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Manifesting justice: Wrongfully convicted women reclaim their rights. By Valena Beety. New York: Kensington, 2022. 320 pp. \$28.00 hardcover

Reviewed by Lara Bazelon, University of San Francisco, San Francisco, CA, USA

Valena Beety's groundbreaking new book, *Manifesting Justice*, is a welcome addition to the Innocence Movement cannon. The subtitle, *Wrongfully Convicted Women Reclaim Their Rights*, underscores the contribution Beety makes. Most pointedly in need of reclamation—or even simple acknowledgement—are women, many of them queer, who are uniquely vulnerable to prosecutorial and police abuses and juror bias. Similarly long-overlooked are the innocence attorneys who must navigate a maze of legal roadblocks simply to have their clients' claims heard in court. They, too, are overwhelmingly female and often part of the LGBTQ community. For too long, the literature of the innocence movement has focused almost exclusively on men when it comes to showcasing wrongful conviction cases and shining a spotlight on advocates. Beety's book is a necessary and overdue corrective.

Using a single, horrific case from Mississippi as a through-line, Beety chronicles the specific challenges facing women who are convicted of crimes they did not commit. The book moves back and forth between the case, which involves two women named Leigh Stubbs and Tammy Vance, and the larger story of why exonerating the innocent is such a legally monumental and at times impossible task (Beety represented Stubbs in her successful bid to have her conviction overturned). We learn about how Stubbs and Vance came to be falsely convicted of sexually assaulting their female friend Kim based on junk science and, along the way, the depressing history of state and federal precedents that have severely narrowed, if not cut off completely, the avenues by which innocence claims like theirs can be proved.

Beety's exploration of the byzantine and often cruel system that deprives innocent people of their freedom is not simply descriptive. She offers up a proposed solution: relief through a showing of "manifest injustice," or what some courts call "cumulative error" or a "confluence of factors review." Traditionally, courts reviewing post-conviction cases take a claim-by-claim approach, considering each in isolation. This standard of review withholds relief unless an asserted legal error, standing alone, caused such prejudice to the outcome of the case as to require overturning the conviction. Beety points out the inherent problems with this balkanized analysis—most cases involve multiple errors that mutually corroborate and reinforce the others. She argues that every provable claim should be aggregated so that judges "look at all influencing factors to determine whether a conviction was wrongful and whether justice was done." Using this approach, she explains, "the court looks holistically at trial errors as well as evidence that exposes a wrongful conviction"—evidence that can include racial bias, homophobia, debunked scientific methods, police misconduct, the suppression of key information, and more. Currently, only a handful of states have used a manifest injustice analysis and the US Supreme Court has never explicitly recognized it as a path to exoneration.

Beety's book is a compelling read. In addition to her creative ideas for reform and fast-paced telling of Vance and Stubbs' harrowing journey through the criminal legal system, the book is also engrossing because the reader comes to know Beety herself. Beety's backstory is crucial to understanding why the reader should trust her as an authoritative voice and goes a long way toward explaining the empathy and care she takes when telling the stories of those who have been "othered"—marginalized, despised, and mistreated because of who they are. A product of a middle-class Midwest upbringing, Beety excelled in school and in her legal career. She attended the University of Chicago for college and law school. Afterward, she clerked for the Honorable James G. Carr of the Northern District of Ohio and the Honorable Martha Craig Daughtrey of the US Court of Appeals for the Sixth Circuit. She then took a position as a federal prosecutor with the US Attorney's

Office for the District of Columbia. It was at that point in her professional trajectory that Beety began to reexamine her view of the criminal legal system. She saw how the system often mistreated crime victims, going so far as to jail them to ensure they testified when they balked. The black-and-white universe she inhabited meant, she wrote, "I never thought about being wrong," or about needing to show "compassion or sympathy for anyone other than the few people, and few situations, I decided deserved it." Beety felt her humanity start to ebb. "My work felt like I was standing in cement that kept pouring and rising, solidifying around me, making me more rigid, cold, and impervious," she wrote. A friend told her about a position that had opened up at the Mississippi Innocence Project. Within months, Beety upended her life quitting her prestigious job as a federal prosecutor in Washington, DC to move to the rural south. She never looked back. She took an academic position at the West Virginia University School of Law where she founded a wrongful conviction clinic and created a forensic science LLM degree program. She also came out as queer and married her longtime partner, UC Hastings College of the Law Professor Jennifer Oliva. Today, Beety is a tenured professor at Arizona State University where she is the deputy director of the school's Academy for Justice.

In short, Beety knows of what she writes. She has exonerated wrongfully convicted people and as a nationally recognized scholar, has conducted in depth research and analysis of the intersecting legal issues and intersecting identities that imperiled her clients and so many others. Her personal journey, from hard-nosed prosecutor to empathetic advocate, lends credibility to the arguments she makes and the stories she tells. I hope this book takes those holding fast to the worldview Beety once held on a similar journey and brings them to the same destination.