLAHOMA,  
Plaintiff,

vs. No. CJ-2017-816

- (1) PURDUE PHARMA, L.P.,
  - (2) PURDUE PHARMA, INC.,
  - (3) THE PURDUE FREDERICK COMPANY;
  - (4) TEVA PHARMACEUTICALS USA, INC.;
  - (5) CEPHALON, INC.;
  - (6) JOHNSON & JOHNSON;
  - (7) JANSSEN PHARMACEUTICALS, INC.;
  - (8) ORTHO-McNEIL-JANSSEN  
PHARMACEUTICALS, INC., n/k/a  
JANSSEN PHARMACEUTICALS, INC.;
  - (9) JANSSEN PHARMACEUTICA, INC.;
  - n/k/a JANSSEN PHARMACEUTICALS, INC.;
  - (10) ALLERGAN, PLC, f/k/a ACTAVIS PLC,  
f/k/a ACTAVIS, INC., f/k/a WATSON  
PHARMACEUTICALS, INC.;
  - (11) WATSON LABORATORIES, INC.;
  - (12) ACTAVIS LLC; and
  - (13) ACTAVIS PHARMA, INC.;
  - f/k/a WATSON PHARMA, INC.;
- Defendants.

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VIDEOTAPED DEPOSITION OF SUSAN F. SHARP, PH.D.  
TAKEN ON BEHALF OF THE DEFENDANTS  
ON APRIL 10, 2019, BEGINNING AT 9:01 A.M.  
IN OKLAHOMA CITY, OKLAHOMA

REPORTED BY:  
Lacy Antle, CSR, RPR  
Job No. 3281858  
Pages 1 - 127

1 Q How many days a week do you teach? 09:36:11  
2 A I teach on Tuesdays and Thursdays, and 09:36:13  
3 then I teach online, which is essentially daily. 09:36:16  
4 Q Do you teach online from the office or 09:36:19  
5 from home? 09:36:22  
6 A From home. 09:36:22  
7 Q What level course do you teach there at 09:36:27  
8 the university? 09:36:29  
9 A I teach a junior level course in the 09:36:29  
10 classroom and a graduate course online. 09:36:32  
11 Q Those are both sociology courses? 09:36:35  
12 A The graduate course is criminal justice. 09:36:37  
13 Q So how many hours during the week do you 09:36:39  
14 work? 09:36:44  
15 A That would vary from one week to the next. 09:36:46  
16 Q Is it a full 40-hour workweek? 09:36:48  
17 A No, sir. 09:36:50  
18 Q Can you estimate how much, average, you 09:36:52  
19 work per week? 09:36:56  
20 A That's a very difficult thing to answer as 09:36:58  
21 an academic because it depends on whether or not I'm 09:37:00  
22 working on a research paper, it depends on whether 09:37:04  
23 or not I'm -- I have a whole bunch of assignments to 09:37:07  
24 [REDACTED]  
25 [REDACTED]

1 [REDACTED] [REDACTED] [REDACTED]  
2 [REDACTED] [REDACTED] [REDACTED]  
3 [REDACTED] [REDACTED]  
4 [REDACTED] [REDACTED] [REDACTED]  
5 [REDACTED] [REDACTED] [REDACTED]  
6 And what are the articles that you're 09:37:31  
7 working on with the doctoral student? 09:37:36  
8 A I don't have names for them right now. 09:37:39  
9 Melissa will name them because she's first author. 09:37:42  
10 Q She's the doctoral student? 09:37:47  
11 A Former doctoral student. She's now Ph.D. 09:37:50  
12 Q What's her name again? 09:37:52  
13 A Melissa Sue Jones. 09:37:53  
14 Q And what are the topics of those articles? 09:37:55  
15 A Again, the topics have to do with intimate 09:37:57  
16 partner violence and women prisoners in a bunch of 09:38:00  
17 different ways, some focus on addiction, some focus 09:38:04  
18 on mental health. 09:38:08  
19 Q None of your current research addresses 09:38:18  
20 opioid addiction, correct? 09:38:19  
21 A Correct, not specifically. 09:38:21  
22 Q Reviewing your CV, you've not authored any 09:38:28  
23 books or articles specific to opioid addiction, have 09:38:33  
24 you? 09:38:36  
25 MS. BALDWIN: Object to the form. 09:38:37

1 THE WITNESS: That would be correct. 09:38:38  
2 Q (BY MR. JOHNSON) Or opioid related 09:38:40  
3 incarceration? 09:38:42  
4 A That would be incorrect. 09:38:43  
5 Q Okay. So you have articles in your CV 09:38:44  
6 relating to opioid incarceration? 09:38:46  
7 A Among other types of addiction. 09:38:49  
8 Q I'm sorry? 09:38:51  
9 A Among other types of addiction, I have 09:38:52  
10 articles that look at several different kinds of 09:38:54  
11 addiction that would not show in the title. 09:38:57  
12 Q Do you have any articles in your CV that 09:39:08  
13 are shown in the title to be opioid-addiction 09:39:10  
14 related articles? 09:39:17  
15 A No, sir. 09:39:18  
16 Q I didn't find the word "opioid" in your 09:39:19  
17 CV, is it located in your CV somewhere? 09:39:21  
18 MS. BALDWIN: Object to the form. 09:39:25  
19 THE WITNESS: Probably not, sir. 09:39:27  
20 Q (BY MR. JOHNSON) Have you authored any 09:39:42  
21 books or articles on the subject of public nuisance? 09:39:43  
22 A Again, I request a definition of public 09:39:48  
23 nuisance, since it's a legal term that I don't know 09:39:51  
24 the exact definition of. 09:39:54  
25 Q You would know whether you had an article 09:39:57



1 or a book or book chapter that had "public nuisance" 09:39:59  
2 in the title, correct? 09:40:02  
3 A The words -- 09:40:03  
4 MS. BALDWIN: Object to the form. 09:40:05  
5 THE WITNESS: The two words "public 09:40:06  
6 nuisance" are not in the title. 09:40:06  
7 Q (BY MR. JOHNSON) Of any of your research or 09:40:09  
8 your publications? 09:40:11  
9 MS. BALDWIN: Same objection. 09:40:12  
10 THE WITNESS: Again, they're not in the 09:40:12  
11 title under that term. 09:40:14  
12 Q (BY MR. JOHNSON) Have you ever received a 09:40:19  
13 grant to study opioid addiction? 09:40:20  
14 A I've received grants to study addiction. 09:40:25  
15 Q But not opioid addiction specifically? 09:40:28  
16 A Not to the exclusion of other addictions. 09:40:32  
17 Q Is there a specific article or book you 09:40:47  
18 have in your CV that would demonstrate your 09:40:51  
19 expertise on opioid addiction? 09:40:55  
20 A My expertise is on addiction, so what the 09:40:59  
21 reports, books and articles would show is addiction 09:41:03  
22 and in, I believe the majority of the reports to the 09:41:11  
23 State, opioid addiction would be addressed 09:41:15  
24 separately, just like methamphetamine would, just 09:41:19  
25 like alcohol abuse would. 09:41:21

1 Q Do you have any pharmacology training? 09:50:53  
2 A No, sir. 09:50:58  
3 Q You haven't done any counseling since 09:51:27  
4 being in Oklahoma, beginning in 1996, correct? 09:51:30  
5 A That is correct. 09:51:34  
6 MR. JOHNSON: Mind if we take a quick 09:52:08  
7 break? 09:52:10  
8 THE VIDEOGRAPHER: Off the record at -- 09:52:11  
9 off the record at 9:51 a.m. 09:52:13  
10 (Break taken from 9:51 a.m. to 9:59 a.m.) 09:52:15  
11 THE VIDEOGRAPHER: Back on the record at 10:00:53  
12 9:59 a.m. 10:00:54  
13 MR. JOHNSON: Do you have copies? 10:00:57  
14 MS. BALDWIN: So I need to make another 10:01:01  
15 one, actually, one of the paralegals is running down 10:01:03  
16 here, so I've got two and then I'll keep one. Well, 10:01:07  
17 actually, yeah, let me -- you guys can just hold off 10:01:12  
18 on that last copy. Oh, wait, I actually have 10:01:17  
19 another of this one. 10:01:25  
20 MR. JOHNSON: Can I see what we marked it 10:01:29  
21 as? 3 and 4. 10:01:31  
22 THE WITNESS: Yes. The list of 10:01:34  
23 publications is 4. 10:01:36  
24 Q (BY MR. JOHNSON) Okay. All right. 10:01:39  
25 Dr. Sharp, before we took a break you said that you 10:02:29

1 had looked at opioids and other types of addiction 10:02:37

2 [REDACTED]

3 [REDACTED]

4 [REDACTED]

5 [REDACTED]

6 [REDACTED]

7 [REDACTED]

8 [REDACTED]

9 [REDACTED]

10 [REDACTED]

11 [REDACTED]

12 [REDACTED]

13 [REDACTED]

14 [REDACTED]

15 [REDACTED]

16 [REDACTED]

17 [REDACTED]

18 [REDACTED]

19 [REDACTED]

20 [REDACTED]

21 [REDACTED]

22 [REDACTED]

23 [REDACTED]

24 [REDACTED]

25 [REDACTED]

1 [REDACTED] [REDACTED]  
2 [REDACTED] [REDACTED]  
3 [REDACTED] [REDACTED]  
4 [REDACTED] [REDACTED] [REDACTED]  
5 [REDACTED] [REDACTED]  
6 [REDACTED] [REDACTED] [REDACTED]  
7 [REDACTED] [REDACTED] [REDACTED]  
8 [REDACTED] [REDACTED] [REDACTED]  
9 [REDACTED] [REDACTED]  
10 [REDACTED] [REDACTED] [REDACTED]  
11 [REDACTED] [REDACTED] [REDACTED]  
12 [REDACTED] [REDACTED] [REDACTED]  
13 Q And it appears to me this document is a 10:04:42  
14 document where you've pulled information from your 10:04:47  
15 previous studies of incarcerated women and their 10:04:52  
16 children? 10:04:57  
17 A I pulled it from the datasets that were 10:04:57  
18 collected in the years listed. 10:04:59  
19 Q Right. So is the -- for example, the 10:05:01  
20 information on the first page, 2014, studying 10:05:05  
21 incarcerated women and their children, did you pull 10:05:09  
22 that data from the actual study? 10:05:13  
23 A I pulled it from the SPSS file of data. 10:05:16  
24 Q What's an SPSS file? 10:05:20  
25 A That's a data analysis file. So the way 10:05:22

1 it works is, if I administered a survey to everyone 10:05:26  
2 in this room, each answer would have a different 10:05:31  
3 place in a data file allowing me to make 10:05:34  
4 comparisons, contrasts, run statistics. An SPSS 10:05:38  
5 data file is a commonly used type of data analysis 10:05:48  
6 file. 10:05:51  
7 Q When did you view this data pull? 10:05:58  
8 A The data pull is in 2014. 10:06:00  
9 Q I mean, when did you go back and pull out 10:06:02  
10 the SPSS files? 10:06:04  
11 ■ [REDACTED] [REDACTED]  
12 Q And you did it as part of preparing your 10:06:10  
13 opinion in this case? 10:06:13  
14 A Yes, sir. 10:06:15  
15 Q And so, for example, for the 2014 study, 10:06:15  
16 you went -- you were trying to find information that 10:06:19  
17 might relate to opioids? 10:06:21  
18 A What I was actually trying to do was to 10:06:25  
19 look at the data over four different points in time 10:06:27  
20 and see if there had been changes in the 10:06:32  
21 incarceration of women for opioid use, non-heroin 10:06:36  
22 opioid use, as well as heroin use, so it was more 10:06:43  
23 going back and looking at these specific time points 10:06:46  
24 to see if there were any changes and then the number 10:06:51  
25 of children impacted. 10:06:53

1 Q When you did the study -- well, strike 10:06:55  
2 that. 10:06:58  
3 That wasn't part of your original purpose 10:06:59  
4 of the study, like, for example, in 2014? 10:07:02  
5 A Yes, it was. 10:07:09  
6 MS. BALDWIN: Object to the form. 10:07:10  
7 THE WITNESS: Okay. Yes, it was, or it 10:07:11  
8 would not have been in my questionnaire. That 10:07:14  
9 doesn't mean that everything that was in the 10:07:18  
10 questionnaire ended up in the report, because the 10:07:19  
11 legislature didn't want a 200-page report. 10:07:23  
12 Q (BY MR. JOHNSON) Okay. All right. So you 10:07:27  
13 -- so in order to essentially pull out the 10:07:28  
14 opioid-related data? Did I say that right? 10:07:34  
15 A That's one way of saying it. 10:07:38  
16 Q You had to go back and look at those 10:07:40  
17 questionnaire answers to be able to pull that data 10:07:43  
18 and analyze it regarding opioids? 10:07:47  
19 MS. BALDWIN: Object to the form. 10:07:49  
20 THE WITNESS: That's one way of 10:07:53  
21 characterizing it. 10:07:54  
22 Q (BY MR. JOHNSON) I just want to make sure I 10:07:55  
23 understand what you did. 10:07:56  
24 A What I did was what I would call data 10:07:57  
25 analysis with one of my variables being opioid use 10:08:02

1 Q (BY MR. JOHNSON) So for -- do you know, 10:19:12  
2 sitting here, how many women were in prison in 10:19:15  
3 Oklahoma in 2014? 10:19:18  
4 A Again, I would have to look at the study 10:19:20  
5 to see the exact number on that date, but it would 10:19:22  
6 be approximately nine times 367. 10:19:30  
7 Q What's the overall purpose of this 10:19:41  
8 Exhibit 3? 10:19:43  
9 A The only overall purpose of Exhibit 3 was 10:19:46  
10 to satisfy my curiosity of about the change in 10:19:49  
11 percentage of opioid users over a 10-year period. 10:19:55  
12 Q So it's -- are you showing that there's 10:20:00  
13 been increase in opioid abuse among women in prison 10:20:05  
14 in Oklahoma? 10:20:08  
15 A Of self-reported opioid use, yes, sir. 10:20:10  
16 Q And it's based on self-report of use of 10:20:12  
17 any opioid, other than heroin, correct? 10:20:18  
18 A Yes, sir. 10:20:20  
19 Q And give me the -- well, I don't know how 10:20:22  
20 to ask this, but what's the change in data from 2014 10:20:28  
21 -- I'm sorry, what's the change in data from 2004 10:20:32  
22 and 2014 percentage wise? 10:20:35  
23 A Well, approximately 10 percent reported 10:20:37  
24 opioid use at that level in 2004 and nearly doubled 10:20:41  
25 that in 2014. 10:20:45

1 Q So when you say -- or you conclude that in 10:20:47  
2 2014 19.1 percent of the women in the survey 10:20:50  
3 reported heavy opioid use, correct? 10:20:56  
4 A Yes, sir. Yes, sir. I think it's 10:20:59  
5 misleading to say that I concluded that. That's 10:21:01  
6 what the data showed. 10:21:04  
7 Q Is there or does this -- does your review 10:21:19  
8 of the data account for any changes in drug policy 10:21:26  
9 or sentencing policy from 2004 to 2014? 10:21:32  
10 A No, sir, it accounts for the people in 10:21:38  
11 prison. 10:21:40  
12 Q Is there data on the change in other -- 10:21:43  
13 the change in use of other drugs as well? 10:21:49  
14 A I did look at one other drug because it 10:21:51  
15 was a drug that's used frequently. 10:21:54  
16 Q What drug? 10:21:57  
17 A Methamphetamine. 10:21:58  
18 Q What was the change in meth from 2004 to 10:22:00  
19 2014? 10:22:03  
20 A Almost none. It was remarkably stable. 10:22:05  
21 Q But the overall point you're trying to 10:22:13  
22 make is that there's -- that the use of opioids 10:22:15  
23 other than heroin in women in prison in Oklahoma 10:22:21  
24 nearly doubled from 2004 to 2014? 10:22:24  
25 MS. BALDWIN: Object to the form. 10:22:27



1 Q (BY MR. JOHNSON) That's the point you're 10:22:28  
2 trying to make? 10:22:29  
3 A I wasn't trying to make a point. 10:22:30  
4 MS. BALDWIN: Same objection. 10:22:31  
5 THE WITNESS: I wasn't exactly trying to 10:22:32  
6 make a point. That's what I'm stating that the data 10:22:33  
7 show. 10:22:36  
8 Q (BY MR. JOHNSON) Okay. And this 10:22:38  
9 information wasn't included in your disclosure of 10:22:59  
10 opinions because it was done sometime after 10:23:02  
11 December 21st of 2018, correct? 10:23:04  
12 A Yes, sir. 10:23:09  
13 Q What is Exhibit 4? 10:23:14  
14 A Exhibit 4 is more for my reference than 10:23:18  
15 anything, certain articles that I looked at over the 10:23:22  
16 past month. 10:23:27  
17 Q Okay. These are articles you've reviewed 10:23:31  
18 since March 10th, approximately, correct? 10:23:33  
19 A Approximately. 10:23:39  
20 Q And what was the -- were you reviewing 10:23:40  
21 articles to prepare for your deposition? 10:23:43  
22 A In part. In part I wanted to see if there 10:23:46  
23 was any literature that stated any difference in -- 10:23:49  
24 my area of expertise is the impact on children and 10:23:53  
25 families and I was looking to see if there was any 10:23:56

1 literature that showed any differences in the impact 10:24:00  
2 of opioid use versus other kinds of drugs on 10:24:04  
3 children and families. 10:24:11  
4 Q And what did you find? 10:24:19  
5 A The majority of them, even including 10:24:23  
6 alcohol, said the same kinds of problems were 10:24:25  
7 detected in the offspring of people who abused any 10:24:30  
8 kind of substance, ranging from legal substances to 10:24:35  
9 illegal substances, which is the same thing that I 10:24:40  
10 focused on in my research. 10:24:44  
11 Q What do you mean by "kinds of problems"? 10:24:48  
12 A There is -- my research has been framed in 10:24:53  
13 the adverse childhood experiences literature. At -- 10:24:57  
14 the argument by Dr. Felitti and Dr. Anda is that 10:25:02  
15 things that happen to us in childhood, trauma that 10:25:08  
16 happens in childhood of certain types affects our 10:25:12  
17 health outcomes, our mental health outcomes, and our 10:25:16  
18 risky behavior in adulthood and so all my research 10:25:19  
19 has been framed around that since 2004. 10:25:25  
20 Q So you're basically of the opinion that 10:25:44  
21 chaotic childhood experiences or damaging childhood 10:25:49  
22 experiences are more significant than the actual 10:25:53  
23 substance used of a person that experienced the 10:26:00  
24 problems? Does that make sense? 10:26:06  
25 MS. BALDWIN: Object to the form. 10:26:09

1 THE WITNESS: I'm a little confused what 10:26:09  
2 you're asking. 10:26:11  
3 Q (BY MR. JOHNSON) As between chaotic and 10:26:15  
4 damaging childhood experiences and the specific 10:26:17  
5 substance used or abused, the one that's more 10:26:21  
6 significant to you or more important to you is the 10:26:26  
7 chaotic childhood experience? 10:26:28  
8 A The research -- 10:26:30  
9 MS. BALDWIN: Object to the form. 10:26:31  
10 THE WITNESS: The research that I have 10:26:31  
11 reviewed has and my research, have all indicated it 10:26:33  
12 doesn't really matter so much what substance is 10:26:38  
13 abused as the fact that it occurs, and there are 10:26:41  
14 certain things you see happen in children, depending 10:26:45  
15 on their age and problems that they develop in 10:26:48  
16 adulthood as well. 10:26:51  
17 Q (BY MR. JOHNSON) And these articles in 10:27:01  
18 Exhibit 4 are they all articles you found in your 10:27:02  
19 review of literature since beginning in March? 10:27:06  
20 A I read on a regular basis, because I'm 10:27:14  
21 also teaching two classes on women and crime and the 10:27:17  
22 impacts on their family, so it would be really hard 10:27:20  
23 for me to separate out and say that I haven't read 10:27:23  
24 anything other than these, but these are particular 10:27:26  
25 ones that I thought were noteworthy. 10:27:29

1 It is part of Number 4, actually. 10:29:14

2 Q Paragraph 6 is a description of the 10:29:26

3 article in Paragraph Number 4? 10:29:28

4 A Yes, sir, I just stuck 5 in there because 10:29:30

5 I looked it up at that point in time and then I went 10:29:34

6 back to summarizing 4 and I numbered them just so I 10:29:37

7 would see separation, not that it makes any... 10:29:42

8 Q Okay. I just -- I'm trying to understand. 10:29:48

9 A Yeah, they're just my notes of things I 10:29:50

10 looked at. 10:29:52

11 Q Okay. 10:29:53

12 A That I considered noteworthy. 10:29:56

13 Q Of these 11 articles -- or 10 articles, I 10:30:31

14 guess, you mentioned that article Number 5 has data 10:30:34

15 specific to Oklahoma; are there any other articles 10:30:39

16 that have data specific to Oklahoma in them? 10:30:43

17 A No, sir, most of it either has national 10:30:46

18 data or, in some cases, data from other countries. 10:30:49

19 The point of the articles was not anything specific 10:30:55

20 to either opioids or to Oklahoma. The point of the 10:30:59

21 articles all was the impact on children of abusing 10:31:04

22 various kinds of substances. So from my 10:31:07

23 perspective, the more different places that find the 10:31:10

24 same thing, the more competence I have in that 10:31:13

25 finding. 10:31:17

1 Q Going back to Exhibit 3, I just want to 10:31:48  
2 confirm for the record here my understanding of what 10:31:50  
3 this is, if I went back and found your 2014 10:31:53  
4 published study, right, which would be the Oklahoma 10:32:04  
5 study of incarcerated mothers and their children 10:32:14  
6 2014, that's what that is, right? 10:32:17  
7 A Yes, sir. 10:32:19  
8 Q The data that you report in Exhibit 4, 10:32:20  
9 that's not included in the 2014 study, correct? 10:32:24  
10 A No, sir. 10:32:29  
11 Q Because you have gone back and looked at 10:32:29  
12 the underlying data and provided some of that 10:32:31  
13 analysis? 10:32:34  
14 A Yes, sir. Again, that's a summary 10:32:35  
15 document for legislators and commissioners of a 10:32:36  
16 state agency. 10:32:40  
17 Q And none of the underlying data in any of 10:32:41  
18 the studies from 2004 to 2014 is specific to 10:32:48  
19 prescription opioids, correct? 10:32:57  
20 MS. BALDWIN: Object to the form. 10:32:59  
21 THE WITNESS: That's correct. The state 10:33:00  
22 -- the term is opioids, other than -- 10:33:02  
23 Q (BY MR. JOHNSON) Other than heroin? 10:33:07  
24 A -- heroin. 10:33:08  
25 Q Okay. Your -- the data in Exhibit 3, 10:33:08

1 you're not using that to opine that -- well, strike 10:33:57  
2 that. Let me make sure I'm understanding you. 10:34:06  
3 Let me ask it this way. You're not 10:34:29  
4 providing the expert opinion about the relationship 10:34:31  
5 between opioids and the incarceration of women, 10:34:35  
6 correct? 10:34:37  
7 MS. BALDWIN: Object to the form. 10:34:38  
8 THE WITNESS: No, sir. I'm expected to 10:34:39  
9 testify about the impact on children and families. 10:34:42  
10 Q (BY MR. JOHNSON) Okay. 10:34:48  
11 A This is tangential. 10:34:50  
12 Q You do not have training in statistics, 10:34:59  
13 correct? 10:35:02  
14 A I have a lot of training in statistics. 10:35:02  
15 Q Okay. As part of your sociology training? 10:35:04  
16 A Yes, sir. 10:35:07  
17 Q You wouldn't call yourself a statistician? 10:35:09  
18 MS. BALDWIN: Object to the form. 10:35:12  
19 THE WITNESS: I wouldn't call myself a 10:35:12  
20 statistician. I would call myself someone who's 10:35:14  
21 proficient in statistics. I've taught it. 10:35:19  
22 Q (BY MR. JOHNSON) All right. Let's look at 10:35:49  
23 Exhibit 2 again, is your opinion disclosure, the 10:35:50  
24 first part of Exhibit 2, it's called Exhibit T, 10:35:58  
25 correct, the front page of it? 10:36:01

1 A Yes, sir. 10:36:04

2 Q And do you know why it's called "Exhibit 10:36:04

3 T"? 10:36:06

4 A I would assume that it came after Exhibit 10:36:07

5 S, but that's just an assumption. 10:36:10

6 Q And before U, before Exhibit U? 10:36:13

7 So Exhibit T is the disclosure of your 10:36:18

8 opinions in this case, correct? 10:36:21

9 A That is correct. 10:36:24

10 Q And when was this prepared? 10:36:24

11 A I don't know exactly when this was 10:36:29

12 prepared. I met in December with the attorneys, I 10:36:30

13 don't know when this was exactly typed up. 10:36:36

14 Q Did you type up any of Exhibit T? 10:36:38

15 A No. 10:36:40

16 Q These are your opinions that you provided 10:36:41

17 to the attorneys and then they prepared the 10:36:43

18 disclosure document? 10:36:45

19 A My opinions, my expertise, what my 10:36:46

20 research is about. 10:36:50

21 Q But the attorneys for the State actually 10:36:52

22 prepared Exhibit T, correct? 10:36:54

23 MS. BALDWIN: Object to the form. 10:36:56

24 THE WITNESS: That's correct. 10:36:57

25 Q (BY MR. JOHNSON) Did you review a draft of 10:36:58

1 Exhibit T? 10:37:00  
2 [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
3 [REDACTED] [REDACTED] [REDACTED]  
4 [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
5 [REDACTED] [REDACTED]  
6 [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
7 [REDACTED] [REDACTED] [REDACTED]  
8 Q Do you believe, sitting here today, you 10:37:17  
9 looked at a draft of Exhibit T before it was 10:37:21  
10 finalized? 10:37:24  
11 A Yes. 10:37:25  
12 Q And do you recall making any changes to 10:37:26  
13 your -- to the draft of Exhibit T? 10:37:30  
14 A No, it reflects accurately. 10:37:32  
15 Q Exhibit T includes all of your opinions, 10:37:36  
16 correct? 10:37:39  
17 A Not all of my opinions. It includes what 10:37:40  
18 I'm expected to testify about. 10:37:43  
19 Q What opinions are not included on Exhibit 10:37:45  
20 T? 10:37:47  
21 A I have a lot of opinion on a lot of 10:37:49  
22 things, you're going to have to narrow it down a 10:37:51  
23 little bit for me. 10:37:53  
24 Q Can you think of any opinions that you 10:37:55  
25 have in this case that are not listed in Exhibit T? 10:37:57



1           A     Just, I guess, go back to Exhibit 3, that 10:38:02  
2     I now have the opinion, after comparing the data 10:38:06  
3     from 2004 to 2014, that there was an increase in 10:38:09  
4     women incarcerated in the state of Oklahoma for use 10:38:13  
5     of opioids, other than heroin. 10:38:18  
6           Q     I thought you told me earlier, and I may 10:38:22  
7     have misunderstood, but you were not providing an 10:38:25  
8     expert opinion on the relationship between heroin -- 10:38:29  
9     I mean, sorry, prescription opioid use and 10:38:32  
10    incarceration of women in Oklahoma? 10:38:35  
11           MS. BALDWIN: Object to the form. 10:38:37  
12           Q     (BY MR. JOHNSON) Did I misunderstand that? 10:38:37  
13           A     I don't think I was asked that 10:38:39  
14    specifically. I'm a little confused at this point. 10:38:41  
15           Q     I may be also. I thought you had told me 10:38:45  
16    earlier you are not testifying as an expert that 10:38:48  
17    there's been -- that there's a relationship between 10:38:51  
18    prescription opioids and an increase in 10:38:57  
19    incarceration from 2004 to 2014 of women? 10:39:00  
20           MS. BALDWIN: Object to the form. 10:39:04  
21           THE WITNESS: No, that's not the focus of 10:39:05  
22    my testimony. This just was additional information 10:39:06  
23    that helped me understand. 10:39:11  
24           Q     (BY MR. JOHNSON) So are you saying, as an 10:39:13  
25    expert here today, that prescription opioids have 10:39:14

1 caused an increase in incarceration of women over 10:39:17  
2 the years in Oklahoma? 10:39:21  
3 MS. BALDWIN: Object to the form. 10:39:23  
4 THE WITNESS: I'm not in the position to 10:39:23  
5 give that kind of opinion. 10:39:25  
6 Q (BY MR. JOHNSON) Okay. All right. I 10:39:27  
7 understand. 10:39:28  
8 Paragraph A of Exhibit T lists the subject 10:39:33  
9 matters of your opinion, and you've told us here 10:39:37  
10 today already that you're focusing on the impact of 10:39:40  
11 parental opioid addiction and/or opioid related 10:39:43  
12 incarceration, correct? 10:39:47  
13 A That is correct. 10:39:48  
14 Q Let me ask you about Paragraph A here, how 10:39:49  
15 do you define "parental opioid addiction"? 10:39:55  
16 A That would be reported dependence by a 10:39:59  
17 parent of a child. 10:40:03  
18 Q And how do you -- where is that 10:40:16  
19 information located, where is the data that 10:40:21  
20 indicates reported dependence on opioids? 10:40:25  
21 A That's a confusing question. 10:40:29  
22 Q Sorry. Let me try to rephrase it. 10:40:31  
23 Is there data that you rely on to study 10:40:35  
24 how many -- well, strike that. 10:40:46  
25 We're talking about people incarcerated in 10:40:51

1 Oklahoma, correct? 10:40:53

2 A Yes, sir. 10:40:56

3 Q And you're looking at people that are 10:40:56

4 incarcerated that have opioid addiction, correct? 10:41:04

5 A I'm looking at the impact of addiction on 10:41:07

6 the families. 10:41:12

7 Q And so how do we determine who is -- which 10:41:12

8 parents have opioid addiction and -- right? 10:41:16

9 A Okay. 10:41:21

10 Q And so you have to look at reported 10:41:21

11 dependence on opioids? 10:41:23

12 A No, sir. If you go back to this document, 10:41:26

13 Exhibit 4. 10:41:30

14 Q Okay. 10:41:30

15 A One of the things that -- the reasons that 10:41:31

16 I looked at those articles was looking to see if 10:41:33

17 there was any difference -- and I believe I've 10:41:35

18 stated this -- any difference in the impacts of any 10:41:38

19 kind of substance abuse, regardless of what the 10:41:42

20 substance was. And I found no reported differences, 10:41:47

21 they all reported, regardless of what substance they 10:41:51

22 were looking at, the same kinds of impacts on 10:41:54

23 children and families, so I don't really need data 10:41:58

24 specific to opioids to answer what I'm an expert on. 10:42:01

25 Q Okay. So what you're saying is the impact 10:42:06

1 of parental drug addiction is really what you've 10:42:11  
2 looked at? 10:42:17  
3 MS. BALDWIN: Object to the form. Is 10:42:21  
4 there a question? 10:42:24  
5 Q (BY MR. JOHNSON) I mean, you've looked at 10:42:25  
6 data that addresses addiction to all kinds of drugs 10:42:26  
7 of people that are incarcerated in Oklahoma, 10:42:32  
8 correct? 10:42:34  
9 A Yes, sir. I've also looked at research by 10:42:35  
10 other people, separating out different kinds of 10:42:38  
11 drugs and the impact and they all say the same 10:42:44  
12 thing, that the impact, regardless of the substance 10:42:50  
13 abused, is the same. 10:42:53  
14 Q But none of those articles or research 10:42:55  
15 specifically addresses opioid addiction? 10:42:58  
16 A No, some of them. 10:43:01  
17 Q And they're listed on Exhibit 4? 10:43:02  
18 A They may or may not be listed here. 10:43:04  
19 Again, these are my notes to myself about things 10:43:05  
20 that caught my attention. 10:43:08  
21 Q So kind of back to what I was trying to 10:43:14  
22 ask about earlier, which my original question was: 10:43:16  
23 How do you define "parental opioid addiction," is it 10:43:18  
24 based on what people that are incarcerated report in 10:43:23  
25 questionnaires? 10:43:29

1           A     It's based on what people report, it's           10:43:30  
2 based -- if I'm talking about my data, it's based on 10:43:34  
3 self-report. If I'm talking about what the research 10:43:37  
4 shows, then it's what other researchers have found 10:43:40  
5 and reported. And again, from my perspective, the 10:43:45  
6 most important thing that I found, looking at a 10:43:50  
7 bunch of different articles, was that it -- that 10:43:53  
8 regardless of what substance was being used, the 10:43:56  
9 impact on children and on families was the same. 10:43:59

10           Q     The impact of opioid addiction on the 10:44:05  
11 lives of children and families in Oklahoma is the 10:44:09  
12 same as the impact of alcohol addiction on the lives 10:44:11  
13 of children and families in Oklahoma, correct? 10:44:16

14           A     Yes, sir, you see the same thing if you 10:44:18  
15 use the ACE studies to frame your research or your 10:44:20  
16 questions, you see the same kinds of problems. 10:44:26  
17 There's a considerable literature out there -- and 10:44:28  
18 I'm not talking about medical problems, I'm talking 10:44:31  
19 about mental health and behavioral problems, there's 10:44:33  
20 a considerable literature out there that would be 10:44:37  
21 many, many, many pages of just listing titles that 10:44:40  
22 looks at alcohol specific, that looks at opioids 10:44:44  
23 specific, that looks at methamphetamine and they all 10:44:48  
24 show the same kind of impacts on children and 10:44:51  
25 families. 10:44:53

1 Q Which of those articles that discuss 10:44:54  
2 opioid addiction are listed in Exhibit 4? 10:44:59  
3 A I'm not sure if I put any in Exhibit 4. 10:45:06  
4 Again, that wasn't the purpose of this piece of 10:45:09  
5 paper, it was just something -- articles I wanted to 10:45:11  
6 remember about the impact on families in general, 10:45:14  
7 because I'd already answered the question to myself 10:45:18  
8 that it didn't matter whether it was prescription 10:45:21  
9 drugs, alcohol or illegal drugs, you still see the 10:45:24  
10 same syndrome in children. 10:45:28  
11 Q Your subject matter for this case, though, 10:45:33  
12 is the impact of opioid addiction, correct? So I'm 10:45:35  
13 just interested in if you relied on specific article 10:45:41  
14 or study that addressed the impact of opioid 10:45:46  
15 addiction -- 10:45:49  
16 A Again -- 10:45:50  
17 MS. BALDWIN: Object to the form. 10:45:51  
18 Q (BY MR. JOHNSON) -- in developing these 10:45:51  
19 studies or these exhibits? 10:45:53  
20 A Again, I cannot separate out opioid 10:45:54  
21 addiction because the literature shows there's no 10:45:56  
22 difference, so I can't separate it out and say it's 10:45:59  
23 different from. 10:46:04  
24 Q You said that there's considerable 10:46:16  
25 literature out there in the world, many, many, many 10:46:17

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1 pages of just listing titles that looks at all 10:46:19  
2 specific and it looks at opioid specific, what -- 10:46:22  
3 can you identify any specific literature that looks 10:46:28  
4 at opioids that you've reviewed? 10:46:30  
5 A I'd have to go home and look on my 10:46:32  
6 computer and see what all I have saved on computer. 10:46:35  
7 Q And since this is an opioid-specific 10:46:37  
8 opinion that you're providing here today, if you 10:46:39  
9 reviewed an opioid-specific article, you probably 10:46:43  
10 would have included it in this Exhibit 4, correct? 10:46:47  
11 MS. BALDWIN: Object to the form. 10:46:49  
12 Mischaracterizes testimony. 10:46:49  
13 THE WITNESS: Exhibit 4 wasn't intended to 10:46:54  
14 be an exhibit or even brought into this room 10:46:55  
15 originally, it was some things that I wrote down. 10:46:58  
16 Lisa told me I could write down titles of things to 10:47:03  
17 refresh my memory, that's what I did. I didn't 10:47:08  
18 prepare for the question you're asking, so that's 10:47:10  
19 why I don't have that list. 10:47:13  
20 Q (BY MR. JOHNSON) In Exhibit T, or Exhibit 2 10:47:48  
21 to your deposition, Paragraph A, the subject of your 10:47:51  
22 testimony you refer to opioid related incarceration, 10:47:54  
23 what does that mean? 10:47:58  
24 A It would mean incarceration for crimes 10:48:00  
25 related to opioid use. 10:48:02

1 Q Would those include heroin crimes? 10:48:04  
2 A No. 10:48:07  
3 Q So how did -- so did you -- what data did 10:48:07  
4 you look at -- 10:48:14  
5 A Again -- 10:48:17  
6 Q -- for opioid-related incarceration? 10:48:17  
7 A Again, I have to keep saying the same 10:48:20  
8 thing, all the literature -- I mean, if you are in 10:48:21  
9 prison on a drug related crime, even the Department 10:48:26  
10 of Corrections doesn't separate out and say, "We're 10:48:29  
11 going to treat those in for opioid-related crimes 10:48:34  
12 versus those in for meth crimes differently," 10:48:38  
13 they're all charged with possession or distribution 10:48:41  
14 of a CDS, so it's not separated out, nor is the 10:48:44  
15 impact separated out. So if your parent is in jail 10:48:52  
16 for, or in prison for, the use of a prescribed drug 10:48:57  
17 that they abused, it's going to have the same impact 10:49:04  
18 on the family as if they're in for anything else, 10:49:07  
19 so... 10:49:12  
20 Q Like heroin? 10:49:13  
21 A Like heroin, like methamphetamine, like 10:49:14  
22 anything they were in prison for, it's going to 10:49:17  
23 impact the family. 10:49:19  
24 Q Right. So you can't say that there's -- 10:49:20  
25 you know, you can't differentiate on the impact of 10:49:24



1 children and family of prescription opioids versus 10:49:30  
2 heroin? 10:49:33  
3 A The impact of drug use on families is the 10:49:33  
4 same. 10:49:36  
5 Q Okay. All right. Looking at Paragraph B 10:49:42  
6 of your disclosure, your first sentence there 10:49:46  
7 provides the opinion that, "The two most common 10:50:07  
8 reasons for female incarceration in Oklahoma are: 10:50:11  
9 One, possession of CDS; and two, trafficking or 10:50:13  
10 manufacturing of CDS," correct? 10:50:19  
11 A That's correct. 10:50:23  
12 Q And that is derived from official DOC 10:50:24  
13 data, correct? 10:50:29  
14 A Correct. 10:50:31  
15 Q Well, and self-report data from 10:50:32  
16 incarcerated women? 10:50:34  
17 A Yeah, I mean, you get the exact same 10:50:35  
18 thing. 10:50:37  
19 Q What do you mean by that? 10:50:39  
20 A If you ask a woman why she's in prison, 10:50:40  
21 she's going to list the same crime as Department of 10:50:43  
22 Corrections lists for her to be in prison. 10:50:45  
23 Q Okay. And where is that Department of 10:50:50  
24 Corrections data that you reviewed? 10:50:53  
25 A Well, at the time it was on their website. 10:50:56

1 They've taken a lot of it off under a new director. 10:50:58  
2 I also regularly got data from Dr. Pitman, as she's 10:51:07  
3 in charge of data management for DOC. 10:51:11  
4 Q So is this -- is this first sentence here 10:51:14  
5 about, "The most common reasons for female 10:51:21  
6 incarceration," is it limited to any specific dates? 10:51:23  
7 A That's been a consistent fact in this 10:51:28  
8 state for at least a decade. 10:51:32  
9 Q So at least going back to 2009, the most 10:51:40  
10 common reasons for female incarceration has been 10:51:43  
11 possession of CDS and/or trafficking or 10:51:48  
12 manufacturing? 10:51:51  
13 A Yes, sir. 10:51:52  
14 Q Can you be any more specific than the 10:52:15  
15 Department of Corrections website or information 10:52:18  
16 from Dr. Pitman? 10:52:20  
17 A Department of Corrections used to keep 10:52:22  
18 data, both daily count data and annual data, on the 10:52:24  
19 website. They no longer have it up there, or didn't 10:52:32  
20 the last time I looked. 10:52:35  
21 Q And how was the data provided when you 10:52:39  
22 prepared this disclosure, was it like percentages of 10:52:41  
23 women that had -- 10:52:45  
24 A Most common offenses. 10:52:47  
25 MS. BALDWIN: Object to the form. 10:52:49

1 THE WITNESS: A list of most common 10:52:49  
2 offenses. 10:52:51  
3 MS. BALDWIN: Sorry, Dr. Sharp. 10:52:53  
4 Object to the form. 10:52:55  
5 THE WITNESS: Again, a list of most common 10:52:56  
6 offenses. Dr. Pitman also put out reports in 2009 10:52:58  
7 and 2010 where she listed that fact. 10:53:02  
8 Q (BY MR. JOHNSON) Where would I find 10:53:13  
9 Dr. Pitman's report? 10:53:14  
10 A I don't know anymore since they took them 10:53:15  
11 all down. 10:53:17  
12 Q So it was something that was sourced on 10:53:18  
13 the Department of Corrections' website? 10:53:20  
14 A Yes, sir, it was -- she was the deputy 10:53:23  
15 director of female offender management division 1, 10:53:26  
16 so her role was to gather that data and present it. 10:53:30  
17 Q Okay. The next sentence in your 10:53:35  
18 disclosure says, "Children of incarcerated and 10:53:43  
19 addicted women are quite likely to experience a 10:53:46  
20 number of adverse childhood experiences, or ACEs," 10:53:49  
21 that's consistent with what you testified to earlier 10:53:52  
22 about adverse childhood experiences, correct? 10:53:57  
23 A That is correct. 10:54:02  
24 Q And that's based on your previous research 10:54:07  
25 and studies, that sentence is? 10:54:10

1           A     It's based, not just on my own, but on a     10:54:13  
2     lot of different articles and things that I've read,     10:54:16  
3     including most of the research by Dr. Vincent             10:54:19  
4     Felitti and Dr. Robert Anda and their colleagues who     10:54:22  
5     did a study of 17,000 people with Kaiser Health         10:54:29  
6     Insurance in California.                                     10:54:33  
7           Q     Do you refer that -- how do you say that,     10:54:34  
8     ACEs or A-C-Es?   10:54:37  
9           A     ACEs is what people normally say.             10:54:40  
10           THE VIDEOGRAPHER: Doctor, I'm having a             10:54:50  
11     hard time hearing because I know you're pulling on     10:54:51  
12     your microphone. Thank you.                                 10:54:53  
13           Q     (BY MR. JOHNSON) And in the next sentence     10:55:36  
14     of your disclosure defines what ACEs are, correct?     10:55:38  
15     Where it says, "ACEs include"?                             10:55:43  
16           A     It doesn't -- yeah, it lists some of the     10:55:45  
17     ACEs, in fact, it lists all 10.                             10:55:47  
18           Q     And then it says, "The high likelihood         10:55:58  
19     that children will experience a number of ACEs in         10:56:01  
20     turn increases the likelihood that children will         10:56:04  
21     suffer from depression and physical health problems     10:56:08  
22     and even develop substance abuse problems themselves     10:56:08  
23     as they age," what is that sentence based on?             10:56:11  
24           A     That sentence is based on my own research     10:56:15  
25     and research of others.                                     10:56:16

1           The purpose of Exhibit 4 was not to be           10:58:48  
2 data of any kind, it was to refresh my memory about   10:58:53  
3 some of the research on impacts on families.           10:58:56  
4           Q    (BY MR. JOHNSON) But there's research out   10:59:05  
5 there that addresses the impact of prescription       10:59:06  
6 opioid addiction on children and families?           10:59:12  
7           A    Yes, sir, there's a limited amount of       10:59:16  
8 research out there.                                       10:59:18  
9           Q    And you didn't list that in Exhibit 4?       10:59:18  
10          A    No.   10:59:21  
11          Q    Why not?                                     10:59:21  
12          A    I didn't bring Exhibit 4 to testify about   10:59:22  
13 in any way.   10:59:26  
14          Q    Okay. And you can't tell us the cite to    10:59:27  
15 or identify the title of any of that literature       10:59:32  
16 today, correct?   10:59:35  
17          A    No. I can tell you that I used Google       10:59:36  
18 Scholar and I used JSTOR to look for literature.       10:59:39  
19          Q    And how would you type a search in Google   10:59:45  
20 Scholar to look for literature in this case?           10:59:47  
21          A    "Impact of opioid addiction," "impact of     10:59:51  
22 prescription drug dependence on children," a lot of    10:59:54  
23 different ways, whatever strikes me at the moment as   11:00:00  
24 the most useful way to get to whatever part of the     11:00:05  
25 question I want to answer.                             11:00:08

1 Q Okay. Looking at the last sentence of 11:00:10  
2 Paragraph B of your disclosure, "Children of 11:00:13  
3 opioid-related incarcerated parents are three times 11:00:22  
4 more likely to become addicted themselves," it's the 11:00:25  
5 first part of the sentence, correct? 11:00:29  
6 A Yes, sir. 11:00:31  
7 Q Where is that data from? 11:00:32  
8 A That data is from a variety of different 11:00:34  
9 studies. Again, it's based on the fact that 11:00:37  
10 research shows that, regardless of what drug is 11:00:41  
11 being abused, that you get the same outcomes. 11:00:44  
12 Q So when you say "opioid-related 11:00:48  
13 incarcerated parents," that includes any type of 11:00:51  
14 opioid, including heroin, correct? 11:00:53  
15 MS. BALDWIN: Object to the form. 11:00:57  
16 THE WITNESS: It would -- it actually 11:01:00  
17 could just say "drug related," but since the lawsuit 11:01:03  
18 is about opioids, the term "opioids" is in there. 11:01:06  
19 Q (BY MR. JOHNSON) Right. So the literature 11:01:09  
20 actually, you know, supports the -- your -- well, 11:01:14  
21 where you say, in your opinion, the children of 11:01:23  
22 opioid-related incarcerated parents are three times 11:01:26  
23 more likely to become addicted themselves, what you 11:01:29  
24 really refer to is literature that is not limited to 11:01:33  
25 opioids, correct? 11:01:39

1           A     Partially correct. The rest of the answer 11:01:41  
2     would be that the literature also indicates that,     11:01:43  
3     regardless of what type of substance is abused, you 11:01:47  
4     get the same outcomes.                                     11:01:51  
5           Q     Okay. So there's not a piece of             11:01:53  
6     literature that refers specifically to                   11:01:55  
7     opioid-related incarcerated parents?                    11:02:03  
8           MS. BALDWIN: Object to the form.                   11:02:06  
9           THE WITNESS: I'm not familiar with every 11:02:07  
10    piece of literature out there, so I feel unqualified 11:02:09  
11    to answer that.   11:02:12  
12           Q     (BY MR. JOHNSON) But you've not identified 11:02:13  
13    one for us here today, correct?                           11:02:14  
14           A     Not today.                                     11:02:17  
15                    Could we take a break, my mouth is getting 11:02:39  
16    dry?   11:02:42  
17           MR. JOHNSON: Oh, absolutely, yes, sure.         11:02:42  
18           THE VIDEOGRAPHER: Off the record at               11:02:44  
19    11:01 a.m.   11:02:45  
20                    (Break taken from 11:01 a.m. to 11:23     11:02:47  
21    a.m.)   11:02:47  
22           THE VIDEOGRAPHER: Back on the record at           11:24:13  
23    11:23 a.m.   11:24:15  
24           Q     (BY MR. JOHNSON) Dr. Sharp, we're back on 11:24:22  
25    the record after a break. Is there anything you         11:24:25

1 Q Okay. But you somehow can't separate this 11:58:32  
2 out from your other opinions, is that what I'm 11:58:35  
3 understanding? 11:58:37  
4 A Again, what I'm reporting on in articles 11:58:39  
5 is the data, and in academic articles they have to 11:58:42  
6 be framed with a theory and there wasn't a 11:58:48  
7 particular theory that I tested that would include 11:58:52  
8 this, but this is part of that whole big picture. 11:58:55  
9 Q So there was no particular theory you 11:58:58  
10 tested relating to this opioid portion of the data 11:59:00  
11 that's in Exhibit 3? 11:59:04  
12 A No. 11:59:05  
13 Q And your opinions overall in this case, as 11:59:06  
14 I understand, is there no difference on the impact 11:59:08  
15 between -- with respect to whether it's an opioid 11:59:12  
16 abused or a methamphetamine abused? 11:59:15  
17 A Or any other substance. 11:59:19  
18 Q Sure, I was using those as examples. Or 11:59:21  
19 any other substance? 11:59:23  
20 A Or any other substance, that is correct. 11:59:24  
21 Q Okay. You somehow can't -- you can't talk 11:59:24  
22 about that without referencing this data that's in 11:59:27  
23 Exhibit 3, is what I understand you're telling me? 11:59:30  
24 MS. BALDWIN: Object to the form. 11:59:32  
25 THE WITNESS: I can't talk about the 11:59:34



1 impact -- what I'm supposed to be talking about is 11:59:35  
2 the impact on children and families of addicted and 11:59:39  
3 incarcerated women in Oklahoma, I can't talk about 11:59:42  
4 that without including some of this, because that's 11:59:45  
5 cutting out a huge chunk, the impact. 11:59:50  
6 Q (BY MR. EVANS) As I understand it, your 11:59:58  
7 ultimate conclusion is not drug specific? 11:59:59  
8 MS. BALDWIN: Object to the form. 12:00:02  
9 THE WITNESS: That's correct. 12:00:06  
10 Q (BY MR. EVANS) Let's talk about this data 12:00:10  
11 that's on Exhibit 3 then. As I understand your 12:00:11  
12 previous testimony, and please correct me if I'm 12:00:15  
13 wrong, you drafted the questionnaires for each of 12:00:18  
14 these years from 2004 through 2014? 12:00:23  
15 A Yes, sir. 12:00:26  
16 Q And you actually -- I think you said you 12:00:28  
17 actually administered the surveys? 12:00:31  
18 A Yes, sir. 12:00:33  
19 Q So that means you sat down with the women? 12:00:34  
20 A Yes. There were -- there were -- they 12:00:38  
21 filled out the survey, myself and my research team, 12:00:42  
22 which was always graduate students, and the last 12:00:45  
23 year included, Dr. McCloud also, were there to answer 12:00:49  
24 any questions they had about wording in the 12:00:52  
25 instruments, in the questionnaires. 12:00:55

1 Q Were the questionnaires the exact same for 12:00:59  
2 each year? 12:01:02  
3 A No, they were not. 12:01:02  
4 Q Okay. What were some of the differences 12:01:04  
5 in the questionnaires? 12:01:07  
6 A Each year I either refined questions that 12:01:09  
7 weren't giving good data or eliminated them and 12:01:13  
8 added more questions that had entered the 12:01:16  
9 literature. 12:01:18  
10 Q How did you determine which questions were 12:01:20  
11 not giving, quote/unquote, good data? 12:01:22  
12 A If I had a question that had 75 percent of 12:01:25  
13 them didn't answer it, I would call that not good 12:01:28  
14 data. 12:01:32  
15 Q Just left it blank? 12:01:32  
16 A Just left it blank. 12:01:35  
17 Q Any other examples of questions, types of 12:01:36  
18 questions that were not eliciting good data? 12:01:39  
19 A That would be the main type. 12:01:41  
20 Q So you refined the questions throughout 12:01:45  
21 the years? 12:01:48  
22 A I refined questions throughout years, 12:01:49  
23 additionally, I added things that had emerged in the 12:01:51  
24 scholarly literature in my area. 12:01:55  
25 Q Do you still have those questionnaires? 12:02:00

1           A     Somewhere on my computer, probably, yes.     12:02:03

2           Q     Have you produced those in this                     12:02:04

3     litigation?   12:02:06

4           A     No, no one's asked for them.                     12:02:06

5           Q     Do you still have the data files that you     12:02:08

6     created based on the questionnaires?                     12:02:09

7           A     I have 2004, 2007, 2008 and 2014.             12:02:12

8           Q     So that would be all the years in the             12:02:19

9     study, correct?   12:02:20

10          A     No.   12:02:21

11          Q     Or all the years that are listed on             12:02:22

12     Exhibit 3?   12:02:23

13          A     All the years that are listed there.             12:02:24

14          Q     Okay. And have you produced those data     12:02:26

15     files in this litigation?                                     12:02:28

16          A     Now, I don't know if it would make any             12:02:32

17     sense to give you SPSS files if you didn't have an     12:02:35

18     SPSS program.   12:02:38

19          Q     But you have those still?                         12:02:40

20          A     I do have them.                                     12:02:42

21          Q     Explain to me how the footnote here, at             12:02:43

22     least from 2014, states, that you went to three             12:02:47

23     different women's prisons?                                     12:02:53

24          A     That's correct.                                     12:02:55

25          Q     Did you go to the same three prisons for             12:02:57

1 each year that you did the questionnaire? 12:03:00

2 A Each year I went to whatever women's 12:03:02

3 prisons we had in the state at the time, which 12:03:04

4 changed over the years. 12:03:06

5 Q So these were women-only prisons? 12:03:11

6 A All our prison -- all our prisons that 12:03:15

7 have women in them are women-only prisons. 12:03:17

8 Q And are you saying that there are only 12:03:19

9 three in the entire state and that those changed 12:03:22

10 over the years? 12:03:26

11 A I think there's four now. 12:03:26

12 Q But at some point there was only three? 12:03:29

13 A There's two major prisons, there's a 12:03:31

14 community correctional center, that's what the three 12:03:36

15 prisons listed in 2014 are. There is now a work 12:03:38

16 center that's been added to that. 12:03:41

17 Q So is it fair to say that each year that 12:03:46

18 you did this questionnaire you went to all of the 12:03:50

19 women's prisons that currently existed at the time? 12:03:54

20 A That's correct. 12:03:58

21 Q How did you select the women that 12:04:00


22 participated in the questionnaire? 12:04:03

23 A I had the Department of Corrections pull a 12:04:05

24 stratified random sample. 12:04:08

25 Q And for people in the court, the judge or 12:04:11

1 caregivers of the women prisoners' children to see 12:24:24  
2 if they reported the same kinds of problems the 12:24:28  
3 women prisoners reported about their children and 12:24:30  
4 also what kind of issues it was creating for them. 12:24:33  
5 Q And what kind of issues did the caregivers 12:24:37  
6 report the children were experiencing of these 12:24:41  
7 incarcerated women? 12:24:44  
8 A I can give you some examples. There were 12:24:46  
9 so many different kinds of issues they reported. 12:24:49  
10 Economic problems were a huge one for these 12:24:54  
11 families, because they were taking in another 12:24:57  
12 person. The children had a lot of problems with 12:25:00  
13 school. Some of the elder children were abusing 12:25:04  
14 substances. The children, in some cases, ran away. 12:25:06  
15 Some of the children had, with previous caregivers, 12:25:12  
16 been abused, all those kinds of things were things 12:25:17  
17 that the caregivers told me. 12:25:23  
18 [REDACTED] [REDACTED] [REDACTED]  
19 [REDACTED]  
20 [REDACTED] [REDACTED]  
21 [REDACTED] [REDACTED]  
22 [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
23 [REDACTED]  
24 [REDACTED]  
25 [REDACTED]

1 Q So the caregivers -- is it fair to say 12:25:56  
2 that the caregivers reported similar negative 12:26:01  
3 consequences for the children in their care as the 12:26:05  
4 women incarcerated reported for their children? 12:26:08  
5 A Absolutely. The most common problems 12:26:11  
6 reported were mental health problems by both the 12:26:13  
7 caregivers and the women. 12:26:16  
8 Q I think you testified earlier that your 12:26:30  
9 opinions are based on, in addition to the research 12:26:34  
10 that you've done, your education, training, some of 12:26:40  
11 your experiences, is that -- 12:26:43  
12 A That's correct. 12:26:47  
13 Q Are any of these experiences specific to 12:26:51  
14 opioids and opioid addiction in particular? 12:26:53  
15 A I can think of several. One -- in one 12:26:56  
16 case there was -- this was when I was working as a 12:26:59  
17 counselor, a woman who had a baby who was born 12:27:03  
18 addicted to, in this case it was Methadone that the 12:27:07  
19 child was addicted to, because she had gotten on 12:27:11  
20 Methadone to get off of any other form of opiate, 12:27:14  
21 and I sat with her and watched that baby going 12:27:17  
22 through withdrawal. Probably one of the more 12:27:21  
23 painful things that I've ever done in my life is 12:27:25  
24 watch that baby day in, day out withdrawing. 12:27:28  
25 

1 [REDACTED] [REDACTED]  
2 [REDACTED] [REDACTED]  
3 [REDACTED] [REDACTED]  
4 [REDACTED] -- [REDACTED] [REDACTED]  
5 [REDACTED] [REDACTED]  
6 [REDACTED] [REDACTED]  
7 [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
8 [REDACTED] [REDACTED]  
9 [REDACTED] [REDACTED]  
10 [REDACTED] [REDACTED]  
11 [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
12 [REDACTED] [REDACTED] [REDACTED]  
13 [REDACTED] [REDACTED] [REDACTED]  
14 [REDACTED] [REDACTED]  
15 [REDACTED] [REDACTED]  
16 [REDACTED] [REDACTED] [REDACTED]

17 Q Did any of the women in the prisons that 12:28:38  
18 you surveyed, did they ever come and talk to you 12:28:42  
19 about their opioid addiction? 12:28:44

20 A Yes. I can remember one in particular, 12:28:47  
21 [REDACTED] [REDACTED] [REDACTED]  
22 [REDACTED] [REDACTED] [REDACTED]  
23 [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
24 [REDACTED] [REDACTED] [REDACTED]  
25 [REDACTED] [REDACTED] [REDACTED]

1 [REDACTED] [REDACTED]  
2 [REDACTED] -- [REDACTED]  
3 [REDACTED] [REDACTED] [REDACTED]  
4 [REDACTED] [REDACTED]  
5 [REDACTED] [REDACTED]  
6 [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
7 [REDACTED] [REDACTED]  
8 Q Are there any other experiences that you 12:29:43  
9 had that relate to the research that you've done or 12:29:46  
10 your expertise on addiction and its impact on 12:29:53  
11 families? 12:29:59  
12 A I'm not sure exactly what you're asking. 12:30:00  
13 I mean -- 12:30:05  
14 Q Just, I just thought -- it's really just a 12:30:05  
15 follow-up question -- 12:30:08  
16 A Follow-up questions? 12:30:09  
17 Q -- any other relevant experience? 12:30:09  
18 A You know, had a 21-year career at OU, 12:30:11  
19 prior to that I had more than 10 years working as a 12:30:16  
20 substance abuse counselor, there's so many 12:30:19  
21 experiences. 12:30:22  
22 Q And can you describe your experience as a 12:30:25  
23 substance abuse counselor, where did you work when 12:30:28  
24 you worked as a counselor? 12:30:32  
25 A I worked two different places. One was at 12:30:34



1 Q And what kind of problems were they 12:32:04  
2 experiencing? 12:32:05  
3 A Well, they had legal problems, they had 12:32:06  
4 dropping out of school at 15, 16 years old kind of 12:32:09  
5 problems, they were addicted themselves, even though 12:32:13  
6 they were teenagers. 12:32:17  
7 Q You testified earlier about, I think you 12:32:24  
8 were asked a question about your -- if you have ever 12:32:27  
9 acted as an expert, and you had mentioned some 12:32:31  
10 testimony before the Sentencing Commission and your 12:32:34  
11 work with regards to reporting, or your research on 12:32:38  
12 incarcerated women and the impact on families and 12:32:43  
13 children, is there any other capacity in which you 12:32:46  
14 have opined as an expert in this area? 12:32:51  
15 A The short answer is yes, I've spent a lot 12:32:58  
16 of my career doing that. If you turn into my 12:33:00  
17 curriculum vitae, "Papers Presented and 12:33:06  
18 Participation on Panels," in the majority of the 12:33:14  
19 those cases I was asked to be a presenter because of 12:33:16  
20 my expertise. For example, the first item, Oklahoma 12:33:23  
21 Department of Human Services Practice and Policy 12:33:27  
22 Lecture asked me two years ago, less than two years 12:33:30  
23 ago, to do a presentation on Oklahoma's children 12:33:35  
24 prisoner mothers to train their workers, and that's 12:33:40  
25 -- that's just one of many examples. When I -- I 12:33:46

1 guess I was thinking expert in terms more of expert 12:33:52  
2 witness, which I haven't been. I have spoken all 12:33:56  
3 over the state, I have spoken at universities in 12:34:00  
4 other states as an expert, specifically in 12:34:04  
5 Pennsylvania and Michigan, in Tennessee. 12:34:10  
6 Q And are these presentations that you're 12:34:15  
7 describing listed in your CV? 12:34:19  
8 A Yes, they are. 12:34:21  
9 MS. BALDWIN: I have no further questions. 12:34:37  
10 Thank you. 12:34:38  
11 REDIRECT-EXAMINATION 12:34:38  
12 BY MR. JOHNSON: 12:34:40  
13 Q I've got a couple follow-up questions, 12:34:41  
14 Dr. Sharp. Since counsel was just referring to your 12:34:43  
15 CV and your speaking engagements, are any of those 12:34:48  
16 speaking engagements specific to opioids? 12:34:51  
17 A No. 12:34:54  
18 [REDACTED] [REDACTED]  
19 [REDACTED] [REDACTED]  
20 [REDACTED] [REDACTED]  
21 [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
22 [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
23 [REDACTED] [REDACTED]  
24 [REDACTED] [REDACTED] [REDACTED] [REDACTED]  
25 [REDACTED] [REDACTED] [REDACTED]

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4 [REDACTED]  
5 [REDACTED]  
6 [REDACTED]  
7 [REDACTED]

8 Q Back to Exhibit 3, I had asked earlier 12:37:00  
9 whether -- I said, "So you are not going to be 12:37:25  
10 testifying at trial regarding the data that's 12:37:28  
11 included in Exhibit 3?" And you said, "No, sir." I 12:37:30  
12 said, "Am I correct?" And you said, "Yes, sir." 12:37:33  
13 You've changed that now, you believe you are going 12:37:35  
14 to be testifying about the data that's in Exhibit 3? 12:37:38

15 A Yeah, I don't think I was really clear at 12:37:41  
16 the time, even though you stated it clearly. I've 12:37:43  
17 gotten a little bit confused from time to time. 12:37:46

18 Q So Exhibit 3 is part of your opinion that 12:37:49  
19 there's been an impact on the lives of children and 12:37:57  
20 families by opioid addiction and opioid related 12:38:02  
21 incarceration, right? 12:38:05

22 A Yes, sir. 12:38:06

23 Q This is part of your impact, your impact 12:38:07  
24 testimony, correct? 12:38:10

25 A Yes, sir. 12:38:11

