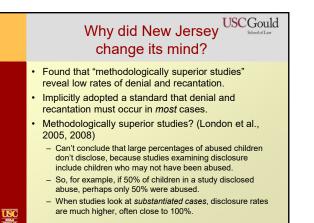
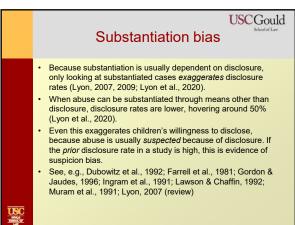
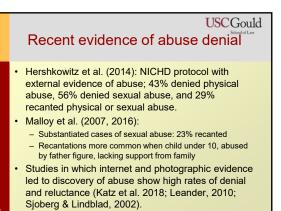




Exception: New Jersey
New Jersey v. J.Q. (1993): Rebuttal use OK
Model jury charge (2011): Accommodation ""relates only to a pattern of behavior of the victim which may be present in some child sexual abuse cases" and "may help explain why a sexually abused child may" delay reporting and recant or deny abuse.
New Jersey v. J.L.G. (2018): Rebuttal use NOT OK for denial and recantation
Testimony regarding delay only admissible if child is unable to explain the reasons for delay.

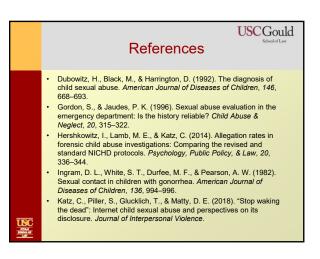






Have other courts USCGould

- No.
- But most opinions are by *intermediate* appellate courts that are bound by prior *state supreme court* opinions. E.g., California.
- Some inklings of influence:
 - Michigan v. Mejia (2020): 3 (of 7) state supreme court justices dissented from a denial of review, arguing that accommodation testimony should be reassessd.
 - Ohio v. Svoboda (2021): FN4: Perhaps, sometime in the near future, the Ohio Supreme Court will agree to revisit this issue in light of the numerous other state courts that have rejected CSAAS expert testimony.





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