

EXHIBIT F

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

STEVE COLEMAN,
Plaintiff

V.

MARIA KIM GRAND,
Defendant

Case No. 1:18-cv-05663 (JBW) (RLM)

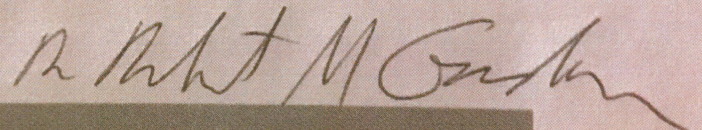
DECLARATION OF DR. ROBERT GORDON

I, Dr. Robert Gordon, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I have been retained by Plaintiff Steve Coleman as an expert psychologist / psychoanalyst in the above captioned action, pursuant to F.R.E. 702.
2. I have prepared an expert report in rebuttal of expert reports submitted by Brandie Pugh and Charlene Muehlenhard on behalf of Defendant Maria Grand.
3. My report has been disclosed to opposing counsel pursuant to F.R.C.P. 26(a).
4. My report is attached to this Declaration as an Exhibit to Plaintiff's Statement of Undisputed Material Facts.
5. If called to testify in the trial of this matter, I will testify regarding the contents of the report attached hereto.

I hereby declare under penalty of perjury that the foregoing statements made by me are true and correct.

Executed on this 23 day of October, 2019, at 14041 Bellagio Way Osprey Florida 34229.



Dr. Robert M. Gordon

Robert M. Gordon, Ph.D., ABPP, LLC
Board Certified in Clinical Psychology and Psychoanalysis
Clinical and Forensic Psychology
Licensed Psychologist in Florida PY 10411 and in Pennsylvania PS 002387

14041 Bellagio Way #214
Osprey Florida 34229
610-417-0501
rmgordonphd@gmail.com, www.mmpi-info.com

Expert Psychological Report

Steven Douglas Coleman v. Maria Kim Grand

(Confidential)

7/23/19

Referred by:

Attorney Joyce Cooper
Agee Owens & Cooper
110 N. Spring St. STE 100
McMinnville, TN 37110
P: (931) 507-100

Reason for Referral:

Atty Joyce Cooper requested that I assess the psychological factors involved in the Coleman v Grand defamation suit and also respond to the expert reports of Charlene L. Muehlenhard, Ph.D. and Brandie Pugh, M.A. (PhD ABD).

Procedures:

Interview with Steven D. Coleman on July 17, 2019 via Video Conference
Interview with Patricia Magalhaes (wife of Mr. Coleman) on July 18, 2019 via Video Conference
Expert Report of Charlene L. Muehlenhard, Ph.D. July 12, 2019
Expert Report of Brandie Pugh, M.A. (PhD ABD) July 12, 2019
I also requested to interview Maria Grand on July 17, 2019 as is my custom to interview relevant parties. However that request was denied by Atty Mark Ballen on July 17, 2019 stating in part, "As was made clear by both of Defendant's expert witnesses, neither of them interviewed or even met Ms. Grand. Muehlenhard at 1; Pugh at 1. Such an interview was not the basis for any of

Defendant's expert witness opinions in this matter and, for that and other reasons, Plaintiff is not entitled to have a psychologist "interview" Ms. Grand."

Document Review:

Maria Letter.pdf P. 3

Grand Clarifying Statement 01 (evidence) edited.pdf P. 8-10

Grand Clarifying Statement 02 (evidence) edited.pdf

Grand Clarifying Statement 03 (evidence) edited.pdf

Grand Clarifying Statement 04 (evidence) edited.pdf

Grand Clarifying Statement 05 (evidence) edited.pdf

Grand Clarifying Statement 07 (evidence) edited.pdf

Grand Clarifying Statement 08 (evidence) edited.pdf

Grand Clarifying Statement 09 (evidence) edited.pdf

Grand Clarifying Statement 10 (evidence) edited.pdf

Grand Clarifying Statement 11 (evidence) edited.pdf

Grand Clarifying Statement 12 (evidence) edited.pdf

Grand Clarifying Statement 13 (evidence) edited.pdf

Grand Clarifying Statement 14 (evidence) edited.pdf

Grand Clarifying Statement 15 (evidence) edited.pdf

Grand Clarifying Statement 16 (evidence) edited.pdf

Grand Clarifying Statement 17 (evidence) edited.pdf

Grand Clarifying Statement 18 (evidence) edited.pdf

Grand Clarifying Statement 19 (evidence) edited.pdf

Grand Clarifying Statement 20 (evidence) edited.pdf

Grand Clarifying Statement 21 (evidence) edited.pdf

Grand Clarifying Statement 22 (evidence) edited.pdf

Grand Clarifying Statement 23 (evidence) edited.pdf

Grand Clarifying Statement 24 (evidence) edited.pdf

Maria teasing and hitting on me (starting around mid 2013).pdf

Exhibit E4 - iChat Chat - Sexual Manipulation - Antoine Roney on 2011-07-07 at 17.02.pdf
MG010631

MariaKimGrand_PDFTran.pdf (Defendant deposition transcript 4/17/19) P. 60, 76-77, 84-85, 90-91, 93, 98, 101, 102, 106-17, 109, 116-117, 130, 140-145, 161-163, 168-177, 202, 210, 214-220

212_MG009162.pdf

Tidd_s_iPhone and 75815_ (Maria).pdf P. 1, 24, 29-32, 34-51

MG051552

20190428 - FS Motion for Protective Order (Grand sworn declaration).pdf (3/28/19) P. 10, 47, 48
RESPONSE in Opposition re 30 MOTION for Protective Order Pursuant to FRCP 26(c) filed by
Steven Douglas Coleman.pdf P. 5-6

20190405 - AFFIDAVIT-DECLARATION in Opposition re 30 MOTION for Protective Order
Pursuant to FRCP 26(c) filed by Steven Douglas Coleman (Steve's filed Affidavit).pdf P. 7-8

First Amended Complaint (Coleman).pdf P. 4-5, 7

FS Defendants Answer to First Amended Complaint and Counterclaims.pdf P. 5, 8, 9-10, 16, 19

Grand Discovery Responses (Interrogatories).pdf P. 17-18

Vijay Iyer-subpoena docs-vi-001 to vi-212-Final.pdf P. 59-68

Merewitz Production - Full Responses-Bates.pdf P. 1-2, 5, 11-12-13, 29-30

File: OH-00000001 P. 298-303

Swaminathan Production.zip

Steve Rowland Production parts 1-3.zip
Vijay Iyer Email Chain - sent voluntarily from a Forward from Damion Reid.pdf
MG050983
MG050980
MG031151
MG050941
MG020454
MG048626
MG048603
MG048627
MG048625
Steve Coleman - Maria Grand Skype Chat (20130510)_1.png
Steve Coleman - Maria Grand Skype Chat (20130510)_2.png
Steve Coleman - Maria Grand Skype Chat (20130510)_3.png
Steve Coleman - Maria Grand Skype Chat (20130510)_4.png
Steve Coleman - Maria Grand Skype Chat (20130510)_5.png
Steve Coleman - Maria Grand Skype Chat (20130510)_6.png
Steve Coleman - Maria Grand Skype Chat (20130510)_7.png
few more things.pdf
few more things (2).pdf
File: Text with argument between Plaintiff and Defendant about this threesome request.pdf
day that Plaintiff supposedly got angry.pdf
Relationship status marriage etc.pdf
Messages with Maria Grand (20110821-22).pdf
only content with a three-people relationship.png
20131020 - Arguments about Maria proposing a threesome.pdf
Maria propositions a threesome with Cassandra Wilson
Birthday Surprise_01.pdf
Birthday Surprise_02.pdf
Exhibit 5b.pdf
Exhibit 5c.pdf
Can I sit in_02.pdf
DECLARATION EXHIBITS - ALL.pdf P. 40
Exhibit I3 - stalking - Re/ Please, stop - Email.pdf

Included in this report at the end are references, my Curriculum Vita and Fed.R.Civ.P.
26(a)(2)(B)(v) Statement 2019

Informed Consent and Confidentiality waiver: Both Steven Coleman and Patricia Magalhaes stated that they understood that what they disclosed could be used in my report and agreed to the interview and its conditions.

Expert Report of Charlene L. Muehlenhard, Ph.D. July 12, 2019

Dr. Muehlenhard offers us a scholarly report on various kinds of romantic relationships and how the parties can have different subjective understanding of the nature and behaviors in such relationships. Also Dr. Muehlenhard takes Maria Grand's complaints at face value assuming them

to be facts and has many instances of making assumptions based on bias. For example, on page 6 Dr. Muehlenhard wrote that “Parts of Mr. Coleman’s complaint supported Ms. Grand’s claims. The complaint states that “Defendant admitted she was using the intimate relationship to get ‘musical information’) Mr. Coleman’s complaint, p.9/12). In this statement, Mr. Coleman seems to admit that he exchanged his musical information for sexual access to Ms. Grand.”

There is no such admission of exploitation on the part of Mr. Coleman from this statement. This is Dr. Muehlenhard biased assumption. By all evidence, Ms. Grand and Mr. Coleman fell in love and when the relationship ended Ms. Grand was hurt and sought to hurt Mr. Coleman by claiming victimization and sought to damage Mr. Coleman’s reputation.

Dr. Muehlenhard offers psychological and sociological generalizations about how women have been sexual exploited by men throughout the ages. This is certainly true and well documented. But there is no evidence that this was the case in the long-term romantic relationship between Mr. Coleman and Ms. Grand.

We cannot assume that the fact that Mr. Coleman is older and helped Ms. Grand with her training and profession that this equates to the intimate psychological power in a particular relationship.

I have treated couples for over 40 years, and I often found a great distinction between apparent power and real intimate power within a relationship. Sociological generalizations are valuable in guiding legislated and case laws for protection and fairness for women, but Sociological generalizations are not a replacement for the understanding of the complex dynamics of any particular intimate romantic relationship.

Dr. Muehlenhard concludes on page 10 of her report that, “...Ms. Grand was not claiming that Mr. Coleman committed rape or sexual assault. She was not suing him. She was just describing her own experience- telling her own story. Her stated goal is for this to be “the start of a larger conversation about what’s acceptable and what’s not.”

However, Ms. Grand’s claims of sexual exploitation were sent to a great many news outlets and influential people who could affect Mr. Coleman’s reputation and work. This is hardly an act of helping woman, but an act of revenge for her losing control over Mr. Coleman.

In short, Dr. Muehlenhard report offers social-psychological and sociological generalizations and nothing to support Ms. Grand’s claims of sexual exploitation by Mr. Coleman.

Expert Report of Brandie Pugh, M.A. (PhD ABD) July 12, 2019

Likewise, Brandie Pugh offers a wealth of scholarly insights about sexual coercion, exploitation, etc. but these generalizations do not validate Ms. Grand’s claims of sexual coercion and exploitation. Ms. Pugh shows an obvious bias in assuming Ms. Grand’s claims as facts. Ms. Pugh wrote on page 1, “I identified at least five areas that Ms. Grand’s experiences that resonate with a vast amount of historical and contemporary research literature and legal thinking on sexual assault, coercion, consent, and interpersonal violence.” Ms. Pugh by using the phrase “Ms. Grand’s experiences” shows a biased assumption that indicates that Ms. Pugh is taking Ms. Grand’s accusations at face value.

It is interesting for example Ms. Pugh states on page 10 that Ms. Grand described “that she had high levels of anxiety. Not only is this a symptom of workplace sexual harassment, but victims of sexual coercion cite significant harm from their experiences.” Ms. Pugh makes the mistake of assuming that Ms. Grand’s anxiety is evidence for sexual harassment, when in fact there are very many causes of anxiety, most of which have nothing to do with sexual harassment or sexual coercion.

Both Dr. Muehlenhard and Ms. Pugh offer a narrative of Ms. Grand as a weak woman lacking autonomous choices. Feminist writer and philosopher, Camille Paglia has criticized Feminists for encouraging a victimization narrative vs. a power narrative and rather sees the seductive power of women in their relationship to men as a long used source of power.

Psychologist Martin H. Williams wrote a paper (2000) on how various personality traits and disturbed motives can contribute to making false sexual claims against therapists who overtly have power, but might be victimized by (more often women) who present themselves as “victims” for revenge.

Interview with Steven D. Coleman on July 17, 2019 via Video Conference

Mr. Coleman said, “Maria and I met May 5th 2009 at a workshop I was giving where she was a participant. I was about 52 and she was about 17. Maria’s father was a saxophone player. He was a fan of mine. Her father idealized me. Maria said that she was determined to come to America from Switzerland to meet me as well as another saxophonist named Sonny Rollins. We began our intimate relationship in June 2011, when Maria was 19. The sex was consensual, and Maria initiated our first sexual encounter. I have written evidence for all that I am saying. I have emails and texts of Maria admitting that it was consensual.”

“06/02/2011 20:08, Maria Kim Grand at <mailto:maria.k.grand@gmail.com> wrote: Let me know when I can come up. Cold-ass Devil”

She had a boyfriend at the time, and she told her boyfriend we had sex.

“===== Skype chat ===== mbase1235 6/4/2011 5:41:41 PM
yea, but what exactly did you tell him happened?”

Maria Grand 6/4/2011 5:42:01 PM
I told him you ate me...

Maria Grand 6/4/2011 5:47:51 PM
yes I enjoy being with you. As far as the sexual part, I can't exactly see why I did it. It is a mix of a will to experiment, a will to kill some fear inside me, and a will to please you”

Maria proposed a three-way relationship with me and my wife, and my wife rejected it. My wife and I were arguing about Maria around August-September 2013. I told Maria that I am going to pause the relationship with her and try to work out things with my wife. Maria freaked out. So, in September 2013, after my wife returned home from a trip to Paris, I temporarily broke my relationship off with Maria. At this point Maria began stalking me. My wife emailed Maria to stop, but Maria told her that she could not tell her what to do. At which point my wife wrote to

Maria in a September 9, 2013 email “*ah, yes, I forgot you have no respect. My bad!*”. Maria told me that it was traumatic for her to be rejected. Maria was constantly teasing and propositioning me, we were both propositioning each other. In December 2013 Maria was still trying to get me to be with her, and Maria told me that she wanted to marry me. In January 2014 she sent nude selfies to me. This on-off sexual relationship went on until September 2016. This whole thing is about revenge.

Later, beginning in November 2017, Maria sent, showed or approved proxies to send on her behalf, her accusation Letter to music industry professionals in Europe and the US including; musical colleagues of mine, concert and festival promoters, music journalists, and film, TV and radio personalities (at least 75 individuals in all that I discovered so far), stating that I took advantage of her, coerced her into having sex with me, and forced her to stay in hotel rooms with me.

Maria wanted to harm my personal and professional reputation, and the method that she used to send her Letter, and to whom she sent it, proves this. Maria intended her Letter to have a certain impact. Despite what she has said in court testimony, Maria’s intention was for everyone to understand that I was forcing her to have sex with me. This is what was currently outraging everyone at the height of the #MeToo movement, and this was the most damaging impression that harmed my reputation the most. Maria only used the “X” identification in her Letter, and a few statements about her initiating sexual contact for legal reasons. But even then, the reasons why she offered herself to me were always because she feared to lose gigs, or did want me to be angry with her. It was never because she desired to have sex with me, which was the real reason.

This is part of what makes her Letter so damaging. Maria’s November 2017 Letter has one form, but Maria frequently either enclosed this Letter in an email with additional damaging information, or she followed her Letter up with additional individual private communications, all or which contained more damaging and even more false information. This is what makes Maria’s attacks so devastating, and the damage is ongoing, as Maria is still constantly working to demonize me, as she gets more desperate to cover-up her previous lies and actions.

Maria’s methods involve telling different people different false narratives, depending on who they are and how much they know. She cannot lie extensively to someone who knows me well, for example, the bassist Anthony Tidd, whom I have known well since the early 1990s, and who probably knows every woman with whom I’ve had an intimate relationship with since that time (see the discovery production file *Tidd_s_iPhone and 75815_ (Maria).pdf* pages 37-51 as an example). But to someone who does not know much about the dynamic between Maria and I, or between me and any other woman, such as the music journalist Steve Rowland, Maria can lie with a greater degree of confidence (see the discovery production file MG051552 as an example).

In 2018 Maria contacted and requested that NPR reporters Michelle Mercer and Anastasia Tsioulcas do negative stories on me, and was preparing one such story with Ms. Tsioulcas; and Maria initiated a negative and very damaging story about me by Nancy Dillon in the NY Daily News, that was published on November 14, 2018, after Ms. Dillon had already published a similar harmful negative story in the same newspaper one month before in. Maria even had a PR firm working with her to organize her public attacks on me.

In October 2018, after the publication of the damaging NY Daily News story (and as a result another story in the UK Daily Mail, which used an extremely damaging false quote from Maria's Letter as it's headline), an extreme amount of cyber bullying began. The optics that an older black man forced a younger white woman to have sex with him are not good, in the current biased times that we live in.

But Maria had explored doing a negative story on me with a music journalist as early as November 2017, and sent her damaging accusations attacking me to many other journalists. So Maria had caused a lot of damage to my reputation long before I even learned of her Letter, and although this was something that I could feel happening, I did not have any proof until the start of fact discovery in this current litigation.

I am not a person who hates, I just want the truth to come out. Since I first learned of Maria's Letter (on January 11, 2018) I tried for at least 8 months to mediate and resolve this matter in many ways before initiating a defamation lawsuit. But Maria was determined and would not admit to what she had done. Maria wanted to harm my career, by distributing her letter secretly to colleagues, media, journalist and concert promoters around the world, in exactly the places where I frequently got work. Maria is lying about me forcing her to have sex with me and forcing her to stay in hotel rooms with me.

Discovery documents prove this, and also prove that Maria has a pattern of lying, both in the past, and currently in sworn testimony. Even after I filed my lawsuit, Maria has continued to accuse me of further acts of harassment and sexual intimidation, stating that any concert or event that I attend where she is in the room constitutes harassment, stating the me begin present in court in the same room as her constitutes harassment, even stating that my defamation lawsuit itself is harassment and intimidation (implying that I have no right to defend myself against false accusations).

As further proof of her dishonesty, Maria has also engaged in several conspiracies and a cover-up to conceal her previous lies and unethical actions. Maria threatened me and was interested in revenge and punishing me. Her accusation were made in such a way to prevent me from being able to defend myself until maximum damage had already been done to my reputation. The way this was done demonstrates that this had nothing to do with helping young women in future generations deal with sexual harassment. This was not about accountability, which would have been about both of us being answerable for our words and actions. What Maria did was a vindictive campaign to ruin my personal and professional reputation.

Maria initiated the first and last sexual contact, and many other intimate sexual encounters up until the final encounter in September 2016. We liked to video tape ourselves. All of these recordings show consensual sex, and the recordings also show Maria sometimes operating the cameras. I have text messages from Maria where she told me that she masturbated while watching the tapes."

At this point in the interview, I explained that all people have idiosyncratic eroticisms and asked Steve if either enjoyed sado-masochistic sex play or other forms of enactments.

Mr. Coleman responded, "No, but the tapes show her on top a lot of times. I am a 'germ-phob.' I can't coerce or force anyone to have sex with me since the woman has to wash up before sex. It

takes at least a ½ hour to go through the washing. She was fine with this. Also, I like to use oils such as grapeseed oil or olive oil. The oils must go all over both of our bodies. I can't have dry sex without oils. You can see this in the videos.

In July of 2016 Maria wrote this email to herself (found in discovery):

"From: Maria Kim Grand [maria.k.grand@gmail.com]
Sent: 7/9/2016 3:24:13 AM
To: Maria Grand [maria.k.grand@gmail.com]
Subject: Note on feelings

What I need to touch is my fear. My anxiety. The level of my fear of being left, being abandoned, being excluded. The feeling of not belonging. The feeling of being left out, being pushed away. Not being enough. Not being what I should be. Hating myself for being what I am.

I think part of the reason why my circle is made of prominently people of color and African-Americans has to do with this. I'm used to being the outsider but also I keep putting myself in situations where I'm not wanted. Where I'm different. Where I'm underprivileged. I've tried so hard not to use my privilege. I've tried to erase it, deny it, and always be in situations where I was the underdog. Why? Because deep down I feel that I'm not enough and that the way to fight privilege is to erase myself as opposed to helping others get the same privilege. And that's also why when I am excluded from those circles I feel so shitty. It's because I'm hoping again and again to fix myself. To be cool enough, to be dope enough, to have enough rhythm, to be anti-racist enough, to be innocuous enough, to be enough of an ally, to finally be accepted and prove to myself that yes I am enough. But of course no matter how much effort I put in being accepted, there's always a reason why I'm not entirely "a part of", or someone who finds me to be out of my place.

That's what happened with Steve, but I had decided that I was going to belong with him. Alas, he decided I wasn't enough to belong with him. And so he abandoned me/pushed me out/excluded me, which is one of the things that hurt me the most.

And that's what happens also when James gets together with his friends. I'm always excluded from that. And it hurts so much. That's what hurts when I'm around him in business situations I'm not a part of; I'm excluded. When I'm excluded my typical pattern is to withdraw and be depressed. And to cry and also be angry. That's the other one; create a scene in hopes of getting more attention.

In the end nothing works, because when you are excluded the reality is that you are excluded. So I try to act like I'm ok and keep feeling worse and worse. And in the end I cut the connection with others, I cut the possibility of intimacy with them, so I am not rejected again. It's very hard and I'm touching it very very closely right now.

Everything seems like it's falling apart. Thank god I have the EP to put out. I think after I put it out people are going to start being interested.

I need to touch the happiness that I feel on my own. How good it feels to be just me. I also need to get a gig at the Bar Next Door and at some place in Harlem, where I'll do more singing. And I

need to keep calling Billy Hart. He has to hear me play. I know he'll hear what I'm going for and he'll be of much help. I'll work hard so that when this happens I am very ready.

There's nothing wrong with using the available technology. I have to use it so that I can keep up with the times, in fact.”

Interview with Patricia Magalhaes (wife of Mr. Coleman) on July 18, 2019 via Video Conference

Patricia Magalhaes (estranged wife of Steven Coleman who is now living in Brazil via VCON interview)

“I first met Steve 2003. We married in May of 2005.

Maria was hurt. I believe what she did was because she believed that was the only way to hurt him back. I know Steve well and Steve is just not coercive.”

I then asked Ms. Magalhaes that her husband already shared with me his ritual of washing and using oils before he can have sex.

Ms. Magalhaes responded, “Yes, Steve is a ‘germ-phob.’ He needed me to wash. Both of us had to wash before sex. It was never forced. He used oils every time. It would require a lot of time and cooperation to have sex with him. He is not sexually aggressive at all. He would never force anyone to have sex with him.”

Summary:

Learning of Mr. Coleman sexual rituals precludes the possibility of coercion, since it requires consent and a long period of cooperation before physical intimacy. The defendant’s experts did not have this knowledge of intimacy particularism and only based their opinion on stereotypes and generalizations.

Based on the extensive documents of written exchanges between Ms. Grand and Mr. Coleman, they clearly indicate that Ms. Grand sought a romantic and physical intimacy with Mr. Coleman. She remained of her own free will in a romantic relationship with Mr. Coleman for about 4-5 years. They fell in love and both offered resources to each other- as is the case in most intimacies. Such agreements are implicit and not overtly contractual or forced. Ms. Grand’s writing clearly indicates that Ms. Grand was very hurt by Mr. Coleman stopping the relationship and that Ms. Grand acted to hurt Mr. Coleman by maliciously and falsely distributing her accusations of coercion and harassment to news outlets, colleagues, members of the music business, associates, etc. Currently, all one has to do is search the Internet to find these damaging stories of alleged sexual misconduct.

These are current examples that I found:

“Famed jazz saxophonist accused of sexual misconduct by former protégé now suing for defamation

By JOHN ANNESE, ELIZABETH KEOGH and NANCY DILLON

OCT 12, 2018 |

A new defamation lawsuit has exposed disputed claims that famed jazz musician Steve Coleman preyed on a teen protégé and sexually harassed her during a tortured five-year relationship...”

“Daily Mail.com

By CHEYENNE ROUNDTREE FOR DAILYMAIL.COM PUBLISHED: 10:20 EDT, 16 October 2018 | **UPDATED:** 15:27 EDT, 16 October 2018

- Musician Steve Coleman, 62, is suing Maria Grand, 26, after she accused him of sexually harassing her over several years
- The two met at a workshop Coleman was teaching in New York City in 2009 when Grand was 17 years old and wanting to improve her saxophone skills
- Grand claims Coleman told her he wanted to sleep with her and describes how she felt pressured into having sex in order to keep his attention and mentorship
- They were involved sexually from 2011 up until 2016, when Grand broke it off
- Grand wrote a seven-paged letter where she detailed Coleman's alleged sexual misconduct, which was included as an exhibit in Coleman's suit against her
- She writes Coleman 'told me not to contact him [if] I didn't plan on having sex with him. He made it clear I was studying with him because he liked me'
- Grand, who is originally from Switzerland, claims Coleman told her that she owed him a 'lifetime of p***y' for everything he had taught her
- She likens the relationship to Stockholm Syndrome, writing she once refused to have sex and had to leave his room at 3am, spending the night in a station nearby
- Grand said she came forward because she was 'bearing the brunt of the trauma and negative consequences of this, while he enjoys a stable life and career'
- Coleman is suing Grand for at least \$500,000 in damages for her statements, which he claims has damaged his reputation and his ability to book gigs”

“Slipped Disc

By Norman Lebrecht On October 22, 2018

A new defamation lawsuit has exposed disputed claims that famed jazz musician Steve Coleman preyed on a teen protégé and sexually harassed her during a tortured five-year relationship...”

“Famed jazz saxophonist countersued by former protégé who says he sexually harassed her

By NANCY DILLON

| NEW YORK DAILY NEWS |

NOV 14, 2018 | 11:35 AM

Jazz saxophone star Steve Coleman has been countersued by a former teen protégé who claims he sexually harassed her during an “abusive” five-year relationship... She alleged in the letter that Coleman would cut off his valuable mentorship and later paid gigs unless she agreed to sleep with him...”

“Jazz Star Hit in Protégé Sex Suit

New York Daily News 15 Nov 2018 by NANCY DILLON...”

If Ms. Grand wanted to help other woman to deal with sexual manipulation and coercion, she could have warned them to not use their sexuality to get what they want in life, and that such a

strategy contributes to confused values and does not build healthy intimacy. Certainly claiming that she was sexually coerced and exploited by Mr. Coleman to many news outlets, individuals in the music business, associates and so on is a matter of revenge.

These are now enduring damaging accusations on the World Wide Web.

In conclusion, I see no evidence of Mr. Coleman of sexually coercing or harassing Ms. Grand or engaging in quid pro quo sex for tutelage. By Ms. Grand's own writings, it is apparent that she suffers from low self-esteem and felt devastated by the rejection and sought revenge. But the most revealing evidence is Mr. Coleman's sexual ritual requiring a long time and extensive cooperation with his partner to have sex. This would make coerced or forced sex impossible.

I make this conclusion with a reasonable degree of psychological certainty.

Respectfully submitted,
Robert M. Gordon, Ph.D., ABPP
(electronically signed)
CV can be viewed at www.mmpi-info.com

References:

Paglia, Camille (2018). *Free Women, Free Men, Sex, Gender, Feminism*; Penguin Random House.

Williams, Martin (2000). Victimized by "Victims:" A Taxonomy of Antecedents of False Complaints Against Psychotherapists; *Professional Psychology: Research and Practice*, 31 (1), 75-81.

CURRICULUM VITAE- BRIEF 2019

Robert M. Gordon, Ph.D., ABPP

Diplomate in Clinical Psychology and Psychoanalysis
Clinical and Forensic Psychology
14041 Bellagio Way, 214, Osprey Florida 34229
610.417.0501
rmgordonphd@gmail.com, www.mmpi-info.com

Licensed Psychologist in Florida PY 10411 and in Pennsylvania PS 002387

EDUCATION

Ph.D. Psychology, Temple University, Philadelphia, PA 1975
B.A. Psychology, Temple University, Philadelphia, PA 1970

PROFESSIONAL ASSOCIATIONS

American Psychological Association- Fellow
Elected to the Governing Council of the American Psychological Assoc.
1992 -1995 and again in 2001 - 2003 representing Pennsylvanian psychologists

Society for Psychoanalysis and Psychoanalytic Psychology: Division 39 of the American Psychological Association, Fellow and charter member and member of sections:

- I. Psychologist-Psychoanalyst Practitioners
- VI. Psychoanalytic Research Society
- VII. Psychoanalysis and Groups
- VIII. Couple and Family Therapy and Psychoanalysis

President - Pennsylvania Psychological Association, 1990–1991;
Pennsylvania Psychological Foundation Board, 1991-2003, 2006-2010;
President of the Clinical Division, 1987;
Charter Member of the Colleague Assistance Committee since 1992

President 1980 - 1981 - Lehigh Valley Psychological Association;
Chair of the Ethics Committee, 1983-1986

Philadelphia Society for Psychoanalytic Psychology, Charter member since 1982

Fellow of the Academy of Clinical Psychology (AClinP) of the American Board of Professional Psychology since 1991

Fellow of the Academy of Psychoanalysis of the American Board of Professional Psychology since 2006

American Psychoanalytic Association Research Associate- charter member

Psychodynamic Psychoanalytic Research Society- charter member

American Psychology-Law Society of the American Psychological Association

Society for Personality Assessment

Tampa Bay Psychoanalytic Society

CREDENTIALS and AWARDS

Pennsylvania Psychology License since 1976

Florida Psychology License since 2019

Distinguished Service Award from the Pennsylvania Psychological Association 2001

Certificate of Professional Qualification in Psychology by the Association of State and Provincial Psychology Boards since 2002, #3655

Diplomate of the American Board of Professional Psychology in Clinical Psychology; #3414, since 1982

Diplomate of the American Board of Professional Psychology in Psychoanalysis, #6211, since 2006

National Register of Health Service Providers in Psychology 1979-2010

American Association for Marriage and Family Therapy since 1976, and Approved Supervisor 1981-2007

An American Psychological Association Approved Sponsor of Continuing Education to Psychologists 1985-2011 (The first in east-central Pennsylvania).

Honorary Membership presented by the American Psychoanalytic Association- 2015

Honorary Editor for Forensic Research & Criminology International Journal- 2015

Honorary Member of the Psychoanalytic Center of Philadelphia- elected 2016

Honorary Member of the Florida Psychoanalytic Center - elected 2019

PRACTICE

Independent practice specializing in forensic psychology, psychoanalysis, psychodynamic psychotherapy, assessment, teaching and research

Forensic Psychologist Consultant to the Lehigh County Public Defender's Office
2010-2020

Psychodynamic Diagnostic Manual 2 (PDM2) Steering Committee member and Section co-editor on assessment tools 2014-2016

TEACHING and RESEARCH POSITIONS and WORKSHOPS

Academic appointments at: Lehigh University, Temple University, Yeshiva University, Chestnut Hill College, and Widener University: academic topics include personality assessment, forensic psychology, research, ethics, MMPI-2, Psychodynamic Diagnostic Manual (PDM and PDM2), philosophy of science and methodology, psychodynamic theory and psychodynamic psychotherapy.

Clinical and Forensic Assessment Practicum Supervisor for Chestnut Hill College
Doctoral students 2010-2019

Presented and led workshops nationally and internationally (ex.: Albania, Belgium, Canada, China, France, Germany, Israel, Italy, Netherlands, Russia, Switzerland, etc.) since 1982 (ex.: International Psychoanalytic Assoc., American Psychoanalytic Assoc., American Psychological Assoc., Society for Personality Assessment, etc.) in:
MMPI-2 interpretation, forensic psychology, psychological diagnostic taxonomies, the PDM and PDM2, psychodynamic research, psychoanalysis-theory and technique, couples, family and group therapy, ethics in psychology, and the psychology of love relations. Led yearly ethics CE workshops for the Penna. Psychological Foundation for 17 years.

China American Psychoanalytic Alliance (CAPA)- instructor of courses on Adult Psychodynamic Psychotherapy and the writings of Sigmund Freud to Chinese professionals via VCON, since 2012

Chair of Research and Scholarship Grants of the China American Psychoanalytic Alliance elected 2017

China American Psychoanalytic Alliance (CAPA)- Board of Directors since 2017

Visiting Professor of Psychology teaching forensic and clinical psychology to masters and doctoral students at Albanian University via VCON 2014.

FILMS

39 Scuds (1991). A 30-minute documentary I made about the psychological effects of the potential gas poisoning of civilians in Israel during the Persian Gulf War.

Balance and Integration in Psychoanalytic Group Therapy (2006). Produced by Video Diamond, LLC; a workshop I lead on psychoanalytic group therapy.

TEDx Talk “The Power of Apology” September, 2014

REVIEWER FOR JOURNALS

Ex.: Journal of Consulting and Clinical Psychology and Psychoanalytic Psychology

PUBLICATIONS

Gordon, R.M. & Fatehi, M. (2019). A Meta-Theoretical Integration of Psychotherapy Orientations (manuscript submitted for publication).

Gordon, R.M. (2019). Against Methodological Fundamentalism: Towards a Science for a Complex Dynamic Psychology. *International Journal of Psychiatry Research*, 2(2):1-2. ISSN 2641-4317

Gordon, R.M. (2019) Psychodynamic Distance Training and Treatment: The China American Psychoanalytic Alliance Research. *Psychoanalytic Inquiry*,

Gordon, R.M., Spektor, V. & Luu, L. (2019). Personality Organization Traits and Expected Countertransference and Treatment Interventions. *International Journal of Psychology and Psychoanalysis*, 5:1 pp.1-7. doi.org/10.23937/2572-4037.1510039

- Mulay, A. L., Waugh, M. H., Finn, M. T., Gilmore, J. E., Whitley, M. L., Cain, N. M., Gordon, R. M., Hopwood, C. J., Jones, A., Nichols, D. S., Rossi, G. M. P., & Streiner, D. L. (2019). Contemporary MMPI-2 personality disorder Spectra scales. *Archives of Assessment Psychology*, Vol.9. No.1, 3-41.
- Gordon, R.M., Wang, X. & Jane Tune, J. (2019). Comparing Psychodynamic Teaching, Supervision and Psychotherapy over Video-Conferencing Technology with Chinese Students; Chapter 8, pp. 126-139, in Scharff, J. S. (Ed.). *Psychoanalysis Online 4: Teleanalytic Practice, Teaching, and Clinical Research*. Routledge.
- Gordon, R.M. & Lan, J. (2019). The Effect of Distance Training on the Development of Psychodynamic Psychotherapists. Chapter 9, pp. 143-155, in Scharff, J. S. (Ed.). *Psychoanalysis Online 4: Teleanalytic Practice, Teaching, and Clinical Research*. Routledge.
- Gordon, R.M., (2018). Ethics for Social and Medical Professionals. VII. Professional Ethics in the Internet Era, Chapter in *Telepsikologjia: Etika Për Profesionistët E Shkencave Sociale Dhe Mjekësore*.
- Gordon, R.M. & Bornstein, R.F. (2018). Construct Validity of the Psychodiagnostic Chart:
A Transdiagnostic Measure of Personality Organization, Personality Syndromes, Mental Functioning, and Symptomatology. *Psychoanalytic Psychology*, 35(2), 280-288. <http://dx.doi.org/10.1037/pap0000142>
- Ibrahimi, S., Gordon, R. M. & Eglantina, D. (2017). The Psychodynamic Diagnostic Manual 2: A Novel International Taxonomy for Understanding Mental Health. *International Conference on Education and Cultural Heritage Proceeding Book*, 23-30.
- Gordon, R.M. (2019). A Concurrent Validity Study of the PDM-2 Personality Syndromes. *Current Psychology*, 38(3), 698-704, DOI: 10.1007/s12144-017-9644-2, previously published online in (2017) DOI: 10.1007/s12144-017-9644-2, pp.1-7.
- Gordon, R.M., Blake, A., Etzi, J., Rothery, C., & Tasso, A.F. (2017). Do Practitioners Find a Psychodynamic Taxonomy Useful? *Journal of Psychology and Clinical Psychiatry* 7(5): 00452. DOI: 10.15406/jpcpy.2017.07.00452

- Waldron, S., Gordon, R.M., & Gazzillo, F. (2017). Chapter 15 Assessment within the PDM-2 Framework, Lingiardi, V. & McWilliams, N. (Eds), *Psychodynamic Diagnostic Manual, Version 2 (PDM-2)*. New York: Guilford Press.
- Gordon, R.M. (2017). Personality Disorders and Syndromes Across ICD-10, DSM5, and PDM2. *Currents, 1*, pp. 10.
- Gordon, R.M., & Lan, J. (2017). Assessing Distance Training: How Well Does It Produce Psychoanalytic Psychotherapists? *Psychodynamic Psychiatry, 45* (3), 329-341.
- Gordon, R.M. (2017). Assessing Distance Psychoanalytic Treatment: Perspectives of Therapist and Patient. *The American Psychoanalyst, 51*,2, 15.
- Gordon, R.M., Tune, J. and Wang, X. (2016). What are the characteristics and concerns of high and low raters of psychodynamic treatment to Chinese students over VCON? *Psychoanalysis and Psychotherapy in China, 2*, 86-96.
- Gordon, R.M., Blake, A., Bornstein, R.F., Gazzillo, F., Etzi, J., Lingiardi, V., McWilliams, N., Rothery, C. and Tasso, A.F. (2016) What do practitioners consider the most helpful personality taxa in understanding their patients? *Division/Review: A Quarterly Psychoanalytic Forum, 16*,70.
- Gordon, R.M., Gazzillo, F., Blake, A., Bornstein, R.F., Etzi, J., Lingiardi, V., McWilliams, N., Rothery, C. and Tasso, A.F. (2016) The Relationship Between Theoretical Orientation and Countertransference Awareness: Implications for Ethical Dilemmas and Risk Management, *Clinical Psychology & Psychotherapy, 23*, 3,236-245; (online published 2015, DOI: 10.1002/cpp.1951)
- Gordon, R.M. & Bornstein, R.F. (2015). The Psychodiagnostic Chart-2 v.8.1 (PDC-2), DOI: 10.13140/RG.2.1.4147.4647
- Ibrahimi, S., & Gordon, R.M. (2015). Post-Traumatic Identity within Social Contexts. *Balkan Journal of Interdisciplinary Research Vol 1*, No 1, 47-51. ISSN 2410-759X, Access online at www.iipcccl.org
- Ibrahimi, S., Dervishi, E., and Gordon, R.M. (2015). Traumatic behavior deviance of individual within social contexts. *European Psychiatric Congress*, Vienna Austria.
- Spektor, V., Luu, L. & Gordon, R.M. (2015) The Relationship between Theoretical Orientation and Accuracy of Countertransference Expectations., *Journal of the American Psychoanalytic Association, 63*(4), NP28-NP32.
- Gordon, R.M., Wang, X. and Tune, J. (2015). Comparing Psychodynamic Teaching, Supervision and Psychotherapy Over Video-Conferencing Technology with Chinese Students. *Psychodynamic Psychiatry, 43* (4), 585-599.

- Huprich, S., Lingardi, V., McWilliams, N., Bornstein, R., Gazzillo, F., and Gordon, R.M., (2015). The *Psychodynamic Diagnostic Manual (PDM)* and the *PDM-2*: Opportunities to Significantly Affect the Profession. *Psychoanalytic Inquiry*, 35: 60-73.
- Lingiardi, V., McWilliams, N., Bornstein, R.F., Gazzillo, F. and Gordon, R.M. (2015) The Psychodynamic Diagnostic Manual Version 2 (PDM-2): Assessing Patients for Improved Clinical Practice and Research, *Psychoanalytic Psychology*, 32(1), 94-115. <http://dx.doi.org/10.1037/a0038546>
- Gazzillo, F., Lingardi, V., Del Corno, F., Genova, F., Bornstein, R.F., Gordon, R.M., McWilliams, N. (2015). Clinicians' Emotional Responses and PDM P Axis Personality Disorders: A Clinically Relevant Empirical Investigation. *Psychotherapy, Special Section: Personality and Psychotherapy*, 52(2),238-246. <http://dx.doi.org/10.1037/a0038799>
- Gordon, R.M. and Stoffey, R.W. (2014). Operationalizing the Psychodynamic Diagnostic Manual: a Preliminary Study of the Psychodiagnostic Chart (PDC), *Bulletin of the Menninger Clinic*, 78,1, 1-15.
- Gordon, R.M. and Cosgrove, L., (2013) Ethical Considerations in the Development and Application of Mental and Behavioral Nosologies: Lessons from DSM5, *Psychological Injury and Law*, 6,4, 330-335, DOI 10.1007/s12207-013-9172-9.
- Gordon, R.M. and Stoffey, R.W. and Perkins, B.L. (2013) Comparing the Sensitivity of the MMPI-2 Clinical Scales and the MMPI-RC Scales to Clients Rated as Psychotic, Borderline or Neurotic on the Psychodiagnostic Chart, *Psychology: Special issue on Criminal Investigative Psychology*, 4, 9A, 12-16. doi: 10.4236/psych.2013.49A1003.
- Gordon, R.M. (2013). The Pyramid of Love. In *The World Book of Love*, Ed. Leo Bormans, Lannoo, Publishers, Tielt, Belgium. 60-63.
- Gordon, R.M. (2013). Book Review: *To Know and to Care: [Review of Psychoanalytic Diagnosis: Understanding Personality Structure in the Clinical Process. Second Edition, by Nancy McWilliams.]* Division/Review: A Quarterly Psychoanalytic Forum, Spring, 7, 9-11.
- Bornstein, R. F. and Gordon, R. M. (2012). What Do Practitioners Want in a Diagnostic Taxonomy? Comparing the PDM with DSM and ICD. *Division/Review: A Quarterly Psychoanalytic Forum*, Fall, 6, 35.

- Gordon, R.M., & Bornstein, R.F. (2012). A practical tool to integrate and operationalize the PDM with the ICD or DSM. <http://www.mmpi-info.com/pdm-blog>.
- Gordon, R.M. (2012). A Psychological Alternative to the Medically Based DSM and ICD, *The National Psychologist May/June, vol. 21, 3*, p. 19
- Gordon, R.M. (2011). Repercussions of a Patient's Suicide, *Pennsylvania Psychologist Quarterly, 71,6*, 12-14.
- Gordon, R.M., Hoffman, L., and Tjeltveit, A. (2010). Religion and Psychotherapy: Ethical Conflicts and Confluence, *Pennsylvania Psychologist, 70, 9*, 3-4.
- Gordon, R.M. (2010). The Scientific Renaissance of Psychodynamic Therapy (PDT), *Pennsylvania Psychologist Quarterly, March, 70,3*, 22-23.
- Gordon, R.M. (2010). The Psychodynamic Diagnostic Manual (PDM). In I. Weiner and E. Craighead, (Eds.) *Corsini's Encyclopedia of Psychology (4th ed., volume 3*, 1312-1315), Hoboken, NJ: John Wiley and Sons.
- Gordon, R.M. (2009). Money, Masochism, Narcissism and Indifference, *Pennsylvania Psychologist Quarterly, 69,8,10* and 14.
- Gordon, R.M. (2009). The Psychodiagnostic Report for Treatment Recommendations. *The Pennsylvania Psychologist Quarterly, 69, 3*, 17-18.
- Gordon, R.M. (2009). Reactions to the Psychodynamic Diagnostic Manual (PDM) by Psychodynamic, CBT and Other Non- Psychodynamic Psychologists. *Issues in Psychoanalytic Psychology, 31,1*,55-62.
- Gordon, R.M. (2008). Addendum To MMPI/MMPI-2 Changes In Long Term Psychoanalytic Psychotherapy. *Issues in Psychoanalytic Psychology, Issues In Psychoanalytic Psychology Vol. 30, No. 2, p.159*.
- Gordon, R.M. (2008). *An Expert Look at Love, Intimacy and Personal Growth*. Second Edition, IAPT Press, Allentown, Pa.
- Gordon, R.M. (2008). Early reactions to the PDM by Psychodynamic, CBT and Other psychologists. *Psychologist-Psychoanalyst, XXVI, 1*, Winter, p.13.
- Gordon, R. M. (2008). *I Love You Madly! On Passion, Personality and Personal Growth*. Second Edition, IAPT Press, Allentown, Pa.
- Gordon, R. M. (2008). The Two-Minute Check-in at the Beginning of Psychoanalytic Group Therapy Sessions. *Group Analysis, 41 (4)*, 366-372.

- Gordon, R.M. and Bottinelli, J. (2008), Ethics and the Difficult Patient: The Psychopath in Film and in Your Office. *The Pennsylvania Psychologist*, July/August Issue, p.10.
- Gordon, R. M., Stoffey, R., & Bottinelli, J. (2008). MMPI-2 findings of primitive defenses in alienating parents. *American Journal of Family Therapy*, 36 (3): 211–228.
- Gordon, R. M. (2007). *I Love You Madly! Workbook: Insight Enhancement about Healthy and Disturbed Love Relations*. Allentown, PA: IAPT Press.
- Gordon, R. M. (2007, November/December). PDM valuable in identifying high-risk patients *National Psychologist*, 16, (6), November/December, pp. 4.
- Gordon, R. M. (2007, spring). The Powerful Combination of the MMPI-2 and the Psychodynamic Diagnostic Manual, *Independent Practitioner*, 84–85.
- Gordon, R. M. (2007). To wit or not to wit: The use of humor in psychotherapy. *Pennsylvania Psychologist*, 67(3), 22–24.
- Gordon, R.M. (2006). *An Expert Look At Love, Intimacy And Personal Growth*. First Edition, Allentown, PA: IAPT Press.
- Gordon, R.M. (2006). False assumptions about psychopathology, hysteria and the MMPI-2 restructured clinical scales. *Psychological Reports*, 98, 870–872.
- Gordon, R. M. (2006). Psychoanalytic reflections on love and Sexuality: Book review. *Issues in Psychoanalytic Psychology*, 28(2), 85–89.
- Gordon, R. M. (2006). The APA Ethics Code as a projective test. *Psychologist-Psychoanalyst XXVI*(1), 67–68.
- Gordon, R. M. (2006). What is love? A unified model of love relations, *Issues in Psychoanalytic Psychology*, 28(1), 25–33.
- Moyer, D. M., Gordon, R. M., Ward, J. T., & Burkhardt, B. B. (2006). Characteristics of successful fakers versus unsuccessful fakers: Is empathy, intelligence, or personality associated with faking PTSD on the MMPI-2? *Psychological Reports*, 99, 747–750.
- Gordon, R. M. (2005). The doom and gloom of divorce research: Comment on Wallerstein and Lewis (2004). *Psychoanalytic Psychology*, 22(3), 450–451.
- Gordon, R. M. (2005, September) The ethics of supervising a family member. *Pennsylvania Psychologist*, 5–6.

- Gordon, R. M. (2003, July). The countertransference controversy. *Pennsylvania Psychologist*, 8–9
- Gordon, R. M. (2003, January). Towards a theoretically individuated and integrated family therapist. *Psychotherapy (Moscow)*, 1, 18–24 (In Russian).
- Gordon, R. M. (2002). *Child custody evaluators: Psychologists or detectives?* Mechanicsburg, PA: Pennsylvania Bar Institute.
- Gordon, R.M. (2002). Outcome research in a private practice. *Pennsylvania Psychologist*, 62,5, 16.
- Moyer, D., Burkhardt, B., & Gordon, R. M. (2002). Faking PTSD from a motor vehicle accident on the MMPI-2. *American Journal of Forensic Psychology*, 20(2), 747-750.
- Gordon, R. M. (2001). MMPI/MMPI-2 changes in long-term psychoanalytic psychotherapy. *Issues in Psychoanalytic Psychology*, 23(1–2), 59–79.
- Gordon, R. M. (2000, June). Boundary: Protection, limits and safety. *Pennsylvania Psychologist*, 4-5.
- Gordon, R. M. (1998). The Medea Complex and the parental alienation syndrome: When mothers damage their daughter’s ability to love a man. In Gerd H. Fenchel (Ed.), *The mother–daughter relationship echoes through time*. Northvale, NJ: Jason Aronson, Inc.
- Gordon, R. M. (1997, February). Handling transference and countertransference issues with the difficult patient. *Pennsylvania Psychologist Quarterly*, 20,24. Also reprinted in *Independent Practitioner* (summer 1998), 18(3), 147–149.
- Gordon, R. M. (1995, fall). Common mistakes made with the MMPI, MMPI-2 and MMPI-A, *Hawaii Psychologist*, 11–12.
- Gordon, R. M. (1995). The symbolic nature of the supervisory relationship: Identification and professional growth, *Issues in Psychoanalytic Psychology*, 17(2), 154–162.
- Gordon, R. M. (1993). Ethics based on protection of the transference. *Issues in Psychoanalytic Psychology*, 15(2), 95–105.
- Gordon, R. M. (1990). A job selection interview form for screening secure positions. In Peter Keller & Steven Heyman (Eds.), *Innovations in clinical practice: A source book* (pp. 275–285). Sarasota, FL: Professional Resource Exchange, Inc.

- Gordon, R. M. (1989). *Interpreting MMPI subtle scales as representing defense mechanisms*. Paper presented at the 24th Annual Symposium on Recent Developments in the Use of the MMPI, Hawaii.
- Gordon, R. M. (1989, November). Is it really better? *Pennsylvania Psychologist*.
- Gordon, R. M. (1987). Interpreting Weiner's obvious and subtle scales in terms of the psychodynamics of conflict and defense. The 10th International Conference on Personality Assessment: Brussels, Belgium.
- Gordon, R. M. (1987). Suggestions on the use of the MMPI in child custody evaluations: Case examples of detecting paranoia in false negative profiles. The 10th International Conference on Personality Assessment: Brussels, Belgium.
- Bennett Woolever, Debra Kay & Gordon, R. M. (1986, October). How to pick a good apple. *Security Management*, 101-103.
- Gordon, R. M. (1984). *The MMPI-168 psychotherapist's report*. Allentown, PA: International Information Systems.
- Gordon, R. M. (1984). *The MMPI physician's psychodiagnostic report 168, 400/566*. Allentown, PA: International Information Systems.
- Gordon, R. M. (1984). *The MMPI personnel report 168, 400/566*. Allentown, PA: International Information Systems.
- Gordon, R. M. (1984). *The MMPI psychotherapist's psychodiagnostic report 400/566*. Allentown, PA: International Information Systems.
- Gordon, R. M. (1984). *The MMPI security Report 168, 400/566*. Allentown, PA: International Information Systems.
- Gordon, R. M. (1982). Systems-object relations view of marital therapy: Revenge and re-raising. In L. R. Wolberg, & M. Aronson, *Group and Family Therapy*, 325-333, New York: M., Brunner-Mazel.
- Gordon, R. M. (1980). A concurrent validity study of the CAQ and MMPI. In Samuel E. Krug (Ed.), *Clinical analysis manual*, (pp. 17-20). Savoy, IL: Institute for Personality and Ability Testing.
- Gordon, R. M. (1978). Imprecision or dissonance? A reply to Harris and Harvey. *Journal of Consulting and Clinical Psychology*, 46, 329-330.

- Gordon, R. M. (1976). Effects of volunteering and responsibility on the perceived value and effectiveness of a clinical treatment. *Journal of Consulting and Clinical Psychology, 44*, 799–801.
- Gordon, R. M. (1975). Effects of interpersonal and economic resources upon values and the quality of life. *Dissertation Abstracts International, 36*, 3122B. (University Microfilms No. 75–28, 220).
- Weissman, H. N., Goldschmid, M. L., Gordon, R. M., & Feinberg, H. (1972). Changes in self-regard, creativity, and interpersonal behavior as a function of audio-tape encounter groups. *Psychological Reports, 31*, 975–981.
- Shure, M. B., Spivak, G., & Gordon, R. M. (1972, May). Problem-solving thinking: A preventive mental health program for pre-school children. *Reading World, II*(4) 259-273.
- Weissman, H. N., Ritter, K., & Gordon, R. M. (1971). Reliability study of the defense mechanism inventory. *Psychological Reports, 24*, 1237–1238.

Fed.R.Civ.P. 26(a)(2)(B)(v) Statement 2019

Nature of Practice

Since my Pa. license to practice psychology in 1976, I have specialized in clinical and forensic psychodiagnostic assessment (along with psychotherapy, research and teaching). My forensic practice is general in nature, that is, not limiting myself to any particular civil or criminal area or to defense or plaintiff work. The only exception is that from 2010-2020, I worked as Lehigh County Public Defender Office's forensic psychologist which included teaching doctoral students how to do forensic assessments. About 30% of my professional work is in forensic psychology.

My general forensic assessment practice has included assessments for:

- IMEs and psychological record reviews
- Criminal responsibility
- Mental state
- Competency to stand trial
- Capital mitigation evaluations
- Juvenile matters and transfer evaluations
- Sentencing evaluations
- Malingering and deception
- Testamentary capacity

PTSD

Personal injury and emotional distress claims

Malpractice — plaintiff and defense

Sexual offender evaluations

Risk assessment

Family law: custody, parental competence, parental alienation, adoption

Employment issues: fitness for duty, discrimination, harassment, wrongful termination.

2019

Denise Gallagher v Lehigh County Children and Youth Services CP 39 DP 0000266 2018
(Testimony for the mother)

2018

Rogers v. Dr. Cerwonks Parish of Lafayette Louisiana for the Defense

2017

Fontanez competency to stand trial - Lehigh County Defense

Estepan v. Ferguson for the plaintiff in a MVA

Dr. Cerwonka v. Louisiana State Board of Examiners of Psychologists for the Defense

2016

Gabrieli v. Easton Hospital, et al. for the defense

Green vs. Lehigh Valley Hospital for the defense

Deanne and Toby Snyder h/w vs. Estate of Geoffrey K Sherman, M.A. et al. for the
defense

Shugars, Leonard state of mind - Lehigh County Defense

Blahosky, Carolyn for the plaintiff PTSD from MVA Lehigh county

2015

Diggs, Jhainee Nateequa, decertification hearing - Lehigh County Defense

Hausknecht, Barbara for the plaintiff PTSD from MVA Lehigh county

Zimmerman, Joseph state of mind - Lehigh County Defense

Figuroa-Velez, Axel decertification hearing - Lehigh County Defense

Melendez, Juan competency to stand trial - Lehigh County Defense

2014

Scardetto v. Scardetto - Custody - Bucks County- request of Father's Atty.

Commonwealth v. Jean-Pierre - Lehigh County Defense

Commonwealth v. Heminitz - Lehigh County Defense

Commonwealth v. Rivera-Oyola - Lehigh County Defense

Commonwealth v. Rodriguez - Lehigh County Defense

Commonwealth v. Lehigh County - Defense
Shoen v. Shoen Deposition Custody- Berks County - request of Mother's Atty.

2013

Commonwealth vs. Tirado Lehigh County Defense
Dawson vs. Shoemaker-Deposition for the Plaintiff, P.I. Lehigh County
Commonwealth vs Amonra Lehigh County Defense
Commonwealth vs Heminitz Lehigh County Defense
Commonwealth vs Yeager Lehigh County Defense

2012

Cortez vs. Cortez Custody –court appointed evaluation- Luzerne County Courthouse
Lis vs. Wittich Custody- court appointed evaluation- Berks County Courthouse
Forrestel v. Forrestel State Supreme Court Erie County Review of psychological tests as requested by mother's attorney
Kinsey vs. Star Custody Court Appointed, Berks County
Pelosi vs Stokes Custody Court Appointed Northampton County
Commonwealth vs Kromer Lehigh County Defense

2011

As a Forensic Psychologist for Lehigh County Public Defender's Office Court
Testimonies in Lehigh County Court trials:
Commonwealth vs. Cressman. Jeffrey – 3232-2010
Commonwealth vs. Santos, Samuel- 4114/2010
Commonwealth vs. Laureano, Christian – CR 4062-4067-2010
Commonwealth vs. Klein, Geoffrey – 3476-2011
Commonwealth vs. Castillo-Mota, Braulio Rafael – 62-2010
Commonwealth vs. Hernandez, Brandon – CP 39 – LV – 0000933 – 2010
Commonwealth vs. Glasper, Eli – CR 1943 – 2010
Commonwealth vs. Cowley, Richard – 2984-2010
Commonwealth vs. Lopez, Antonio – 555-2010

Civil

In re: A.C. Department of Public Welfare- #48001900, Sex Abuse Defense Witness
Bureau of Hearing and Appeals Reading State Building – Trial

2010

Berry, Bobbie –Kutztown Univ. Plaintiff's Expert Witness at deposition in disability case
Ayala vs. Tomaino- Sex Abuse Evaluation- defense Lehigh County court- trial-
2009-FC-0330
Kriner v. Kriner - Custody opinion at Berks county court- trial
Velez-Hernandez, Gustavo David- As a forensic psychologist for Lehigh County Public
Defender's Office – trial- 301/2011

Fed.R.Civ.P. 26(a)(2)(B)(vi) Statement

The fee for all time and services by Dr. Robert Gordon is \$400 an hour including travel time. Depositions and court testimony are charged \$4000 per day. Bills for this case are enclosed.