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## *Evans on Identification-freedom*

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### **I Introduction**

Gareth Evans' account of Identification-freedom (IF), which he develops in Chapters 6 and 7 of *The Varieties of Reference* (henceforth *VR*) is almost universally misunderstood.<sup>1</sup> Howell is guilty of this same misunderstanding, and as a result claims to have mounted a criticism of Evans, when in fact he has not. I will take the occasion of Howell's otherwise insightful article to clarify Evans' position. Note that the bulk of Howell's analysis is targeted at the phenomenon known as immunity to error through misidentification (IEM), which is related to but not (necessarily) identical to IF. Therefore, the accuracy of Howell's treatment of Evans in particular is tangential to the main thrust of his article. My exegesis of Evans' account — like any non-trivial exegesis — goes somewhat beyond anything Evans overtly says. That Evans did not explicitly put the pieces together in the way I suggest they fit no doubt contributes to the widespread misunderstanding of his views. But I am

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1 Many authors have discussed IEM, and in that context discussed Evans. In most cases it is simply unclear whether these authors take themselves to be explicating Evans' views or providing their own account of IEM. In any case, with the arguable exception of Bar-On (2004), I have not seen in the literature any adequate discussion of the phenomenon that Evans discusses under the heading of *IF*, whether that discussion was supposed to be Evans exegesis or not.

confident that once my interpretation is on the table it will be *post hoc* obvious that it really is the correct interpretation Evans' account.

## II A rough definition of IF, and two versions of a criterial test

Near the end of Chapter Six of *VR*, Evans points out that his account of demonstratives has as a consequence that in normal circumstances demonstrative judgments — such as *that book is red* (made in appropriate circumstances) — are IF. To a rough first approximation Evans means by this that in the normal case such a judgment is reached in a way that does not involve any distinct identity judgment. An example of an identification-dependent (ID) judgment would be my judgment *my golf ball is dirty*, made when I see a dirty golf ball in the bushes that I take to be mine. In this case, from the demonstrative judgment *that golf ball is dirty* and the identity judgment *that golf ball is my golf ball*, I arrive at the ID judgment *my golf ball is dirty*. Because this judgment is made in part on the basis of an identity judgment, it can turn out to be in error if the identity judgment is false. If the ball I am looking at is in fact not my ball, my judgment that *my golf ball is dirty* will have fallen to an error of identification. But in the IF case, my demonstrative judgment that, say, *that book is red* (when made in the normal way — e.g. looking directly at a red book in good lighting conditions) does not rest on any intervening identity judgment.

Evans articulates a criterial test to determine whether a judgment is IF:

... a judgement is identification-free if it is based upon a way of knowing about objects such that it does not make sense for the subject to utter 'Something is F, but is it *a* that is F?', when the first component expresses knowledge which the subject does not think he has, or may have, gained in any other way. (*VR*, 189-90)

So when I see the golf ball in the bushes, I can coherently wonder: *something is dirty, but is it my golf ball that is dirty?* However, it seems to not make sense for me to wonder, of the book I can plainly see in front of me: *something is red, but is it that book that is red?*

Because it is couched in terms of identification-free *judgment*, the form of Evans' test, and his discussion generally, unhelpfully elides two separate issues. The first is what I will call the purely psychological aspect of IF, which has to do with whether a certain kind of psychological episode — what I will call a *thought-attempt* or *judgment-attempt* (a judgment is a thought that is held true) — is identification-free. The second is Evans' doctrine that some types of thoughts are object-dependent

in that there are conditions that must obtain in order for certain sorts of thought-attempts to qualify as thoughts. And so an identification-free judgment is, for Evans, something that both i) is a psychological episode that is IF; and ii) is a psychological episode that qualifies as a judgment because of satisfaction of the object-dependence constraints. Clarity will be greatly served if we keep these distinct. So I will reformulate the test question in a manner neutral on the satisfaction of the object-dependence constraints, and hence will be formulated in terms of (possibly successful) judgment-attempts, or *JAs*, rather than (definitely successful) judgments:

A demonstrative JA the subject would express as '*a* is F' is IF if it is based on information from an information channel *C* in such a way that it does not make sense for the subject to question the JA in a way that could be verbally expressed as 'Something is F, but is it *a* that is F?' when the JA expressed in the first clause ('Something is F') is a piece of putative knowledge which the subject does not think he has, or may have, gained in any other way.

These tests are taken to be criterial for a JA's being IF, and so I will refer to them as the criterial tests. I will return later to a discussion of the externalist conditions that, on Evans' account, render a JA a genuine judgment. But while these tests are criterial, it is nowhere explained *why* they are criterial (and this is true of its predecessors in Wittgenstein and Shoemaker as well). My exegesis will proceed by way of explaining why this test is criterial.

### III Evansian Ideas, information channels, and dispositions

The first component of Evans' account of IF (as I am reconstructing it) is his theoretical notion of an *Idea* of an object. According to Evans, a subject's *Idea* of an object *O* is roughly how the subject is thinking (or attempting to think) of *O*. A subject might employ a descriptive *Idea* of some object, when thinking of it as the satisfier of some description (e.g. *THE PERSON ON THE OTHER END OF THIS PHONE LINE is quite rude*); or the subject might employ a demonstrative *Idea* when the object is directly perceived (e.g. *THAT BOOK is red*). Among Evans' goals in Chapters 6 and 7 of *VR* is to provide an account of what is involved in various types of demonstrative and indexical *Ideas* – for example, to detail what is involved in a subject's thinking of something demonstratively (a demonstrative *Idea*), or thinking of oneself indexically as oneself (one's 'I-Idea'). One of the requirements on an *Idea*'s being a demonstrative *Idea* is that the subject have a disposition such that information received from some information channel is treated as immediately germane to the subject's appreciation of thoughts (or

thought-attempts) of the object that the Idea is an Idea of. This is part of Evans' program of making more precise the view that demonstrative thought involves perception of some sort, and it is voiced in the original version of the criterial test in the phrase 'is based on a way of knowing about objects.'

Of particular relevance for this discussion will be what Evans calls 'pure' cases of demonstrative identification. These are cases in which the content of the Idea is all but exhausted by the deliverances of this information channel, and in such a case the identity of that Idea is established entirely by its dispositional relation to that information channel. So my thought that *that book is red* counts as a demonstrative thought because the Idea I am using for *that book* is a demonstrative *Idea*. And it is a demonstrative Idea in part because there is an information channel *C* (some aspect of my visual input) such that I have a disposition to treat the deliverances of that information channel, for example information to the effect that redness is instantiated, as immediately germane to my thought about the object that that Idea is an Idea of. And it is a pure case so long as I do not take myself to have seen this book before.

Crucially, even though the existence of a disposition mainlining the deliverances of an information channel to an Idea is partially constitutive of that Idea's being the kind of Idea it is (e.g. demonstrative), the subject need not have, and typically will not have, any thoughts about or conceptions of these dispositions or channels. The dispositions are in the normal case part of the infrastructure of demonstrative thought, and are not directly reflected as such in its content. When thoughts about the information channel or dispositions come into play, they form the materials for a descriptive Idea: such as *the object that is the source of the information delivered via this channel*.

In some cases, including the pure cases where there is nothing to the content associated with the Idea beyond the deliverances of the information channel, these information channels can serve to individuate Ideas. If Idea  $\beta$  and Idea  $\alpha$  qualify as demonstrative Ideas because  $\alpha$  is associated with a disposition involving information channel 1, while  $\beta$  qualifies as a demonstrative Idea because it is associated with a disposition involving numerically distinct information channel 2, then  $\alpha$  and  $\beta$  are numerically distinct Ideas. Conversely, if information channels 1 and 2 are numerically identical, then the Ideas  $\alpha$  and  $\beta$  are numerically identical. Examples will be given shortly.

#### IV The intuitive criterion of difference

A second way of individuating Ideas derives from Evans' aim of developing his account of Ideas so that they correspond to Fregean Senses. Evans articulates a criterion he finds in Frege for individuating Senses, the *Intuitive Criterion of Difference*:

... the thought associated with one sentence *S* as its sense must be different from the thought associated with another sentence *S'* as its sense, if it is possible for someone to understand both sentences at a given time while coherently taking different attitudes towards them, i.e. accepting (rejecting) one while rejecting (accepting), or being agnostic about, the other. (*VR*, pp. 18-19)

One can generalize this to a criterion for individuating senses of sub-sentential expressions, by keeping the rest of the sentence constant and varying only the expression. And because Evans develops his account of Ideas with the aim that they correspond to Fregean Senses, an analogue of the Intuitive Criterion of Difference also applies to Evansian Ideas. A rough formulation of this constraint, as applied to Ideas would be as follows:

Intuitive Criterion of Difference for Ideas (very rough formulation): Two Ideas  $\alpha$  and  $\beta$  are numerically distinct iff it is possible for someone (a rational subject) to simultaneously adopt different attitudes (taking to be true, taking to be false, agnosticism) towards thoughts *A* and *B* when *A* and *B* are identical except that where *A* employs Idea  $\alpha$  *B* employs Idea  $\beta$ .

So since a rational subject might take the thought *THE PERSON ON THE OTHER END OF THIS PHONE LINE is rude* to be true, but to be agnostic about *THAT PERSON is rude* (made on the basis of seeing someone across the street in a phone booth), the (descriptive) Idea *THE PERSON ON THE OTHER END OF THIS PHONE LINE* must, by the Intuitive Criterion of Difference, be numerically distinct from the (demonstrative) Idea *THAT PERSON*. This example involved Ideas of different types (descriptive and demonstrative), but the Criterion can classify as numerically distinct Ideas of the same type, such as *THAT SHIP<sub>L</sub> was built in Japan*, and *THAT SHIP<sub>R</sub> was built in Japan*, where *THAT SHIP<sub>L</sub>* is a demonstrative Idea of a ship part of which is seen through one window, and *THAT SHIP<sub>R</sub>* is a demonstrative Idea of a ship part of which is seen through a different window (and hence via a different information channel). Evans discusses this example on *VR* p. 84.

## V Why the criterial tests discern IF

On Evans' account of demonstrative Ideas, if Ideas  $\alpha$  and  $\beta$  are both demonstrative Ideas whose content is exhausted by the current deliverances of a single information channel dispositionally related to them, then they are not numerically distinct Ideas, but rather are numerically identical. And if this is the case, then according to the Intuitive Criterion of Difference, a rational subject should not be able to adopt different attitudes to thought-attempts A and B if these thoughts are identical except that A employs Idea  $\alpha$  where B employs Idea  $\beta$ . In particular, the subject won't be able to coherently simultaneously assent to the thought  $\alpha$  is F while being agnostic about the thought  $\beta$  is F.

Let's return to the criterial test, which I repeat here for convenience:

A demonstrative JA the subject would express as ' $a$  is F' is IF if it is based on information from an information channel C in such a way that it does not make sense for the subject to question the JA in a way that could be verbally expressed as 'Something is F, but is it  $a$  that is F?' when the JA expressed in the first clause ('Something is F') is a piece of putative knowledge which the subject does not think he has, or may have, gained in any other way.

The JA at issue is based on information from an information channel C, and it qualifies as a demonstrative JA because it employs an Idea of its object  $a$  that involves a dispositional relation to the deliverances from information channel C. What is of current importance is the nature of the Idea employed in the first clause of the question, the Idea corresponding to the 'something' in 'something is F' — call this Idea  $\sigma$ . The requirement that the subject's judgment that 'something is F' is based on information that he 'does not think he has, or may have, gained in any other way' is Evans' way of ruling out cases where the subject is thinking *about* the information channel, and hence where subject's Idea  $\sigma$  is descriptive (e.g. *THE PERSON ON THE OTHER END OF THIS PHONE LINE*). The subject is not thinking of the 'something' as *the thing that is the source of this information* or as the satisfier of any other description. So with the requirement that the judgment expressed in the first clause is information based, and with cases in which  $\sigma$  is descriptive removed from consideration, we are restricting attention to the case where  $\sigma$  is demonstrative (and so the linguistic expression of this Idea as 'something' is infelicitous, and potentially misleading, but some means of inscribing the incoherent question had to be chosen, and that wording has become standard in the literature). But since  $\sigma$  and  $\alpha$  are both demonstrative, and both based purely on information from the same channel C, they are not, on Evans' account of demonstratives, distinct Ideas. And so the rationality constraint imposed by the Intuitive Criterion of Difference comes into play, and we see that the rational

subject should be unable to simultaneously assent to  $\alpha$  is  $F$  while being agnostic about (as a non-rhetorical reading of the question in the second clause requires)  $\sigma$  is  $F$ .

If the original judgment 'a is  $F$ ' were ID, then there would be, by definition of ID, some other Idea  $\beta$  in play serving as the mediating identity term. If the subject is thinking of the information channel, and thinking by description of some object that is the source of information from this channel, then a numerically distinct Idea  $\beta$  is at hand. But with cases in which thought about the information channel is excluded, the inexistence of any such numerically distinct Idea is exactly what has been shown by the demonstrative judgment's passing of the test. Hence it is IF.

## VI Evans' doctrine of object-dependence

Now I turn to the complication of object-dependence. Well-functioning perceptual systems attempt to manage information channels such that their deliverances track objects or locations of interest. Sometimes this management is minimal, as in the case of thermoreceptors in the skin tracking the temperature of the location *here*. In other cases, this management can require a good deal of sophistication, as when one is tracking a visual object when both it and the subject are in relative motion. When this tracking is successful — when the information channel is in fact delivering information exclusively about the target object/location — Evans' refers to it as an information *link* to the successfully tracked object/location. A psychological episode employing a demonstrative or indexical Idea that is dispositionally related to an information *link* can qualify as a thought or judgment, whereas a psychological episode employing such an Idea related to an information channel that fails to successfully track the target object/location will fail to so qualify. The subject need not be able to discern the difference between these conditions, and may take herself to be entertaining a thought when in fact she is not — when, that is, she is in a psychological state that, for reasons unbeknownst to her, fails to qualify as a thought.

This fact is why a judgment's status as IF is, for Evans, not a mark of epistemological magic. To the extent that an IF *judgment* is immune to an error of identification, this is not because correct identification is mysteriously guaranteed. The wrong object or no object might be the one that the psychological judgment-attempt latches onto, but in such a case, the attempt is a *mere* attempt. It loses its status as a judgment and *a fortiori* as a IEM judgment. As an aside, this is why Evans at one point loosely characterizes IEM as a corollary of IF: because of the object-dependent nature of demonstrative and indexical thought and hence

judgment, any episode that is IF and *qualifies as a judgment* will be IEM. But the guarantee in this case is epistemologically impotent: the *judgment* can't get the wrong object only because if it did, it would lose its status as a judgment, not because there is any epistemological voodoo in the vicinity.

## VII Dispositions vs. dedication

Now I will turn briefly to a comparison between i) the account of the IF status of demonstrative judgments(/attempts) I have here provided, which sees dispositional relations between the Ideas and information channels as key; and ii) the more common account which takes the object-dedication of an information channel to be key (see Howell's article and references therein for supporters of this interpretation). I will proceed by showing that object dedication is neither necessary nor sufficient for IF *simpliciter* (though dedication is necessary for an information channel's counting as an information link, and hence for an IF episode's qualifying as a judgment, but this necessity is not attached to the IF part of an IF judgment).

Evans provides an example demonstrating the lack of sufficiency, involving a subject who believes that his auditory input may be from undetectable earphones reporting sounds from a randomly placed microphone. The subject might hear a loud din, and believe that the microphone is hidden under his chair, and as a result judge *it is loud here* not in the normal IF manner, but as a result of two judgments *it is loud wherever the microphone driving my earphones is located* and the identity judgment *the location of the microphone is here*. The subject's paranoia is enough to render the judgment ID, even if there are no microphones or earphones and the information channel is as dedicated as ever to the subject's vicinity, because the paranoia effects an override of the disposition normally in play with auditory input. So clearly the dedication of an information link is not sufficient for IF.

What about necessity? I will adapt one of Evans' examples to bring this out: a patient with bandages over her eyes is lying in a hospital bed, but unbeknownst to her the bed is moving down a crowded hallway, rolling on well-oiled wheels and being pulled by strings. By coincidence, as she moves down the hallway people near the bed begin talking loudly, but they then stop as it passes. Because the subject does not take herself to be moving, she has a disposition connecting her auditory input to her 'here'-Idea, and she makes an IF judgment-attempt to the effect that *it is loud here*, since to her it sounds like a single large group of people taking loudly around a stationary bed. In this case, the subject's judgment-attempt is not based on any identity: she is not, like

the paranoid subject in the previous paragraph, judging that *it is loud at the  $\phi$  location*, and *the  $\phi$  location is here*, and concluding that *it is loud here*. The judgment-attempt in this case is IF, even though C is not in fact dedicated to any object/place. Given that she has no inkling that her situation is abnormal — and hence has not marshaled any resources for the formulation of a descriptive Idea that is numerically distinct from her 'here'-Idea, she is not in a position to coherently wonder "It is loud somewhere, but is it *here* where it is loud?" This judgment-attempt (in this case a mere attempt) is clearly IF despite the lack of any dedication-relation between the 'here'-Idea and a single target location. Hence object-dedication of an information channel is not necessary for the IF status of a judgment-attempt.

I pointed out earlier that by framing the situation in terms of judgment and thought, Evans' formulation of his criterion for IF, and his discussion generally, elided the issue of the psychological aspect of IF with the issue of whether the judgment-attempt whose status as IF is at issue does or does not qualify as a judgment. This has the consequence that on Evans' theory, any IF psychological episode *that qualifies as a judgment* will involve an information channel that successfully tracks a target object/location, and hence is an information *link*. This state of affairs can be plausibly glossed as one in which the subject's information channel is dedicated to providing information about a certain object/location. The patient on the moving hospital bed is not making an IF *judgment*, on Evans' theory, because the information channel dispositionally related to her 'here'-Idea is not an information link (a failure of the object-dependence condition), and so the episode does not qualify as a judgment, though it is IF. I believe Evans' elision of the psychological factors involved in IF proper with his thesis of the object-dependence of judgment and thought have aided and abetted the 'object dedication' reading of Evans' account of IF.

As for reason to think that the disposition interpretation is to be preferred over any of the various versions of the dedication interpretation, a careful reading of the relevant chapters with both readings in mind should suffice — and there is no substitute for that in any case. Here I will merely point out that neither the word 'dedication' nor any cognates appear anywhere in Chapters 6 or 7 of VR (nor is there any synonym used in the discussion of IF); nor are 'specification' (and cognates) nor 'justification' (and cognates) used anywhere in those chapters for characterizing IF. On the other hand, the word 'disposition' and its cognates appear many times, and while some of those appearances are in contexts where Evans is discussing issues other than IF, it appears many times in relevant contexts where Evans' topic is IF and dispositions linking information sources with Ideas. Typical passages are:

...demonstrative thoughts take place in the context of a continuing informational link between subject and object: the subject has an evolving conception of the object, and is so situated vis-à-vis the object that the conception which controls his thinking is disposed to evolve according to changes in the information he receives from the object. (VR p. 146)

It is a consequence of this necessary condition that a subject who has a demonstrative Idea of an object has an unmediated disposition to treat information from that object as germane to the truth and falsity of thoughts involving that Idea. (VR p. 146)

Though 'here'-Ideas are not dependent upon the receipt of any actual information from a place, a subject is entertaining 'here'-thoughts about a place only if he is disposed to allow his thinking to be controlled by information from the place. Hence when he exercises this disposition, and judges 'It's F here' upon the basis of information received from the place, his judgement will be identification-free. (VR p. 182)

### VIII Evans on quasi-memory

I turn now to Evans' remarks on quasi-memory, since Howell has also misinterpreted Evans on this front. These remarks are in the context of Evans' claim that memory is (in the normal case) a source of IF first-person judgments. The idea is that in the normal case one does not via memory get information that leads one to judge, e.g. that someone left their wallet in the car, and then infer (on whatever basis) that that someone is oneself. Rather, via memory one has a disposition linking the mnemonic information to one's 'I'-Idea in such a way that one judges something like *I left my wallet in the car* in an IF way. Evans voices a potential objection to this claim, which revolves around quasi-memory:

Given that quasi-remembering (q-remembering) is a possible situation, it would appear that a subject might grasp that it is a possible situation, and even believe, perhaps for good reason, that he is in it. Such a subject would seem to be able to utter, perfectly significantly, 'Someone stood in front of a burning tree, but it was not I' — even when the first component expresses information which he has in his memory. (VR p. 242)

Such a subject might eventually come to believe that the q-remembered event was in fact an event in which he was the relevant first-person participant, and in such a case the judgment would be ID, the result of the judgments *the person who is the source of this q-memory did X*, and *I am the person who is the source of this q-memory*. (Note again that Evans' theory provides for the possibility that a paranoid subject with normal memory could believe that her memories are merely q-memories and raise associated identity questions and issue ID first-person judgments

on the basis of her memories, and so this objection could be raised within Evans' overall scheme without having to assume that q-memory is in fact a possible phenomenon. One need only assume that some possibly paranoid subject believes it is possible.) But, the objection continues, this shows that memory is not a source of IF judgments, since in this case the resultant judgment is ID. Evans' response:

But it certainly does not follow from this that judgements about an object, based upon this way of possessing information about it, must be based upon an identification. And it seems to me that we cannot regard the ordinary memory judgements which we make about ourselves as articulable into the two components, 'That man was in front of a burning tree' and 'I am that man.' (*VR* p. 242)

The first sentence is making the point that even if in some cases, such as the one depicted by the objector, q-memory, or even a paranoid suspicion of q-memory, can result in ID judgments, it does not follow that in all cases it results in ID judgments. It would follow if a judgment's being IF were a function of properties of the information channel (memory) itself — the inference would be that since the information channel itself isn't changing, if it yields ID judgments in some scenarios it must always yield ID judgments. But what is relevant for IF is not the features of the information channel itself, but rather how the subject treats the deliverances of that information channel. In the case of q-memory, normally subjects have a disposition linking that channel to their own T-Ideas, and are entertaining no beliefs about the information channel, and hence the judgment-attempts based upon it are IF. But if either of those conditions alters, the judgment-attempts based on q-memory can become ID: if one has a disposition feeding information from q-memory to an Idea of some other person, or a higher-order belief to the effect that this should be done, then the subject will be employing a numerically distinct Idea of a person (which need not be an Idea of a numerically distinct person, of course), and then questions of identity can be raised.

A contributor to the confusion is that Evans immediately goes on, without much by way of marking the transition in topic, to mount a separate argument whose conclusion is that it would not be possible for a normal subject to treat all memory-like information sources in an ID manner. This is a sort of transcendental argument — actually, little more than a transcendental *pronouncement* in these sections of *VR* — to the effect that a putative subject who never had any non-overridden dispositions linking memory-like information sources with their T-Idea would not in fact have a coherent T-Idea, and would hence not be a normal subject. Or to put it another way, that making at least some IF judgment-attempts on the basis of q-mnemonic information is a precondition for being a subject. This can (and apparently did, to Howell)

suggest that Evans' response to the q-memory objection was simply to argue that q-memory is not a coherent or possible phenomenon. But this is wrong for two reasons. First, as pointed out above, this is not Evans' response to the q-memory objection. Second, the conclusion of this argument is not that q-memory is an impossible or incoherent situation. Indeed, Evans himself agrees that q-memory is a possible situation (see the quote above from *VR* p. 242). What is incoherent on Evans' view is the suggestion that an otherwise normal subject might always treat all memory-like sources as q-mnemonic.

## IX Discussion

What consequences does my interpretation of Evans have? Several. First, it offers, I believe, a more complete and satisfying exegesis of Evans' position than has heretofore been produced. Second, it makes explicit the connection between IF (and perhaps IEM), and the Fregean Intuitive Criterion of Difference, even if this connection was not made by Evans — though I suspect that he did have this connection in mind and for whatever reason it never made it explicitly into the text of *VR*. Third, and most relevantly in the context of Howell's criticisms of IEM, it shows that Evans' notion of IF represents an attractive position that simultaneously i) does justice to the phenomenon that Wittgenstein and Shoemaker used as inspiration, but ii) lacks any pretense of supporting the strong epistemological conclusions that various philosophers have thought could be drawn from IEM — and as such is not subject to the sorts of criticisms that philosophers such as Howell have mounted. To put it another way, Evans' notion of IEM is not subject to Howell's criticisms because it is not making any of the strong claims to which Howell is objecting. To see what I mean, take for instance my (possibly q-)memory about a game of racquetball I take myself to have played yesterday. I make a mnemonic JA to the effect that I played racquetball on court 4 yesterday at 6 pm. Is that JA liable to an error of identification? Yes. If unbeknownst to me what I take to be my memory is actually q-memory derived from someone else's game. But (and here Evans' object-dependence comes into play), only if my mnemonic faculty is in fact tracking the correct object — me — does my JA count as an actual *judgment*. And so while the JA *per se* is liable to identification error, it is nevertheless true that if that JA qualifies as a judgment then it is cannot be in error. But this is for the simple reason that, in effect, its not being in this sort of error is one of the conditions of it satisfying the requirements of being a judgment. This will strike one as verbal trickery only if one thinks that Evans then goes on to use IEM to make any kind of epistemological gains. But he does not. Now it is certainly true that many others have

articulated a different notion of IEM, one that does make non-trivial epistemological claims, and it is incumbent upon those other views to address Howell's criticisms.

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### **References**

Bar-On, Dorit (2004). *Speaking My Mind: Expression and Self-Knowledge*. Oxford: Oxford University Press.

Evans, Gareth (1980). *The Varieties of Reference*. Oxford: Oxford University Press.