Narcissistic Rage and the Murder of Allison Baden-Clay

Russ Scott^{a*} and Ian Freckelton QC^{b,c}

^aForensic Psychiatrist, The Park – Centre for Mental Health, Treatment and Research; ^bBarrister, Professorial Fellow in Law and Psychiatry, University of Melbourne; ^cAdjunct Professor of Forensic Medicine, Monash University

The trial and the appeals in relation to the killing of Allison Baden-Clay in Queensland in 2012 focused attention upon the role of relevance of motive and thereby intention in what was ultimately found to be the murderous conduct of her husband Gerard Baden-Clay. There are strong grounds for concluding that he had narcissistic personality disorder, a consequence of which can be particular susceptibility to narcissistic injury and thereafter narcissistic rage if the person perceives themselves threatened by attack to their reputation and integrity. This article reviews the extensive clinical literature on narcissism, insofar as it has potential relevance to the commission of crimes of violence and argues that identifying Baden-Clay as having the disorder provides a useful psychological insight into his conduct.

Key words:: homicide; malignant narcissism; motive; narcissistic injury; narcissistic personality disorder; narcissistic rage.

Introduction

Allison Baden-Clay was last seen alive on the night of 19 April 2012. The following morning, when they arrived at the family home, police immediately noticed scratches on the cheek of her husband Gerard, who reported that he had cut himself shaving hurriedly.

Ten days later, Allison's body was found on a creek bed under a bridge 14 kilometres from the family home. Because of the effects of decomposition, the subsequent autopsy was unable to determine the cause of her death. Six weeks later, Baden-Clay was charged with murder. A committal hearing and trial monopolised the media for weeks, as revelations, particularly of his repeated infidelity, came to light. The jury deliberated for four days before convicting Baden-Clay of murder. However, in a very controversial decision, the

Queensland Court of Appeal developed a 'reasonable hypothesis' consistent with Baden-Clay's innocence. In substituting a conviction for manslaughter, the Court of Appeal emphasised a number of features of the case including that there was no evidence of motive in the sense of a reason to kill and no evidence that Baden-Clay had ever intimated any intention of harming his wife. After the Queensland Attorney-General obtained special leave to appeal the decision, the High Court of Australia comprehensively rejected the reasoning of the Queensland Court of Appeal and reinstated the murder conviction.

This article offers an 'alternative hypothesis', which proposes that Baden-Clay demonstrated all the prominent features of narcissistic personality disorder ('NPD') and that on the night of the murder, he developed

*Correspondence: Russ Scott, Forensic Psychiatrist, The Park – Centre for Mental Health, Treatment and Research, Queensland Locked Bag 500, Archerfield, Qld, 4108, Australia. Email: Russ.Scott@health.qld.gov.au

a narcissistic rage in which he fully intended to either kill or inflict grievous bodily injury on his wife, and then set about concealing the crime. It highlights that murder in the context of NPD is a phenomenon well known to the criminal law and analyses the features of NPD which can render persons with those personality traits capable of extreme violence.

Early Constructs of Narcissism

In Greek mythology, Narcissus was a handsome youth who rejected the desperate advances of the nymph Echo.¹ Nemesis, the goddess of retribution, noticed his hubris ('lack of humility') and disdainful behaviour and attracted Narcissus to a pool, where he fell in love with his own reflection in the water. Unable to leave the beauty of his reflection, Narcissus lost his will to live.

In 1898, describing a case of a woman who became lost in self-admiration, Ellis first referred to excessive self-love as *Narcissus-like*.² In 1911, Rank published a paper on narcissism in which he highlighted the self-love and vanity of the personality type.³ By 1927, Ellis had advanced the 'conception of narcissism' which he regarded as autoeroticism, or the self-absorption of sexual emotion.⁴

In his seminal essay in 1914 entitled 'On Narcissism: An Introduction', Freud elaborated upon the developmental process whereby interest and libido shifts from an inward focus (the 'primary narcissism' of the child) to objects in the outer world, leading to the development of the ego.⁵ Freud posited that successful negotiation of this developmental process is necessary for personality maturation. He differentiated narcissism from its more extreme manifestation in 'megalomania', with the latter being more related to omnipotent power and delusions of grandeur.

Narcissism and Theories of Personality Development

Narcissism later became the central feature of psychoanalytical theories of normal and

abnormal personality development.⁶ In Kohut's self-psychology, the development of the self is based on an integration of the internalised self and object relations.⁷ According to Kohut's theory, narcissists possess a self-concept characterised by grandiosity and over-ambition as well as exhibitionist drives. The narcissist's tolerance for anxiety is maintained by narcissistic fantasies and withdrawal into the self.⁸

According to Kernberg's ego psychology-object relations theory, narcissists possess abnormal self-structures and exhibit pathological self-esteem regulation strategies.⁹ Emphasising the maturation of inner representations of self as central to normal development, Kernberg proposed that the narcissist's disturbances in object relations reflect intense, primitive and internalised object relations, and the narcissist is emotionally invested in their grandiose self-image:

Normal narcissism ... derives from the integration of libidinally and aggressively invested self representations into a cohesive, normal self. Pathological vicissitudes of aggression may determine failure of such an integration and of the corresponding integration of object representations, with the subsequent development of pathological object relations and a pathological, grandiose self.¹⁰

For Kernberg, the prominent manifestations of narcissism included a sense of superiority, grandiosity and self-absorption, along with exhibitionism, envy and exploitativeness.¹¹ Conceptualising 'narcissism' has become quite contentious in the psychoanalytic literature.¹²

Trait narcissism can be described dimensionally and may be conceptualised as occurring on a continuum characterised by entitlement and an inflated sense of self often associated with a dominant interpersonal style.¹³ Sub-clinical or 'healthy' narcissism reflects adaptive strategies used to promote a positive self-image and facilitate agency by otherwise psychologically well-adjusted individuals who may assert dominance in social hierarchies, hold positive illusions about the self, are creative and ambitious and strive for

self-enhancement and success in achievement-related contexts.¹⁴ Narcissistic individuals are often competitive and may be drawn to high-profile or 'celebrity' professions where their self-confidence and craving for admiration is validated.¹⁵

By definition, pathological narcissism is characterised by an impaired ability to regulate the self, emotions and behaviour in discharging impulses for self-enhancement and fulfilling needs for recognition and admiration. Their maladaptive self-regulation processes cause significant distress and impaired functioning,¹⁶ particularly in the context of interpersonal relationships.¹⁷

Grandiose and Vulnerable Sub-types of Narcissism

In 1991, Wink conducted a principal-components analysis of Minnesota Multiphasic Personality Inventory (MMPI) narcissism scales and first suggested a phenomenological distinction between two distinct constructs of narcissism – the 'grandiose' and 'vulnerable' phenotypes.¹⁸ Whilst grandiosity is expressed in arrogant attitudes, inflated self-esteem and interpersonal behaviours marked by exploitativeness, entitlement and exhibitionism,¹⁹ vulnerability reflects a fragile self-esteem, emotional instability and internalising pathology.²⁰ In addition to confirming the two dimensions of narcissism, a possible third dimension of narcissism has been posited in which markedly aggressive and antisocial behaviours are demonstrated.²¹

Ronningstam has separated subtypes of narcissistic personality on the basis of similarities and differences in self-esteem dysregulation, affect dysregulation and interpersonal relationship difficulties.²² Grandiosity is emphasised in descriptions of the arrogant narcissist and the psychopathic narcissist. The arrogant narcissist copes with self-esteem dysregulation by creating an exaggerated sense of superiority and 'specialness' and may engage in grandiose fantasies. The arrogant narcissist

demonstrates entitlement, exploitativeness and a lack of empathy. Also, as a result of their affective dysregulation, they experience intense envy and aggression. In contrast, the psychopathic narcissist manages their self-esteem dysregulation by antisocial behaviours to protect or bolster their inflated self-image.²³

Grandiose and vulnerable themes in pathological narcissistic dysfunction also generate different transference and counter-transference in the context of therapy.²⁴ The oblivious narcissist may present as aloof or disengaged and may devalue the therapy to protect against feeling envious of the therapist, whilst the hypervigilant narcissist may be highly sensitive to the therapist's reactions and feedback and may view the therapist as a persecutor if they perceive the therapist as not completely engaged in the therapy or fails to acknowledge the hypervigilant narcissist's 'specialness'.²⁵

DSM Criteria for Narcissistic Personality Disorder

The operationalising of narcissistic personality disorder (NPD) has an interesting history.²⁶ After their first empirical study, which identified 15 features which discriminated between the pathological narcissist and comparison groups,²⁷ Gunderson and Ronningstam constructed the *Diagnostic Interview for Narcissism*.²⁸ Empirical research on normal narcissism by social psychologists was facilitated by the development of the Narcissistic Personality Inventory (NPI).²⁹

NPD first appeared in the 1987 third edition of the American Psychiatric Association's *Diagnostic and Statistical Manual of Mental Disorders* (DSM-III).³⁰ According to Frances, who later chaired the DSM-IV Task Force, NPD was included among the formal personality disorders in the DSM-III on the basis of developments in the psychoanalytic research of narcissism.³¹

In the DSM-IV-TR, NPD was classified as a cluster 'B' (dramatic, emotional or

erratic cluster) disorder in which the criteria were sub-divided into four categories – self-image (criteria 1 and 3), cognitive (criterion 2), interpersonal (criteria 4, 5, 6, 7 and 8) and behavioural (criterion 9).³² Although the DSM-5 Work Group on Personality and Personality Disorders initially proposed to do away with NPD as a discrete personality disorder type,³³ after much consternation,³⁴ NPD was restored in subsequent proposals.³⁵

The DSM-5 has the same criteria for NPD as the DSM-IV-TR. It defines NPD as:

a pervasive pattern of grandiosity (in fantasy or behaviour), need for admiration, and lack of empathy, beginning by early adulthood and present in a variety of contexts, as indicated by five (or more) of the following nine criteria:

1. Has a grandiose sense of self-importance (e.g., exaggerates achievements and talents, expects to be recognized as superior without commensurate achievements).
2. Is preoccupied with fantasies of unlimited success, power, brilliance, beauty, or ideal love.
3. Believes that he or she is ‘special’ and unique and can only be understood by, or should associate with, other special or high-status people (or institutions).
4. Requires excessive admiration.
5. Has a sense of entitlement (i.e., unreasonable expectations of especially favourable treatment or automatic compliance with his or her expectations).
6. Is interpersonally exploitative (i.e., takes advantage of others to achieve his or her own ends).
7. Lacks empathy: is unwilling to recognize or identify with the feelings and needs of others.
8. Is often envious of others or believes that others are envious of him or her.
9. Shows arrogant, haughty behaviours or attitudes.³⁶

Individuals with NPD can be characterised as behaviourally arrogant, grandiose and pretentious. They are interpersonally exploitative and callous and they show a profound sense

of entitlement.³⁷ Because they lack emotional depth and have difficulty understanding the emotions of others,³⁸ those with NPD often fail to develop or maintain satisfying long-term relationships³⁹ although they expect unconditional love and admiration.⁴⁰

NPD features have been found to be positively associated with the psychodynamic conflicts of rejection of others, ambition-achievement and resentment over being thwarted by others, and negatively associated with the conflicts of the experience and expression of emotional needs and anger, separation abandonment and dominant other.⁴¹

Although NPD is one of the least common personality disorders, with a prevalence of up to 6% in community samples,⁴² a number of authors have suggested that modern society is increasingly self-preoccupied and narcissistic so that its incidence may be rising.⁴³

Variants of Narcissistic Personality Disorder

There is a multitude of proposed variants or phenotypes of NPD.⁴⁴ Arguably, the four variants elaborated by Millon best capture the expression of different traits which are most usefully identified in clinical practice.⁴⁵ The elitist narcissist represents the core, unblended subtype and reflects overriding, grandiose themes by which these individuals are convinced of their superior self-image. They are boastful self-promoters, empowered by their ‘specialness’ despite having few real achievements. They exaggerate or lie about their achievements and exploit others. The amorous narcissist blends narcissistic and histrionic characteristics, demonstrating an erotic and seductive orientation that bolsters the narcissist’s sense of self-worth through multiple sexual exploits. However, the amorous narcissist has very limited capacity for genuine intimacy. The compensatory narcissist blends narcissistic and avoidant characteristics which results in individuals who are acutely aware of their inner emptiness. While these individuals may seek to create the

covert illusion of superiority, they are prone to chronic feelings of shame, humiliation and anxiety and are exceedingly sensitive to the reactions of others. The unprincipled narcissist combines the self-confidence of the narcissist with the recurrent deviant behaviour of anti-social personality patterns. The unprincipled narcissist has few internalised moral inhibitions and demonstrates a pattern of unscrupulous and exploitative behaviour, has little compunction about conning or defrauding others and obtains vindictive gratification from dominating and humiliating others.⁴⁶

Narcissistic Injury and Narcissistic Rage

The proclivity of persons with NPD to react to humiliation with an intense fury is well recognised. In 1932, Freud proposed a description of narcissistic personality in which there is a preoccupation with oneself and that when criticised, humiliated or rejected, the narcissistic individual may perceive the experience as an acute personal rejection (the 'narcissistic injury') which fuels anger and aggression and in which the narcissistic individual may respond in an irrational or extreme way.⁴⁷

In 1972, Kohut first described 'narcissistic rage' in which frustrations of a narcissistically perceived reality and a vulnerable sense of self result in dejection and shame that fuel anger, resentment, vindictiveness and aggression:

The need for revenge for righting a wrong, for undoing a hurt by whatever means, and a deeply anchored, unrelenting compulsion in the pursuit of those aims which gives no rest to those who have suffered a narcissistic injury – these are features which are characteristic for the phenomena of narcissistic rage in all its forms and which sets it apart from other kinds of aggression.⁴⁸

Averting to the "dark side of high self-esteem" and the association between narcissism and violence, Bauemeister *et al* have suggested:

"... the major cause of violence [in narcissism] is high self-esteem combined with an ego threat. When favourable views about oneself are questioned, contradicted, impugned, mocked, challenged, or otherwise put in jeopardy, people may aggress. In particular, they will aggress against the source of the threat".⁴⁹

Narcissistic rage has more recently been defined as an explosive mix of vengeful anger and retaliatory hostility when the narcissist's fractured sense of self is threatened.⁵⁰ When their ability or sense of entitlement is challenged or when they perceive a threat to their self-image, individuals with NPD are likely to use primitive defence mechanisms including intense aggression and extreme hostility.⁵¹ Individuals with NPD may also have a predisposition to a hostile attribution bias⁵² in which they are more likely to interpret ambiguous actions as hostile and threatening to their self-image,⁵³ may exaggerate the significance of the affront and be more inclined to respond to perceived slights and criticism with hostility and aggression.⁵⁴

"The Malignant Narcissist"

In 1964, Fromm first proposed the social psychology term 'malignant narcissism' which represented 'the quintessence of evil'.⁵⁵ In 1970, Kernberg observed that the antisocial personality is fundamentally narcissistic without morality and that 'malignant narcissism' includes a sadistic element, creating, in essence, a sadistic psychopath.⁵⁶ For Kernberg, there are four features of the malignant narcissist:

- a typical core narcissistic personality disorder;
- antisocial behaviour;
- ego-syntonic sadism; and
- a deeply paranoid orientation toward life⁵⁷

To maintain their inflated but fragile self-esteem, the pathological narcissist employs defence mechanisms to avoid awareness of negative aspects of their grandiose self.

Kernberg suggested that pathological narcissism ranges in severity as a function of the level of aggression. With increasing aggression, the continuum of narcissistic pathology moves from narcissistic personality disorder to malignant narcissism to psychopathy.⁵⁸ Other more recent research suggests that the constructs of psychopathy⁵⁹ and narcissism may be disaggregated by self-esteem. In his seminal work, entitled *The Mask of Sanity*, Cleckley noted that psychopaths are superficially charming, deceitful and remorseless and included 'pathological egocentricity' among the criteria for defining a psychopath.⁶⁰ Later, Hare also highlighted the psychopath's grossly inflated self-concepts and sensitivity to insults.⁶¹ Higher self-esteem is a defining characteristic of Factor 1 psychopathy (callousness, grandiosity, manipulativeness) and healthy narcissism and lower self-esteem prompt the behaviour of those with Factor 2 psychopathic (poor behaviour controls, impulsivity, need for excitement) and pathological narcissistic traits.⁶²

Narcissistic Personality Disorder and Violence

The association between NPD and violence is well recognised.⁶³ A study comparing incarcerated violent and non-violent offenders found that violent offenders demonstrate a more inflated sense of entitlement than non-violent offenders.⁶⁴ Similarly, a correlation has been identified between absence of empathy and violence.⁶⁵

Baumeister et al have found that incarcerated violent offenders demonstrate significantly elevated levels of pathological narcissism, in particular on the subscales of entitlement and superiority, which relates to the construct of 'threatened egotism'.⁶⁶ A study of 261 female offenders in a high-security prison also found a powerful relationship between a diagnosis of NPD and violent behaviour in females, who were eight times more likely to have a current conviction for a violent offence, including homicide.⁶⁷

Emphasising the ubiquity of narcissistic traits in those who commit violent crimes, Stone has suggested that instrumental (as opposed to impulsive) spousal murders are strongly associated with NPD and that the prominent motives in this group include greed, jealousy and the wish to be rid of one sexual partner so as to be with another.⁶⁸

A narcissistic personality disorder has been associated with a number of high-profile murderers in recent years, including Ted Bundy,⁶⁹ the serial rapist and murderer executed in Florida in 1989, Anders Breivik,⁷⁰ the perpetrator of the mass murders in Oslo and Utøya in 2011 and Man Haron Monis,⁷¹ the perpetrator of the Lindt Café Siege in Sydney in 2014.

Rage-type Murder and Narcissistic Personality Disorder

Rage-type murders can be usefully categorised as a form of expressive or hostile violence.⁷² In rage-type murder, the victim and perpetrator are usually known to each other, and the perpetrator usually has no history of aggressive behaviour. The violence may occur very suddenly following what may appear to be a relatively trivial argument or insult. Revitch and Schlesinger have highlighted at least three recurrent features in rage-type murder:

- the murder often occurs in the context of a close interpersonal relationship in which unresolved conflict has resulted in attachment difficulties for the perpetrator;
- injury to the pride of the perpetrator is a key factor; and
- displacement of emotion onto the victim (who carries a symbolic significance to the perpetrator) is a motivating factor⁷³

In contrast to the psychotically-driven murder or the instrumental murder with an overt criminal motive, Cartwright has proposed that narcissistic rage-type murder is an expression of a primitive volatile affective state in response

to a personal insult that is a consequence of shame and a failure to maintain the self-system.⁷⁴ Unlike pure anger, which is goal-directed and results from a frustration of purpose, the rage of the narcissist is not connected to overcoming an obstacle, but rather is 'a primitive explosive affective state'⁷⁵ in response to an injury to the self.⁷⁶ It has also been suggested that the rage reaction occurs when a threshold of activation has been reached, and the reactivity is triggered when ego defence mechanisms are unable to mediate the experience.⁷⁷

Two types of personalities in extremely aggressive populations have been identified: the under-controlled personality and the over-controlled personality.⁷⁸ Whilst the under-controlled personality has low inhibitions against aggressive behaviour and engages in impulsive violence when provoked, the over-controlled personality has extremely rigid inhibitions against aggressive behaviour and rarely responds violently to provocation.⁷⁹ Brookman has suggested that whilst over-controlled, conforming individuals are more likely to commit murder, they are less likely to commit other types of crimes.⁸⁰ When the frustration becomes overwhelming, the over-controlled individual strikes out angrily at the source of the frustration. There is an eruption of violence which may be associated with an isolation of appropriate affect by which the individual with NPD may seem relatively unaffected by what has occurred and the consequences for themselves and their victim.⁸¹

Baden-Clay's Narcissistic Personality Traits – Self-importance

Gerard Baden-Clay was born on 9 September 1970 and spent his early childhood in Rhodesia (now Zimbabwe). He is the great-grandson of Lieutenant General Robert Stephenson Smyth Baden-Powell (1857–1941) of the British Army. After the relief of the 217-day siege of the town of Mafeking during the Second Boer War, at the age of 43, Lieutenant-General Baden-Powell became a hero of the British Empire. In 1908, after he had retired from

the army, Lord Baden-Powell founded the Boy Scouts.⁸²

When he was aged 10, Gerard Baden-Powell's family migrated to Australia. In 1981, his family moved to Toowoomba where he attended the prestigious Toowoomba Grammar School, a boys' school that was founded in 1875. He later obtained an undergraduate degree in business and, in 1995, he was working as a book-keeper with the travel company Flight Centre when he met Allison, who was already the state human resources manager of the company. In 1997 they married and subsequently had three daughters.

From an early age, Baden-Clay knew he was 'special', and he developed a strong sense of his self-importance. He became an assiduous self-promoter and regularly referred to his lineage from Lord Baden-Powell. In the offices of his real estate business, he prominently displayed a portrait and other items referring to the iconic founder of the Boy Scouts and he frequently spoke about his famous great-grandfather.

However, by 2012, he had no substantial assets and, for the previous six years, the Baden-Clay family had rented a modest, single-level weather-board house. Even though his business was failing and he was heavily in debt, Baden-Clay promoted himself as an 'industry-leader' and boasted of his membership of the local chamber of commerce.

Baden-Clay's Narcissistic Personality Traits – Fantasies, Success

In 2004, after less than a year in his first employment as a real estate agent with Raine and Horne, Baden-Clay secretly leased offices next door to where he was employed and entered into a franchise agreement with the rival real estate agency, Century 21. In his subsequent sales pitches, Baden-Clay had the habit of disparaging his competitors – the other real estate agents in the area.

He extolled his qualities and ethics on a blog-site he named 'The Real Estate Expert'. On his website, he boasted about the success

of his business as well as highlighting that he was a regular church-attender. He was disposed to giving talks about his famous ancestor and he gave presentations about the legacy of his great-grandfather to school children.

Baden-Clay's Narcissistic Personality Traits – 'Special' and Unique, Requires Excessive Admiration

Baden-Clay cultivated a friendship with the wealthy local state Liberal member of parliament and was also Facebook friends with other Liberal Party members. In 2004, he became president of the local Chamber of Commerce and was later photographed with the then Prime Minister Kevin Rudd.

In contrast to the wholesome image he projected ('church-going family man', vice-president of his daughters' school Parents and Friends Committee), Baden-Clay was actually a philanderer. Indeed, during his trial, he unashamedly testified to his casual sexual encounters including sleeping with two different women over a two-day interstate conference. He also visited an online 'swingers' website on which he made the entry 'Looking for discrete sex – married but don't want to be'.

Baden-Clay's Narcissistic Personality Traits – Sense of Entitlement

Baden-Clay's sense of entitlement was reflected in his expectation of favourable treatment from others and his retributive behaviour if his value was not recognised. When he was made redundant in August 2000 by his then employer, Flight Centre, Baden-Clay sued for breach of contract.

In April 2007, 38-year-old Toni McHugh, a married mother of two 14-year-old boys, started work at Baden-Clay's real estate business. She later testified at trial that by at least August 2008, she was in an affair with Baden-Clay and, in November 2009, she separated from her husband. She said that Baden-Clay expected her to maintain and conceal the affair.

Baden-Clay asked his brother and friends to lend him money and, when his real estate business fell more heavily into debt, he expected his business partners to remain with him and share the debt of the company. Baden-Clay borrowed a total of \$270,000 from his brother and three friends but never repaid the loans. In December 2011, he asked wealthy member of parliament Bruce Flegg, who in fact was not much more than a business acquaintance, to lend him \$400,000 as an 'unsecured loan'. In March 2012, he made another similar request to Dr Flegg.

On the day that police reported that a body had been found on a creek bank under a bridge, and before a formal identification had been made, Baden-Clay alerted Allison's life insurer. The following day, he advised the insurer that he planned to make a claim on her policies. Subsequently, he sought a death certificate as a matter of urgency. Altogether, Allison's life insurance and superannuation provided for a \$975,000 payment upon her death.

Baden-Clay's Narcissistic Personality Traits – Interpersonally Exploitative

Baden-Clay demonstrated a propensity to exploit others in a variety of his personal dealings. After having a short affair with another real estate agent in the company for which he previously worked, he began the workplace affair with Toni McHugh in 2008. He frequently told McHugh that he would leave his wife to be with her, even after McHugh herself began to doubt his sincerity.

In September 2011, after Allison was told of the affair by a friend, Baden-Clay abandoned the relationship with McHugh and then sacked her as an employee. He told her he could have no further contact with her but in December 2011, less than three months later, he contacted McHugh and resumed the affair. Baden-Clay maintained the affair whilst he was having relationship counselling with his wife Allison.

Baden-Clay demonstrated in a number of ways a preparedness to be disingenuous and exploitative to achieve his own ends. For

instance, he lied to his business partners about the affair whilst McHugh was employed at his real estate firm. In his own evidence at trial, Baden-Clay claimed that he only maintained the affair to keep his mistress in his business.

Baden-Clay's Narcissistic Personality Traits – Lack of Empathy

Baden-Clay showed a quite profound lack of empathy. For instance, he denigrated and belittled his faithful wife, the mother of his three young children. During his very first conversation with police, he highlighted Allison's history of treatment for depression and, in his later evidence, he emphasised how many of his needs were not met when Allison experienced episodes of depression. During his evidence at trial, he described how Allison's anti-depressant medication had reduced her libido and how she had gained weight.

Baden-Clay engaged in sham marriage counselling whilst continuing his affair with McHugh, and he sent her an email in which he said he would be 'separated from his wife by July the 1st', which was Allison's birthday. However, during his trial, Baden-Clay testified that he did not love McHugh and was effectively using her, describing the relationship as 'just physical'. He also asserted that he continued to sleep with McHugh because he did not want to lose a 'good saleswoman'.

After Allison went missing, Baden-Clay declined a police request to appear in a televised appeal for information from the public, and he let his three young daughters anguish for 10 days whilst her family and friends, police and a huge contingent of volunteers searched for Allison.

Baden-Clay's Narcissistic Personality Traits – Arrogant, Haughty Behaviours or Attitudes

Baden-Clay lied to the police when he told them that on the night of Allison's

disappearance, he had gone to bed at 10:00 pm and had slept until after 6:00 am. An examination of his iPhone revealed that at 1:48 am he had connected the phone to a charger.

He elected to give evidence at trial in an arrogant self-belief that he could persuade the jury to overlook the strong circumstantial case against him. Implausibly, he testified that he had repeatedly dragged a 'blunt' razor down his face causing the jagged parallel injuries which clearly appeared to be scratches, not razor cuts.⁸³

During cross-examination, Baden-Clay appeared haughty and conceited. He did not seem to be discomforted by admitting to his numerous affairs (many of which were, by his account, 'concurrent' and included one whilst Allison was pregnant). During cross-examination, he admitted to deceiving his wife and his business partners and then lying to his wife as he engaged in the appearance of marriage counselling whilst at the same time maintaining an affair.

The Jury Trial of Gerard Baden-Clay

On the 10th day of the trial, after the prosecution case was closed, in the absence of the jury, Baden-Clay's counsel made an application that since there was no evidence to prove intent to kill or cause grievous bodily harm, which was an essential element of the charge, there was 'no case to answer on murder'. The trial judge, Byrne SJA, observed:

What he did involved disposing of a body in an undignified way and in a manner calculated to prevent its timely discovery. He then engages in serious subterfuge. He lies about the scratches and does more than that. He uses the razor blade to create the appearance some hours later of scratches on the face in the redder area. Now, he then lies to the police about these things and maintains the deception and has never departed from it.

The jury might think that the pressure of it all, especially as he was most resistant to the idea that he should be subjected to hearing how

his wife felt about the affair, led to a state of affairs where the violence erupted and, for whatever reason, he felt compelled to end his wife's life. Now, some of the jurors might think he was motivated by the insurance proceeds. Others might think that he was motivated by an anxiety to be with Ms McHugh. Others might think ... he was simply so incensed by the exercise that Ms Ritchie [the marriage counsellor] had recommended that he lost composure and attacked her.⁸⁴

The trial judge held that the jury could conclude that Baden-Clay's face was scratched by his wife as she was 'fighting for her life' and that his behaviour afterwards was difficult to reconcile if her death was accidental. The trial judge concluded that Baden-Clay's post-offence conduct was sufficient for the jury to consider the question that the necessary element of intent had existed and rejected the application.

Baden-Clay's counsel called evidence in support of his defence, and Baden-Clay also gave evidence, claiming that following the birth of their first daughter in July 2001, Allison developed an anxiety disorder and later depression which left him responsible for having to attend to many of the domestic activities of the household. He also testified that after Allison commenced medication, the side-effects included loss of libido and she gained weight. He contended that it was in the context of the absence of any intimacy 'for years' that he began having affairs. Baden-Clay testified that in 2009 he purchased a new Lexus motor vehicle, the same year that he complained to Allison's psychiatrist that she had 'wasted money' getting an exercise treadmill.

After a month-long trial, counsel completed their final arguments and the trial judge summarised the case and gave directions to the jury.⁸⁵ The 125-page summary and directions included specific directions with respect to the use the jury could make of Baden-Clay's evidence that all the injuries to his face were caused whilst shaving, if the jury found them to be false. Over objection, the trial judge also directed the jury that if Baden-Clay

had attempted to disguise the abrasions by making nearby shaving cuts in an attempt to provide an innocent explanation for the injuries, that conduct could support an inference of guilt ('consciousness of guilt') of murder or manslaughter. The trial judge gave the usual cautions and in particular emphasised that it was necessary for the jury to give careful consideration to whether the conduct could support an inference of murderous intent, as opposed to unlawful killing without intent.

The jury convicted Baden-Clay of murder. In his sentencing remarks, the trial judge was denunciatory:

Gerard Baden-Clay, on the night of 19 April 2012, you murdered your wife, Allison. The killing was not premeditated. But it was violent. That night, you were under considerable stress. Your financial circumstances were, as you confessed to police, dire. Your domestic circumstances were no better. You had resumed your affair with Toni McHugh. You kept telling her that you loved her. You led her to understand that you intended to leave Allison and to be with her. That afternoon, you told Ms McHugh that Allison would be at the conference Ms McHugh was to attend in Brisbane the next day.

Allison knew nothing about the resumption of the affair. You deceived her into believing that it had ended in September 2011. If the two women were to meet the next day, the consequences could have been dramatic, as you realised. Your unsuspecting wife was doing her best to maintain the marriage. A relationship counsellor had devised a plan. It allowed for Allison to express to you her feelings about the affair in a brief session every second day. You had agreed, reluctantly, to that. The first session happened the night before Allison died; and it had turned into an interrogation. Allison remained tormented by the affair. She pressed you for details. On the night she died, Allison again questioned you about the affair. All the pressures proved too much for you. The prosecution suggested that you smothered Allison; and that looks likely. But whatever the mechanism, your violent attack caused her death. Her fingernails scratched your face, the act of a

desperate woman struggling for life. Those marks are only consistent with your guilt.

Your shameful conduct after murdering Allison bespeaks a profound absence of remorse. You took her body to Kholo Creek. There you disposed of her in an undignified way: dumping her over a ledge to leave her lying in mud, exposed to the elements, insects and wildlife. Then you put in place - and persisted in - a deception plan. You used a razor to cut yourself near where she had scratched you, trying to disguise the injuries she had inflicted in defending herself.

You drove around the streets of Brookfield pretending to look for her. You have insinuated that mental illness may have led to drug overdose or suicide. And besmirching Allison's memory in that way is thoroughly reprehensible.

You have no criminal history. But you are definitely not of good character. You are given to lies and other deception: so much so that whatever you may say on any application for parole, 15 years or more hence, will need to be assessed with considerable scepticism.

The community, acting through the court, denounces your lethal violence. The impacts on Allison's family have been grave. Their impact statements poignantly express their pain. You took a devoted, loving mother from her three girls, blighting their lives. The law provides but one penalty for your awful crime. I impose it. You are sentenced to imprisonment for life.⁸⁶

Appeal

During the trial, the defence case was simple: there had been no argument or altercation during the evening, he did not sustain the scratches to his face during a struggle and he did not kill his wife either intentionally or accidentally. But before the Court of Appeal, Baden-Clay's counsel submitted that whilst it was open to the jury to be satisfied *beyond reasonable doubt* that he had unlawfully killed his wife, the jury could not properly be satisfied of the 'necessary intent' for murder or grievous bodily harm.

Senior counsel for Baden-Clay argued that the jury could not be satisfied of the

'necessary intent' for a number of reasons. Allison's body showed no injuries to indicate an intent to kill or do grievous bodily harm. There was no sign of blood or evidence of a clean-up in the house to suggest violence. There was no evidence of any previous violence in the marriage. Nothing had changed in the marriage. He also argued that Baden-Clay was under no undue financial pressure in the business and that his creditors were not pressing for payment.

Decision of Court of Appeal – the 'Reasonable Hypothesis'

In December 2015, the Queensland Court of Appeal in *R v Baden-Clay* [2015] QCA 265 held that the jury verdict was 'unreasonable' and allowed the appeal and substituted a verdict of manslaughter.

In its reasoning, the Court of Appeal emphasised a number of features including that there was no evidence that Baden-Clay had ever manifested any intention of harming his wife and there was no compelling motive. There were no signs of blood or disarrangement at the house and there was no evidence of noise which suggested that there had been no repeated violent blows or struggle and that whatever occurred on the night concluded quickly. Also, the post-mortem did not identify any injury which Baden-Clay may have had motive to conceal. Whilst the Court of Appeal acknowledged (at [46]) that the inability to identify any injury may be due to decomposition, it concluded that any suggestion of a 'possible injury' was a matter of conjecture. It held that such conjecture was impermissible.

The Court of Appeal held (at [48]) that whilst the findings that Baden-Clay lied about the cause of his facial injuries and attempted to conceal his wife's body should not be separated out from the other evidence, the evidence of his conduct after he killed his wife 'remained neutral on the issue of intent'. The Court of Appeal further outlined how a 'reasonable hypothesis' could be developed

which was consistent with Baden-Clay being innocent of murder:

[T]here was a physical confrontation between [Baden-Clay] and his wife in which he delivered a blow which killed her (for example, by the effects of a fall hitting her head against a hard surface) without intending to cause serious harm; and, in a state of panic and knowing that he had unlawfully killed her, he took her body to Kholo Creek in the hope that it would be washed away, while lying about the causes of the marks on his face which suggested conflict. Smothering, the Crown's thesis, was a reasonable possibility, but while there was also another reasonable possibility available on the evidence, the jury could not properly have been satisfied beyond reasonable doubt that the element of intent to kill or do grievous bodily harm had been proved.

The decision of the Queensland Court of Appeal resulted in public outrage and highly critical media coverage.⁸⁷ The Queensland Attorney-General lodged an application for special leave to appeal. On 26 July 2016, the High Court granted special leave and heard oral submissions.⁸⁸ The Crown argued, amongst other things, that the Court of Appeal had been wrong to 'substitute its own views, including a factual assertion not established by the evidence'.

Decision of the High Court

On 31 August 2016, more than four years after Allison's body was found, the High Court allowed the appeal and re-instated the murder conviction (*The Queen v Baden Clay* [2016] HCA 35).

The reasoning of the High Court included a close examination of the chronology to the killing. By August 2008, Baden-Clay had begun a sexual relationship with Toni McHugh. In September 2011, Allison learnt of the affair and confronted Baden-Clay who then ended the affair and reached an 'agreement' with Allison whereby he would not go out at night without her approval. He gave her the password to his mobile phone so

that she could check his texts messages and call history. He also installed a GPS (global positioning system) tracking 'app' on his mobile phone and gave her the login details of his email account.

However, in December 2011, Baden-Clay resumed the affair and opened a secret email account, using the alias 'Bruce Overland', by which he continued to communicate with his mistress. On 3 April 2012, Baden-Clay sent an email to McHugh in which he gave her a commitment that he would be 'separated from his wife by the 1st of July 2012'. On 11 April 2012, he sent McHugh a further email in which he maintained his love for her. On 16 April 2012, he attended a relationship counsellor with Allison and reluctantly agreed that every second day, he would devote 15 minutes to listening to Allison 'vent' and express her feelings about the affair that he had had.

On 19 April 2012, Baden-Clay's mistress phoned him to tell him that she was attending a property management conference the following day. Baden-Clay then disclosed that Allison would also be attending the conference. In her evidence at trial, McHugh testified that she became very angry and said 'tell your wife ... its not fair to either of us'. McHugh also demanded to know his intentions. Her evidence was that Baden-Clay answered only that he was thinking of selling his business and leaving Allison.

However, during his trial, Baden-Clay testified that, on the evening prior to Allison's disappearance, they spent 15 minutes discussing the problems in their relationship and then talked about their plans for the following day, including her intention to attend the real estate conference. Baden-Clay testified that he did not tell Allison about the affair and that he was not concerned that Allison might meet his mistress during the conference.

The account that Baden-Clay gave at trial appears implausible. Baden-Clay had already suffered the indignity of the veiled ultimatum from his mistress who demanded that he disclose his infidelity to his wife. He would also

have recognised that at least some of the delegates to the conference knew about his ongoing affair with McHugh and that someone was likely to at least advert to the affair to Allison. It is more likely that during the discussion on the evening before she went missing, Baden-Clay finally told Allison of his ongoing infidelity and that he had been lying to her for months. It is also likely that Allison reacted angrily to this revelation and abused and denigrated him. She may well have told him that she planned to expose him as an unfaithful husband and a failed businessman. She may also have threatened to divorce him in a very public spectacle which Baden-Clay would have found hugely embarrassing.

It is not difficult to imagine the shame that Baden-Clay could envisage and the contempt in which he would be held by his family and children as well as his friends and business associates. It was in this context that Baden-Clay was likely to have developed a narcissistic rage during which he struck Allison. Even if his first rage-driven blow had not been lethal, Baden-Clay was likely to have realised the import of that overt act of violence. Knowing that his assault on Allison would inexorably lead to abject humiliation from her accusing him of domestic violence and finally leaving the marriage, it is likely that Baden-Clay then suffocated or strangled Allison before disposing of her body.

Conclusion

During the trial, Baden-Clay testified that there had not been any argument or altercation during the evening and that he did not sustain the scratches to his face during a struggle in which he killed his wife. During the appeal, Baden-Clay's counsel submitted that whilst it had been open to the jury to be satisfied *beyond reasonable doubt* that he had unlawfully killed his wife, the jury could not properly be satisfied of the 'necessary intent' for murder or grievous bodily harm. Baden-Clay's counsel emphasised that no evidence was found to suggest any violence and

Allison's body showed no injuries to indicate an intent to kill or do grievous bodily harm. Baden-Clay's counsel also argued that there was no evidence of any previous violence in the marriage and that nothing had changed in the marriage.

In overturning the murder conviction, the Queensland Court of Appeal developed a 'reasonable hypothesis' consistent with Baden-Clay's innocence. In substituting a conviction for manslaughter, the Court of Appeal emphasised that there was no evidence of motive in the sense of a reason to kill and no evidence that Baden-Clay had ever intimated any intention of harming his wife.

However, in quashing the Court of Appeal's decision, the High Court held (at [68]) that it was for the jury to determine whether, in a physical confrontation on the night of 19 April 2012, Baden-Clay formed the intention to kill his wife because he suddenly found intolerable the consequences of his years of deception, including his wife's recriminations in the course of her 'venting and grilling', and the prospects of her response to the discovery of his ongoing infidelity and deception; it was open to the jury 'to determine the likely effect upon his mind of the difficulties in which he found himself when he took her life. It was not unreasonable for the jury to conclude, on the whole of the evidence, that it tested credulity too far to suggest that his evident desire to be rid of his wife was fortuitously fulfilled by her unintended death' (at [69]). The High Court affirmed that motive, if proven, is a matter from which intention can be inferred and it located error in the Court of Appeal's reasoning that the evidence of financial stress and the extra-marital affair suggested a context of strain between the couple which might well have culminated in a confrontation (at [70]).

The High Court also held (at [78]) that the jury could take into account the absence of any signs that a weapon was used to cause the death and make their own judgment about his intention at the time, 'bearing in mind the

difficulty involved in killing a human being without the use of a weapon unless the act of killing is driven by a real determination'.

Thus, in all the circumstances of the case, the High Court concluded that it had been open to the jury to be satisfied beyond reasonable doubt that Baden-Clay killed his wife and did so with intent, at least, to cause her grievous bodily harm (at [79]).

Since the early work of Freud, Kohut and Kernberg, and the more recent research of Gunderson, Ronningstam, Baumeister and others, the concept of a 'narcissistic injury' triggering anger and rage in a person with NPD has been well elaborated. Baden-Clay exhibited all the prominent characteristics of over-controlled NPD with features of both the elitist and amorous phenotypes. He was arrogant, grandiose and pretentious. He showed a profound sense of entitlement and was interpersonally exploitative and callous. It can plausibly be hypothesised that when his wife finally challenged his fragile sense of self and he was shamed and humiliated, he reacted violently.

At the heart of the appellate proceedings against Baden-Clay was whether there was a motive for him to engage in violence against his wife. Understanding the nature of his narcissistic personality and the potential for him to experience narcissistic injury and to be filled with narcissistic rage that prompted his extreme violence provides an enhanced capacity to appreciate from a psychological perspective what is likely to have taken place on the fateful night.

Disclosure Statement

No potential conflict of interest was reported by the author(s).

Notes

1. JW Hamilton, 'Some Remarks on Certain Vicissitudes of Narcissism' (1942) 5 *International Review of Psychoanalysis* 275–84.
2. H Ellis, 'Auto-eroticism: A Psychological Study' (1898) 19 *Alienist and Neurologist* 260–99.

3. O Rank, 'A Contribution to Narcissism' [*Ein Beitrag zum Narzissismus*] (1911) 3 *Jahrbuch für Psychoanalytische und Psychopathologische Forschungen* 401–26.
4. H Ellis, 'The Conception of Narcissism' (1927) 14 *Psychoanalytic Review* 129–53.
5. S Freud, 'On Narcissism: An Introduction' in *Collected Papers* (Hogarth, London 1925, vol 4) (original work published in 1914); see also J Sandler, P Fonagy and ES Person (eds), *Freud's 'On Narcissism': An Introduction* (Karnac Books, London 2012).
6. F Summers, *Object Relations Theories and Psychopathology: A Comprehensive Text* (Analytic Press, Hillsdale, NJ 1994).
7. H Kohut, 'The Psychoanalytic Treatment of Narcissistic Personality Disorders' (1968) 23 *The Psychoanalytic Study of the Child* 86–113.
8. H Kohut, *The Analysis of the Self: A Systematic Approach to the Psychoanalytic Treatment of Narcissistic Personality Disorders* (International Universities Press, Connecticut 1971); H Kohut, *The Restoration of the Self* (International Universities Press, New York 1977); H Kohut, *The Search for the Self* (International Universities Press, New York 1978).
9. O Kernberg, 'Borderline Personality Organization' (1967) 15 *Journal of the American Psychoanalytic Association* 641–85.
10. O Kernberg, *Borderline Conditions and Pathological Narcissism* (Jason Aronson, New York 1985) 246.
11. O Kernberg, 'Pathological Narcissism and Narcissistic Personality Disorder: Theoretical Background and Diagnostic Classification' in EF Ronningstam (ed), *Disorders of Narcissism: Diagnostic, Clinical and Empirical Implications* (American Psychiatric Press, Washington DC 1998) 29–52; OF Kernberg, 'An Ego Psychology Object Relations Theory of the Structure and Treatment of Pathological Narcissism: An Overview' (1989) 12 *Psychiatric Clinics of North America* 723–29; OF Kernberg, 'Narcissistic Personality Disorder in Childhood' (1989) 12 *Psychiatric Clinics of North America* 671–94; OF Kernberg, 'The Narcissistic Personality Disorder and the Differential Diagnosis of Anti-social Behaviour' (1989) 12 *Psychiatric Clinics of North America* 553–70; OF Kernberg, *Aggression in Personality Disorder and Perversions* (Yale University Press, New Haven, CT 1992); OF Kernberg, *Aggressivity, Narcissism, and Self-*

- destructiveness in the Psychotherapeutic Relationship* (Yale University Press 2004).
12. S Pulver, 'Narcissism: The Term and the Concept' (1970) 118 *Journal of the American Psychoanalytic Association* 319–15; RE McGrath, 'Conceptual Complexity and Construct Validity' (2005) 85 *J Personal Assess* 112–24.
 13. E Ronningstam, JG Gunderson and M Lyons, 'Changes in Pathological Narcissism' 152 *American Journal of Psychiatry* 253–57; DL Paulhus, 'Interpersonal and Intrapsychic Adaptiveness of Trait Self-enhancement: A Mixed Blessing?' (1998) 74 *Journal of Personality and Social Psychology* 197–208; JD Foster, WK Campbell and JM Twenge, 'Individual Differences in Narcissism: Inflated Self-views Across the Lifespan and Around the World' (2003) 37 *Journal of Research in Personality* 469–86; JD Foster and WK Campbell, 'Are There Such Things as "Narcissists" in Social Psychology? A Taxometric Analysis of the Narcissistic Personality Inventory' (2007) 43 *Personality and Individual Differences* 1321–32; V Zeigler-Hill and others, 'Trouble Ahead, Trouble Behind: Narcissism and Early Maladaptive Schemas' (2011) 42 *Journal of Behavior Therapy and Experimental Psychiatry* 96–103.
 14. C Sedikides and AP Gregg, 'Narcissists and Feedback: Motivational Surfeits and Motivational Deficits' (2001) 12 *Psychological Inquiry* 237–39; CC Morf and F Rhodewalt, 'Unraveling the Paradoxes of Narcissism: A Dynamic Self-regulatory Processing Model' (2001) 12 *Psychological Inquiry* 177–96; C Derber, *The Pursuit of Attention: Power and Ego in Everyday Life* (2nd edn, OUP, Oxford 2000); S Hotchkiss, *Why Is It Always About You? The Seven Deadly Sins of Narcissism* (Simon & Schuster, New York 2003); C Sedikides and others, 'Are Normal Narcissists Psychologically Healthy? Self-esteem Matters' (2004) 87 *Journal of Personality and Social Psychology* 400–16; C Lasch, *The Culture of Narcissism: American Life in the Age of Diminishing Expectations* (WW Norton, New York 1978); JM Oldham and LB Morris, *The New Personality Self-portrait: Why You Think, Work, Love and Act the Way You Do* (Bantam Books, New York 1995); M Warren and A Capponi, 'The Role of Culture in the Development of Narcissistic Personality Disorders in America, Japan and Denmark' 20 *Journal of Applied Social Sciences* 77–82; E Payson, *The Wizard of Oz and Other Narcissists: Coping with the One-way Relationship in Work, Love, and Family* (Julian Day Publications, Royal Oak, MI 2010); S Vaknin, *Malignant Self-love: Narcissism Revisited* (Narcissus Publications, Prague, Czech Republic 2013); E Lunbeck, *The Americanization of Narcissism* (Harvard Press, Cambridge 2014); P Curk and A Gaitanidis, *Narcissism: A Critical Reader* (Karnac Books 2007); E Lunbeck, *The Americanization of Narcissism* (Harvard University Press 2014).
 15. HM Wallace and RF Baumeister, 'The Performance of Narcissists Rises and Falls with Perceived Opportunity for Glory' (2002) 82 *Journal of Personality and Social Psychology* 819–34; SM Young and D Pinsky, 'Narcissism and Celebrity' (2006) 40 *Journal of Research in Personality* 463–71; L Jones and AB Brunell, 'Clever and Crude but Not Kind: Narcissism, Self-esteem, and the Self-reference Effect' (2014) 22(4) *Memory* 307–22.
 16. JM Post, *Narcissism and Politics: Dreams of Glory* (Cambridge University Press, New York 2015); D Sankowsky 'The Charismatic Leader as a Narcissist: Understanding the Abuse of Power' (1995) 23 *Organizational Dynamics* 45–55; CE Joubert, 'Narcissism, Need for Power and Social Interest' (1998) 82 *Psychological Reports* 701–702; WK Campbell, 'Is Narcissism Really so Bad?' (2001) 12 *Psychological Inquiry* 214–16; P Rose, 'The Happy and Unhappy Faces of Narcissism' (2002) 33 *Personality and Individual Differences* 379–91.
 17. J Nelson, 'Varieties of Narcissistically Vulnerable Couples: Dynamics and Practice Implications' 23 *Clinical Social Work Journal* 59–70.
 18. P Wink, 'Two Faces of Narcissism' (1991) 61 *Journal of Personality and Social Psychology* 590–97.
 19. KA Dickinson and LA Pincus, 'Interpersonal Analysis of Grandiose and Vulnerable Narcissism' (2003) 17 *Journal of Personality Disorders* 188–207; JD Miller and others, 'Grandiose and Vulnerable Narcissism: A Nomological Network Analysis' (2011) 79 *Journal of Personality* 1013–42; E Grijalva and L Zhang, 'Narcissism and Self-insight: A Review and Meta-analysis of Narcissists' Self-enhancement Tendencies' (2016) 42 *Personality and Social Psychology Bulletin* 3–24.
 20. SD Freis and others, 'Shame, Rage and Unsuccessful Motivated Reasoning in

- Vulnerable Narcissism' (2015) 34 Journal of Social and Clinical Psychology 877–95.
21. E Russ and others, 'Refining the Construct of Narcissistic Personality Disorder: Diagnostic Criteria and Subtypes' (2008) 165(11) American Journal of Psychiatry 1473–81; L Houlcroft, M Bores and D Munro, 'Three Faces of Narcissism' (2012) 53(3) Personality and Individual Differences 274–78.
 22. E Ronningstam, 'Narcissistic Personality Disorder: A Review' in M Maj and others (eds), *Evidence and Experience in Psychiatry, Volume 8: Personality Disorders* (John Wiley & Sons, New York 2005) 277–327.
 23. DM Falkenbach, JR Howe and M Falki, 'Using Self-esteem to Disaggregate Psychopathy, Narcissism, and Aggression' (2013) 54(7) Personality and Individual Differences 815–20.
 24. GO Gabbard, 'Two Subtypes of Narcissistic Personality Disorder' (1989) 53 Bulletin of the Menninger Clinic 527–32; GO Gabbard, 'Transference and Counter-transference in the Treatment of Narcissistic Patients' in E Ronningstam (ed), *Disorders of Narcissism: Diagnostic, Clinical, and Empirical Implications* (American Psychiatric Press, Washington DC 1989) 125–45.
 25. JO Rovik, 'Overt and Covert Narcissism: Turning Points and Mutative Elements in Two Psychotherapies' (2001) 17 British Journal of Psychotherapy 435–47; A Tanzilli and others, 'Countertransference when Working with Narcissistic Personality Disorder: An Empirical Investigation' (2017) 54 (2) Psychotherapy 184–94.
 26. S Akhtar and JA Thomson, 'Overview: Narcissistic Personality Disorder' (1982) 139 American Journal of Psychiatry 12–20; KN Levy and others, 'Narcissistic Personality Disorder' in W O'Donohue, KA Fowler and SO Lilienfeld (eds), *Personality Disorders: Toward the DSM-V* (Sage, Thousand Oaks, CA 2007) 233–77.
 27. E Ronningstam and J Gunderson, 'Narcissistic Traits in Psychiatric Patients' (1988) 29 Comprehensive Psychiatry 545–49.
 28. JG Gunderson and E Ronningstam, 'Diagnostic Interview for Narcissism' (2nd edn, McLean Hospital, Belmont, MA 1990).
 29. RN Raskin and CS Hall, 'A Narcissistic Personality Inventory' (1979) 45 Psychol Rep 590; RN Raskin and CS Hall, 'The Narcissistic Personality Inventory: Alternate Form Reliability and Further Evidence of Construct Validity' (1981) 45 J Personal Assess 159–62.
 30. American Psychiatric Association, *Diagnostic and Statistical Manual of Mental Disorders. 3rd Ed-Revised* (American Psychiatric Association, Washington DC 1987).
 31. A Frances, 'The DSM-III Personality Disorders Section: A Commentary' (1980) 137 American Journal of Psychiatry 1050–54; see also BM Rienzi, J Forquera and DL Hitchcock, 'Gender Stereotypes for the Proposed DSM-IV Negativistic, Depressive, Narcissistic and Dependent Personality Disorder' (1995) 9 Journal of Personality Disorders 49–55; T Millon, *Disorders of Personality. DSM-III: Axis II* (John Wiley and Sons, NY 1981); MA Blais, MJ Hilsenroth and FD Castlebury, 'Content Validity of the DSM-IV Borderline and Narcissistic Personality Disorder Criteria Sets' (1997) 38 Compr Psychiatry 31–37.
 32. American Psychiatric Association, *Diagnostic and Statistical Manual of Mental Disorders, 4th Ed-Text Revision* (American Psychiatric Association, Washington DC 2000).
 33. AE Skodol and others, 'Proposed Changes in Personality and Personality Disorder Assessment and Diagnosis for DSM-5. Part I: Description and Rationale' (2011) 2 Personality Disorders: Theory, Research and Treatment 4–22.
 34. E Russ and others, 'Refining the Construct of Narcissistic Personality Disorder: Diagnostic Criteria and Subtypes' (2008) 165 American Journal of Psychiatry 1473–81; NM Cain, LA Pincus and EB Ansell, 'Narcissism at the Crossroads: Phenotypic Description of Pathological Narcissism Across Clinical Theory, Social/Personality Psychology, and Psychiatric Diagnosis' (2008) 28 Clin Psychol Rev 638–56; R Piers, 'How to Eliminate Narcissism Overnight: DSM-V and the Death of Narcissistic Personality Disorder' (2011) 8 (2) Innovations in Clinical Neuroscience 23–27.
 35. AL Pincus and MR Lukowitsky, 'Pathological Narcissism and Narcissistic Personality Disorder' (2010) 6 Annual Review of Clinical Psychology 421–46; E Ronningstam, 'Narcissistic Personality Disorder: Facing DSM-V' (2009) 39 Psychiatric Annals 111–21; E Ronningstam, 'Narcissistic Personality Disorder in DSM-V: In Support of Retaining a Significant Diagnosis' (2011) 25 Journal of Personality

- Disorders 248–59; E Ronningstam, ‘Narcissistic Personality Disorder: A Clinical Perspective’ (2011) 17 *Journal of Psychiatric Practice* 89–99; LC Morey and BH Stagner, ‘Narcissistic Pathology as Core Personality Dysfunction: Comparing the DSM-IV and the DSM-5 Proposal for Narcissistic Personality Disorder’ (2012) 68 *Journal of Clinical Psychology*: In Session 908–21.
36. American Psychiatric Association, *Diagnostic and Statistical Manual of Mental Disorders, Fifth Edition* (American Psychiatric Association, Arlington, VA 2013).
 37. B J Bushman, A M Bonacci, M Van Dijk and R F Baumeister, ‘Narcissism, sexual refusal, and aggression: Testing a narcissistic reactance model of sexual coercion’ (2003) 84 *Journal of Personality and Social Psychology* 1027–1040; J M Twenge and W J Campbell, ‘Isn’t it fun to get the respect that we’re going to deserve?’ Narcissism, social rejection, and aggression’ (2003) 29 *Personality and Social Psychology Bulletin* 261–272.
 38. CR Cloninger, TR Przybeck and DM Svrakic, ‘Emotional Features of Narcissistic Personality Disorder’ (1985) 143 *Am J Psychiatry* 720–24; L Carroll, ‘A study of narcissism, affiliation, intimacy, and power motives among students in business administration’ (1987) 61 *Psychological Reports* 355–358; K Ritter and others, ‘Lack of Empathy in Patients with Narcissistic Personality Disorder’ (2011) 187 *Psychiatry Research* 241–47; A Baskin-Sommers, E Krusemark and E Ronningstam, ‘Empathy in Narcissistic Personality Disorder: From Clinical and Empirical Perspectives’ (2014) 5(3) *Personality Disorders: Theory, Research, and Treatment* 323–33; JS Ogrodniczuk and others, ‘Interpersonal Problems Associated with Narcissism Among Psychiatric Outpatients’ (2009) 43(9) *Journal of Psychiatric Research* 837–42; S Konrath and others, ‘The Relationship between Narcissistic Exploitativeness, Dispositional Empathy, and Emotion Recognition Abilities’ (2014) 38(1) *Journal of Nonverbal Behavior* 129–43.
 39. WK Campbell, CA Foster and EJ Finkel, ‘Does Self-love Lead to Love for Others? A Story of Narcissistic Game Playing’ (2002) 83 *Journal of Personality and Social Psychology* 340–54; L Carroll and others, ‘Interpersonal Consequences of Narcissistic and Borderline Personality Disorders’ (1989) 17 *Journal of Social and Clinical Psychology* 38–49; W K Campbell and C A Foster, ‘Narcissism and commitment in romantic relationships: An investment model analysis’ (2002) 28 *Personality and Social Psychology Bulletin* 484–495; W K Campbell, C A Foster and E J Finkel, ‘Does narcissism lead to love for others? A story of narcissistic game playing’ (2002) 83 *Journal of Personality and Social Psychology* 340–354; W K Campbell, E A Rudich and C Sedikides, ‘Narcissism, self-esteem, and the positivity of self-views: Two portraits of self-love’ (2002) 28 *Personality and Social Psychology Bulletin* 358–368. S Akhtar, ‘Love, Sex, and Marriage in the Setting of Pathological Narcissism’ (2009) 39(4) *Psychiatric Annals* 185–91, WK Campbell, AB Brunell and EJ Finkel, ‘Narcissism, Interpersonal Self-regulation, and Romantic Relationships: An Agency Model Approach’ in KD Vohs and EJ Finkel (eds), *Self and Relationships: Connecting Intrapersonal and Interpersonal Processes* (Guilford Press, New York 2006) 57–83.
 40. LM Penney and PE Spector, ‘Narcissism and Counterproductive Work Behavior: Do Bigger Egos Mean Bigger Problems?’ (2002) 10 *International Journal of Selection and Assessment* 126–34; RM Boldt, ‘Who Feeds Narcissism?’ (2007) 63 *Journal of Individual Psychology* 146–57; S Thomaes, B J Bushman, B Orobio de Castro and H Stegge, ‘What makes narcissists bloom? A framework for research on the etiology and development of narcissism’ (2009) 21 *Development and Psychopathology* 1233–1247; SD Boon, VL Deveau and AM Alibhai, ‘Payback: The Parameters of Revenge in Romantic Relationships’ (2009) 26 *Journal of Social and Personal Relationships* 747–68; SD Boon, AM Alibhai and VL Deveau, ‘Reflections on the Costs and Benefits of Exacting Revenge in Romantic Relationships’ (2011) 43 *Canadian Journal of Behavioural Science* 128–37; DE Reidy, JD Foster and A Zeichner, ‘Narcissism and Unprovoked Aggression’ (2010) 36(6) *Aggressive Behavior* 414–22; K Rasmussen, ‘Entitled Vengeance: A Meta-analysis Relating Narcissism to Provoked Aggression’ (2016) 42(4) *Aggressive Behavior* 362–79.
 41. JDC Perry and JC Perry, ‘Conflicts, Defenses and the Stability of Narcissistic Personality Features’ (2004) 67(4) *Psychiatry* 310–30.
 42. FS Stinson and others, ‘Prevalence, Correlates, Disability, and Comorbidity of DSM-IV Narcissistic Personality Disorder: Results

- from the Wave 2 National Epidemiologic Survey on Alcohol and Related Conditions' (2008) 69 *J Clin Psychiatry* 1033–45; AJ Pulay, RB Goldstein and BF Grant, 'Sociodemographic Correlates of DSM-IV Narcissistic Personality Disorder: Results from the Wave 2 National Epidemiologic Survey on Alcohol and Related Conditions (NESARC)' in WK Campbell and JD Miller (eds), *The Handbook of Narcissism and Narcissistic Personality Disorder: Theoretical Approaches, Empirical Findings, and Treatments* (John Wiley & Sons, Hoboken, New Jersey 2011) 167–80; N Dhawan and others, 'Prevalence and Treatment of Narcissistic Personality Disorder in the Community: A Systematic Review' (2010) 51 *Comprehensive Psychiatry* 333–39; see also K Wright and A Furnham, 'How to Spot a Narcissist: Mental Health Literacy with Respect to Narcissistic Personality Disorder' (2015) 9 *Personality and Mental Health* 150–61.
43. C Lasch, *The Culture of Narcissism* (WW Norton, New York 1991); LE Buffardi and WK Campbell, 'Narcissism and Social Networking Web Sites' (2008) 34 *Personality and Social Psychology Bulletin* 1303–14; JM Twenge and WK Campbell, *The Narcissism Epidemic: Living in the Age of Entitlement* (Free Press, New York 2010); JM Twenge and others, 'Egos Inflating over Time: A Cross-temporal Meta-analysis of the Narcissistic Personality Inventory' (2008) 76 *Journal of Personality* 875–902; A Manne, *The Life of I: The New Culture of Narcissism* (Melbourne University Press 2015); A Blachnio, A Przepiorka and P Rudnicka, 'Narcissism and self-esteem as predictors of dimensions of Facebook use' (2016) 90 *Personality and Individual Differences* 296–301.
 44. See also AL Pincus and MR Lukowitsky, 'Pathological Narcissism and Narcissistic Personality Disorder' (2010) 6 *Annual Review of Clinical Psychology* 421–46.
 45. T Millon, *Disorders of Personality: DSM-IV and Beyond* (Wiley, New York 1996); T Millon, 'DSM Narcissistic Personality Disorder: Historical Reflections and Future Directions' in E Ronningstam (ed), *Disorders of Narcissism: Diagnostic, Clinical, and Empirical Implications* (American Psychiatric Press, Washington DC 1998) 75–101.
 46. See also T Millon and others, *Personality Disorders in Modern Life* (2nd edn, Wiley, Hoboken, NJ 2004).
 47. S Freud, 'Libidinal Types' (1932) *The Psychoanalytic Quarterly* VI; LM Bogart, EG Benotsch and JD Pavlovic, 'Feeling Superior but Threatened: The Relation of Narcissism to Social Comparison' (2004) 26 *Basic and Applied Social Psychology* 35–44.
 48. H Kohut, 'Thoughts on Narcissism and Narcissistic Rage' (1972) 27 *Psychoanalytic Study of the Child* 360–400, 380.
 49. R F Bauemeister, L Smart and J M Boden, 'Relation of threatened egotism to violence and aggression: the dark side of high self-esteem' (1996) 103 *Psychological Review* 5–33 at 8; see also S Vazire and D C Funder, 'Impulsivity and the self-defeating behavior of narcissists' (2006) 10 *Personality and Social Psychology Review* 154–165; K Geukes, S Nestler, R Hutteman, M Dufner et al, 'Puffed-Up but shaky selves: State self-esteem level and variability in narcissists' (2017) 112 (5) *Journal of Personality and Social Psychology* 769–786.
 50. Z Krizan and O Johar, 'Narcissistic Rage Revisited' (2015) 108 *Journal of Personality and Social Psychology* 784–801; see also R Stolorow, 'Narcissistic Rage' (1986) 16 *Psychiatric Annals* 489–90; H Schulte, MJ Hall and R Crosby, 'Violence in Patients with Narcissistic Personality Pathology: Observations of a Clinical Series' (1994) 48 *American Journal of Psychotherapy* 610–23; NW Brown, *The Destructive Narcissistic Pattern* (Praeger Publishers, Westport, CT 1998); A Bateman, 'Narcissism and its Relation to Violence and Suicide' in RJ Perelberg (ed), *Psychoanalytic Understanding of Violence and Suicide* (Routledge, London 1999); PH Ornstein, 'Chronic Rage from Underground: The Treatment of a Patient with a Severe Narcissistic Disorder' (2009) 39 *Psychiatric Annals* 137–43; JL Maples and others, 'Narcissistic Personality Disorder and Self-esteem: An Examination of Differential Relations with Self-report and Laboratory-based Aggression' (2010) 44 *Journal of Research in Personality* 559–63; S Akhtar and H Parens (eds), *Revenge: Narcissistic Injury, Rage, and Retaliation* (Lanham, MD/Plymouth, UK 2014); R Fatfouta and others, 'Narcissism and Lack of Interpersonal Forgiveness: The Mediating Role of State Anger, State Rumination, and State Empathy' (2015) 75 *Personality and Individual Differences* 36–40; K Rasmussen, 'Entitled Vengeance: A Meta-analysis Relating Narcissism to Provoked Aggression' (2016) 42 *Aggressive Behavior* 362–79; W Hart, JM Adams and G Tortoriello, 'Narcissistic Responses to Provocation: An

- Examination of the Rage and Threatened-egotism Accounts' (2017) 106 *Personality and Individual Differences* 152–56.
51. EF Ronningstam, *Identifying and Understanding the Narcissistic Personality* (OUP, NY 2005); NW Brown, *Coping with Infuriating, Mean, Critical People: The Destructive Narcissistic Pattern* (Praeger, Westport 2006); M Larson, MG Vaughn, C P Salas-Wright and M Delisi, 'Narcissism, low self-control, and violence among a nationally representative sample' (2015) 42 (6) *Criminal Justice And Behavior* 644–661.
 52. TS Stucke, 'Who's to Blame? Narcissism and Self-serving Attributions Following Feedback' (2003) 17 *European Journal of Personality* 465–78; C Li and others, 'State Narcissism and Aggression: The Mediating Roles of Anger and Hostile Attributional Bias' (2016) 42(4) *Aggressive Behavior* 333–45; M G Vaughn, M Delisi, K M Beaver, J P Wright, M O Howard, 'Toward a psychopathology of self-control theory: the importance of narcissistic traits' (2007) 25 (6) *Behavioral Sciences and the Law* 803–821.
 53. MJ Horowitz, 'Self-righteous Rage and the Attribution of Blame (1981) 38 *Archives of General Psychiatry* 1233–38; T S Stucke and L S Sporer, 'When a grandiose self-image is threatened: Narcissism and self-concept clarity as predictors of negative emotions and aggression following ego-threat' (2002) 70 *Journal of Personality* 509–532; R Edwards and AJ Bond, 'Narcissism, Self-concept Clarity and Aggressive Cognitive Bias Amongst Mentally Disordered Offenders' (2012) 23 *Journal of Forensic Psychiatry and Psychology* 620–34.
 54. Baumeister, Smart and Boden (n 46); BJ Bushman and RF Baumeister, 'Threatened Egotism, Narcissism, and Direct and Displaced Aggression: Does Self-love or Self-hate Lead to Violence?' (1998) 75 *Journal of Personality and Social Psychology* 219–29; BP Papps and RE O'Carroll, 'Extremes of Self-esteem and Narcissism and the Experience and Expression of Anger and Aggression' (1998) 24 *Aggressive Behavior* 421–38; F Rhodewalt and CC Morf, 'On Self-aggrandizement and Anger: A Temporal Analysis of Narcissism and Affective Reactions to Success and Failure' (1998) 74 *Journal of Personality and Social Psychology* 672–85; TS Stucke and SL Sporer, 'When a Grandiose Self-image is Threatened: Narcissism and Self-concept Clarity as Predictors of Negative Emotions and Aggression Toward Ego Threat' (2002) 70 *Journal of Personality* 509–32; JM Twenge and others, 'Social Exclusion Decreases Prosocial Behavior' (2007) 92 *Journal of Personality and Social Psychology* 56–66; M A Martinez, A Ziechner, D A Reidy and J D Miller, 'Narcissism and displaced aggression: Effects of positive, negative, and delayed feedback' (2008) 44 *Personality and Individual Differences* 140–149.
 55. E Fromm, *The Heart of Man* (Harper & Rowe, New York 1964); See also M Goldner-Vukov and LJ Moore, 'Malignant Narcissism: From Fairy Tales to Harsh Reality' (2010) 22 *Psychiatria Danubina* 392–405.
 56. O Kernberg, 'Factors in the Psychoanalytic Treatment of Narcissistic Personalities' (1970) 18 *J American Psychoanal Assoc* 51–85; OF Kernberg, *Borderline Conditions and Pathological Narcissism* (Jason Aronson, Northvale, NJ 1975); OF Kernberg, 'The Psychotherapeutic Management of Psychopathic, Narcissistic, and Paranoid Transferences' in T Millon and others (eds), *Psychopathy: Antisocial, Criminal, and Violent Behaviour* (Guilford Press, New York 1998) 372–92; see also E Ronningstam, *Disorders of Narcissism: Diagnostic, Clinical and Empirical Implication* (American Psychiatric Press, Washington DC 1997).
 57. OF Kernberg, *Severe Personality Disorders* (Yale University Press, New Haven, CT 1984).
 58. OF Kernberg and E Caligor, 'A Psychoanalytic Theory of Personality Disorders' in MF Lenzenweger and J Clarkin (eds), *Major Theories of Personality Disorder* (Guilford Press, New York 2005) 114–56.
 59. R Scott, 'Psychopathy: An Evolving and Controversial Construct' (2014) 21(5) *Psychiatry, Psychology and Law* 687–715.
 60. H Cleckley, *The Mask of Sanity* (Mosby, St. Louis, MO 1941/1988).
 61. D Hare, *Without Conscience: The Disturbing World of the Psychopaths Among Us* (Pocket Books, New York 1993); see also RF Baumeister and LM Boden, 'Aggression and the Self: High Self-esteem, Low Self-control, and Ego Threat' in RG Geen and E Donnerstein (eds), *Human Aggression: Theories, Research, and Implications for Social Policy* (Academic Press, San Diego, CA 1998) 111–37.
 62. P Rose, 'The Happy and Unhappy Faces of Narcissism' (2002) 33(3) *Personality and Individual Differences* 379–92; EM Cale and SO Lilienfeld, 'Psychopathy Factors and

- Risk for Aggressive Behavior: A Test of the "Threatened Egotism" Hypothesis' (2006) 30(1) Law and Human Behavior 51–74; DM Falkenbach, JR Howe and M Falki, 'Using Self-esteem to Disaggregate Psychopathy, Narcissism, and Aggression' (2013) 54 Personality and Individual Differences 815–20.
63. PL Hart and CE Joubert, 'Narcissism and Hostility' (1996) 79(1) Psychological Reports 161; RF Baumeister, 'Violent Pride: Do People Turn Violent Because of Self-hate or Self-love?' (2001) Scientific American 96–101; JM Ruiz, TW Smith and F Rhodewalt, 'Distinguishing Narcissism and Hostility: Similarities and Differences in Interpersonal Circumplex and Five-factor Correlates' (2001) 76(3) Journal of Personality Assessment 537–55; BR Goldberg and others, 'Predictors of Aggression on the Psychiatric Inpatient Service: Self-esteem, Narcissism, and Theory of Mind Deficits' (2007) 195 Journal of Nervous and Mental Disease 436–42; J Lowenstein, C Purvis and K Rose, 'A Systematic Review on the Relationship between Antisocial, Borderline and Narcissistic Personality Disorder Diagnostic Traits and Risk of Violence to Others in a Clinical and Forensic Sample' (2016) 3 Borderline Personality Disorder and Emotion Dysregulation 14.
 64. S Fisher and G Hall, "'If You Show a Bit of Violence They Learn Real Quick": Measuring Entitlement in Violent Offenders' (2011) 18 (4) Psychiatry, Psychology and Law 588–98.
 65. EM Seider and others, 'Empathic Competencies in Violent Offenders' (2013) Psychiatry Res 1168–75.
 66. RF Baumeister and others, 'Self-esteem, Narcissism, and Aggression: Does Violence Result From Low Self-esteem or From Threatened Egotism?' (2000) 9(1) Current Directions in Psychological Science 26–29; see also JG Gunderson and E Ronningham, 'Differentiating Narcissistic and Antisocial Personality Disorders' (2001) 15 J Personal Disord 103–109.
 67. JI Warren and SC South, 'A Symptom Level Examination of the Relationship between Cluster B Personality Disorders and Patterns of Criminality and Violence in Women' (2009) 32 International Journal of Law and Psychiatry 10–17.
 68. MH Stone, 'Violent Crimes and their Relationship to Personality Disorders' (2007) 1(2) Personality and Mental Health 138–53; See also M Hubs, *Know Your Enemy: Reflections on NPD* (Lulu.com 2013).
 69. SG Michaud and H Aynesworth, *Ted Bundy: Conversations with a Killer* (Authorlink Press, Irving, Texas 2000).
 70. See A Seierstad, *One of Us* (Hackett, London 2015); I Melle, 'The Breivik Case and What Psychiatrists Can Learn from It' (2013) 12(1) World Psychiatry 16; C Allely, 'Deadly Combination: The Psychiatric Disorders that May Have Made Anders Breivik into a Mass Shooter' *The Conversation* (4 November 2016) <<http://theconversation.com/deadly-combination-the-psychiatric-disorders-that-might-have-made-anders-breivik-into-a-mass-shooter-68035>>, accessed 5 October 2017.
 71. See State Coroner of New South Wales (Michael Barnes), *Inquest into the Deaths Arising from the Lindt Café Siege: Findings and Recommendations* (May 2017) <<http://www.lindtinquest.justice.nsw.gov.au/Documents/findings-and-recommendations.pdf>>, accessed 5 October 2017.
 72. GC Salfati, 'The Nature of Expressiveness and Instrumentality in Homicide: Implications for Offender Profiling' (2000) 4 Homicide Studies 265–93; S Adjorlolo and HG Chan, 'The Nature of Instrumentality and Expressiveness of Homicide Crime Scene Behaviors: A Review' (2017) 18 Trauma, Violence and Abuse 119–33.
 73. E Revitch and LB Schlesinger, *Sex Murder and Sex Aggression: Phenomenology, Psychopathology, Psychodynamics and Prognosis* (Charles C Thomas Pub Ltd, Springfield, IL 1998); see also JR Meloy, 'Spousal Homicide and the Subsequent Staging of a Sexual Homicide at a Distant Location' (2001) 47 Journal of Forensic Science 395–98.
 74. D Cartwright, 'The Narcissistic Exoskeleton: The Defensive Organization of the Rage-type Murderer' (2002) 66 Bulletin of the Menninger Clinic 1–18.
 75. D Cartwright, *Psychoanalysis, Violence and Rage-type Murder: Murdering Minds* (Brummer-Routledge, London 2002) 22; D Cartwright, 'The Role of Psychopathology and Personality in Rage-type Homicide: A Review' (2001) 37 South African Journal of Psychology 12–19.
 76. C Bezuidenhout and M Wharren, 'An Analysis of the Probable Association between Narcissistic Personality Disorder and a Rage-type Murder Event' (2013) 5 Pakistan Journal of Criminology 251–73; C Bezuidenhout and M Wharren, 'The Role of Narcissistic Personality Disorder in Rage-type Murder'

- (2013) 5 Pakistan Journal of Criminology 275–98.
77. RA Glick and SP Roose, *Rage, Power and Aggression* (Yale University Press, New Haven 1993).
78. E Megargee, ‘Recent Research on Overcontrolled and Undercontrolled Personality Patterns Among Violent Offenders’ (1973) 9 Sociological Symposium 37–50; EI Megargee, ‘Undercontrolled and Overcontrolled Personality Types in Extreme Antisocial Aggression’ (1996) 80 Psychological Monographs Whole No 611.
79. CR Bartol and AM Bartol, *Criminal Behavior: A Psychosocial Approach* (10th edn, Prentice Hall, Upper Saddle River, NJ 2014).
80. F Brookman, *Understanding Homicide* (Sage, Thousand Oaks, CA 2005).
81. CP Malmquist, *Homicide: A Psychiatric Perspective* (2nd edn, American Psychiatric Publishing, Arlington, VA 2006).
82. See EH Begbie, *The Story of Baden-Powell, the Wolf that Never Sleeps* (Kessinger Publishing, Whitefish, MT 2004); T Jeal, *Baden-Powell, Founder of the Boy Scouts* (Yale University Press, New Haven, CT 2007).
83. See R Scott, ‘The Murder Trial of Gerard Baden-Clay: Admissibility of Expert Opinion Evidence of Injuries and Cause of Death’ (2017) 25 Journal of Law and Medicine (in press).
84. <<http://www.couriermail.com.au/news/queensland/crime-and-justice/gerard-baden-clay-wins-appeal-trial-judge-refused-to-dismiss-murder-charge/news-story/353fa84ab4c7db91c8fb2c26d4135aa4>>, accessed 5 October 2017.
85. *R v Baden-Clay* [2014] QSC 154 Byrne SJA 9 July 2014 – summing up <<http://archive.sclqld.org.au/qjudgment/2014/QSC14-154.pdf>>, accessed 5 October 2017.
86. *R v Baden-Clay* [2014] Supreme Court 154 Byrne SJA – Unreported sentencing, 15 July 2014 <<http://archive.sclqld.org.au/qjudgment/2014/QSC14-155.pdf>>, accessed 5 October 2017.
87. D Murray, *The Murder of Allison Baden-Clay* (Penguin Random House, Australia 2016).
88. *The Queen v Baden-Clay* [2016] HCATrans 166.