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Maryland v. Craig: Ignoring the Letter and Purpose of the Confrontation Clause

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I. INTRODUCTION

The wresting of testimony from children in sex abuse cases presents a great dilemma for modern trial courts. Young sex abuse victims often find it very difficult to testify in a courtroom setting, sometimes to the point that they can't testify at all. Some states have attempted to remedy this problem by allowing children to testify outside of the courtroom in a less traumatic setting. However, the confrontation clause of the sixth amendment poses a legal obstacle to this solution, in that it gives a defendant the right to confront all witnesses against him.

The 1990 United States Supreme Court case of *Maryland v. Craig*[1] held that one-way closed circuit television may be used in criminal cases to elicit testimony from young victims of sexual abuse under some circumstances. The Court held that the child need not face the defendant, but that the child must be visible to the judge and jury in the courtroom. Also, the Court required the State to show a clear necessity in the particular case for such testimony as well as some indication that the testimony is accurate.

Craig will have a major impact on child abuse litigation,because it expands exceptions to the confrontation clause, thus setting a standard for future sexual abuse trials. Therefore, several dangerous weaknesses in the Court's decision must be addressed with an eye toward better protecting the constitutional rights of defendants while maintaining sensitivity toward victims of child abuse. While rigid insistence that the confrontation clause stands for face-to-face confrontation in sex abuse cases would make prosecution unnecessarily burdensome, steps must be taken to better protect the rights of defendants. The alternative is a precariously high risk of convicting innocent citizens of sexual abuse, as well as increasing the number of sex abuse charges that are filed based on scant evidence.

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1. 110 S. Ct. 3157 (1990).

II. BACKGROUND

The sixth amendment states that "[i]n all criminal prosecutions, the accused shall enjoy the right . . . to be confronted with the witnesses against him."[2] Prior to *Craig*, no variation from this principle had been specifically allowed in child abuse cases. However, a number of cases liberally interpreted the confrontation clause generally and paved the way for some flexibility in applying the clause to child abuse cases.

In *Mattox v. United States*,[3] the Court admitted testimony from two witnesses who had testified in an earlier murder trial against the same defendant but had since died. The Court ruled that it was clearly necessary to allow the testimony and pointed out that the testimony had been given in the presence of the defendant and thus satisfied the confrontation clause.[4] This case established that *some* variation in the application of the sixth amendment may be allowed under certain circumstances.

In *California v. Green*,[5] the Court extended *Mattox*, allowing the admission at trial of prior inconsistent testimony from a preliminary hearing. The Court pointed out that the declarant was in fact available at trial, and thus the defendant could confront him. The Court then stated three conditions necessary to allow such variation from the confrontation clause. First, the original statements must be made under oath. Second, the witness must be available for cross-examination at the time of the original statement. Third, the jury must have the opportunity to observe the demeanor and assess the credibility of the witness.[6]

In *Ohio v. Roberts*,[7] the Court admitted evidence from a preliminary hearing but deleted the requirement that the declarant be present at trial. The declarant had fled the area and was unavailable to testify. The Court focused on the need for some "indicia of reliability" or "particularized guarantees of trustworthiness" to justify the admission of out-of-court statements.[8] Reliability was deemed more important to satisfying the confronta-

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2. U.S. CONST. amend. VI.
3. 156 U.S. 237 (1895).
4. *Id.* at 244.
5. 399 U.S. 149 (1970).
6. *Id.* at 158.
7. 448 U.S. 56 (1980).
8. *Id.* at 66.

tion clause than a rigid requirement that the declarant must always be present in the courtroom.

The notion that young victims of sexual abuse might be eligible for special protection while testifying at trial was first suggested in *Globe Newspaper Co. v. Superior Court.*[9] The Court in *Globe Newspaper* held that a Massachusetts statute which *always* excluded the media and public from trials involving minor (eighteen years and under) victims of sexual crimes was too broad and therefore invalid. The Court, while conceding in dicta that there is a compelling state interest to "safeguard[] the physical and psychological well-being of a minor,"[10] pointed out that any determination to exclude the public from trial would have to be made on a case by case basis.

In *Coy v. Iowa*,[11] the Court specifically addressed whether a child victim must face the accused defendant while testifying. In that case, a special screen was placed in front of the testifying children such that all (including the defendant) could view the demeanor of the witness, but the witness could not see the defendant. The Supreme Court disallowed the testimony, holding that it was more important to reveal the possibility that a child had been coached prior to trial (by forcing her to look at the defendant) than to protect young children from becoming upset.[12] However, the Court also stated that, "[s]ince there have been no *individualized* findings that these particular witnesses needed special protection, the judgment here could not be sustained by any conceivable exception.[13] This statement implies that if a particular witness *were* found to need special protection, a device such as that used in *Coy* might be constitutional. In fact, Justice O'Connor (author of the *Craig* opinion) made that very point in her concurring opinion in *Coy*. She stated that, because child abuse is such a grave problem, a shielding device might be permitted in some circumstances to prevent trauma.[14]

In *Idaho v. Wright*,[15] decided the same day as *Craig*, the Court refused to admit a child's out-of-court statements con-

9. 457 U.S. 596 (1982).
10. *Id.* at 607.
11. 487 U.S. 1012 (1988).
12. *Id.* at 1020.
13. *Id.* at 1021 (emphasis added).
14. *Id.* at 1022 (O'Connor, J., concurring).
15. 110 S. Ct. 3139 (1990).

cerning alleged sexual attacks by the defendant upon the witness' sister.[16] However, the majority set the stage for *Craig* by focusing on the statements' "lack of reliability," rather than declaring a stringent requirement that the confrontation clause be strictly adhered to in all situations.[17]

III. *Maryland v. Craig*

A. *Facts of the Case*

Sandra Ann Craig ran a kindergarten/preschool in Howard County, Maryland. Craig was charged with various counts of child abuse, including sexual offenses, perverted sexual practice, assault, and battery. The alleged victim was a six-year-old who had attended Craig's school.[18]

At trial, the state invoked a Maryland statute which permits alleged victims of child abuse to testify outside of the courtroom by way of closed circuit television.[19] The statute mandates that the court determine whether the child's testimony in court will cause that child to suffer severe emotional distress, thereby preventing the child from communicating effectively.[20] The statute allows the prosecuting attorney, the defendant's attorney, the operators of the television equipment, and any person whose presence will help the child to testify (including a child therapist) to be present when the child testifies.[21]

An expert witness testified that the six-year-old victim, as well as other children allegedly abused by Craig, would suffer such emotional distress if they attempted to testify in the courtroom that they would be unable to communicate adequately. The children were then permitted to testify by means of one-way closed circuit television. All in the courtroom could see the children as they testified, but the children could not see defendant Craig. Craig's attorney was present in the room where the children testified and could communicate electronically with her.[22]

The trial court allowed the closed circuit testimony, re-

16. *Id.* at 3145-53.
17. *Id.* at 3145-47.
18. Maryland v. Craig, 110 S. Ct. 3157, 3160 (1990).
19. MD. CTS. & JUD. PROC. CODE ANN. § 9-102 (1989).
20. *Id.*
21. *Id.*
22. *Craig*, 110 S. Ct. at 3161-62.

jecting the argument that the procedure violated the confrontation clause.[23] Craig was convicted on all counts, and the Maryland Court of Special Appeals affirmed the convictions.[24] However, the Court of Appeals of Maryland reversed and remanded, finding that the State had not met "the high threshold required by [*Coy v. Iowa*] before [the Maryland statute] may be invoked."[25] The Court of Appeals was especially disturbed by the failure of the trial court to observe the demeanor of the children in the presence of the defendant or to use a method of testifying that would be less intrusive on the defendant's constitutional rights, such as two-way closed circuit television.[26]

B. The Court's Rationale

The United States Supreme Court vacated the decision of the court of appeals and remanded, ruling that too much emphasis had been placed on suggestions that the trial court should have observed the children's demeanor in the presence of the defendant or used two-way closed circuit television. While believing that such acts would strengthen the grounds for the use of out-of-court statements, the Court "decline[d] to establish . . . any such categorical evidentiary prerequisites for the use of the one-way television procedure," so long as the trial court made a case-specific finding of necessity.[27]

The Court justified allowing television testimony by asserting that the fundamental goal of the confrontation clause is not face-to-face confrontation, but rather elicitation of reliable testimony. While conceding that face-to-face confrontation is ideal, the Court pointed to earlier Supreme Court decisions where out-of-court statements were admitted in criminal trials.[28]

Having established that there are circumstances where a declarant's statements made outside the courtroom may be admitted, the Court set out to show that, on its face, the Maryland closed circuit procedure assures that this exception to pure confrontation is necessary and carries with it the necessary indicia

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23. *Id.*

24. *Id.* at 3162 (citing Craig v. State, 76 Md. App. 250, 544 A.2d 784 (Md. Ct. Spec. App. 1988).

25. *Id.* at 3162 (quoting Craig v. State, 316 Md. 551, 554-55, 560 A.2d 1120, 1121 (1989)).

26. Craig v. State, 316 Md. at 568-71, 560 A.2d at 1128-29.

27. 110 S. Ct. at 3171.

28. *Id.* at 3164.

of reliability as defined by *Green*[29] and *Roberts*.[30] The Court ruled that protecting child witnesses "from trauma that would be caused by testifying in the physical presence of the defendant" does qualify as necessity if that trauma will "impair the child's ability to communicate."[31] Additionally, the Court pointed out that many elements of confrontation still exist under the Maryland procedure; the witness is under oath, the opportunity exists for cross-examination, and the judge and jury are able to see the witness' demeanor during testimony.[32] Therefore, the *Green-Roberts* standards for "indicia of reliability" were met by the Maryland statute.[33]

The Court was careful to point out that the standard of necessity cannot be taken lightly. Necessity must be case specific; it must not become automatic.[34] The child's trauma must be a result of the defendant's presence, not the courtroom generally.[35] Finally, the trauma cannot be "mere nervousness or excitement or some reluctance to testify," but must significantly impair the ability to communicate.[36]

IV. ANALYSIS

A. *Legal Precedent for Expanding the Confrontation Clause*

Legal precedent clearly fails to resolve the issue of whether testimony by one-way closed circuit television is constitutional. The *Craig* majority cited a number of cases which have allowed various out-of-court statements to be admitted as evidence under the theory that if testimony is sufficiently reliable, it can be admitted. However, these cases are distinguishable from *Craig*.

In *Mattox v. United States*,[37] the Court admitted testimony from two witnesses who had testified at the defendant's previous murder trial, but had since died. Technically, this expanded the confrontation clause, as the defendant could not confront the witnesses whose testimony was being used to accuse him. In re-

29. California v. Green, 399 U.S. 149 (1970). *See supra* text accompanying note 5.
30. Ohio v. Roberts, 448 U.S. 56 (1980). *See supra* text accompanying note 7.
31. 110 S. Ct. at 3170.
32. *Id.* at 3166.
33. *Id.* at 3167.
34. *Id.* at 3169.
35. *Id.*
36. *Id.* (quoting Wildermuth v. State, 310 Md. 496, 524, 530 A.2d 275, 289 (1987)).
37. 156 U.S. 237 (1895).

ality, though, the confrontation clause was served, as the defendant was able to confront the witnesses at the previous trial. If they were lying or withholding important facts, the defendant had the opportunity to assert such and have the witnesses respond in the first trial.

The *Mattox* Court stated that firm rules "must occasionally give way to considerations of *public policy*" and necessity.[38] Clearly this is true. Nevertheless, *Mattox* does not control a dispute such as that in *Craig*. *Mattox* allows previously "confronted" testimony, while *Craig* allows testimony which has never been confronted.[39]

The *Craig* Court also cited the standards for admission of out-of-court statements established in *California v. Green*.[40] *Green* outlines three standards which must be met to admit these statements.[41] First, the statements must be made under oath. In *Craig*, this requirement was met—the children did testify under oath just as they would in the courtroom. Second, the witness must have been cross-examined by the defendant (or counsel) when the testimony was given. This prong is satisfied in *Craig*, as defendant's counsel was permitted to cross-examine the child.[42] Finally, there should be an opportunity to observe the demeanor of the witness at the time of trial so the trier of fact can sense the declarant's credibility (or lack thereof). In *Craig*, this opportunity existed as all in the courtroom were able to watch the children testify.[43]

Though the *Craig* situation satisfies all of these requirements, the fact remains that *Green* and *Roberts* did not present the same circumstances as *Craig*. First, in *Green*, the defendant was present at the original hearing when the damning statements were made against him, and was able to confront the witness. Such was not the case in *Craig*, with the children unable to see the defendant while testifying by way of closed circuit television. Second, both *Green* and *Roberts* satisfy the requirement that there be a true "necessity" to stretch the sixth amendment's confrontation requirement. In *Green*, the declarant was

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38. *Id.* at 243 (emphasis added).

39. At least there has been no confrontation in the traditional sense.

40. 399 U.S. 149 (1970).

41. *Id.* at 158. *See supra* text accompanying note 6.

42. The opinion does not make clear whether Craig took advantage of this opportunity.

43. Craig v. State, 110 S. Ct. 3157, 3161 (1990).

recanting earlier important statements, and the earlier testimony was essential. In *Roberts*, the witness had fled the area and could not be found. In *Craig*, the witnesses were available to testify.

In summary, the precedents cited by the *Craig* majority do present exceptions to, or at least broad interpretations of, the confrontation clause. However, those cases are distinguishable in key areas. *Coy v. Iowa*[44] specifically disallowed one form of "one-way confrontation" (using the one-way screen), and therefore appears far more controlling than *Roberts* or *Green* on the issue of closed-circuit testimony. In any event, the *Craig* Court was not bound by the *Green* or *Roberts* decisions.

B. Policy of Guaranteeing Reliability

Justice O'Connor asserted that the primary goal of the confrontation clause is to assure reliability.[45] While traditional confrontation is always preferable, if the trial court is confident that the testimony in question is reliable, and that the alternative means of testimony is truly necessary, face-to-face confrontation need not be strictly adhered to. From a policy standpoint, reliability and necessity must be the focus in admitting testimonial evidence.

The confrontation clause has no inherent motive aside from ensuring that accusatory testimony is as reliable as possible. This is not to say that all rights given to criminal defendants are a means of ensuring that truth and justice are accomplished. Some rights are designed to ensure that innocent citizens are not harassed (search and seizure) or to allow defendants protection when they have broken the law, but in the public's mind, justice warrants an acquittal (trial by jury). But "[t]he *central* concern of the confrontation clause is to ensure the reliability of the evidence against a criminal defendant by subjecting it to rigorous testing in the context of an adversary proceeding . . . ."[46]

Justice Scalia stated in dissent that the closed-circuit television testimony permitted under the Maryland statute should be rejected "[b]ecause the text of the sixth amendment is clear, and because the Constitution is meant to protect against, rather than conform to, current 'widespread belief' " concerning what is or is

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44. 487 U.S. 1012 (1989).
45. 110 S. Ct. at 3163.
46. *Id.*

not reliable evidence.[47] But what if in fact the fear of some child abuse victims is so intense that the truth can't come out under Scalia's interpretation of the sixth amendment? If there exists a way whereby a full testimony can be obtained from a young child with *guaranteed reliability*, the confrontation clause would not be offended by admitting this evidence, assuming no better alternative (in-court testimony) is possible. Scalia says this cannot be done because the defendant is explicitly entitled to " 'meet face to face all those who appear and give evidence at trial.' "[48] But the clause itself only guarantees a defendant the right to "be confronted with the witnesses against him."[49] The Maryland statute approved by *Craig* allows confrontation in the form of cross-examination. If the Maryland statute guaranteed reliability, then the confrontation clause would be satisfied.

The above cannot be interpreted to mean that the confrontation clause is satisfied by the Maryland statute. The statute is constitutional only *if* it can guarantee reliability. A closer look at the issues indicates that the *Craig* standards do not guarantee reliability.

1. Witness trauma

The Supreme Court in *Craig* recognized the need to protect children from "the trauma of testifying in a child abuse case."[50] However, the stated purpose of the Maryland statute at issue in *Craig* is not to protect children from trauma per se, but rather to allow an alternative form of testimony when a child is too scared to testify. The goal is to obtain reliable testimony, and not necessarily to protect children from emotional trauma. This goal is stated in the statute's language, which allows the use of closed circuit testimony when "[t]he judge determines that testimony by the child victim in the courtroom will result in the child suffering serious emotional distress *such that the child cannot reasonably communicate*."[51] If the primary goal of the statute were to guard against trauma, the phrase ". . . such that the child cannot reasonably communicate . . ." would have been

47. 110 S. Ct. at 3172 (Scalia, J., dissenting).

48. *Id.* (quoting Coy v. Iowa, 487 U.S. 1012, 1016 (1988).

49. U.S. CONST. amend. VI.

50. 110 S. Ct. at 3169.

51. *Id.* at 3161 n.1 (quoting MD. CTS. & JUD. PROC. CODE ANN. §9-102 (1989) (emphasis added).

left out, with the emphasis on the child's ". . . serious emotional distress . . ."[52]

The Maryland statute is consistent with the theory behind the Court's reasoning in *Craig*. According to the Court, the chief goal of the confrontation clause is to bring out the truth. This is exactly what is sought by the statute—reliable information. The key question then becomes whether this disabling courtroom trauma truly exists in children, thus preventing the truth concerning the defendant from coming out.

The trauma of young child abuse victims often prevents prosecutors from filing sexual abuse charges, or in some cases forces the charges to be dropped prematurely.[53] A study of child witness behavior has shown that young children are uncomfortable identifying, in the defendant's presence, a defendant whom the children have known previously.[54] This tendency existed even if the child witness was not a victim of the defendant.[55]

While testifying in the presence of one's sexual attacker does not inhibit every child from remembering the offensive events, the fact that it affects a large number of victims demands that a reliable alternative be sought. It is unacceptable to reward sex offenders for attacking children they know will be unable to coherently testify by eliminating all means of eliciting the truth. Testimony by one-way closed circuit television meets the objective of hearing the testimony of children who might otherwise be unable to testify. Of course, the fact that the Maryland statute meets this objective does not end the inquiry. It must still be determined whether or not this testimony is reliable.

2. *The power of suggestion as a threat to reliability*

It is important to find some manner of obtaining testimony from young sexual abuse victims which will not inhibit the truth. However, it is far more important that any such alternative be completely reliable. This is especially true of child abuse cases, as the young victim's testimony is quite often the key evidence supporting the prosecutor's case. The standard permitted in

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52. *Id.*

53. Note, *Videotaping Children's Testimony: An Empirical View*, 85 MICH. L. REV. 809, 827 (1987).

54. *Id.* at 820 & n.37.

55. *Id.*

Craig fails to satisfy these requirements of reliability. It does not take into account a child's great susceptibility to the power of suggestion.

When alleged child abuse victims are first questioned by a medical therapist, they are often reluctant to speak openly about the alleged abuse. As a result, it is common practice to make subtle suggestions as to what may have happened to the child.[56] Often, with encouragement, this practice is successful in encouraging the young victim to tell the story of the abuse. But this practice presents a great danger as well. Children naturally seek to please. They quickly catch on that when they tell of abuse, they get a positive response (part of the method to get them to tell the story). The pressure to "tell all" is so strong at times that "[i]t would be a strong-willed child indeed who could hold out against persistent, suggestive questioning aimed at eliciting statements that certain events took place, especially when the child knows that he will get a hug and good words if he says that they did."[57]

Eager to please, children have a tendency to accept the suggested scenario as an actual memory of events. Later, certain cues by an interviewer will trigger this false memory.[58] The Maryland statute accepted in *Craig* takes no precautions against coached testimony. In fact, it permits the therapist (and other "comfortable" parties) to be present in the room where the child is questioned at trial,[59] and their presence "may put additional suggestive pressure on the child."[60] Further, cross-examination may not help to elicit that the testimony is false; the child may be completely convinced that these statements are true.[61] Because the standard approved in *Craig* does not protect against such "fantasy testimony," the standard is arguably unacceptable.

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56. Christiansen, *The Testimony of Child Witnesses: Fact, Fantasy and the Influence of Pretrial Interviews*, 62 WASH. L. REV. 705, 712-13 (1987).

57. *Id.*

58. *Id.* at 709-10.

59. *Craig*, 110 S. Ct. at 3161, n.1. The defendant can object to the therapists presence, *Id.*, but the therapist should never be allowed in the room with the child if it will decrease reliability and increase reliance on suggestibility.

60. Christiansen, *supra* note 56, at 711.

61. *Id.* at 708.

C. The Fair Solution

The standard which the Supreme Court should accept for the admission of out-of-court testimony by child abuse victims must permit uninhibited testimony by an alleged victim. On the other hand, it must also protect the defendant from being convicted based on coached or suggestive testimony. If reliability cannot be assured, then the defendant must be allowed "to sit in the presence of the child, and to ask, personally or through counsel, 'it is really not true, is it, that I—your father (or mother) whom you see before you—did these terrible things?' "[62] The unacceptable danger of stigmatizing an innocent person as a child molester and sending him or her to prison demands such precautions even if the result is a different danger—setting free a child abuser.

However, there is a reasonable solution which would allow a child's out-of-court statement to be admitted while significantly increasing reliability. That solution is to simply require all meetings between an alleged victim and a social therapist to be recorded on tape.[63] This requirement should apply even where no formal charge has been brought against a defendant. As a result, it would become standard procedure for child therapy clinics to tape all meetings with possible child abuse victims. The defendant or defendant's counsel can be present (though not visible) for these sessions if desired to assure that all is properly recorded. This is by no means a novel approach,[64] but the Supreme Court in *Craig* has failed to require such a standard. Justice requires that such recordings be mandated.

With the sessions between child and therapist on tape, the defendant, if desired, will have the opportunity to show the judge and jury how the child came to his or her version of the facts. If some suggestion was made to get the child speaking, the jury will see the amount of coaxing used and can decide whether child or therapist is telling the story. The danger of preliminary secret meetings with the child will not be great. The demeanor of the child will reveal whether the session is a first-time encounter or not. Taping these sessions greatly increases the reliability of the testimony given by allowing the judge and jury to see how the child's testimony came about, as opposed to only

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62. *Craig*, 110 S. Ct. at 3172 (Scalia, J., dissenting).
63. Note, *supra* note 53 at 824.
64. *See generally Id.*

seeing the final result. Taping preliminary sessions thereby satisfies the goal of the confrontation clause as interpreted by the Court in *Craig*, improving reliability without allowing sex abuse charges to be dropped whenever a victim is too scared to testify competently at trial.

The child should still testify at trial, but if unable to do so coherently, the defendant now has two checks against false testimony. The defendant can still cross-examine the child as before, *and* if the testimony is more suggestion than reality, the defendant can point this out by showing the tapes of the child's session(s) with the therapist. While requiring all such sessions to be taped may come at some expense, it is so vital to gaining reliable testimony that it is necessary.

V. CONCLUSION

As Justice O'Connor notes in her concurring opinion in *Coy v. Iowa*, child abuse and assault is a grave problem in our society.[65] However, neither the size of the problem nor the seriousness of the offense can justify the admittance of out-of-court testimony which is not completely reliable. Testifying by closed circuit television allows children to more freely testify against alleged child molesters. However, the potential harms of the minimal *Craig* standards for such testimony are very serious. First, the possibility of convicting innocent citizens is increased. Second, these permissive standards will encourage the filing of abuse charges with scant evidence, thus stigmatizing the defendant as a child molester even if charges are later dropped or dismissed.[66]

By taping sessions between counselors and children, defendants are better protected against any type of coached testimony, whether the coaching is intentional or not. Also, the tapes provide a possible alternative to closed-circuit testimony should the child be unable to testify in the defendant's presence. The tapes of the session protect the defendant's rights as well, as they do not give the same appearance of guilt which naturally accompanies closed-circuit testimony.

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65. 487 U.S. 1012, 1022 (1988) (O'Connor, J., concurring).

66. Justice Scalia's dissent in *Craig* refers to the example of Jordan, Minnesota. In that small town, at one stage, there were 24 adults charged with molesting 37 children. Only one defendant was convicted. *Craig*, 110 S.Ct. at 3175 (Scalia, J., dissenting)(citing Feher, *The Alleged Molestation Victim, The Rules of Evidence, and the Constitution: Should Children Really Be Seen and Not Heard?*, 14 AM. J. CRIM. L. 227, 239-40 (1988).

In sum, taping of children when their story of abuse is first elicited protects a defendant from unreliable testimony without forcing the state to free a sex offender because his victim is too traumatized to testify at trial. The fight against child abuse demands that there be alternatives to the strict interpretation of the confrontation clause which forces a traumatized child to testify at trial. However, the spirit of the confrontation clause demands that stronger guarantees of reliability be put into place than now exist under *Maryland v. Craig*.

Anthony S. Parise