Original Article:

EXPLORING DIFFERENCES IN THE PERCEPTIONS OF THE NOT GUILTY BY REASON OF INSANITY PLEA BASED ON THE DEFENDANT'S MOTIVE AND RELIGIOUS AFFILIATION

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Abstract

This study investigated differences in mock jurors' perceptions of a Not Guilty by Reason of Insanity (NGRI) case based on a defendant's religious affiliation and motive. Participants evaluated the NGRI case of a defendant (Christian/Muslim/Agnostic/unstated) after having committed murder by a certain motive (voice of: God/Devil/unidentified) and evaluated the NGRI plea's believability. There was a significant religious affiliation by motive interaction on NGRI plea believability, $F(6, 632) = 2.75$, $p = .012$, $\eta_p^2 = .025$. The NGRI plea of defendants with unstated religious affiliations ($M = 5.21$, $SD = 1.56$) were found to be more believable when compared to Agnostic defendants ($M = 4.28$, $SD = 1.86$), when both heard the Devil's voice. There was a marginally significant religious affiliation by motive interaction on mock juror confidence. This has implications for future NGRI definitions and cases.

Keywords: NGRI, insanity plea, religious affiliation, motive, mock jurors

INTRODUCTION

The insanity defense, otherwise known as the Not Guilty by Reason of Insanity (NGRI) plea, has a long and complicated history. Initial ideas of criminal responsibility date back to Hebrew law, as well as the time of Plato and Aristotle (Stimpson, 1994). Although the NGRI defense has been part of the criminal justice system for an extensive amount of time, it is viewed as quite controversial. However, it continues to be used in modern legal settings.

One of the early definitions of a legal premise somewhat resembling the NGRI plea was the Good and Evil Test in 1313, which decided that the insane, including children, were not capable of determining good from evil and therefore, punishment against them would not be just (Perlin, 1994). In 1724, *Rex v. Arnold* determined the Wild Beast Test, which stated that the defendant must not have any memory or mental faculties, like a wild beast, and as a consequence of this, would not be punishable (Rex v. Arnold, 1724, pp. 764-765). However, the Wild Beast Test was replaced by the Good and Evil Test until the Right and Wrong Test was first used in 1812. The Right and Wrong Test was more broadly described in 1840 during *Regina v. Oxford,* which was then interpreted to be the first definition of the Irresistible Impulse Test. The Irresistible Impulse Test required the defendant to be "unaware of the nature, character, and consequences of the act he was committing...whether he was under the influence of a diseased mind and was really unconscious at the time" (Regina v. Oxford, 1840, p. 546).

The next significant change for the insanity defense came with *Regina v. M'Naghten* in 1843, which required the defendant to have a "disease of the mind," the capability to understand the nature of the crime, and the capability of knowing that the crime was wrong (Regina v. M'Naghten, 1843, p. 722). These requirements were then updated in 1954, after *Durham v. United States* stated that a defendant who was suffering from a mental disease or defect could not be held responsible for their actions (Belt, 2015). This addition encouraged the increased use of psychiatric evaluations, lending legitimacy to an often-questioned defense. However, critics like Szasz (1963) challenged the main tenets from the Durham and M'Naghten rules that related to the responsibility a person with a psychological disorder has for their own actions. Nevertheless, Durham remained as the main guidance for the insanity defense until it was updated in 1962 by the American Law Institute (ALI), which introduced more wording regarding psychological assessment as a requirement to determine criminal responsibility prior to formal legal action (Belt, 2015). The ALI rule was then updated in 1972 after the decision of *United States v. Brawner*, establishing that a defendant could not be held legally responsible for their actions if they had a substantially reduced mental capacity which may or may be due to a mental disease or defect (Robin, 1997).

One of the more recent updates to the NGRI plea emerged with the Insanity Defense Reform Act of 1984. The Insanity Defense Reform Act shifted the burden of proof to the defendant, changed the standard for expert witnesses limiting their scope, and allowed

defendants with mental illnesses who knew that what they did was wrong to still qualify for the NGRI plea (Robin, 1997). In shifting the burden of proof, the defendant was now responsible for presenting the defense with convincing and clear evidence, while it had previously been the position of the prosecution to put forward a case against the defense. Expert witnesses were no longer able to testify whether or not they deemed the defendant to be legally sane and were only able to testify on the defendant's mental health and capacity. It also bears adding that some states have the Guilty but Insane rule, as well as Diminished Capacity, which are distinguished from the NGRI plea. The most recent update to the insanity defense, however, was the decision of *Kahler v. Kansas* in 2020. In this case, the Supreme Court of the United States decided that states could not be held to the M'Naghten decision and are able to decide whether or not to use the NGRI defense (Kahler v. Kansas, 2020). In this decision, the Supreme Court noted that legal standards regarding mental illness and criminal liability need to be consistently reevaluated, which is part of why the NGRI plea is so controversial. Deeming an individual clinically insane by legal standards is difficult due to frequently shifting requirements and the inconsistent nature of the expert witness testimony of forensic psychologists and psychiatrists. Additionally, along with insanity defenses being notoriously unsuccessful, many defense teams are also wary to plead Not Guilty by Reason of Insanity because it shifts the burden of proof to the defendant, as mentioned above. Due to these reasons, the insanity defense may be used as the last attempt by some defendants to get a lesser sentence, legally known as malingering.

Although *Kahler v. Kansas* (2020) has affirmed states' right to choose whether they use the NGRI plea in their criminal justice systems, many states still allow the use of this defense. However, the use of the NGRI defense is fairly rare, as it is used in about 1% of all legal cases and only successful around 25% of the time (Savoy, 2017). These percentages are often misconstrued by the public, who have perceptions of the NGRI defense as commonplace due to the popularity of crime shows in the media. One of the most infamous NGRI defense cases is that of Andrea Yates, a mother of 5 from Texas, who drowned all of her children after hearing voices tell her that the only way she could save them from the devil was to kill them (Meadows & Kuehnel, 2005). Yates was a devout Christian who had been prescribed medication for her history of postpartum depression and psychosis. However, she stopped taking her medication shortly before the murders. Yates' case was widely covered in the media, most likely highly influencing the public's perception of the NGRI defense. Due to the importance of Yates' religious affiliation to her identity and her criminal motive, throughout the trial, connections were made to her faith that may have influenced the outcome of her case. Yates' NGRI plea was initially unsuccessful, she was charged with capital murder, and sentenced to life in prison (Resnick, 2007). However, after a successful appeal and retrial, Yates was found NGRI and sentenced to life in a mental institution in Texas, where she currently resides (Resnick, 2007).

Although Yates' case is one of the most prominent NGRI plea cases where the defendant claimed to be hearing a voice, there are other similar cases that informed the current study. For example, other people who entered a plea of not guilty by reason of insanity included, Teresa Archie, Deanna Laney, Robert Pasqual Serravo, and Jesse Skinner, all claiming to have heard God's voice order them to kill someone. They were each found to have mental health issues including schizophrenia, psychosis, and delusions, and were all found to be not guilty by reason of insanity. Herb Coddington, Renato Seabra, and Robert Blair also claimed that the voice of God told them to kill, but were found to be guilty of their crimes. NGRI cases have also been documented where the defendant claimed to hear a voice other than God, such as Bruco Eastwood, who murdered two students in Colorado after allegedly hearing an unstated voice, and James P. Riva who murdered his grandmother after allegedly hearing the devil's voice.

Although the insanity defense has gone through a plethora of legal changes over the years, it has not strayed from its Judeo-Christian roots (Neville, 2010). These roots date back to an early version of the NGRI plea, the deific decree, an exception of M'Naghten from 1843. The deific decree is a defense in which the defendant is deemed not sane due to committing a crime under the belief that God told them to do it (Belt, 2015). The terms used in the definition of the deific decree, which in turn have influenced the current standards of the NGRI plea, include the entity of God and not a general, more inclusive deity. Additionally, mental illness in the early era of the NGRI plea was believed to be madness caused by demons and sin, once again displaying the strong influence of the NGRI plea's Judeo-Christian roots. This has led to a limited interpretation of the NGRI plea when a defendant is anything other than the standard Christian tradition that the insanity defense assumes. As mentioned above in the Andrea Yates case, this deep-rooted bias can have life-changing consequences for defendants who choose to plead NGRI, depending on their religious affiliation and criminal motive. Additionally, this religious bias often favors Christian defendants since the United States is a mostly Christian country. According to the Pew Research Center, a nonpartisan research organization, 70.6% of the U.S. population is Christian, 4% is Agnostic, while only around 1% of the U.S. population is Muslim (Religion in America, 2020).

Media portrayals of Muslim individuals have led to increased anger and decreased warmth towards both Arab and non-Arab Muslims (Shaver et al., 2017). These negative perceptions of Muslims were not found to be related to a specific political ideology, which suggests how commonplace these views have become. Additionally, a study by Bergstrom et al. (2021) found that although Agnostic and Atheist individuals are often grouped together when being studied, Agnostics were believed by participants to be more confused, moral, indecisive, and trustworthy than Atheists. This information, coupled with the fact that personal opinion cannot be kept out of legal proceedings, shows that more research needs to be done to determine the extent to which these views are impacting court outcomes for Muslim and Agnostic defendants.

Every part of the trial process, from voir dire through sentencing, is affected by religion and there are variations in outcomes based on religious characteristics (Miller et al., 2008). Religious affiliation also affects specific defenses, as this study intends to show with the NGRI plea. A study by Miller et al. (2014) found that religious conversions, specifically to Christianity or Islam increased an incarcerated person's chance of being paroled, when compared to no conversion. This shows the impact that bias towards various religious affiliations can have in the legal system, however, there are few, if any, examples of research about religious bias regarding the NGRI defense.

Although literature regarding religious bias in relation to the NGRI plea has been scarce, there are a few examples of how a juror's religious identity can affect NGRI cases. Adjorlolo et al. (2016) found that participants who were more involved in religious activities, especially those in cultures who highly value religious involvement, such as Latin America, Africa, and Europe, were more sympathetic towards a defendant pleading NGRI. However, the vignettes created in this study had a predetermined outcome of guilty but insane, which may have affected the mock juror's perceptions of the case and the defendant. The verdict of guilty but insane or guilty but mentally ill allows a jury to hold a defendant accountable for their actions via a guilty verdict, but acknowledges that the defendant's mental illness was an impactful factor in the crime. Another study by Yelderman and Miller (2016) specifically researched the impact of religious fundamentalism on an NGRI case. They found that fundamentalist beliefs predicted mock jurors' punitiveness towards a defendant who was pleading NGRI, such that priming fundamentalist beliefs increased the mock juror punitiveness (Yelderman & Miller, 2016). Further research by Yelderman and Miller (2016) related religious fundamentalism to increased authoritarian attitudes towards the mentally ill and mental illness, which could be attributed to why fundamentalist beliefs were related to mock jurors' punitiveness. Although this research provides insight into how a juror's religious affiliation can affect the outcome of an NGRI case, it does not demonstrate the effects that a defendant's religious affiliation can have on their own case.

The purpose of this study was to determine how a defendant's religious affiliation and criminal motive affects the perceptions of mock jurors in an NGRI defense case. It was hypothesized that mock jurors will be most harsh towards Muslim and Agnostic defendants, i.e. mock jurors will display lower believability of a defendant's NGRI defense, and lower confidence in the defendant's diagnosable mental disorder. Further, it was hypothesized that mock jurors will be fairer in their decisions and with sentencing, along with displaying more believability in the defendant's NGRI defense, towards defendants who state hearing God's voice as their criminal motive. Lastly, it was hypothesized that mock jurors will display a similar pattern of greater fairness and believability towards Christian defendants who state hearing God's voice as their criminal motive.

METHOD

Participants

The sample initially consisted of 953 participants, however, those who did not meet attention checks or who had incomplete data were removed. The final data set included 644 participants who were recruited from Amazon's crowdsourcing, survey-taking platform, Mechanical Turk (MTurk) and received 50 cents for their participation in the study. The average age of the participants was 39.82 ($SD = 13.13$), with ages ranging from 18 to 89 years old. Of the 577 participants who stated the gender they identified with, 53.6% identified as male, 46.1% as female, and 0.3% as nonbinary. Of the 579 participants who stated their religious affiliations, 72.3% were Christian, 1.2% were Jewish, 1.7% were Hindu, 1.4% were Buddhist, 12.4% identified as Agnostic, 6.2% identified as Atheist, 1% identified as Muslim, and 3.6% stated another religious affiliation. Of the 577 participants who stated their race/ethnicity, 67.2% identified as White/Caucasian, 15.1% were African/African American/Black, 8.1% were Asian/Asian American, 4.7% were Native American, 4.2% were Hispanic/Latinx, and 0.7% stated another race/ethnicity.

Materials

Jury Instructions: Participants were initially presented with a set of criminal jury instructions (CalCrim, 2019) about the NGRI defense and how to proceed with deciding a case that utilizes the NGRI defense. These instructions were from the Judicial Council of California Criminal Jury Instructions (2019) and are what actual jurors in the state of California would receive in a case that involves the NGRI defense.

Crime Vignettes: The vignettes, which were created for the purpose of the current study, described a legal case in which a defendant murdered her three children after hearing a voice tell her that the world was ending, and she must get her house in order. It was stated that the defendant had been diagnosed with schizophrenia by a psychologist in her past and had been taking medication to control her symptoms, although she had recently stopped taking that medication. Each vignette varied only by the voice speaking to the defendant that told her to kill her children (God, the devil, or an unidentified voice) and the religious affiliation of the defendant (Christian, Muslim, Agnostic, or not stated).

Dependent Measures: The following dependent measures were created for the purpose of the current study.

Believability: Participants were asked about believability in the NGRI case and rated it on a 7-point scale ranging from 1 (strongly disbelieve) to 7 (strongly believe). Specifically, this included how much they believed the defendant was not guilty by reason of insanity, if they were actually hearing a voice, if the NGRI defense should continue to be used, and how much the defendant's race and religion factored into their involvement in the murder.

Confidence: Participants were asked about their confidence in the NGRI case and rated it on a 7-point scale from 1 (extremely not confident) to 7 (extremely confident). This included how confident they were in the decision they made about the case, their decision to sentence the defendant to prison and/or a psychiatric facility, the defendant actually hearing voices, and the defendant actual having a diagnosable mental disorder.

Fairness: Participants were also asked questions regarding the fairness of their decisions in the NGRI case rated on a 7-point scale from 1 (not fair) to 7 (very fair). This specifically included how fair they felt in their decision to sentence the defendant to time in prison and/or a psychiatric facility, along with fairness in the defendant receiving psychiatric help.

Likelihood of Decisions: Participants were asked questions regarding the likelihood of certain decisions in an NGRI case, which were rated on a 7-point scale from 1 (not likely) to 7 (extremely likely). This included how likely they were to believe the defense and the prosecution, how likely the defendant was malingering, and how likely it was that the defendant was faking hearing voices in order to avoid prison time.

Sentencing: Participants were asked to indicate how many years (ranging from 0 to 100) the defendant should spend in prison and a psychiatric facility.

Emotional Response: Participants were asked how worried they were that the defendant would be released back into society after their determined sentence on a 7-point scale from 1 (extremely not worried) to 7 (extremely worried).

Impact of Identity: Participants were also asked to assess how much they believed the defendant's religion, gender, and race/ethnicity affected their decision of guilty or not guilty by reason of insanity, rated on a 5-point scale, ranging from 1 (none) to 5 (a great deal).

Current Issues: Participants were asked how much the current social justice issues affected their decision in this case, rated on a 7-point scale from 1 (not at all) to 7 (very much).

NGRI Outcomes: Lastly, participants were asked how often they believed that insanity cases end in an NGRI decision, rated on a 5-point scale from 1 (never) to 5 (always).

Manipulation Checks: Participants were asked to select which voice the defendant heard (God, the devil, or an unidentified voice) and what her religious affiliation was (Christian, Muslim, Agnostic, or unstated), based on the vignette they read. The purpose of the manipulation checks was to determine whether or not the participants attended to the variables and if they were able to correctly identify the condition (religious affiliation and criminal motive) in their vignette.

Attention Questions: In order to determine whether or not participants were distracted while they took this study, they were asked if they copied and pasted sentences or paragraphs from other sources and if they were distracted while participating.

Demographics: Participants were asked to indicate their age, gender they identified with, religious affiliation, and race/ethnicity.

Procedure

This study was posted to Amazon's crowdsourcing platform, Mechanical Turk (MTurk), and created using Qualtrics. Participants were able to register for this study if they were 18 years of age or older. Participants were asked to review the consent form first, where they were given the option to either consent or not consent. If they consented, participants were randomly assigned to read one of the twelve vignettes that only varied based on the voice the defendant heard (God / the devil / unidentified) and the defendant's religious affiliation (Christian / Muslim / Agnostic / unstated). They then responded to the dependent variable measures, followed by the manipulation checks, attention checks, and demographic questions. Finally, participants were thanked for their time and paid $0.50 for their participation.
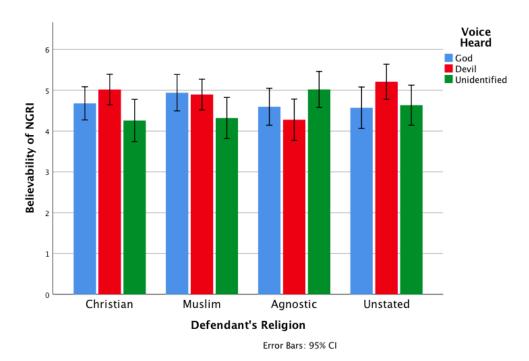
RESULTS

A 4 (Religious Affiliation: Christian / Muslim / Agnostic / Unstated) x 3 (Criminal Motive/Voice Heard: God / the Devil / Unidentified) between-subjects ANOVA was performed on the dependent variables. Post hoc analyses of pairwise comparisons were performed using the Bonferroni Correction.

Believability

There was a significant interaction of the religious affiliation and criminal motive of the defendant on how believable the mock jurors found the defendant's NGRI plea to be, $F(6, 632) = 2.75$, $p = .012$, $\eta_p^2 = .025$ (see figure 1). When motivated by the Devil's voice to commit murder, the NGRI pleas of a defendant with an unstated religious affiliation ($M = 5.21$, $SD = 1.56$) were significantly more believable when compared to Agnostic defendants ($M = 4.28$, $SD = 1.86$). Further, when the defendant was Agnostic, the mock jurors found their plea marginally more believable when she heard an unidentified voice ($M = 5.02$, $SD = 1.53$) rather than the devil's voice ($M = 4.60$, $SD = 1.71$). A Christian defendant was significantly more believable when they heard the Devil ($M = 5.02$, $SD = 1.40$) versus an unidentified voice ($M = 4.26$, $SD = 1.97$).

There were no other significant main effects or interactions on mock jurors' believability of a defendant's NGRI defense, based on that defendant's religious affiliation and criminal motive.
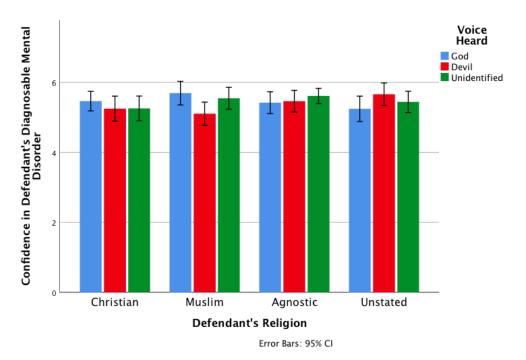
Figure 1. Believability of the Defendant's NGRI Defense Based on
Their Religious Affiliation and Criminal Motive

Confidence

There was a marginally significant interaction on the mock juror's confidence in the defendant having a diagnosable mental disorder based on the defendant's religious affiliation and criminal motive, $F(6, 631) = 1.94$, $p = .073$, $\eta_p^2 = .018$ (see figure 2). Mock jurors were significantly more confident that the mental disorder was diagnosable when a Muslim defendant heard God's voice ($M = 5.69$ $SD = 1.18$) rather when she heard the devil's voice ($M = 5.11$, $SD = 1.25$). Further, when claiming the devil's voice as a motive for the crime, mock jurors were marginally more confident that the defendant with an unstated religious affiliation ($M = 5.66$, $SD = 1.18$) had a diagnosable mental disorder than if the defendant was Muslim ($M = 5.11$, $SD = 1.25$).

Other Dependent Measures

There were no significant main effects or interactions related to mock jurors' fairness, likelihood of decisions, sentencing decisions, emotional responses, impact of identity, current issues, and NGRI outcomes.

Figure 2. Confidence in a Defendant's Diagnosable Mental Disorder
Based on their Religious Affiliation and the Voices Heard

DISCUSSION

This study intended to determine how mock jurors' perceptions in an NGRI defense case are affected by a defendant's religious affiliation and criminal motive. It was hypothesized that mock jurors would respond with less fairness and more punitively towards defendants who were Muslim and Agnostic, while responding with greater fairness towards defendants who heard God's voice as their motive, or were specifically Christian and heard God's voice. The current study partially supported these hypotheses, such that mock jurors, although influenced by a defendant's religious affiliation and criminal motive, were not consistently more lenient towards one religious affiliation. In this context, leniency was related to higher levels of belief and confidence in the defendant and their NGRI plea.

This research has shown that there are significant differences in how believable a defendant's NGRI plea is to mock jurors based on their religious affiliation and criminal motive. In addition, there were differences in how confident mock jurors were in a defendant having a diagnosable mental disorder. Based on the criminal motive originating from hearing the devil's voice, this study found that mock jurors believed the NGRI plea from the defendant with an unstated religious affiliation rather than when she was Agnostic. Additionally, mock jurors believed Christian defendants whose motives were

incited by the devil's voice more to be NGRI than when their motive was unidentified voices. This pattern reversed for the Agnostic defendant, such that her NGRI plea was more believable when she heard an unidentified voice telling her to commit murder rather than the devil's. These findings do not demonstrate a hypothesized pattern of a consistent lack of believability towards a specific religious affiliation, but rather that it depends on the motive for their crime. When the defendant was Agnostic, she was less believably NGRI, especially when she stated that the devil told her to commit the murders. This bias towards an Agnostic person is consistent with the results of Miller et al. (2014), that has shown that the presence of religion or a religious conversion, is often viewed positively, as compared with no religious change. This would suggest that the presence of religion positively impacts a defendant's case, which also seems to be true in the current study. This may also relate to previous literature that demonstrated people who are Agnostic are often perceived as confused and indecisive, and therefore less believable (Bergstrom et al., 2021).

Miller et al. (2020) also found little evidence of bias against Atheists when their motivation was religious, as they were perceived to be more of a moral threat and less of a criminal one. Although the current study did not include an Atheist defendant, Agnostics and Atheists are both considered to be in a category of nonbelief (Silver, 2013). Agnostic defendants in the current study were only believed to be NGRI when their motive was not religious, as it is generally more believable for a person of nonbelief to have a non-religious motive than someone with a recognizable religious affiliation. These results demonstrated that stating a defendant's religious affiliation can affect the strength of their plea and outcome of their legal case, especially when it is related to their criminal motivation.

The conditional confidence in a Muslim defendant's mental disorder being diagnosable is supported by research by Miller et al. (2020), which stated that bias against Muslims is generally socially acceptable. Participants were more likely to express bias against Muslims if the crime they had committed was motivated by their religion and conversely, more likely to be sympathetic towards a Muslim defendant if they had committed a crime in self-defense due to their religion (Miller et al., 2020). In the current study, Muslim defendants were only believed to have a diagnosable disorder when they heard God's voice rather than the devil's voice. Therefore, since the belief in God is a central tenet in Islam, mock jurors expressed believing their diagnosis when it was motivated by a religious belief. Further, this confidence in the Muslim defendant may be an overcorrection for bias, similar to aversive racism, which is seen more frequently in studies exploring perceptions of Muslims (Miller et al., 2020). For example, a Muslim defendant may be seen as justified in her crime since she is religiously motivated, as compared with a defendant without a stated religious affiliation who has no obvious reason to have a religious motive. Although it was shown that religious affiliation and motive did affect mock jurors' confidence in the defendant having a diagnosable mental disorder, they were not most confident in Christian defendants, even when they heard God's voice as their motive, which was hypothesized. These findings, although somewhat contrary from

the hypothesized outcomes, are consistent with past research on religious bias in the criminal justice system, such that jurors' perceptions of various religious affiliations can affect the outcome of a trial (Miller et al., 2008; Miller et al., 2014).

Implications

The current research has implications that extend beyond the field of social psychology. Although the NGRI plea is rarely used, the results of this study can inform general legal policies and practices in order to decrease the prevalence of bias in the criminal justice system. The current study has shown that prejudice and stereotyping is present within the courtroom based on a defendant's religious affiliation and how it relates to their criminal motive as well as the impact it has how jurors perceive the defendant's case. To prevent unfair treatment based on preconceived perceptions of one's identity, all involved in court proceedings should be mandated to attend implicit bias training. This will include jurors, judges, prosecutors, defense attorneys, as well as expert witnesses, police officers, and any other individuals involved. This training will allow those who take part in it to identify any implicit biases and preconceived perceptions they may have about certain religious groups, along with bias related to other identity groups. Additionally, as mentioned above, each state has the authority to decide whether or not to use the NGRI plea and what NGRI standards they will work within their state. Again, although rare, the NGRI plea still occurs and this research will be available to serve as an example of how the current standards interact with jurors' perceptions and biases. This research will also be helpful for lawyers in the voir dire process, especially if the defendant is not a Christian and could be the target of bias. Voir dire is the initial examination of the potential jurors, typically by the prosecution and defense, although sometimes by a judge. Finally, this research can generally be informative to various disciplines about the perceptions that are present towards certain religious affiliations, especially in the context of the law.

Limitations and Future Research

In this research, the criminal motive was included as the voice of God, the devil, or a voice with an unidentified source. However, it is unknown if participants' perceptions of Muslim defendants would have shifted if instead of labeling it as God, the word Allah was used. Allah is the Arabic word for God in the Islamic faith. Using the Arabic word, Allah, has the potential to evoke stronger responses from participants than the use of the word God, and therefore its use should be considered in future studies.

The defendant in each vignette was a woman, with each case being based on the high-profile case of Andrea Yates. The case of Yates was chosen as a model for the vignette because it is one of, if not the most, well-known NGRI plea case where the defendant claimed to be hearing voices, which was one of the main variables being explored. Future studies should consider the use of a male defendant in order to determine whether participants react differently to a male defendant, although in this study gender was not

found to be a significant factor in participants' perception of the crime. In addition to this, future research could explore how the implications of the type of crime (homicide versus theft) and the victims of those crimes (stranger, spouse, children, siblings, or parents) engage with various systems of morality based on how one's religion views the severity of different acts or transgressions.

There were also limitations within our participants' demographics. The majority of our participants were White/Caucasian and Christian. However, since there were a range of religious affiliations in the various vignettes, they may have been evaluated differently by a Latino Muslim mock juror or Black Agnostic mock juror, as compared with a White Christian participant. Future studies should consider broadening their participant base by recruiting participants from platforms other than Amazon's MTurk, which is where the current study's participants were sourced from.

Future studies should also improve upon the sentencing questions included in the current study. It is difficult for participants to conceptualize sentencing decisions as they may have no point of reference for such decisions and giving them context for sentencing without leading them to an answer can be challenging. The sentencing scales were also large, ranging from 0 to 100 years, which may have been difficult for participants to understand. Although the participants were given jury instructions, sentencing tends to be an arbitrary process for those who are not familiar with it in the context of the criminal justice system. Additionally, sentencing in an NGRI case is more difficult because jurors must decide whether to sentence the defendant to time in prison, a mental hospital, or both.

This study has implications for future research as well as policy changes within the criminal justice system. Due to the lack of research regarding religious bias and the NGRI defense, this study serves as a base for future research to delve deeper into mock juror perceptions of the insanity plea with regard to religious bias. These findings can be applied to inform improved implicit bias training in the courtroom, potentially through updating jury instructions, as well as other parts of the criminal justice system where religious bias is present. In conclusion, this confirmation that the criminal justice system is affected by religious bias in the form of jurors' perceptions in a legal case will inform future research on these topics as well as increase awareness of these biases in this setting.

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