

## The Sexism of Transitive Verbs in Legal Process

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### Abstract

The use of grammatical transitivity by the criminal law is considered. This question is discussed: is it appropriate for courts to use a discourse in which unthinking men do actions that cause harm to the feelings of women? Is the mental state of an actor depicted by the language used to describe the actions of that actor? The choice of verbs such as “abuse”, “treat” and “ply with” and military metaphors such as “bombard” and “harass” in relations between men and women are particularly problematic. The data analysed are child protection, relationship break-up, and intimate partner violence. Frieze’s evidence on habitual one-sided violence and the more frequent “common couple violence” is reproduced. Transitive verbs are analysed in the cases of *R v. Love* and *R v Balakrishnan*. Some reformulations using intransitive verbs with multiple agents are offered.

**Keywords:** transitivity, sexism, abuse, harassment, coercion

### Introduction

Law depends heavily on accurate use of language, yet the way we speak remains preconscious and needs bringing into the light. The rationale for the present research is to examine the use of transitive verbs in legal processes to see whether bias is created. The question to be answered is whether rephrasing with intransitive verbs changes the presumption of wrongdoing. The methods for the analysis are linguistic, particularly those used for elucidating hidden syntax.

The traditional grammar of English derives heavily from the grammar used to teach Latin, dating from the centuries when Latin was the high language of England, reconstructed from historic sources. Verbs are our interest here, so does English have the tenses, moods and voices that are essential for learning Latin? Moods show the speaker's attitude to what they are saying. Most utterances are in the indicative mood, but other possibilities are interrogative, imperative or subjunctive. Questions and orders are fairly self-explanatory, whereas subjunctive in English is now a rarely-used mood for hypothetical events. It was historically taught in English but is now hardly marked in morphology and most educated people cannot reliably distinguish it. A

hypothetical judge might say about an agitated accused, “I order that the prisoner *is* removed and *sees* a doctor”. These might slip by as a good English sentence, but a nagging doubt might prompt him or her later to change it to “...*be* removed” and “that he *see* a doctor”. The judge might also say “if the accused drank less, he might remember who he gave the stolen items to”. On reflection the judge might notice this type two conditional is using an unreal past and also recall that “who” displays inflectional morphology. The transcript might then read, “...if he *were* to drink less ...” and “to *whom* he gave the stolen items”.

The judge who chose these corrections would be reinstating the subjunctive mood, the ‘who’ morphology and an older verb form for the conditional, which are each slipping into disuse. Omission of the subjunctive and unreal past in a conditional are now generally acceptable for educated English. This obsolescent English would probably increase the perceived gravitas of the court, at the expense of distancing it from the accused. This obsolescence is of interest here in possible distortions introduced by a court that chooses to use transitive verbs for the actions of a man attributed the status of perpetrator and intransitive verbs for the feelings of a woman attributed the status of victim.

Voice usually means active or passive, and a middle voice is described occasionally. There is a small literature on the passive voice in legal use. Riggle (1998) analysed 185 legal texts used in the US Air Force. This author notes that many current technical writing handbooks still advise writers to avoid the passive voice, but finds several situations where there is a choice between active and passive voice. I am choosing to use the first person in the rest of this paragraph after reading Nunn et al's (2018) analysis of 10 papers in the journal *Nature*, which encourages the use of the first person in conjunction with the active voice. They found that authors used the passive voice more in the method section but first-person transitive verbs in the main body. In clinical practice I found that probation officers may advise their clients not to say, “he looked at me in a funny way so I hit him before he could hit me”. An alternative such as “I was under severe threat and was obliged to defend myself” is likely to induce a more favourable attitude in the judge.

Transitivity is a relatively robust way of describing verbs. This construct refers to whether or not the verb takes a direct object. Some verbs such as “give” can take an additional indirect object and are said to be ditransitive. The hypothesis to be investigated here is this: speakers trained in law frequently choose a verb that has a female, or the mental state of a female, as direct object of a transitive verb.

In modern linguistic theory there are many competing grammars. Chomsky’s approach has had several iterations, of which the third was Minimalism. I used Adger’s (2003) textbook and

managed to analyse syntactic trees in an examination and achieve a good pass, but still find Minimalism challenging! Another approach is Corpus Linguistics (Sinclair, 1992), which is particularly appropriate for large amounts of text on computers. Algorithms may be used to predict the next word without assuming a sentence syntax. This is good for mobile phones, but not for law.

Systemic Functional Linguistics (SFL) is another competing grammar theory, which offers a different account of transitivity. SFL was proposed by Halliday and widely used for research on legal proceedings. Halliday rephrases transitivity in terms of three constituents: Participant, Process and Circumstance. For example, one study of English-Persian legal translations (Aghagolzadeh & Farazandeh-pour (2012) used SFL in a typology of students' errors. They classify a "Mistranslation" only when all three transitivity constituents in a sentence, namely Participant, Process and Circumstance, are wrong.

De Carvalho Figueiredo (1998) analysed transitivity choices in five appellate decisions in rape cases, using Halliday's understanding of transitivity. She says, "To analyse relations of agency and causality in the reported decisions I will investigate not only what kinds of processes appear in it, but also the passive and the nominalizations used when referring to the three main participants of an appeal: the judges (or the Court), the appellant (the man convicted of rape, who is now appealing the previous judgment) and the complainant (the woman who was raped)." Note that she does not say "the woman who alleges she was raped". The author's use of critical discourse analysis makes transitivity hard to separate.

Bartley (2017) also analysed transitivity in a courtroom discourse where a man was convicted of raping a minor. He uses the Appraisal feature of Systemic Functional Linguistics to examine the closing arguments of lawyers for both sides, which apparently led to wrongful conviction. Bartley later expands this PhD thesis in a comparison of the Sydney and Cardiff approaches to SFL (Bartley, 2018). Unfortunately, there is no phrasebook, as it were, to compare several competing grammars with traditional grammar, so the reader will be greatly slowed down if they have to follow this side route. For the present research traditional grammatical terms such as "adverb" (see e. g., Vocatic, no date) will be used in preference to "circumstance" of SFL.

"Consent to sexual intercourse" is particularly problematic linguistically. It implies an active male agent and a female passive object. It makes the comparison with consent to a surgical procedure. The consent form is in principle the moment where the doctor yields agency to the patient, though I have heard junior surgeons say they "have consented the patient". Consent in law requires a permanent record - in text with a signature, or by audio-visual recording. This

hardly ever happens and indeed I would be interested to hear of a historical record of consent to intercourse. Kaitlin Priest is a woman journalist who discloses her own sensitive experiences, including an episode where she went to bed with a long-term male friend and subsequently regretted doing so. She had left her recording equipment running and later listened to her own conversation. In this rather unusual evidence, she reappraises her utterances as excitement. Radiolab (Oct 12, 2018) included this in a series of four podcasts using the punning title “in the no”. Radiolab tentatively suggests that “they reached a consensus” (and, presumably, “they disagreed”) is a better phrase than “she consented”. In legal practice consensus or dissensus may have to be decided behaviourally. “Coming in for a nightcap” implies a strong commitment and putting on a condom is almost unambiguous. “Consensus” derives from Latin “consentire” - “to feel together” via French. The derivative “consent” meaning “giving permission” apparently occurred in French before it was borrowed into English. It was mainly used for legal contracts until about 1977 when it was extended to rape (Online Etymology Dictionary, n.d.).

### **Methodology**

The materials below are compared on one feature only – transitivity. The utterances have been presented under a numbering system which can be used for later analysis. While, in principle the official record of a court procedure can be found at the judiciary.uk website, strictly speaking, the utterances in the sections beginning with “2” or “5” are taken from newspaper reports, thus, these two groups are sentences provided by the newspaper editor rather than the court’s transcription.

### **Analysis**

The following seven sentences 1.1 to 1.7 are constructed by the author for purposes of discussion or have been drawn from external sources (where noted). They use verbs that are relatively appropriate for describing conception. Consider the agency of the following statements.

- 1.1 Adam begat Seth; and Seth, Enos [1 Chronicles 1, *Wycliffe Bible*]
- 1.2 Mary was found to be pregnant through the Holy Spirit [1 Matthew 18, *New International Version Bible*]
- 1.3 John and Jane decided to have full intercourse on her 16th birthday, but he got her pregnant straight away
- 1.4 John and Jane feel they are mature and financially secure enough to be parents

- 1.5 John and Jane have started a family
- 1.6 Jane feels it's a woman's choice and is not taking precautions
- 1.7 Jane longed to be a mother and the baby was conceived by anonymous donor insemination

The sentences above describe a biological event in which conception occurs by two parents. The differences are mainly in agency – who did what to whom. In 1.1 the main concern is the paternity of the child, which determines inheritance of livestock and land and the mother's view is not heard. One male agent with a transitive active verb takes a child as its direct object. In 1.2 the mother is passive and the object of two transitive verbs. In 1.3 two agents agree on intercourse, but his lack of (family) planning is held to transitively cause her conception. A more modern pattern appears in 1.4 and 1.5. In the first a man and woman share feelings but there is no direct object. In the second their actions have caused a conception - two agents, transitive verb, family as direct object. One aphorism concerning traditional sex differences is "men do, woman feel", but in these sentences both feel, and both do. In 1.6 the single subject leaves conception to chance and rejects agency. The parents of John and Jane in both 1.3 and 1.6 might feel that the young people are being feckless and ask who will provide the money and childcare. In 1.7 one female agent discloses only her feeling and the baby is the passive object without a clear causal connection by a male. If the child later takes legal action to discover their paternity, it will appear that Jane had chosen to conceal it. The corpora of utterances that follow will be examined to see whether the even-handedness of 1.4/1.5 actually prevails in law, or whether 1.1 to 1.3 still prevail.

Modern English verbs are extremely difficult to categorise and rarely correspond to a grammar based on Latin. What are the Latin conjugations corresponding to the following? “I am going to London tomorrow”; “boys will be boys”; “we would take a picnic in summer”. Most grammatical forms for describing the act of conception still favour a male subject and a female object, though a female agent with a transitive verb and the baby as grammatical object is now just possible, as in 1.7. The issue to be explored in the following sentences is this: can the behaviour of a male partner be connected by grammatical transitivity with the mental state of a female partner?

The principal legal domain in which transitivity is used is child abuse. UK Government guidance (National Society for the Prevention of Cruelty to Children [NSPCC], no date) defines four types of child abuse, as follows: 1. Physical abuse, 2. Emotional abuse, 3. Sexual abuse 4. Neglect. A minor is presumed not to have mental capacity and to be substantially weaker than an adult. Therefore, transitive verbs are natural for the first category, with verbs

such as hitting or punishing. The legal principle that a minor can never consent makes transitive verbs fairly appropriate for the third category, irrespective of whether “seduction” and “buying favours with sex” by the minor are sometimes involved. Transitive verbs for the second and fourth types, emotional abuse and neglect are more problematic. “Emotional abuse” in 2. 1 and 2. 2 below involves the mental state of the object. It is highly doubtful whether one person’s thoughts are wholly determined by another’s actions. “Neglect” in 2. 3 below is a failure to act, rather than harmful action. (These sentences are taken from NSPCC, no date.)

- 2.1 conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- 2.2 ‘making fun of’ what they say
- 2.3 neglect is the persistent failure to meet a child’s basic ... psychological needs

These statements imply a causal chain between the adult’s actions and the child’s mental state. “Conveying” takes [a mental state of being] “worthless or unloved” as direct object and “children” as indirect object. “Making fun of” is a phrasal verb equivalent to “mocking”, which is a transitive verb with the child’s utterances as its grammatical object and mental state as its implied object. It may be doubted whether a mental state can ever be a direct object. Although the actions of an adult are a major influence on a child’s thinking, the child always has at least some chance of thinking differently. The child may be angry, cynical, or think he or she deserves what is being said. Consider the following sentence: “Hitler terrified the Jews”. There is no doubt about perpetrator and victim in this sentence, but were the victims “terrified”? Terrified people behave in a disorganised way and are highly physiologically aroused, so they become exhausted quickly. “Fearful compliance” was a more usual response. Occasionally, as with the Bielski partisans, the desire for active defence and even retaliation was the dominant mental process.

Forms of syntax that speak of “adverse influences on thinking” rather than causes would be preferable, not least because it gives a good therapeutic direction. A more satisfactory revised syntax of the NSPCC propositions would include mental states of both parties, as follows, where ‘A’ enumerations show an intransitive version of the utterances above:

- 2.1A parents who have experienced coldness in their own childhood may not nurture their children towards feeling worthwhile, loved, adequate, or valued
- 2.2A a parent who has status insecurity may make derogatory remarks about a child so that the child may also feel lower self-worth
- 2.3A a parent may be unaware of or unable to give nurturance to a child

We turn now to the problematic area that arises when the concept of abuse is extended to interactions between adults. “Abuse” has its etymology in the prefix ab- and the verb use, and the original meaning “to use up”. Until recent decades it usually meant to make derogatory statements to someone. The use of the verb “abuse” between female and male adults is highly asymmetrical. Consider the statements:

3.1 John abused his wife Jane

3.2 Jane abused her husband John

The simple transitive syntax in 3.1 is the same as in 1.1 above. The mental state of the object is presumed to be of having been emotionally harmed or neglected, but the mental state of the agent is unknown. 3.2 has the same syntax as 3.1, but its use is as rare as 1.7.

The verb “to treat” is also used asymmetrically between the sexes. English uses the passive voice to focus on the person affected, rather than the person affecting. Consider the plausibility of an active female and passive male in the following sentences (sentences 3. 3 are novel and created for this discussion):

3.3 John was badly treated by Jane after she married him

3.4 Jane was badly treated by John after he married her

Social influence is best considered in terms of attributions. It would be more psychologically accurate to rephrase either of the above in terms such as

- “A experienced B as unsupportive / critical/ loud etc.”

The verb “to ply with” also discriminates between the sexes, as may be heard in the following sentences.

3.5 John plied Jane with drink in order to have sex with her

3.6 Jane plied John with drink in order to steal his wallet

The first has been widely used in several recent criminal trials in the UK. Its use immediately implies wrongdoing and prejudices the jury member or onlooker. If the phrase was used before trial, it might even be considered contempt of court. The idea of a woman plying a man with drink for wrongful purposes is now improbable, though historically prostitutes often robbed sailors this way.

Power attributions about electronic communication are particularly enhanced by battlefield metaphors. The term was coined by Sandra Bem (1974), to describe how academic seminars use military metaphors: positions are advanced, attacked or defended. Bem saw this as a deterrent to female students, who might prefer a more collaborative academic atmosphere. Text messages, e-mails and tweets are intrinsically rather weak communications: only characters are sent, without paralinguistic and non-verbal communication; the presumed reader is absent and

can always block the message. Various verbs associated with female harming might be chosen, such as “she gave him a poisonous look” or “her coldness pierced him through the heart”. However, the preferred metaphors in several recent court case have come from artillery and cavalry warfare. “Bombard” and “launch a campaign” are very frequent.

The verb “harass” has become a specific legal offence to describe attempts to communicate or be in proximity with another that are rejected. The verb retains its earlier associations of repeated small-scale attacks before or after a major battle. Harassing was the task of hussars or skirmishers and other light cavalry. Barratt (2008) says “British light dragoons were first raised in the 18th century. Initially they formed part of a cavalry regiment performing scouting, reconnaissance and the like, but due to their successes in this role (and also in charging and harassing the enemy), they soon acquired a reputation for courage and skill.”

The language used by the Crown Prosecution Service in a “harassment” case (*R. v Adam Love*) was reported by the *Daily Mail* (Gye, 2013). Mr Love is described as having made 200 phone calls, 400 text messages and 74 e-mails, apparently in a continuous 14-hour period. The intended reader/ listener for each of these was only the other partner. There is no mention of Facebook or Instagram, which would have allowed other people to listen in: both parties had such sites, images from which were reproduced by the *Daily Mail* (Gye, 2013). The linguistic context is close to a perfect dyadic communication. The semiotics (Saeed, 1997) of the communication are violated by this dissemination. The mechanics and propriety of this disclosure were not discussed in the published evidence. The *Daily Mail* (Gye, 2013) reports (emphasis added):

- 4.1 Adam Love bombarded aspiring doctor Gabrielle Onions with 200 phone calls...  
Recorder Pye sentenced him to eight months and said
- 4.2 “you dominated her life and when she ended your relationship ...
- 4.3 “you started the campaign of harassment in which ...
- 4.4 “you threatened her life”.

Unfortunately, this conviction for “harassment” thus combines a negative mental state, which was not explored, and metaphors supplied by the court for either attack with a sword from horseback or artillery rounds.

In *R v Aravindan Balakrishnan*, (B) of Enfield, north London, was convicted of six counts of indecent assault, four counts of rape and two counts of actual bodily harm at Southwark court. He was also found guilty of cruelty to a child under 16. Six women complainants, B, B’s daughter and another woman communard sympathetic to B, had shared a commune in Brixton,

South London for decades. The following utterances 5.1 to 5.7 are taken from The Daily Telegraph (Ward, Nov 14 2015; Ward, Dec 4 2015):

Ms Rosina Cottage Cottage for the prosecution used these phrases

- 5.1 B told the woman she should never dream about anyone else
- 5.2 B treated female followers as sex slaves
- 5.3 B brain-washed them into believing they would die if they did not worship him as a god
- 5.4 B is accused of raping two women
- 5.5 B founded the Communist collective
- 5.6 B used violence and sexual degradation to bend them to his will [multiple transitive verbs]
- 5.7 B told her she would be killed by the fictional, dangerous character ‘Jackie’ he had created in order to threaten his followers and control their minds

The BBC web-site (2015) reported that chief crown prosecutor for London, Baljit Ubhey, said:

- 5.8 “Balakrishnan has robbed these women including his own daughter of a huge part of their lives”

and that the Det Supt Caroline Barker said:

- 5.9 “The victims were so conditioned that they truly believed he was all-powerful and all-seeing. Tragically one of them was born into his control”.

Propositions 5.1 to 5.9 above are rephrased with ‘A’ enumerations, using intransitive verbs as far as possible.

- 5.1A The woman felt that disclosing her dreams to B was unwelcome
- 5.2A Female members did not feel they could refuse B sex
- 5.3A B’s communications were compared by some women with the political re-education programmes for American PoWs in the Korean war.
- 5.4A Two women made love with B at various times; the extent to which these achieved consensus is now disputed
- 5.5A Several women and B founded the communist collective
- 5.6A Some women felt their social status was reduced after sex
- 5.7A She thought she might be killed by Jackie after discussion with B
- 5.8A Several women including Miss B felt their lives had been futile and attributed this to B
- 5.9A Some women’s attributions of divinity to B had arisen by Pavlovian Conditioning

After the verdict one of the defendant's former followers shouted: "You are sending an innocent man to prison. Shame on you". The full force of English law therefore says this: "six or more women living in a terrace house in Brixton were so powerless that they were unable to leave the house, refuse sex or listen to media over a 45 year period, while the accused was such a powerful personality that he needed no weapons or restraints to enforce his command". Is this plausible?

Intimate partner violence is a third area where choice of verb is critical in legal process. Professor Irene Frieze (2008) has summarised the data as follows. The earlier research generally drew on battered women, but general population surveys gave a rather different picture. Straus (1979) used the Conflict Tactics Scale (CTS) and found that 16% of US married couples had had some partner violence in the last 12 months, and that 27% of the men and 24% of the women reporting using violence against their partner. Archer (2000) published a meta-analysis of 82 published and unpublished studies of partner violence and concluded that overall women are more likely to use aggression as measured by the CTS than men. In spite of women initiating more violent acts, it was also found that 65% of those reporting injuries from partner violence were women, and 71% of those receiving medical treatment were women. Frieze distinguishes two patterns: one involving very one-sided and repeated violence, typically from a man to a woman; a second pattern is "common couple violence", which tends to be relatively low-level violence that rarely results in injury and is done by both men and women, about equally. The default language for common couple violence would therefore be an intransitive dual-subject verb such as "they fought". This could be qualified if the one partner used unreasonable force and escalated to use of a weapon or battering.

## **Discussion**

The data above may show that arraignments and judicial verdicts using intransitive verbs are less prejudicial to male defendants. Unfortunately, UK law continues to extend the linguistic framework in which one person is nominated as a "perpetrator" who transitively causes a mental state in a second person, dubbed a "victim". We may consider Section 76 in the United Kingdom's Serious Crime Act 2015 as an example.

"Controlling or coercive behaviour in an intimate or family relationship" was a new crime defined by Section 76 Subsection 1 in the UK's Serious Crime Act 2015, in which:

6. 1 "a person (A) commits an offence if — A repeatedly or continuously engages in behaviour towards another person (B) that is controlling or coercive ... and the behaviour has a serious effect on B..."

The “serious effect” is defined in Subsection 4 of the Act as

it causes B to fear, on at least two occasions, that violence will be used against B or (b) it causes B serious alarm or distress which has a substantial adverse effect on B’s usual day-to-day activities ....

The law was championed by Gillian Guy of the Citizens’ Advice Bureau. All the examples she gave in motivating the new law were of a man trying to restrict the spending of his woman partner. No woman has apparently yet been angry enough to seek imprisonment of her ex-partner about her spending habits. The Surrey police used the “Coercion” law to achieve imprisonment of Steven Saunders, a homeless man, so that he could be separated from his partner who was pregnant. She did not want to appear, so Surrey police have declared with some pride that the conviction is “the first to be made only on hearsay evidence” (Smith, 2018).

At the same time as the law extends into intimate relationships, controlling behaviour in intimacy is being greeted enthusiastically in romantic fiction. The 50 Shades trilogy novels by E. L. James have sold 125 million copies. These were written by a woman and 80% of readers are women, spread fairly evenly across the age spectrum. The inference is that the women who identify with Anastasia wish to cede control of their sexuality to a man who is wealthy, attentive and monogamous. Perhaps the last quality is the most unlikely feature of the imaginary Christian Grey.

The “Rescue Triangle” of Perpetrator, Victim and Rescuer is well-known in couple therapy as a “game” in Transactional Analysis theory. Zimberoff (1989) offers some therapeutic applications of the triangle. The three positions are unstable: a would-be rescuer who identifies only with the “victim” and rejects the viewpoint of the “perpetrator” can then become the perpetrator. Section 76 of The Serious Crime Act (2015) invites courts to take just such a one-sided identification. The above discourse can readily be rewritten in this way using the Rescue Triangle:

6. 2 “the legal person A (judge) takes the viewpoint only of V (victim) and continuously engages in behaviour towards B (the defendant) that is controlling or coercive, causing B to fear violence and causes B serious alarm or distress ...”

If this were applied to R v Adam Love above, it would become:

6. 3 “Judge Pye took the viewpoint of Onions and engaged in behaviour towards Love that was coercive by confining him in jail, causing Love to fear violence or sexual molestation – a frequent consequence of imprisonment.”

This discussion has argued that the use of transitive verbs in legal contexts to describe relationships between adult male and females is biased. The use of shared-agency verbs,

passive voice and intransitivity would be less sexually discriminatory. Whereas sentences 1.1 to 1.7 provide a range of syntaxes for the act of conception, an active male subject acting transitively on a passive female object is still the default assumption. The differences between males “doing” and females “being” probably originates in the domain of biology rather than syntax.

### Conclusion

The utterances above argue that courts' choices to use transitive verbs in the area of conflict between men and women is prejudicial to men. The interests of justice may be better served by rephrasing arraignments and judgments with intransitive verb forms. The above sample of criminal cases is small so further research is indicated. Courts seem to be able to slip into a discourse in which active males do wrongful things to passive females. The unwitting ease with which this discourse is adopted hints at a biological process. Perhaps there is a preconscious drive to protect babies and their mothers. This is an important area for research which is beyond the scope of this journal article.

### References

- Adger, D. (2003). *Core Syntax: A Minimalist Approach*. Oxford University Press.
- Aghagolzadeh, F., & Farazandeh-pour, F. (2012). The analysis of English-Persian legal translations based on Systemic Functional Grammar approach (SFG). *Theory and Practice in Language Studies* 2(1), 126-131. <https://doi.org/10.4304/tpls.2.1.126-131>
- Archer, J. (2000). Sex differences in aggression between heterosexual partners: A meta-analytic review. *Psychological Bulletin* 126, 651–680. <https://doi.org/10.1037/0033-2909.126.5.651>
- Barrett C.R.B. (2008). *History of the XIII Hussars Volume 1*. Naval & Military Press.
- Bartley, L.V. (2017) *Transitivity, no stone left unturned: Introducing flexibility and granularity into the framework for the analysis of courtroom discourse* [unpublished doctoral dissertation]. Universidad de Granada]. <https://digibug.ugr.es/handle/10481/48043>
- Bartley, L.V. (2018) Putting transitivity to the test: a review of the Sydney and Cardiff models. *Functional Linguist* 5, 4. <https://doi.org/10.1186/s40554-018-0056-x>
- BBC. (Dec 4, 2015). Maoist cult leader Aravindan Balakrishnan guilty of sex assaults. <https://www.bbc.com/news/uk-england-london-35007848>

- Bem, Sandra L. (1974). The measurement of psychological androgyny. *Journal of Consulting and Clinical Psychology* 42, 155–62. <https://doi.org/10.1037/h0036215>
- De Carvalho Figueiredo, D. (1998). An analysis of transitivity choices in five appellate decisions in rape cases. *Fragmentos* 8(1), 97-113.  
<https://periodicos.ufsc.br/index.php/fragmentos/article/download/6041/5611>
- Frieze, I. (2008). Social policy, feminism, and research on violence in close relationships. *Journal of Social Issues* 64(3), 665-684. <https://doi.org/10.1111/j.1540-4560.2008.00583.x>
- Gye, H. (2013, Oct 18). Gifted student, 26, threatened to drown ex-girlfriend, 21, in lake while sending 400 texts, 74 emails and making 200 calls to her in just 14 hours. *Mail Online*. <https://www.dailymail.co.uk/news/article-2465873/>
- Judiciary.UK. (n.d.). <https://www.judiciary.uk/judgment-jurisdiction/crime>
- NSPCC. (n.d.). *Child abuse and Neglect*. Retrieved March 9 2019 from <http://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/>
- Nunn, R., Deveci, T., Khan, I., & Ayish, N. (2018). A transitivity investigation of *Nature* journal articles: Legitimizing first-person use. *The Linguistics Journal* 12(1), 192-220. <https://www.elejournals.com/linguistics-journal/linguistics-journal-volume-12-issue-1-2018/>
- Online Etymology Dictionary. (n.d.) Consensual, adj.  
[https://www.etymonline.com/word/consensual#etymonline\\_v\\_28668](https://www.etymonline.com/word/consensual#etymonline_v_28668)
- Radiolab. (2018, Oct 12). In the No. Part 1 [podcast transcript]. WNYC Studios.  
<https://www.wnycstudios.org/podcasts/radiolab/articles/no-part-1>
- Riggle, K.B. (1998). Using the active and passive voice appropriately in on-the-job writing. *Journal of Technical Writing and Communication* 28(1), 85-117.  
<https://doi.org/10.2190/4G7U-PMYR-8M2T-RA3C>
- Saeed, J.I. (1997). *Semantics*. Oxford: Blackwell.
- Sinclair, J. (1990). *Collins Cobuild English grammar*. London: Collins.
- Sinclair, J. (1992). The automatic analysis of corpora. In J. Svartvik (Ed.), *Directions in corpus linguistics (Proceedings of Nobel Symposium 82)*. Berlin: Mouton de Gruyter.
- Smith, J. (2018, Feb 1) 'Securing a conviction on hearsay evidence is unusual': Surrey case sets new precedent for victims of coercive and controlling behaviour. *Surrey News* [online]. <https://www.getsurrey.co.uk/news/surrey-news/surrey-mans-prison-sentence-sets-14234328>

Conduit, E.

Straus, M.A. (1979). Measuring intrafamily conflict and violence: The Conflict Tactics Scale. *Journal of Marriage and the Family* 41, 75-88.

The Serious Crime Act 2015. (2015). The United Kingdom.

<http://www.legislation.gov.uk/ukpga/2015/9/section/76/enacted>

Vocatic. (n.d). 3b. Advanced English Grammar – Discourse markers (adverbs/adverbial expressions). <http://advancedenglish.net/3b-advanced-english-grammar-discourse-markers-adverbs-adverbial-expressions>

Ward, V. (2015, Dec 04). Maoist cult leader guilty of rape, sexually assaulting followers and keeping daughter as slave for 30 years.

<https://www.telegraph.co.uk/news/uknews/crime/12031449/Maoist-cult-leader-Aravindan-Balakrishnan-guilty-of-keeping-daughter-as-slave.html>

Ward, V. (2015, Nov 14). Cult leader 'threatened to kill daughter for having a crush on Ken Livingstone'. *The Daily Telegraph*. <https://www.pressreader.com/uk/the-daily-telegraph/20151114/282746290659334>

Zimberoff, D. (1989). *Breaking Free from the Victim Trap*. Nazareth: Wellness Press.