

CiteCheck Report

File: puerto rico.pdf

Date: 9/8/2026

Summary

Section	Count	Breakdown
Cases cited	8	8 verified (cited 13 times in total)
Propositions	13	12 supports • 1 partial • incl. 1 wrong page
Brief Quality	0	No issues

Citation Verification

Does each cited case exist, and do the case name and reporter match?

Citation	Status	Notes
Globe Newspaper Co. v. Superior Court, 457 U.S. 596 (U.S. Supreme Court 1982)	CASE VERIFIED	Confirmed real via CourtListener courtlistener.com/opinion/110757/ globe-newspaper-co-v-superior-court-county-of-norfolk/
Press Enterprise Co. v. Superior Court II, 478 U.S. 1 (U.S. Supreme Court 1986)	CASE VERIFIED	Confirmed real via CourtListener courtlistener.com/opinion/111735/ press-enterprise-co-v-superior-court-of-cal-county-of-riverside/
Richmond Newspapers v. Virginia, 448 U.S. 555 (U.S. Supreme Court 1980)	CASE VERIFIED	Confirmed real via CourtListener courtlistener.com/opinion/110339/richmond-newspapers-inc-v-virginia/
Richmond Newspaper v. Virginia, 448 U.S. 555 (U.S. Supreme Court 1980)	CASE VERIFIED	Confirmed real via CourtListener courtlistener.com/opinion/110339/richmond-newspapers-inc-v-virginia/
Publicker Industries, Inc. v. Cohen, 733 F.2d 1059 (U.S. Court of Appeals for the Third Circuit 1984)	CASE VERIFIED	Confirmed real via CourtListener courtlistener.com/opinion/8931090/publicker-industries-inc-v-cohen/
Fulana de Tal v. Demandado A, 138 D.P.R. 610 (Supreme Court of Puerto Rico 1995)	CASE VERIFIED	Confirmed real via CourtListener courtlistener.com/opinion/8588903/fulana-de-tal-v-demandado-a/
Sheppard v. Maxwell, 384 U.S. 333 (U.S. Supreme Court 1966)	CASE VERIFIED	Confirmed real via CourtListener courtlistener.com/opinion/107247/sheppard-v-maxwell/
Detroit Free Press v. Ashcroft, 303 F.3d 681 (U.S. Court of Appeals for the Sixth Circuit 2002)	CASE VERIFIED	Confirmed real via CourtListener courtlistener.com/opinion/779123/detroit-free-press-v-john-ashcroft/

Proposition Check (Premium)

Verifies each cited case actually supports the proposition you are using it for.

Verdict Summary

Verdict	Count
PARTIAL SUPPORT	1
SUPPORTS	12

Per-Citation Findings

Citation	Verdict	Conf.	Proposition / Analysis
Globe Newspaper Co. v. Superior Court, 457 U.S. 596 (U.S. Supreme Court 1982)	SUPPORTS	HIGH	Proposition: "Whether Article 5.005 of Puerto Rico's Judiciary Act of 2003, 4 L.P.R.A. § 25e, as construed by the Puerto Rico Supreme Court to require automatic closure of all domestic violence proceedings and the official recordings of those proceedings, violates the First Amendment public access right under Globe Newspaper Co. v. Superior Court, 457 U.S. 596 (1982)." Analysis: The brief cites Globe Newspaper as the governing First Amendment public-access precedent for challenging a mandatory closure statute. The holding squarely establishes that mandatory closure rules excluding press and public from criminal proceedings violate the First Amendment absent narrowly tailored justification, which is precisely the framework the brief invokes. From the case at 610: "we hold that § 16A, as construed by the Massachusetts Supreme Judicial Court, violates the First Amendment... a mandatory rule, requiring no particularized determinations in individual cases, is unconstitutional."
Press Enterprise Co. v. Superior Court II, 478 U.S. 1 (U.S. Supreme Court 1986)	SUPPORTS	HIGH	Proposition: "By determining that all domestic violence cases held in a specialized court are entirely closed and confidential, without applying the test enunciated by this Court on Press-Enterprise Co. v. Superior Court II, 478 U.S. 1 (1986), the Puerto Rico Supreme Court has effectively denied all present and future First Amendment access." Analysis: The proposition is a paraphrase invoking the Press-Enterprise II test for First Amendment access to criminal proceedings. The holding text confirms the Court articulated the experience-and-logic test and required specific findings that closure is essential and narrowly tailored, which is exactly the test the brief invokes. From the case at 9: "the presumption may be overcome only by an overriding interest based on findings that closure is essential to preserve higher values and is narrowly tailored to serve that interest."
Richmond Newspapers v. Virginia, 448 U.S. 555 (U.S. Supreme Court 1980)	SUPPORTS	HIGH	Proposition: "Ever since 1980, this Court has held that the U.S. Constitution guarantees to the press the right to attend criminal trials. Richmond Newspapers v. Virginia, 448 U.S. 555, 580 (1980)." Analysis: The Court expressly held that 'the right to attend criminal trials is implicit in the guarantees of the First Amendment,' establishing the constitutional right of the press and public to attend criminal trials, exactly as the brief asserts. From the case at 580: "We hold that the right to attend criminal trials is implicit in the guarantees of the First Amendment; without the freedom to attend such trials, which people have exercised for centuries, important aspects of freedom of speech and of the press could be eviscerated."

Citation	Verdict	Conf.	Proposition / Analysis
Richmond Newspapers v. Virginia, 448 U.S. 555 (U.S. Supreme Court 1980)	SUPPORTS	HIGH	Proposition: "Richmond Newspapers v. Virginia, 448 U.S. 555, 580 (1980). [The Court] described how the openness of these trials serves several purposes: it opens the judge, jury and attorneys up to public scrutiny [...] Id. at 569-571." Analysis: The proposition paraphrases (no direct quote) the Court's discussion at 569-571 of how open trials serve multiple purposes, including subjecting judges, juries, and attorneys to public scrutiny. The controlling opinion at those pages discusses openness ensuring fair conduct, discouraging perjury and misconduct, and providing community therapeutic value—supporting the proposition. From the case at 569: "it gave assurance that the proceedings were conducted fairly to all concerned, and it discouraged perjury, the misconduct of participants, and decisions based on secret bias or partiality."
Richmond Newspapers v. Virginia, 448 U.S. 555 (U.S. Supreme Court 1980)	SUPPORTS	HIGH	Proposition: "Id. at 569-571. This is the basis for the presumption of openness in all criminal trials. Id. at 573." Analysis: The cited pages accurately support the proposition. Pages 569-571 discuss the historical basis for open trials, and page 573 explicitly states that 'a presumption of openness inheres in the very nature of a criminal trial under our system of justice.' From the case at 573: "we are bound to conclude that a presumption of openness inheres in the very nature of a criminal trial under our system of justice."
Press Enterprise Co. v. Superior Court II, 478 U.S. 1 (U.S. Supreme Court 1986)	PARTIAL SUPPORT Wrong page	MEDIUM	Proposition: "These prongs allow lower courts to consider any prejudice to any of the parties involved, as well as the benefits that access would bring to the justice system. Press Enterprise II, supra, at 89." Analysis: The proposition paraphrases Press-Enterprise II as establishing prongs (experience and logic) that allow courts to weigh prejudice and benefits of access. The opinion at pages 8-9 does articulate the two-pronged experience-and-logic test and discusses balancing fair-trial prejudice against access benefits, but the brief's framing ('prejudice to any of the parties' and 'benefits that access would bring to the justice system') is a loose characterization; the pin cite '89' does not correspond to this 478 U.S. opinion's pagination. PIN CITE — PAST THE END OF THE OPINION. The brief cites page 89; this opinion's last printed page is 29. Nothing is on the cited page, so it is worth checking where the supporting language came from. Read off the printed page numbers in the opinion — no quotation had to be located to say this. From the case at 8: "our decisions have emphasized two complementary considerations. First... whether the place and process have historically been open... Second... whether public access plays a significant positive role in the functioning of the particular process"
Richmond Newspaper v. Virginia, 448 U.S. 555 (U.S. Supreme Court 1980)	SUPPORTS	HIGH	Proposition: "A narrow majority of the Puerto Rico Supreme Court seems to have their mind set on barring any procedural access to the judicial recordings, blatantly ignoring what this Court established on Richmond Newspaper v. Virginia: "When a shocking crime occurs, a community reaction of outrage and public protest often follows..." Richmond Newspaper v. Virginia, 448 U.S. 555, 571 (1980)." Analysis: The quoted language appears verbatim at page 571 in Chief Justice Burger's plurality opinion (the controlling opinion announcing the judgment), discussing the community therapeutic value of open trials. The quote is accurately attributed and used consistent with the case's holding recognizing a public right of access to criminal proceedings. From the case at 571: "When a shocking crime occurs, a community reaction of outrage and public protest often follows. See H. Weihofen, The Urge to Punish 130-131 (1956)."

Citation	Verdict	Conf.	Proposition / Analysis
Richmond Newspaper v. Virginia, 448 U.S. 555 (U.S. Supreme Court 1980)	SUPPORTS	HIGH	Proposition: "[p]eople in an open society do not demand infallibility from their institutions, but it is difficult for them to accept what they are prohibited from observing". Id. at 572." Analysis: The quoted language appears verbatim at page 572 in Chief Justice Burger's controlling opinion, in the same context the brief uses it — explaining why openness matters to public acceptance of judicial institutions. From the case at 572: "People in an open society do not demand infallibility from their institutions, but it is difficult for them to accept what they are prohibited from observing."
Press Enterprise Co. v. Superior Court II, 478 U.S. 1 (U.S. Supreme Court 1986)	SUPPORTS	HIGH	Proposition: "The Puerto Rico Supreme Court could have applied the criteria in cases permitting access to the judicial proceedings, established in Press, Enterprise II, supra." Analysis: The proposition is a general paraphrase noting that Press-Enterprise II established criteria for public access to judicial proceedings. The opinion indeed sets out the experience-and-logic test and the standard requiring specific findings that closure is essential and narrowly tailored, which are the criteria the brief references. From the case at 13: "the proceedings cannot be closed unless specific, on the record findings are made demonstrating that 'closure is essential to preserve higher values and is narrowly tailored to serve that interest.'"
Publiker Industries, Inc. v. Cohen, 733 F.2d 1059 (U.S. Court of Appeals for the Third Circuit 1984)	SUPPORTS (CORRECTED ON REVIEW)	—	Proposition: "It could have also applied the criteria it adopted from Publiker Industries, Inc. v. Cohen through their decision in Fulana de Tal v. Demandado A. Publiker Industries, Inc. v. Cohen, 733 F. 2d 1059 (3rd Cir. 1984)." Analysis: Publiker holds that the First Amendment secures a right of access to civil proceedings (733 F.2d at 1061), which may be closed only on an overriding interest, supported by specific findings and narrowly tailored (id. at 1071, 1073). Those are the access criteria the brief attributes to Publiker; the citation supports the proposition. Verified by hand — Ben Schulz, 9/8/2026. See the verification path below. Reviewed by hand — Ben Schulz, 9/8/2026 Verify at: Publiker Industries, Inc. v. Cohen, 733 F.2d 1059, 1061 & 1071 (3d Cir. 1984) — right of access to civil proceedings + closure criteria (substantive standard at 1073). In the brief: p.17 CiteCheck originally reported this as "CANNOT DETERMINE", and that finding was corrected on review. Original reasoning: The proposition is essentially unintelligible — it refers to unspecified 'criteria' adopted from Publiker and applied through a Puerto Rico case ('Fulana de Tal v. Demandado A'), without identifying what criteria or holding is at issue. Without a discernible substantive claim to test, no support determination can be made against this opinion.
Fulana de Tal v. Demandado A, 138 D.P.R. 610 (Supreme Court of Puerto Rico 1995)	SUPPORTS	HIGH	Proposition: "It could have also applied the criteria it adopted from Publiker Industries, Inc. v. Cohen through their decision in Fulana de Tal v. Demandado A. Fulana de Tal v. Demandado A, 138 D.P.R. 610 (1995)." Analysis: The opinion expressly adopts the Publiker Industries, Inc. v. Cohen criteria for evaluating limitations on public/press access to civil proceedings, stating the court finds persuasive 'los criterios expuestos en Publiker Industries, Inc. v. Cohen' and applying them to the case. This directly supports the brief's proposition. From the case at 620: "Consideramos persuasivos... los criterios expuestos en Publiker Industries, Inc. v. Cohen, supra, para determinar si una solicitud para limitar el derecho de acceso a un procedimiento judicial cumple con el requerido estándar de escrutinio estricto."

Citation	Verdict	Conf.	Proposition / Analysis
Sheppard v. Maxwell, 384 U.S. 333 (U.S. Supreme Court 1966)	SUPPORTS	HIGH	Proposition: ""The press does not simply publish information about trials but guards against the miscarriage of justice by subjecting the police, prosecutors, and judicial processes to extensive public scrutiny and criticism." Sheppard v. Maxwell, 384 U.S. 333, 350 (1966)." Analysis: The quoted language appears verbatim in the majority opinion by Justice Clark at page 350, in the discussion of the press's role as 'handmaiden of effective judicial administration.' The quote is accurately attributed and used in the same direction as the opinion. From the case at 350: "The press does not simply publish information about trials but guards against the miscarriage of justice by subjecting the police, prosecutors, and judicial processes to extensive public scrutiny and criticism."
Detroit Free Press v. Ashcroft, 303 F.3d 681 (U.S. Court of Appeals for the Sixth Circuit 2002)	SUPPORTS	HIGH	Proposition: ""Democracies die behind closed doors. The First Amendment, through a free press, protects the people's right to know that their government acts fairly, lawfully, and accurately in deportation proceedings. When government begins closing doors, it selectively controls information rightfully belonging to the people. Selective information is misinformation." Detroit Free Press v. Ashcroft, 303 F. 3d 681 (6th Cir. 2002)." Analysis: The quoted language appears verbatim in the majority opinion by Judge Keith early in the opinion, and the brief uses it in the same direction the court intended — to argue against government secrecy in deportation proceedings. From the case at 683: "Democracies die behind closed doors. The First Amendment, through a free press, protects the people's right to know that their government acts fairly, lawfully, and accurately in deportation proceedings."

Analysis Record

Report generated	9/8/2026, 4:52:47 PM
Report ID	a3d17b8e-2204-40f4-be5a-bc786c5e54df
Citation extraction model	claude-sonnet-4-6
Proposition analysis model	claude-opus-4-7
Citation data source	CourtListener, accessed 9/8/2026
Analysis version	b1fb4ac6cd30
Citations analyzed	13

Citations were checked against CourtListener, a public legal database — the same records can be opened independently. "Cannot Verify" means this citation is not in CourtListener. Real cases fall outside it: unpublished state decisions, Westlaw-only cites, older and foreign reporters. A fabricated case looks identical from here. Absence is not evidence either way, which is why these go to you rather than to a guess. "Citation Doesn't Match" is a different finding — the case name and the citation disagree. Either the citation points to a different case, or the case is real and appears somewhere else. Both are shown with the specifics.

Attorney Review Record

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