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## JURY DYNAMICS AND DECISION-MAKING: A PRESCRIPTION FOR GROUPTHINK

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### ABSTRACT

Since it was initially published, the groupthink hypothesis (Janis, 1972) has been one of the most widely cited contributions to the study of decision-making. Although it was originally conceived as a model of faulty decision-making by political policy-making groups, its applicability to other types of decision-making workgroups is readily apparent. Also apparent is its potential applicability to decision-making by juries. The antecedent conditions and symptoms of groupthink are elaborated, as they may apply to decision-making by juries and preventative strategies are discussed.

**Key words:** discussion, groupthink hypothesis, jury, interpersonal relations, psychology

### 1. INTRODUCTION\*

More than two centuries ago, the framers of the U. S. Constitution determined that criminal defendants had the right to be tried before a jury. This right was also specifically extended to civil trials by the Seventh Amendment to the Constitution. Although the composition of juries has changed from one of all white males to one of mixed genders and races, and the size of juries has become varied from the original 12 jurors to as few as six, the function of the jury has remained essentially the same. Evaluating evidence and acting as an impartial finder of fact is still a jury's task.

From a group psychological perspective, a jury can be described as a unique variety of an autonomous work group. It is one in which the group members are chosen, essentially at random, to perform a function of great importance, for which they generally have had no direct training. They must work in isolation and secrecy, with little or no outside assistance, using procedures and rationales of their own design to produce one product: what will hopefully be a unanimous decision<sup>1</sup>. Whether the decision is innocent or guilty, for the plaintiff or defendant, the decision must be unanimous. A *hung jury*, the result of an inability to reach a unanimous decision, represents the failure of the work group to produce a useable product.

With what is known today about the dynamics of small groups and about group decision-making processes, it becomes clear that the structure of our jury system may, potentially, precipitate group dynamics that are not conducive to quality decision-making.

#### The Groupthink Syndrome

After studying a number of group decisions made by political leaders that proved to be terribly wrong, Janis (1972) developed a model for the dynamics of faulty group decision-making by cohesive groups, in which consensus-seeking became a dominant focus of the group decision-making process. Inspired by the *newspeak* vocabulary of George Orwell's 1984 and its use of such terms as *doublethink* and *crimethink* and in order to portray this phenomenon in an invidious light, Janis called it *groupthink*. He described groupthink as:

*A quick and easy way to refer to a mode of thinking that people engage in when they are deeply involved in a cohesive in-group, when the members' strivings for unanimity override their motivation to realistically appraise alternative courses of action.... Groupthink refers to a deterioration of mental efficiency, reality testing, and moral judgment that results from in-group pressures. (1972, p. 9)*

Janis (1983) and others (Manz & Sims, 1982; Moorhead, Ference, & Neck, 1991) expanded the concept of groupthink to encompass work groups, as well as political groups. They found that the principles were equally applicable to both types of groups. Janis enumerated the following six antecedent conditions contributing to the occurrence of groupthink: (a) Group cohesiveness, (b) insulation of the group, (c) lack of a tradition of impartial leadership, (d) lack of norms requiring methodical procedures, (e) homogeneity of members' social background and ideology, (f) high stress

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from external threats with low hope of a better solution than the leader's, and (g) low self esteem, temporarily induced by recent failures that make members' inadequacies salient, excessive difficulties on current decision-making tasks that lower each group member's sense of self-efficacy, or moral dilemmas.

While the groupthink theory has been widely accepted over nearly three decades since its publication, it has received surprisingly little empirical support. Of the few studies attempting to test the groupthink model, some have demonstrated support and others have failed to find significant associations. As Park (1990) suggested, the nature of the groupthink model makes a comprehensive study of all of its components extremely difficult. Because the model has a large number of variables that are applied to groups rather than individuals, testing the model with a moderate degree of statistical power, when all of its variables are manipulated, would require in excess of 7000 subjects.

A small, but growing, body of empirical work supports the validity of the groupthink model. While no single study has validated the entire model, various studies have supported different aspects of the theory (Esser, 1998). Despite the fact that it has limited empirical support, the groupthink model has received popular acceptance and has demonstrated its usefulness as a tool to improve group decision-making processes. As Janis (1972) suggested, because the primary purpose of the model is not to predict the occurrence of groupthink but to prevent it, empirical support is of limited value.

Though all of the necessary antecedent conditions may be present, the model does not suggest that the occurrence of groupthink is inevitable. Rather, it suggests that in the presence of certain antecedent conditions, an increased risk of faulty decision-making exists. Groupthink is a process, not an outcome, and does not always result in a bad decision (Flippen, 1999). Consensus-seeking is an important part of normal decision-making. It becomes problematic when consensus-seeking occurs before the optimal solution to a problem has been identified or when consensus is reached without fully evaluating the advantages and disadvantages of the decision.

This analysis will attempt to demonstrate that juries are at increased risk for groupthink, and thereby for faulty decision-making, by using a risk management perspective to examine the conditions imposed on juries by the American jury system.

### **The Jury System: Prescription for Groupthink**

The effects of conditions that occur prior to the decision-making process, what Janis (1972) referred to as *antecedent conditions*, may be crucial to successful decision-making, as it is at that stage when precedents are set, group norms are established, and leadership style and situational constraints emerge. There are a sufficient number of parallels between the conditions under which juries operate and the antecedent conditions for the occurrence of groupthink that a substantial risk of jury decisions being tainted by groupthink appears to exist.

### **Group Cohesiveness**

Although juries need not to be cohesive, a number of factors operate to increase the likelihood of the development of cohesiveness among jury members. Jurors are thrust into an unfamiliar situation, are tasked with an important responsibility, and are sworn to uphold that responsibility. From that point forward, they are treated as a unit; their individual identities become submerged in the group identity. Jurors may eat their meals together, and they often spend much time together in the confines of the jury room prior to actual deliberations, while courtroom arguments are conducted outside of the jury's presence. Postmes, Spears and Cihangir (2001) found in their study of group norms and cohesiveness that the "perceived validity of information in a group context is in part socially established, especially if consensus is an important factor to group members." The group situation created in juries is one with the goal of reaching an unanimous decision and can therefore present a strong cohesive nature to the structure of the group.

Since they are prohibited from discussing the case at hand during the course of the trial, jurors must find other topics of conversation, such as talking about themselves and their commonalities, and sharing their feelings about the jury experience. Because some trials last weeks or months, the potential for the development of cohesiveness among the members of a jury is substantial, and it increases with the length of their service together. An important distinction must be made between social cohesion and task cohesion in the development of groupthink. High levels of social cohesiveness tend to facilitate the development of groupthink, while high levels of task cohesiveness are inhibiting (Dion, 2000).

### **Insulation of the Group**

Moorhead and Montanari (1986) found that the one condition that most strongly influenced the development of groupthink was the insulation of the group, which is a structural characteristic of all juries. Once a jury is impaneled, it is isolated and insulated from other individuals on a number of levels. Jurors are instructed not to discuss the pending case with anyone and to avoid any media reports of the case. This often means avoiding media reports of any kind. Jurors are typically physically separated from other individuals in the courthouse. They may be identified by lapel pins or other visible methods indicating to others that conversation or interaction with the jurors is to be avoided.

In some cases, jurors may be physically sequestered or kept under guard with their ability to communicate with others by being restricted or monitored. Such conditions not only contribute to the insulation and isolation of the group, they also affect the establishment of cohesiveness among the group members.

### **Lack of a Tradition of Impartial Leadership**

The only formal leadership in a jury is the foreperson that the members of the jury select. Whichever style of leadership the foreperson chooses to exercise as a voting member of the jury, he or she is clearly not impartial as far as

the jury's decision is concerned. The degree to which the foreperson uses whatever authority he or she has within the group for influencing the members toward his or her viewpoint may also contribute to the development of groupthink within the jury. Ahlfinger and Esser (2001) reported that groups with promotional leaders produced more symptoms of groupthink, discussed fewer facts, and reached a decision more quickly than groups with non-promotional leadership.

#### ***Lack of Norms Requiring Methodical Procedures***

The only requirement for a jury decision is that it must be unanimous; there are no norms for specific procedures by which the members are expected to arrive at their decision. The requirement of unanimity alone increases the risk of faulty decision-making. Kameda and Sugimori (1993) have demonstrated that groups whose decision procedures required unanimous rather than majority rule made poorer decisions.

Jury members may use any procedures they choose. Consequently, some juries are more methodical than others. Callaway and Esser (1984) found that while highly cohesive groups without adequate decision-making procedures exhibited less disagreement, they also made poorer decisions than other groups.

#### ***Homogeneity of Members' Social Background and Ideology***

The process of selecting 12 jurors to sit on a jury was originally intended to yield a representative sample of the community. In practice, the jury selection procedure may produce a group whose members tend toward homogeneity in a number of respects. It is a common notion within the legal profession that certain characteristics make some individuals more desirable as jurors than others. Through the process of *voir dire*, in which prospective jurors are examined, attorneys attempt to make informed juror selections that will benefit their cases (Howard & Redfering, 1983). In doing so, they attempt to make the jury more homogeneous with respect to the qualities that they perceive to be beneficial.

#### ***High Stress From External Threats/ Low Hope of a Solution Better Than The Leader's***

Janis (1983) described this condition as complicated as it contains a dual hypothesis, although its underlying premise is that stress may contribute to groupthink. The first hypothesis suggests that stress surrounding the group decision, such as when the group decision involves a choice between unpleasant or objectionable alternatives, contributes to groupthink, particularly in the presence of an authoritarian or promotional leader.

The second hypothesis suggests that in the presence of stress, the group members will be more likely to concur with the decision of the group leader because disagreement would generate additional interpersonal stress within the group. Thus, both external and interpersonal stresses are implicated in the occurrence of groupthink, especially when they occur together. The impact of this condition on a jury depends upon such variables as the level of external stress placed on them, either by social forces or other forces (e.g. demonstrators outside the courthouse, pretrial publicity, media coverage, etc.), and the role of the group leader in the group dynamics.

This is supported by Callaway, Marriott, and Esser (1985), who found that groups in which groupthink occurred reported more state anxiety than groups in non-groupthink conditions. Turner, Pratkanis, Probasco, and Leve (1992) also reported that members of groups in a threat (stress) condition generated more rationalizations for their decisions and the high threat, high cohesiveness groups made poor decisions.

#### ***Temporarily Low Self-Esteem Induced by Situational Factors***

Of the three possible qualifying conditions that Janis offered for this antecedent, two are applicable to juries: (a) Excessive difficulties on current decision-making tasks that lower each group member's sense of self-efficacy, and (b) moral dilemmas characterized by an apparent lack of feasible alternatives except ones that violate ethical standards.

Jury members may be faced with both difficult decisions and moral dilemmas as a normal function of the jury process. Since a jury must reach a unanimous verdict or face being perceived as having failed at its task, these conditions may create a threat to self-esteem. In order to defend their self-esteem, the group members may seek validation through conformity and consensus.

Turner and Pratkanis (1994) reconceptualized groupthink as driven by an effort by the group members to protect the group identity in the face of threat. Under their social identity maintenance model, the possibility of the group failing at its task would present a threat that the group would be perceived negatively, which would further increase the likelihood of groupthink.

#### ***Concurrence Seeking: The Tendency Toward Groupthink***

While none of the above antecedent conditions individually is sufficient to cause the occurrence of groupthink, the greater the number of these conditions that exist, the greater the propensity toward, what Janis (1983) described as *concurrence seeking*. While groupthink can occur in any decision-making group, the structure of the jury system places juries at particularly high risk. The stated objective of juries is to deliver a unanimous decision. This requirement creates a norm of concurrence seeking for the members of the jury. Considering the regularity with which many of the above antecedent conditions occur in juries, the structure of the jury system may not only be conducive but often helps create the occurrence of groupthink.

### Symptoms of Groupthink

While the presence of the antecedent conditions may not result in groupthink, if groupthink occurs, its presence may be established by the following symptoms of groupthink, which Janis (1982) described as behavioral consequences of a coping pattern of defensive avoidance. Janis (1983) described these symptoms as the precursors to faulty decision-making and classified them into the three following types, which are discussed within the context of their application to juries.

#### Type I

*Overestimation of the Group.* Within the judicial system, juries are treated as sacrosanct. They are impaneled in the solemn atmosphere of a courthouse, sworn to their duty, and tasked with making important decisions that sometimes mean the difference between life and death. While it is important that they take their responsibility seriously, there is always a danger that they will take their brief celebrity and importance too seriously.

*Illusion of invulnerability.* The invulnerability of a jury is more than an illusion; it is a fact. There is no recourse against a jury for making a bad decision.<sup>2</sup> The illusion of invulnerability may lead to excessive optimism and encourage risk taking by the group (Janis, 1983).

*Belief in inherent morality.* While morality may influence jury decisions, juries are instructed to follow the law instead. When juries take their oath to follow the law, they must make a decision to set aside their own morality. Operating beyond conventional morality, the law may become a substitute for morality. By ignoring the ethical or moral consequences of their decision, they must accept the group's inherent morality alternative, which is provided for them by the law.

#### Type II

*Closed-Mindedness.* Because their task is to render a decision based solely on the evidence presented to them, juries are necessarily closed-minded to a certain extent. When groupthink is operating, closed-mindedness may become a defense of the consensus.

*Collective rationalization.* Rationalizations may be used to defend faulty logic. In a groupthink condition, a jury may overvalue itself to the extent that since its decisions are invulnerable and sacrosanct, beyond morality and final, they must therefore be correct.

*Stereotypes of out-groups.* Groupthink may increase the tendency for the members of a jury to make decisions based upon stereotypes or overgeneralizations rather than facts. This is particularly true if the jury is highly homogeneous.

#### Type III

*Pressures Toward Uniformity.* Groupthink essentially represents a rush to judgment. In a groupthink condition, each juror would be inclined to minimize his or her expression of doubts or counterarguments. As consensus-seeking becomes the objective of the group, both inter and intra-personal forces would drive the pursuit of consensus.

*Self-censorship.* If a majority opinion appears to emerge, or in response to directive leadership, individual jury members may censor their personal input rather than be labeled as deviant. Such deviance could threaten the cohesiveness of the group, and consequently, the group identity.

*Illusion of unanimity.* One of the consequences of self-censorship is the false assumption that silence means agreement. This may result in an illusion of false consensus, which has also been referred to as an *illusion of universality* (Allport, 1924, p. 305) or *pluralistic ignorance* (O'Gorman, 1975, p. 314).

*Direct pressure on dissenters / Self-appointed mindguards.* A dissenting jury member may receive direct pressure to conform to the majority decision, as his or her dissent would threaten the illusion of unanimity, stereotypes, or rationalizations of the group. A unanimous decision made under the effects of groupthink is a fragile thing; it requires protection. Individual jury members may assume the role of protectors of the consensus in order to protect the identity of the group.

### The Consequences of Groupthink

Janis (1983) listed the following seven specific symptoms of defective decision-making that may arise as a result of groupthink: (a) failure to completely survey alternatives, (b) failure to completely survey risks, (c) failure to examine risks of preferred choice, (d) failure to reappraise initially rejected alternatives, (e) poor information search, (f) selective bias in processing information at hand, and (g) failure to work out contingency plans.

While some of these specific errors in decision-making are more applicable to industrial or governmental policy-making groups than they are to juries, others are quite applicable. Each type of group has its own characteristic types of decision-making errors. Groupthink simply increases the risk that all types of decision-making errors will occur. An investigation of jury decisions may reveal unique types of decision-making errors that are specific to the jury process; however, such an investigation is beyond the scope of this analysis. The nature of the specific decision-making errors is of less importance than the fact that the occurrence of groupthink precipitates faulty decision-making.

## Preventing Groupthink

Neck and Moorhead (1992) specifically applied the groupthink hypothesis to a case study of decision-making by a jury in a criminal trial. In contrast to most groupthink case studies, which typically consist of a postmortem of a decision-making failure, Neck and Moorhead studied a decision by a group that demonstrated a quality decision-making process.

In the 1984 case of *United States of America v. John Delorean*, the jury was presented with a drug-trafficking case in which the defendant asserted the defense of entrapment. After a five-month trial involving many complicated issues, the jury returned a not-guilty verdict. Based on the facts of the case, Neck and Moorhead suggested that the jury reached the appropriate decision.

Neck and Moorhead (1992) described the jury as exhibiting the following five conditions that were a catalyst for their groupthink:

(1) *Group cohesiveness*. Brill (1989) described the jury members as something of an extended family.

(2) *Insulation of the group*. Intensive security measures were taken, further insulating the jury beyond the degree of insulation that is typical in all juries.

(3) *Homogeneity of member's backgrounds*. The jury appeared to be homogeneous in a number of respects: The majority was college graduates, 11 of the members described themselves as political moderates, and nine had some prior government or law enforcement experience. Ten of the jurors voted for president Regan, suggesting a homogeneity of political ideology (Brill, 1989).

(4) *High stress from external threats*. The jurors reported feeling a great deal of pressure from the media, the judge, the lawyers, and the general public.

(5) *Temporarily lowered self-esteem*. When the jury became deadlocked midway through its deliberations, the jurors recollected that they were deeply troubled as they felt pressure not to fail at their task of returning a verdict. This likely resulted in a temporary lowering of their sense of self-efficacy and their self-esteem.

Despite the fact that the jury met the primary antecedent condition of cohesiveness, as well as four of the six secondary conditions, groupthink did not occur in this jury. In their analysis of this jury's decision-making process, Neck and Moorhead (1992) reported that their decision-making process exhibited two characteristics that they believed operated to prevent groupthink and contributed to a productive decision-making process. These were: (a) a non-promotional group leader, and (b) the use of methodical procedures.

This jury elected a foreman who felt that it would be inappropriate for him to use his leadership role to advance his position. Rather, he voiced concern about the jury members advocating their preferred positions before listening to all sides of the issue. The position that he espoused was that the jury could reach a unanimous decision without pressuring any of the group members, and that they would not reach a unanimous decision if the members became too personally identified with defending a particular position.

The jury also appeared to approach their task in a particularly methodical manner. They used *Robert's Rules of Order* for determining the sequence in which the jurors would speak, and they referred to the juror's written notes to support their opinions. They promoted an atmosphere in which all viewpoints were considered. They also (a) thoroughly canvassed a wide range of alternatives, (b) surveyed the objectives implicated, (c) carefully weighed the costs and risks associated with various courses of action, and (d) continuously searched for relevant information for evaluating alternatives (Neck & Moorehead, 1992).

Schafer (1996) suggested that the antecedent conditions to concurrence seeking most significantly determine the emergence of defective decision-making. His analysis indicated that by the time the group engages in information processing, it is generally too late to avoid faulty decision-making. He recommended that decision makers should take a proactive stance by focusing on creating an appropriate decision-making environment.

Janis (1983) offered a number of suggestions for preventing groupthink, several of which may be applicable to juries. They include the following:

1. The group leader should assign the role of critical evaluator to each group member. This practice, however, must be balanced against the leader's ability to accept disagreement and criticism.
2. The use of sub groups to deliberate on a question simultaneously under different leaders.
3. Assigning the role of devil's advocate to one member at each group meeting.
4. After reaching a consensus, the group should hold a "second chance" meeting at which the members are encouraged to express their residual doubts and to rethink the entire issue.

Turner and Pratkanis (1994) offered suggestions for reducing the occurrence of groupthink that are grounded in social identity maintenance theory. They suggested reducing pressures toward identity protection by providing an excuse or face-saving mechanism for potential poor performance. Alternately, a structured discussion of the risks and dangers of decisions could be used to reduce the fear and threat associated with those decisions, and multiple role playing procedures could be used to facilitate the confrontation of threats and rationalizations of decisions. They also recommended stimulating intellectual conflict, by employing structured discussion and evaluation techniques designed to delay solution selection and increase the problem-solving phase, while establishing procedures for protecting minority opinions.

An example of the opposite of groupthink in juries was expertly portrayed in the 1957 film entitled *12 Angry Men*. In this film, starring Henry Fonda, one juror was able to take his dissenting position and turn that position into a unanimous decision for all 12 jurors. This film was a great example of how an individual can sometimes influence a group even when his position on the point at hand is not initially a popular one.

## 2. DISCUSSION

While juries may be susceptible to the effects of groupthink, it appears likely that groupthink may be preventable. Because of the importance of their decisions, juries should be afforded every benefit that may be derived from research into small group dynamics and their effects on group decision-making.

This is clearly illustrated by the fact that between 1992 and early 2006, attorneys Barry Scheck and Peter Neufeld and their Innocence Project at Benjamin N. Cardozo Law School, have used DNA evidence to help free 175 individuals who were imprisoned after being wrongly convicted of crimes, 14 of whom were on death row.

Perhaps it is fortunate that with life or liberty at stake, criminal juries operate within a forced choice paradigm. Some civil juries, beyond finding for the plaintiff or defendant, must determine the dollar amounts of damage awards. This sometimes leads to jury verdicts that are wildly incongruent with the facts of the case.

Solutions that could potentially help juries avoid groupthink may include careful management of the contributing conditions for the development of groupthink and brief targeted training in effective decision-making and avoidance of decision-making errors. These and other proactive steps for improving the quality of jury decisions would benefit, not only the individuals who are subject to those decisions, but the integrity of the judicial system as well.

The American jury is a unique type of decision-making environment, due to its structure. As such, the very pressure for a unanimous decision often creates the group dynamics that are characterized by the groupthink phenomenon. Despite this apparent vulnerability, almost no known research has been published on the application of the groupthink hypothesis to juries. Considering the literal life and death consequences of many jury decisions, which can and have been shown to be adversely impacted by groupthink, additional action research is recommended.

### Notes

<sup>1</sup>While the vast majority of jurisdictions require unanimity in jury verdicts, a few jurisdictions allow jury verdicts by majority rule in certain civil and non-serious criminal cases. Although split jury decisions are not unconstitutional, the Supreme Court has characterized them as unwise. Nash (1973) demonstrated that non-unanimous jury verdicts tend to disadvantage the defendant, particularly when the level of apparent guilt was only moderate. For the purposes of this paper, only unanimous jury decisions will be considered.

<sup>2</sup>While there is no actual recourse against the members of the jury, it is possible for a judge to set aside a jury verdict if the jury makes a finding that is totally unsupported by the evidence. This is a very rare occurrence, however.

## REFERENCES

1. **Ahlfinger, N. R., & Esser, J. K.** (2001). Testing the groupthink model: Effects of promotional leadership and conformity predisposition. *Social Behavior & Personality*, 29, 31-41.
2. **Allport, F. W.** (1924). *Social psychology*. New York: Houghton Mifflin.
3. **Brill, S.** (1989). *Trial by jury*. New York: Simon & Shuster.
4. **Callaway, M. R., & Esser, J. K.** (1984). Groupthink: Effects of cohesiveness and problem-solving procedures on group decision-making. *Social Behavior & Personality*, 12, 533-552.
5. **Callaway, M. R., Marriott, R. G., & Esser, J. K.** (1985). Effects of dominance on group decision-making: Toward a stress-reduction explanation of groupthink. *Journal of Personality & Social Psychology*, 49, 949-952.
6. **Dion, K. L.** (2000). Group cohesion: From "field of forces" to multidimensional construct. *Group Dynamics: Theory, Research, and Practice*, 4, 7-26.
7. **Esser, J. K.** (1998). Alive and well after 25 years: A review of groupthink research. *Organizational Behavior & Human Decision Processes*, 73, 116-141.
8. **Flippen, A. R.** (1999). Understanding groupthink from a self-regulatory perspective. *Small Group Research*, 30, 139-165.
9. **Flowers, M. L.** (1977). A laboratory test of some implications of Janis's groupthink hypothesis. *Journal of Personality & Social Psychology*, 35, 888-896.
10. **Fodor, E. M., & Smith, T.** (1982). The power motive as an influence on group decision-making. *Journal of Personality & Social Psychology*, 42, 178-185.
11. **Howard, W. G., & Redfering, D.** (1983). The dynamics of jury decision-making: A case study. *Social Behavior & Personality*, 11, 83-89.
12. **Janis, I. L.** (1972). *Victims of Groupthink*. Boston: Houghton Mifflin.
13. **Janis, I. L.** (1982). *Stress, Attitudes, and Decisions*. New York: Praeger Publishers.
14. **Janis, I. L.** (1983). *Groupthink* (2<sup>nd</sup> ed.). Boston: Houghton Mifflin.
15. **Kameda, T., & Sugimori, S.** (1993). Psychological entrapment in group decision-making: An assigned decision rule and a groupthink phenomenon. *Journal of Personality and Social Psychology*, 65, 282-292.
16. **Leana, C. R.** (1985). A partial test of Janis' groupthink model: Effects of group cohesiveness and leader behavior on defective decision-making. *Journal of Management*, 11, 5-17.
17. **Manz, C. C., & Sims, H. P.** (1982). The potential for groupthink in autonomous workgroups. *Human Relations*, 35, 773-784.
18. **McCauley, C.** (1989). The nature of social influence in groupthink: Compliance and internalization. *Journal of Personality & Social Psychology*, 57, 250-260.
19. **Moorhead, G., Ference, R., & Neck, C. P.** (1991). Group decision fiascoes continue: Space shuttle Challenger and a revised groupthink framework. *Human Relations*, 44, 539-550.

20. **Moorhead, G., & Montanari, J. R.** (1986). An empirical investigation of groupthink phenomenon. *Human Relations*, 39, 399-410.
21. **Nash, M.** (1973). Unanimity in criminal jury verdicts. *Journal of Forensic Psychology*, 5, 5-13.
22. **Neck, C. P., & Moorhead, G.** (1992). Jury deliberations in the trial of U. S. v. John Delorean: A case analysis of groupthink avoidance and an enhanced framework. *Human Relations*, 45, 1077-1091.
23. **O'Gorman, H. J.** (1975). Pluralistic ignorance and white estimates of white support for racial segregation. *Public Opinion Quarterly*, 39, 313-330.
24. **Park, W.** (1990). A review of research on groupthink. *Journal of Behavioral Decision-making*, 3, 229-245. Postmes, T., Spears, R., Cihangir, S. (2001). Quality of decision-making and group norms. *Journal of Personality and Social Psychology*, 80(6), 918-930.
25. **Sidney Lumet** (1957). *12 Angry Men*. United States: Orion-Nova Productions.
26. **Schafer, M.** (1996). Antecedents of groupthink: A quantitative study. *Journal of Conflict Resolution*, 40, 415-435.
27. **Tetlock, P. E., Peterson, R. S., McGuire, C., Chang, S., & Feld, P.** (1992). Assessing political group dynamics: A test of the groupthink model. *Journal of Personality & Social Psychology*, 63, 403-425.
28. **Turner, M. E., & Pratkanis, A. R.** (1994). Social identity maintenance prescriptions for preventing groupthink: Reducing identity protection and enhancing intellectual conflict. *The International Journal of Conflict Management*, 5, 254-270.
29. **Turner, M. E., Pratkanis, A. R., Probasco, P., & Leve, C.** (1992). Threat, cohesion, and group effectiveness: Testing a social identity maintenance perspective on groupthink. *Journal of Personality & Social Psychology*, 63, 781-196.
30. **United States v. John Z. Delorean**, 85 CR 80646 (U.S. District Court)