

Samia v. U.S.

Samia V. U.S. was decided on June 23, 2023 by the U.S. Supreme Court.

2nd Circuit: Defendant appeals his conviction for Murder for Hire and Kidnapping on Sixth Amendment Confrontation Clause grounds.

Issue:

Whether the admission of a confession—even as altered and with a limiting instruction—was constitutional error because other evidence and statements at trial enabled the jury to immediately infer that the “other person” described in the confession was the defendant himself?

Facts:

The defendant and his co-defendant worked in the Philippines for a crime boss and, on his orders, kidnapped and murdered a woman. Agents interviewed the co-defendant, who confessed but claimed that he was only the driver and that the defendant had shot the victim. The Government tried the defendants jointly. Prior to trial, the Court granted the Government’s motion to admit the codefendant’s confession through an agent, who would testify as to the content of the confession in a way that eliminated the defendant’s name while avoiding any obvious indications of redaction. The agent then testified, over the defendant’s objection, that the co-defendant described a time when “the other person he was with pulled the trigger on that woman in a van that he ...was driving.” During the agent’s testimony, the trial court instructed the jury that his testimony was admissible only as to the codefendant and should not be considered as to the defendant. The trial court later provided a similar limiting instruction before the jury began its deliberations. The defendant objected that that the admission of the confession—even as altered and with a limiting instruction—was constitutional error because other evidence and statements at trial enabled the jury to immediately infer that the “other person” described in the confession was the defendant himself. The trial court overruled the objection.

Holding:

Affirmed the conviction. The Court determined that the Confrontation Clause does not bar the admission of a nontestifying codefendant’s confession where (1) the confession has been modified to avoid directly identifying the nonconfessing codefendant and (2) the court offers a limiting instruction that jurors may consider the confession only with respect to the confessing codefendant. The Court first agreed that the co-defendant’s formal, Mirandized confession to authorities, which the Government sought to introduce at trial, was testimonial, and therefore it fell within the Confrontation Clause’s ambit. However, the Court pointed out that, under Crawford, the Confrontation Clause applies only to witnesses “against the accused,” and ordinarily, a witness whose testimony is introduced at a joint trial is not considered to be a witness against a defendant if the jury is instructed to consider that testimony only against a codefendant. The Court then examined the history of the Confrontation Clause in this context, and then reviewed the 1968 Bruton case, that held that a defendant is deprived of his rights under the Confrontation Clause when his non-testifying codefendant’s confession naming him as a participant in the crime is introduced at their joint trial, even if the jury is instructed to consider that confession only against the codefendant. However, the Court then examined its other cases and concluded that the Court’s precedents distinguish between confessions that directly implicate a defendant and those that do so “indirectly.” Thus, the Bruton rule applies only to “directly accusatory” incriminating statements, as distinct from those that do not refer directly to the defendant and become incriminating only when linked with evidence introduced later at trial.

Bottom Line:

In this case, the Court concluded that the “Confrontation Clause ensures that defendants have the opportunity to confront witnesses against them, but it does not provide a freestanding guarantee against the risk of potential prejudice that may arise inferentially in a joint trial. Here, the Clause was not violated by the admission of a non-testifying codefendant’s confession that did not directly inculcate the defendant and was subject to a proper limiting jury instruction.

Full Case at: https://www.supremecourt.gov/opinions/22pdf/22-196_p8k0.pdf