



PROBABLE CAUSE

PROBABLE CAUSE



WHY IS IT THE STANDARD IN THE FIRST PLACE?



WHERE IS PROBABLE CAUSE REQUIRED AND WHAT FACTORS SHOULD YOU CONSIDER?



HOW DO WE TAKE THIS ABSTRACT TEST AND MAKE IT SOMETHING YOU CAN WORK WITH?



AGENDA

- **DEFINITIONS/HISTORY**
 - **CASE LAW**
- **WHEN TO CONSIDER PROBABLE CAUSE**
 - **PRACTICAL CONSIDERATIONS**
 - **SCENARIOS**
 - **CONCLUSION**

A WORLD WITHOUT A STANDARD

Imagine if there was no standard
in place

How could you do your job

What bad results could you see

Imagine the conflicts and issues
this would cause the Court system



HISTORY

WHERE DOES OUR LEGAL SYSTEM COME FROM

- England
- We based much of our system on theirs
- This was a system we were comfortable with in the beginning
- The original settlers also brought with them books, letters and pamphlets from their homes in England
- Pre-1600s- No real standard except what the royalty wanted

1677

This is when the debate started in England and eventually made its way to the lawyers and judges that presided over our early courts

The debate hinged on the concern of law clerks at Oxford that citizens were making charging decisions that the clerks felt went against the laws on the book

The Clerks sought to limit the power of the grand juries and instill the power in the trial courts

THE FIGHT BETWEEN THE WHIGS AND TORIES

- Late 1600s
- This should come as no surprise of how probable cause came into discussion
- Whigs- wanted power in parliament
- Tories- wanted power in the monarchy
- Whigs gained some seats in parliament and started prosecuting Tories
- The King cancelled parliament
- Tories took revenge



1681/1682

After a fight between the Whigs and the Tories

The standard in London changed, London was Whig territory:

- Grand Juries should be fully satisfied in their conscience that a defendant is guilty before they return a true bill

(This was not necessarily a standard that judges told grand juries, but pamphlets were distributed throughout London to push this theory)

PAMPHLETS FROM LONDON



The pamphlets from London were reprinted in America during the 1700s



These encouraged and created a debate amongst the legal community after the revolution



But there was one more source of information that had more influence than any before it.....

BLACKSTONE'S COMMENTARIES ON THE LAW OF ENGLAND

GRAND JURY EVIDENTIARY STANDARD:

They are only to hear evidence on behalf of the prosecution, for the finding of an indictment is only in the nature of an inquiry or accusation, which is afterwards to be tried and determined; and the grand jury are only to inquire upon their oaths, whether there be sufficient cause to call upon the party to answer it. A Grand Jury, however, ought to be thoroughly persuaded of the truth of an indictment, so far as their evidence goes; and not to rest satisfied merely with remote probabilities; a doctrine, that might be applied to very oppressive purposes

BLACKSTONE'S PROCESS

“They are only to hear evidence on behalf of the prosecution”

- This was not to be a trial, those come later

the grand jury are only to inquire upon their oaths, whether there be sufficient cause to call upon the party to answer it

- Read “probable cause here”

*Grand Juries ought to be **thoroughly persuaded** of the truth of an indictment, so far as their evidence goes*

- The grand jury should trust the person that they are hearing from and the sources that the person presenting is relying on

not to rest satisfied merely with remote probabilities

- Grand juries were to not make assumptions, either the evidence was there or not

HISTORY OF CHARGING STANDARDS

- 1790- The first federal grand jury gathered in Pennsylvania
- At this time there was still a debate on what standard a grand jury should use to charge an individual:
 - 1. Confident of guilt or
 - 2. Any subject the grand jury thought that someone should have to answer for

**EARLY
CONSIDERATIONS
1780 TO 1850**

Courts wanted a standard that was quite high to meet

These were in some ways, trials put on by the prosecution

There was no defense arguments, but the prosecution had to show their entire hand

The courts did not want rush to judgment

WHY DID COURTS WANT A STRICT STANDARD AT THIS TIME



We can only guess but,



Likely Judges were trying to fix a problem that existed elsewhere



During this time trials were generally forgone conclusions



Also, conflicts of interest were always prevalent and the Judges wanted that issue examined as well



Trials were simple and most lasted less than a day

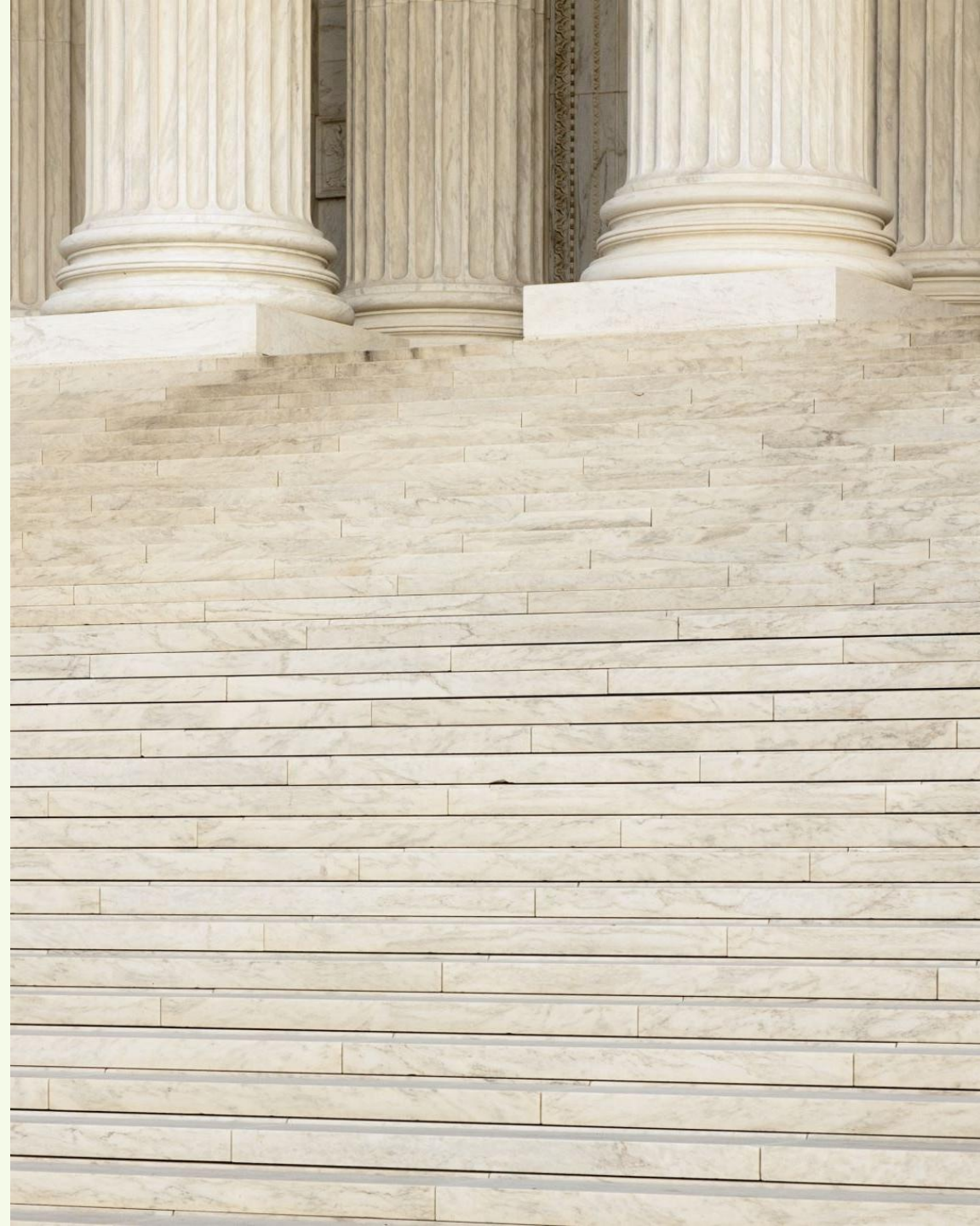
WHEN AND WHY DID THE STANDARD CHANGE

Around 1865, Probable Cause
became the general standard
throughout the country

This was based on United States
Supreme Court decisions, but
nothing groundbreaking

The standard at Preliminary
Hearings had always been
“Probably Cause”

The Supreme Court simply applied
this standard to the charging
instrument



1978

- In 1978, the Federal Judiciary produced a model that incorporated officially that “Probably Cause” was the standard that Grand Juries should be using
- This was then followed by every state

§ 40-5-201. CREATION; POWERS AND DUTIES

(A) THE LEGISLATIVE BODY OF ANY COUNTY HAVING A METROPOLITAN FORM OF GOVERNMENT MAY, BY ORDINANCE, CREATE THE POSITION OF ONE (1) OR MORE JUDICIAL COMMISSIONERS.

(B) THE DUTIES OF THE COMMISSIONER OR COMMISSIONERS INCLUDE, BUT ARE NOT LIMITED TO, THE FOLLOWING:

(1) THE ISSUANCE OF ARREST WARRANTS UPON A FINDING OF **PROBABLE CAUSE**;

(2) THE SETTING OF BONDS AND RECOGNIZANCES IN ACCORDANCE WITH THE PROCEDURES OUTLINED IN THIS CHAPTER AND CHAPTER 6 OF THIS TITLE; AND

(3) THE ISSUANCE OF MITTIMUS FOLLOWING COMPLIANCE WITH THE PROCEDURES PRESCRIBED BY [§ 40-5-103](#).

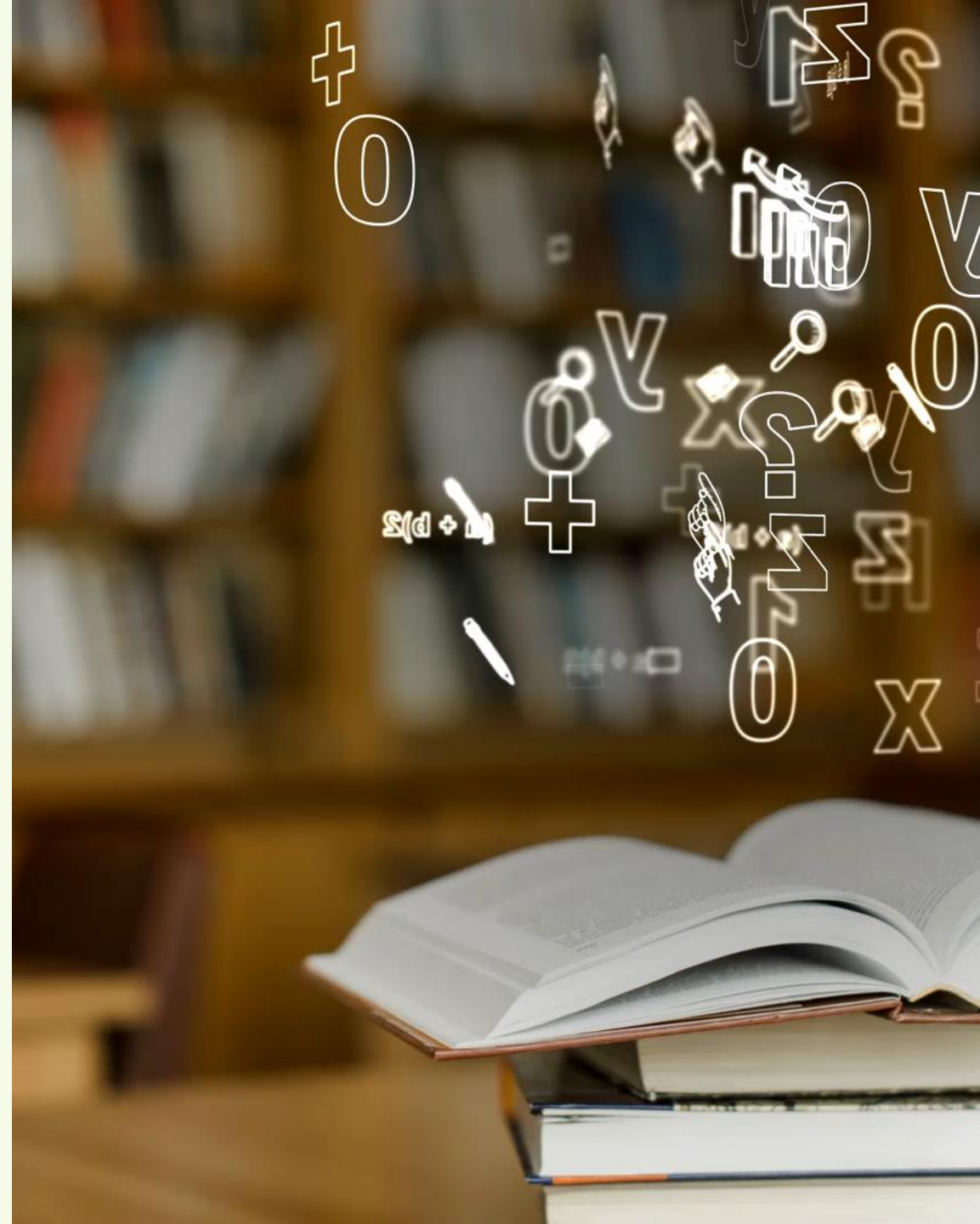
(C) THE LEGISLATIVE BODY OF ANY COUNTY HAVING A POPULATION OF NOT LESS THAN TWENTY-ONE THOUSAND FIVE HUNDRED (21,500) NOR MORE THAN TWENTY-ONE THOUSAND SEVEN HUNDRED (21,700), ACCORDING TO THE 1980 FEDERAL CENSUS OR ANY SUBSEQUENT FEDERAL CENSUS, MAY, BY RESOLUTION, CREATE THE POSITION OF ONE (1) OR MORE JUDICIAL COMMISSIONERS PURSUANT TO THIS PART.

POWERS OF JUDICIAL COMMISSIONER

- This Statute was passed in 1983
- You have more powers than this
- 40-1-111 passed in 1978 gives you even more powers including:
 - Signing search warrants
 - Issuing orders of protection
 - The appointment of attorneys for indigent defendants?

**HOW MANY NOTES ARE
AVAILABLE ON LEGAL
RESEARCH SITES REGARDING
THESE TWO STATUTES?**

19



WHY SO FEW NOTES

Because every decision you make will be analyzed by the local Court system, not appeals court

The General Session Judge will second guess your opinion

The Criminal Court Judge will second guess your opinion

If this involves an Order of Protection and Civil Judge will second guess your opinion

By the time this reaches Appeals level, there has already been consideration given to your decision making



GUIDANCE

So what does this mean for you:

It means there is very little guidance that can be given to you

That is good and bad

You are to be completely independent, but that can be a stressful spot

So lets move to some subjects that could help you through your decision making



DEFINITIONS

PROBABLE CAUSE

- **Webster Definition**- a reasonable ground for supposing that a charge is well-founded
- **Forbes**- means that the facts and circumstances that exist give rise to the reasonable belief a crime is being committed or has occurred
- **Dictionary.com**- it's the reasonable ground for a belief that the accused was guilty of the crime

TENNESSEE DEFINITION

- In Tennessee, probable cause is based on:
 - the practical considerations of everyday life, taking into account,
 - the factual circumstances known at the time of the action



TENNESSEE DEFINITION (CONT.)

Probable cause exists when there is a reasonable ground for belief of guilt, which is more than mere suspicion but less than absolute certainty.

State v. Dotson, 2014



TENNESSEE DEFINITION (CONT.)

- Probable Cause is not a rubber stamp for law enforcement
- Probable Cause is not a Trial

WITHOUT REAL CASE LAW, WHAT NEXT

So there is no case law over your actions

But there is case law over probable cause and that is found when the Courts look at the authorization of search warrants

Let's look at some of the things that the higher courts have said about "probable cause"

STATE V. TUTTLE

- This was a search warrant case
- The officer made a few “mistakes” in his affidavit
- We will look at some of the language the Tennessee Supreme Court used about probable cause

MISTAKES IN TUTTLE SEARCH WARRANT AFFIDAVIT

- The Defense argued that the information was stale
- The Trooper said marijuana was off loaded at the residence that was search, in fact he only assumed that
- The GPS coordinates that were used went to the neighbor's property not the property of the Defendant

STATE V. TUTTLE



Facts of Tuttle



Discussion of Probable Cause



“Probable Cause, as its name implies, deals in Probabilities”



“These Probabilities are not technical; they are the factual and practical considerations of everyday life on which reasonable and prudent men/women, not legal technicians, act”

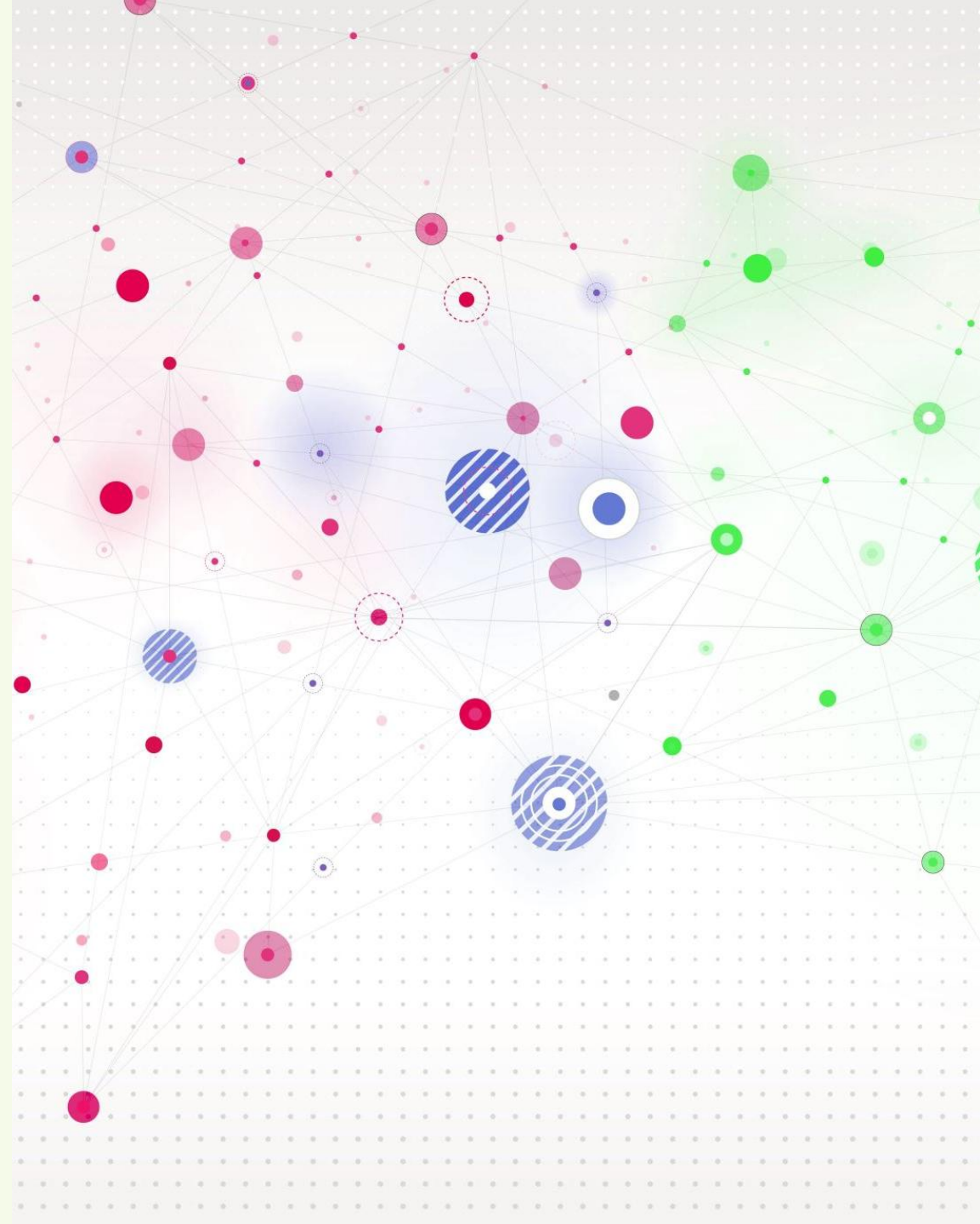


“Determinations of probable cause are extremely fact dependent”

STATE V. TUTTLE

THE ROLE OF HERESAY IN WARRANT
CONSIDERATIONS

THIS INCLUDES SEARCH WARRANTS
AND ARREST AFFIDAVITS



STATE V. TUTTLE

An affidavit may include things not admissible at trial

An affidavit need not reflect the direct personal observations of the affiant

The reliability of hearsay information included in an affidavit is evaluated differently, however, depending on the source:

Officer

Victim

Friend

Relative

Someone
gaining an
advantage?



STATE V. REYNOLDS

FACTS OF REYNOLDS

DUI Blood Draw

Officer obtained blood without a warrant and no consent. The question presented was whether or not the officer had probable cause to obtain the blood.





**STATEMENTS FROM
REYNOLDS**

**LET ME JUST READ THIS PART OF
THE CASE AND THEN WE WILL PULL
OUT SOME LINES.**

LEGAL STANDARDS FOR DETERMINING PROBABLE CAUSE

PROBABLE CAUSE HAS OFTEN BEEN THE TOPIC OF DISCUSSION IN JUDICIAL DECISIONS THROUGHOUT THIS COUNTRY. BELL, 429 S.W.3D AT 530. “ARTICULATING PRECISELY WHAT ... ‘PROBABLE CAUSE’ MEAN[S] IS NOT POSSIBLE.” ORNELAS, 517 U.S. AT 695, 116 S.CT. 1657. PROBABLE CAUSE IS “MORE THAN A MERE SUSPICION,” STATE V. LAWRENCE, 154 S.W.3D 71, 76 (TENN. 2005), BUT LESS THAN ABSOLUTE CERTAINTY, SEE STATE V. MELSON, 638 S.W.2D 342, 350 (TENN. 1982). “[T]HE STRENGTH OF THE EVIDENCE NECESSARY TO ESTABLISH PROBABLE CAUSE TO ARREST IS SIGNIFICANTLY LESS THAN THE STRENGTH OF EVIDENCE NECESSARY TO FIND A DEFENDANT GUILTY BEYOND A REASONABLE DOUBT.” STATE V. BISHOP, 431 S.W.3D 22, 41 (TENN. 2014); SEE ALSO ADAMS V. WILLIAMS, 407 U.S. 143, 148–49, 92 S.CT. 1921, 32 L.ED.2D 612 (1972) (“PROBABLE CAUSE DOES NOT REQUIRE THE SAME TYPE OF SPECIFIC EVIDENCE OF EACH ELEMENT OF THE OFFENSE AS WOULD BE NEEDED TO SUPPORT A CONVICTION.”). “ ‘[I]T IS IRRELEVANT TO THE PROBABLE CAUSE ANALYSIS WHAT CRIME A SUSPECT IS EVENTUALLY CHARGED WITH OR WHETHER A PERSON IS LATER ACQUITTED OF THE CRIME FOR WHICH SHE OR HE WAS ARRESTED.’ ” STATE V. DAVIS, 484 S.W.3D 138, 144 (TENN. 2016) (QUOTING WRIGHT V. CITY OF PHILADELPHIA, 409 F.3D 595, 602 (3D CIR. 2005)).

LEGAL STANDARDS FOR DETERMINING PROBABLE CAUSE

“[T]HE PROBABLE[-]CAUSE STANDARD IS ... PRACTICAL, NONTECHNICAL,” STATE V. JACUMIN, 778 S.W.2D 430, 432 (TENN. 1989) (CITATIONS AND INTERNAL QUOTATION MARKS OMITTED), AND FOCUSES UPON “THE FACTUAL AND PRACTICAL CONSIDERATIONS OF EVERYDAY LIFE ON WHICH REASONABLE AND PRUDENT MEN, NOT LEGAL TECHNICIANS, ACT,” DRAPER V. UNITED STATES, 358 U.S. 307, 313, 79 S.CT. 329, 3 L.ED.2D 327 (1959) (QUOTING BRINEGAR V. UNITED STATES, 338 U.S. 160, 175, 69 S.CT. 1302, 93 L.ED. 1879 (1949)); *301 SEE ALSO ECHOLS, 382 S.W.3D AT 278; MELSON, 638 S.W.2D AT 351.

THE PROCESS [FOR ASSESSING PROBABLE CAUSE] DOES NOT DEAL WITH HARD CERTAINTIES, BUT WITH PROBABILITIES. LONG BEFORE THE LAW OF PROBABILITIES WAS ARTICULATED AS SUCH, PRACTICAL PEOPLE FORMULATED CERTAIN COMMON-SENSE CONCLUSIONS ABOUT HUMAN BEHAVIOR; JURORS AS FACTFINDERS ARE PERMITTED TO DO THE SAME—AND SO ARE LAW ENFORCEMENT OFFICERS. FINALLY, THE EVIDENCE THUS COLLECTED MUST BE SEEN AND WEIGHED NOT IN TERMS OF LIBRARY ANALYSIS BY SCHOLARS, BUT AS UNDERSTOOD BY THOSE VERSED IN THE FIELD OF LAW ENFORCEMENT.

LEGAL STANDARDS FOR DETERMINING PROBABLE CAUSE

AS A RESULT, “[D]ETERMINATIONS OF PROBABLE CAUSE ARE EXTREMELY FACT-DEPENDENT.” BELL, 429 S.W.3D AT 534–35 (CITING KER V. CALIFORNIA, 374 U.S. 23, 33, 83 S.CT. 1623, 10 L.ED.2D 726 (1963); STATE V. GARCIA, 123 S.W.3D 335, 344 (TENN. 2003)). AS THIS COURT LONG AGO RECOGNIZED, IT IS NOT POSSIBLE TO DEFINE PROBABLE CAUSE “IN TERMS TO FIT ALL CASES ARISING. EACH CASE MUST STAND ON ITS OWN FACTS.” DITTBERNER V. STATE, 155 TENN. 102, 291 S.W. 839, 840 (1927). DEFINING THE CONCEPT TOO NARROWLY “WOULD OPEN THE WAY FOR THE ESCAPE OF DESPERATE CRIMINALS AND THE DEFEAT OF JUSTICE,” WHILE CONSTRUING IT TOO BROADLY “WOULD LEAD TO THE HARASSMENT OF THE INNOCENT.” ID. NEVERTHELESS, OFFICERS ARE NOT “REQUIRED TO WAIT ... FOR EVIDENCE WHICH WOULD CONVICT.” ID. PROBABLE CAUSE EXISTS WHEN “THE FACTS AND CIRCUMSTANCES WITHIN THE KNOWLEDGE OF THE OFFICERS, AND OF WHICH THEY HAD REASONABLY TRUSTWORTHY INFORMATION, ARE SUFFICIENT TO WARRANT A PRUDENT PERSON IN BELIEVING THAT THE DEFENDANT HAD COMMITTED OR WAS COMMITTING AN OFFENSE.” ECHOLS, 382 S.W.3D AT 277–78 (ALTERATIONS, CITATIONS, AND INTERNAL QUOTATION MARKS OMITTED).

LEGAL STANDARDS FOR DETERMINING PROBABLE CAUSE

“IT MUST ALWAYS BE REMEMBERED THAT PROBABLE CAUSE IS EVALUATED ‘FROM THE PERSPECTIVE OF A REASONABLE OFFICER ON THE SCENE, RATHER THAN WITH THE 20/20 VISION OF HINDSIGHT.’ ” FRAZIER V. WILLIAMS, 620 F.SUPP.2D 103, 108 (D.D.C. 2009) (QUOTING WOLFE V. PERRY, 412 F.3D 707, 717 (6TH CIR. 2005)). BECAUSE THE ASSESSMENT OF PROBABLE CAUSE IS REVIEWED FROM A PURELY OBJECTIVE PERSPECTIVE, THE OFFICER'S SUBJECTIVE STATE OF MIND IS IRRELEVANT. BRIGHAM CITY, UTAH V. STUART, 547 U.S. 398, 404, 126 S.CT. 1943, 164 L.ED.2D 650 (2006); SEE ALSO BELL, 429 S.W.3D AT 530 (“[I]T MATTERS NOT WHETHER THE ARRESTING OFFICERS THEMSELVES BELIEVED THAT PROBABLE CAUSE EXISTED.”); STATE V. HUDDLESTON, 924 S.W.2D 666, 676 (TENN. 1996) (RECOGNIZING THAT AN OFFICER'S SUBJECTIVE BELIEF THAT HE LACKED PROBABLE CAUSE TO OBTAIN A WARRANT IS IRRELEVANT TO THE COURT'S DETERMINATION OF WHETHER PROBABLE CAUSE ACTUALLY EXISTED). A REVIEWING COURT MAY CONSIDER ALL RELEVANT FACTS AND CIRCUMSTANCES DEMONSTRATED BY THE PROOF, INCLUDING THOSE NOT RELIED UPON BY THE OFFICER. SEE STATE V. SMITH, 484 S.W.3D 393, 402 (TENN. 2016) (APPLYING THESE PRINCIPLES TO A REVIEWING COURT'S ASSESSMENT OF THE EXISTENCE OF REASONABLE SUSPICION).

STATEMENTS FROM REYNOLDS

- “Articulating exactly what probable cause means is not POSSIBLE”
- “It is IRRELEVANT to the probable cause analysis what crime a suspect is eventually charged with or whether a person is later acquitted of the crime for which she or he is arrested”
- “Probable Cause does not deal in hard certainties but in probabilities”
- “Determinations of probable cause are EXTREMELY fact dependent”

STATE V. DOTSON



STATE V. DOTSON

Awful case

Out of Memphis

The probable cause issue in this case was over an issue of lack of probable cause over the Defendants arrest

The Defense was trying to suppress the statements that the Defendant made at the time he was taken into custody



STATE V. DOTSON QOUTES

“The evidence necessary to establishing probable cause is **significantly** less than the strength of evidence necessary to find a defendant guilty beyond a reasonable doubt”

Regarding biases, the information should be considered reliable if, “the source of information is a person known to the police, not part of the criminal milieu, and whose motivation is to aid the police without any expectation of remuneration”

STATE V. DOTSON

- How they caught him
- What happened at trial
- Defenses and testimony



SCENARIOS

SCENARIO CONSIDERATIONS

There are no wrong answers

These are things I have seen while in Court

I won't call on people and I likely will not give an answer, but if you have thoughts, please share!

The goal in these scenarios is to show that rational people can come to different conclusions

SCENARIO #1

Victim comes to the commissioner's office to take out a warrant on her neighbor. She claims that her neighbor is constantly letting her dog run loose on her and the other neighbor's property. She does not have pictures, she does not have any witnesses, and she has not talked to the suspect about the issue. She has made a police report, but the dogs were not out when the police arrived. She demands a warrant. Do you write it?



**THINGS YOU COULD
DO UNDER SCENARIO
#1**



Ask her to bring in other neighbors



Ask her to go obtain photographic evidence



Ask her to talk to her neighbor, (I would not recommend this one)

SCENARIO #2

- Officers want to bring charges against two people. They happen to be husband and wife. Officers responded to their home where a fight had occurred. Husband had a bloody nose and wife had scratches on her face. Husband reported that Wife had gone through his phone and confronted him about his texts to another woman. He decided to leave the house, and she started throwing items and took his keys and refused to give them back. He admits to holding her down to try to get his keys, but says he never hit her. He states while trying to get his keys she must have hit him in the face. She confirms all of that story, but says that while she was being held down, Husband had choked her. The officer sees no marks on her neck to corroborate. Who and what do you charge?

SCENARIO #2

Domestic
Assault?

Aggravated
Domestic
Assault?

False
Imprisonment?

Vandalism?

SCENARIO #3

Woman gets pulled over by the police.

She has a plastic bottle in her passenger seat. The plastic bottle is unsealed but has a top on it and purports to be Delta-8 gummies. The woman does not have a receipt. The officer has knowledge that other individuals have dumped the Delta-8 gummies and filled the bottles with Delta-9, the woman denies doing this.

The officer requests a warrant for Simple Possession of Schedule VI. Do you write it?



SCENARIO #5

OFFICER BRINGS A ROAD RAGE INCIDENT TO YOU. OFFICER HAS BEEN TOLD BY DRIVER **A** THAT DRIVER **B** CUT HIM OFF. DRIVER **A** THEN TAILGATES DRIVER **B** FOR THREE MILES INTO THE DOWNTOWN AREA OF THE CITY. DRIVER **A** THEN PULLS UP TO DRIVER **B** TO AIR HIS FRUSTRATIONS. DRIVER **A** SAYS THAT WHEN HE STARTS YELLING AT DRIVER **B**, DRIVER **B** PULLS A GUN AND POINTS IT AT HIM. DRIVER **B** CONFIRMS THE MAJORITY OF THE STORY. DRIVER **B**, HOWEVER, DENIES PULLING A GUN. DRIVER **B** SAYS THAT DRIVER **A** INVITES HIM TO A FIGHT AND DRIVER **B** DRIVES OFF. DRIVER **B** IS INTERVIEWED AT HOME, THE OFFICER ASKS TO SEARCH HIS CAR FOR A GUN AND DRIVER **B** REFUSES. WHAT OR WHO DO YOU WRITE A WARRANT FOR, IF ANY?

POTENTIAL CHARGES

Following too close?

Reckless Endangerment?

Aggravated Assault?

Tell the officer to go do more work?

SCENARIO #6

- Officer wants to bring warrant for theft. Officer has been told by complainant that complainant paid suspect to work on his motorcycle. This was done a little over 24 hours ago. Complainant had the understanding that his motorcycle would be worked on at the home of the suspect. When Complainant drives by the suspect's home the same night he gave the motorcycle to suspect, his motorcycle is not there and the suspect's vehicle is gone. Complainant calls suspect and suspect tells him that he has been kicked out of the house, but that he will still work on motorcycle. Complainant decides the next morning that he does not like the situation and calls suspect so he can get his motorcycle. Suspect does not answer and complainant calls the police. Police have also called the phone number and no one answered. Do you write a warrant?

SCENARIO #7

- Wal-Mart comes to complain on a potential shoplifter. Wal-Mart says that suspect stole from them by skip-scanning items while checking out. Wal-Mart shows you the receipt that suspect paid and a receipt that shows what suspect should have paid. The total paid was 195.63 and the total she should have paid was 227.34. You inquire how many items she skip-scanned and Wal-Mart reported two items. Your prior knowledge of suspect is that you have written two previous theft warrants on suspect, but it has been more than five years and none of the thefts were from Wal-Mart. Do you write it?

SCENARIO #9

Landlord has come to your office to request a warrant for Vandalism. She reports that she was having a tenant removed. She had filed notice and they had been to court. Landlord had gone to house 3 days before the tenant was to leave and the house was in good shape. However, after tenant left, homeowner went back. There were holes in the wall that looked like someone had punched them or used a hammer. The bathroom mirror was broken. Also, there was a strong odor of alcohol coming from the carpet in the living room. Landlord was a warrant on tenant. Do you write it?



SCENARIO #10

- Officer has arrested suspect. He has reported to you that the suspect was stopped for speeding. The officer approached the vehicle, and the suspect would only roll down the window two inches. The suspect did answer the questions and provided all proper paperwork, but he would not roll the window down any further. The officer asked the suspect to step out of the vehicle and the suspect refused. The officer continued to ask for the next 5 minutes. At this point the officer opened the door to the car and pulled the suspect to the ground and arrested him. Officer wants to charge resisting arrest, he has already written a ticket for the speeding. Do you write it?

SCENARIO #10 CONT.

- **§ 39-16-602. Obstruction of law enforcement; preventing service of process**
- (a) It is an offense for a person to intentionally prevent or obstruct anyone known to the person to be a law enforcement officer, or anyone acting in a law enforcement officer's presence and at the officer's direction, from effecting a stop, frisk, halt, arrest or search of any person, including the defendant, **by using force** against the law enforcement officer or another.

CONCLUSION

- There are no “right” answers
- It is your job to listen and make a decision on what you have heard
- Remember to use your common sense
- You are NOT a tool of law enforcement, you are a gatekeeper
- Remember to look for biases
- Ultimately, you base your decision on what you hear, not on what you assume





THANK YOU!!!