

Circuit Court for Carroll County
Case No. C-06-CR-23-000387

UNREPORTED
IN THE APPELLATE COURT
OF MARYLAND*

No. 1705

September Term, 2024

MOHAMMED A. HOSSAIN

v.

STATE OF MARYLAND

Wells, C.J.,
Albright,
Lazerow, Alan
(Specially Assigned),

JJ.

Opinion by Albright, J.

Filed: June 5, 2026

*This is an unreported opinion. This opinion may not be cited as precedent within the rule of stare decisis. It may be cited for its persuasive value only if the citation conforms to Rule 1-104(a)(2)(B).

Mohammed Hossain, Appellant, was convicted by a jury sitting in the Circuit Court for Carroll County of several counts related to the physical abuse of his three minor daughters and the sexual abuse of the oldest daughter.¹ Mr. Hossain presents two questions on appeal, which we have slightly rephrased:²

- I. Did the circuit court err in admitting testimony that Mr. Hossain did not participate in a scheduled police interview because the testimony was irrelevant and unduly prejudicial?
- II. Did the circuit court commit plain error when it allowed the State in closing argument to call Mr. Hossain a “monster” and to refer to a fact not in evidence?

For the reasons that follow, we shall affirm the judgments.

FACTS AND PROCEEDINGS

The State’s theory of prosecution was that Mr. Hossain physically abused each of his three daughters and sexually abused the oldest of them over a six-year period, starting in 2017. Testifying for the State was April Adams, the lead investigator for the Carroll County Child Protective Service (“CPS”); Detective Valerie Mizansky of the Carroll

¹ As to his oldest daughter, the jury convicted Mr. Hossain of second-degree rape; third-degree sexual offense; sexual abuse of a minor; sexual abuse of a minor as a continuing course of conduct; and first-degree child abuse as a continuing course of conduct. As to each of his two younger daughters, the jury convicted Mr. Hossain of first-degree child abuse as a continuing course of conduct. The court sentenced Mr. Hossain to a total of 130 years of imprisonment, all but 90 years suspended.

² Mr. Hossain’s questions as presented are:

- I. Did the court err in admitting testimony that Appellant did not participate in a police interview?
- II. Did the court plainly err in allowing the State, in closing argument, to refer to Appellant as “a monster” and refer to facts not in evidence?

County Sheriff’s Office; the three children; and Sue Howard, the children’s mother (“Mother”). The State also introduced into evidence videotapes of the two forensic interviews each of the children had at the Child Advocacy and Investigation Center (“CAIC”) in Carroll County. The defense took the position that the children were not telling the truth. Mr. Hossain testified in his own defense.

Mother and Mr. Hossain were married and had three daughters. The parents separated in 2015, when Mother and the children moved to North Carolina and Mr. Hossain moved to Maryland. In 2016, the daughters were removed from Mother’s care for neglect and placed in foster care. Mr. Hossain eventually gained custody of the children, and in April 2017, he and the children moved into an apartment in Carroll County (“the Poole Road Apartment”). At that time, the children were six, four, and three years old. Mother soon joined them at the apartment where they all lived together, even after the parents divorced in 2018. Mother testified that it seemed that Mr. Hossain had a “regular” parenting relationship with the children, but when the oldest daughter was around eleven-years-old, Mother witnessed Mr. Hossain drag her across the floor by the hair.

On April 19, 2023, the oldest daughter called a “hotline” and requested help. Two days later, Ms. Adams, a licensed social worker with Carroll County CPS, was assigned the case and went to the children’s school to speak to them. The oldest daughter disclosed sexual and physical abuse by Mr. Hossain, but because a police officer had not been available to accompany the case worker and there was no video recording of the disclosure, Ms. Adams stopped the interview. She explained to the oldest daughter that

they would continue their conversation the following Monday, but over the weekend, she was to have no contact with Mr. Hossain. Ms. Adams then called Mother and Mr. Hossain separately. She advised them of oldest daughter’s disclosure of physical and sexual abuse by Mr. Hossain; arranged for the creation of a safety plan for the weekend during which the children were to have no contact with Mr. Hossain; and scheduled a forensic interview for the children the following Monday at the CAIC.

On Monday, April 24, 2023, the children, ages eleven, nine, and eight, spoke to Ms. Adams at the CAIC. The oldest was “very angry” at Ms. Adams because she had “wanted to be able to see” Mr. Hossain over the weekend but could not because of the safety plan. None of the children made a disclosure at that time. Because there was no disclosure, the safety plan was discontinued. Ms. Adams advised Mother to file a protective order against Mr. Hossain based on the allegations made at school.

Mother and the children subsequently moved out of the apartment they shared with Mr. Hossain. On May 9, 2023, Mother called Ms. Adams and said that the oldest daughter was ready to talk with her now. The following day, Mother filed a petition for a temporary protective order (“TPO”) alleging sexual and physical abuse by Mr. Hossain.³ Additionally, second forensic interviews were scheduled for the children at the CAIC for May 11 and 12.

On May 11, the oldest child disclosed sexual and physical abuse by Mr. Hossain during her interview. She said that the abuse started soon after they moved to the Poole

³ The TPO was subsequently granted, then extended, and a final protective order (“FPO”) was granted on June 1, 2023.

Road Apartment when she was around seven-years-old. She said that she slept on the couch with Mr. Hossain at night, during which he would put his hand down her pajama pants and rub her “private part” and then put his hand up her pajama shirt and squeeze her chest. This happened every night for a while, and then over the following years, it occurred every few days. Sometimes when this happened, he would have his other hand in his pants and move it back and forth. She described an occasion where Mr. Hossain put his finger inside her private part and moved it around. He told her not to tell her Mother, and he often would buy her things at Five Below afterward. Mr. Hossain also would press his “boy part” against her back or bottom and move in slow motion against her body. She disclosed that Mr. Hossain, who usually drives her and her sisters to school, places his hand on her leg and rubs it back and forth while she sits in the front seat. She pulls away from him, but he continues to rub her leg.

The oldest daughter also disclosed that Mr. Hossain also has dragged her across the floor of their apartment by the hair while she was on her back. He did this when she did not listen to him. She said that he also hits her with an open hand or an object, like a coat hanger, a doll, or telephone charger, which sometimes leaves a red mark for days. Mr. Hossain also hits her sisters. She said that Mr. Hossain recently was trying to bribe her with toys and money, to say “good things about him” so he does not go “to jail.”

The following day, the two youngest daughters disclosed physical abuse by Mr. Hossain. The middle daughter said Mr. Hossain hits her with his hands or a coat hanger, and he once hit her so hard that she had a bruise on her back for two weeks. He told her to say “how nice he [is.]” She noted that Mr. Hossain buys her older sister many items

“because she’s the favorite.” The youngest daughter said that Mr. Hossain yells at her and her sisters, and he “hurts us” by hitting them with coat hangers or toys, once causing a bruise on her leg. He also pulls them around the house by the hair, giving them “carpet burn.” She noted that Mr. Hossain buys things for the oldest sister but not for her and her middle sister. Video recordings of each of the daughters’ first and second interviews were admitted into evidence and played for the jury.

The children were called as witnesses but did not testify about any abuse. When asked how they were feeling, they testified that they were “terrified” and “scared,” and the youngest cried.

Detective Mizansky with the Carroll County Sheriff’s Office testified she was present in the observation room for each of the children’s interviews at the CAIC. It was clear to her that at the first set of interviews, the children were not happy to be there, and no disclosures occurred on that date. On June 1, roughly two weeks after the children’s second interviews, Mr. Hossain failed to show up for a scheduled police interview. The detective subsequently filed charges against Mr. Hossain and obtained an arrest warrant. When she contacted Mr. Hossain’s then-attorney and advised him about the arrest warrant, she learned that Mr. Hossain had “potentially [] fled the county.” The detective then contacted the Maryland State Police, who confirmed that Mr. Hossain was in Bangladesh. The detective admitted that there were no restrictions on Mr. Hossain’s travel when he left the country. At the end of the summer, the detective received flight information about Mr. Hossain’s return to the United States, at which time he returned without incident.

Mr. Hossain testified that he never sexually assaulted his children, nor did he hit them or pull their hair. He believed Mother convinced the children to lie about him in order to gain custody of them. We shall provide additional facts below to address the questions raised.

DISCUSSION

I. Testimony Regarding the Police Interview

Mr. Hossain argues that the circuit court erred in allowing the State, over objection, to elicit testimony that he did not appear for a scheduled police interview. He argues that the testimony was inadmissible because it was irrelevant and unfairly prejudicial. The State responds that Mr. Hossain has only preserved the prejudicial part of his argument because he conceded below that the testimony was relevant, but in any event, the circuit court properly admitted the testimony because it was both relevant and not unfairly prejudicial.

Evidence is relevant if it has “any tendency to make the existence of any fact that is of consequence to the determination of the action more probable or less probable than it would be without the evidence.” Md. Rule 5-401. A finding of relevance “is generally a low bar[.]” *State v. Simms*, 420 Md. 705, 727 (2011). Relevant evidence may be excluded, however, “if its probative value is substantially outweighed by the danger of unfair prejudice, confusion of the issues, or misleading the jury, or by considerations of undue delay, waste of time, or needless presentation of cumulative evidence.” Md. Rule 5-403. Whether evidence is “unfairly” prejudicial is not judged by whether the evidence hurts one’s case but whether it “might influence the jury to disregard the evidence or lack

of evidence regarding the particular crime with which the defendant is being charged.” *Burris v. State*, 435 Md. 370, 392 (2013) (cleaned up).

Whether evidence is relevant is a question of law we review *de novo*. *Williams v. State*, 457 Md. 551, 563 (2018). The admission of relevant evidence, however, is reviewed under an abuse of discretion standard. *Simms*, 420 Md. at 725. “Abuse of discretion has been said to occur where no reasonable person would take the view adopted by the trial court, or when the court acts without reference to any guiding rules or principles.” *Alexis v. State*, 437 Md. 457, 478 (2014) (cleaned up).

Maryland has consistently allowed for the admission of consciousness of guilt or flight evidence as “a factor that may be considered in determining guilt.” *Jones v. State*, 213 Md. App. 483, 508 (2013) (cleaned up). Consciousness of guilt can be inferred from “a broad spectrum of behavior[.]” *Id.* Specifically, “it may be inferred from the evidence that at the time of flight [the defendant] knew he was or would be charged with [a] crime.” *Rice v. State*, 89 Md. App. 133, 143 (1991) (cleaned up). The limited exception to the general admissibility of flight evidence is when the defendant has an alternative explanation for the flight that would require him to confess to another crime. *Thompson v. State*, 393 Md. 291, 314–15 (2006). However, if a defendant has an innocent explanation for his flight that does not risk prejudicing the jury against him, he is expected to present that evidence. *Id.* at 315.

At trial, Detective Mizansky testified that an interview was scheduled with Mr. Hossain on June 1. Defense counsel objected. At the ensuing bench conference, the State proffered that Mr. Hossain “didn’t show up at the interview and instead fled the

country[.]” Defense counsel disagreed with the State’s characterization of Mr. Hossain’s actions. Defense counsel explained that Mr. Hossain’s prior defense attorney scheduled the interview, and although Mr. Hossain did miss the interview because he was in Canada and then his native country, Bangladesh, when he left the United States, he was not charged with a crime. Defense counsel argued that the State was trying to use Detective Mizansky’s testimony about Mr. Hossain’s missed interview to suggest that he had “fled” the country, and “while relevant” to flight, the prejudice in admitting the missed interview testimony outweighed any relevance.

The State responded that Mr. Hossain’s actions in leaving the United States on June 16 could be characterized as “flight” because when he left: he knew there was a police investigation against him; a police interview had been scheduled; and a TPO alleging the same facts as the crime had already been entered against him. Defense counsel reiterated that although evidence of his missed interview and subsequent flight were “perhaps relevant,” he was objecting to the evidence on “prejudicial grounds” because he had the right to leave the country when he did as he was not indicted until after he left. The court overruled the objection, stating that the evidence was relevant and not “unfairly prejudicial.”

The State then continued its direct examination of Detective Mizansky. As relayed above, Detective Mizansky testified that Mr. Hossain did not appear for the June 1, 2024, scheduled police interview, after which she filed charges against him and obtained an arrest warrant. She testified that when she subsequently contacted Mr. Hossain’s former defense attorney and advised him about the arrest warrant, she learned that Mr. Hossain

“potentially had fled the country.” She then contacted the Maryland State Police, who confirmed that Mr. Hossain had left the country. She further testified that at the time Mr. Hossain left the United States there were no restrictions on his travel, and that he returned to the United States on August 23, without incident. The State did not request, nor did the court give the jury a flight instruction.

Assuming without deciding that Mr. Hossain has preserved his relevancy argument for our review, we find no merit to his argument that the circuit court erred in admitting evidence of his missed interview because it was irrelevant and unduly prejudicial.

Mr. Hossain argues that evidence of his missed interview was irrelevant because he was under no obligation to attend a scheduled police interview while under investigation for child abuse and missing the interview did not make it more or less likely that he was guilty of the crimes charged. He argues that he could have missed the interview for any number of innocent reasons, none of which reflect a guilty conscience. We disagree with Mr. Hossain’s reasoning. Mr. Hossain’s absence at a scheduled police interview for allegations of physical and sexual abuse of his daughters, of which he was aware, which occurred simultaneously with his traveling outside the United States, was indicative of consciousness of guilt, and therefore, relevant. If there were innocent explanations for his missed interview, as he suggests, it was incumbent on him to raise them. *Thompson*, 393 Md. at 315. He did not. Although he testified in his own defense, he did not provide any explanation for missing the scheduled police interview.

Mr. Hossain argues that the probative value of evidence of his missed interview and subsequent travel was substantially outweighed by the danger that the jury would assume that he avoided the interview because he was guilty. We again disagree.

As we have stated before:

The “unfair” component of the prejudice is not the tendency of the evidence to prove the identity of the defendant as the perpetrator of the crimes. What is “unfair” is only the incremental tendency of the evidence to prove that the defendant was a “bad man.” As we balance, therefore, the emphasis must be not on the noun “prejudice” but on the qualifying, and limiting, adjective “unfair.”

Oesby v. State, 142 Md. App. 144, 166 (2002). To exclude evidence because it is unfairly prejudicial, “[t]he inflammatory nature of the evidence must be such that the ‘shock value’ on a layperson serving as a juror would prevent the proper evaluation or weight in context of the other evidence.” *Urbanski v. State*, 256 Md. App. 414, 434 (2022). This is not the case here. Under these circumstances, we are persuaded that the circuit court did not abuse its discretion in admitting the evidence.⁴ *Cf. Thomas v. State*, 213 Md. App. 388, 412–13 (2013) (recognizing that an appellate court “will almost never” hold that a trial court abused its discretion in the “final balancing between probative value and unfair

⁴ Mr. Hossain argues that we must reverse his convictions because the error in admitting the evidence that he did not participate in the police interview was not harmless. *See Dorsey v. State*, 276 Md. 638, 659 (1976) (holding that when an appellant establishes error in a criminal case, “unless a reviewing court, upon its own independent review of the record, is able to declare a belief, beyond a reasonable doubt, that the error in no way influenced the verdict, such error cannot be deemed ‘harmless’ and a reversal is mandated.”). Because we find that the evidence was not admitted in error, we shall not address his harmless error argument.

prejudice” and that reversal is “reserved for those rare and bizarre exercises of discretion that are . . . not only wrong but flagrantly and outrageously so.”) (citation omitted).

II. The State’s Remarks in Closing Argument

Lastly, Mr. Hossain argues that the circuit court erred when it allowed the State in closing argument to call him a “monster” and to argue that a friend “convinced” him to return to the United States, which was not a fact admitted into evidence. Acknowledging that he did not object, he nonetheless argues that we should recognize plain error and reverse because the remarks deprived him of a fair trial. The State concedes that the prosecutor’s reference to Mr. Hossain as a monster was improper but argues that we should decline Mr. Hossain’s invitation to review for plain error because the single word did not affect Mr. Hossain’s right to a fair trial—it was an isolated comment and there were strategic reasons that explain defense counsel’s decision not to object. The State argues that the other remark was properly admitted because it was an inference that could be rationally drawn from the evidence.

Counsel are generally afforded wide latitude to engage in oratorical flourishes during closing argument. *Degren v. State*, 352 Md. 400, 430 (1999). “It falls within the range of legitimate argument for counsel to state and discuss the evidence and all reasonable and legitimate inferences which may be drawn from the facts in evidence[.]” *Cagle v. State*, 462 Md. 67, 75 (2018) (cleaned up). Nevertheless, counsel may not refer to facts not in evidence nor inflame the passions of the jury. *Mitchell v. State*, 408 Md. 368, 381 (2009). Even when a prosecutor pushes the limits, however, not every improper remark made during closing argument requires reversal and “whether a prosecutor has

exceeded the limits of permissible comment depends upon the facts in each case.” *Lee v. State*, 405 Md. 148, 164 (2008) (citations omitted). “Reversal is only required where it appears that the remarks of the prosecutor actually misled the jury or were likely to have misled or influenced the jury to the prejudice of the accused.” *Lawson v. State*, 389 Md. 570, 592 (2005) (cleaned up). This determination lies within the sound discretion of the trial court, and “[o]n review, an appellate court should not reverse the trial court unless that court clearly abused the exercise of its discretion and prejudiced the accused.” *Id.* (cleaned up).

Because there is no specific rule governing preservation of trial court error during closing argument, we look to Rule 8-131(a). That Rule provides: “Ordinarily, an appellate court will not decide any [non-jurisdictional] issue unless it plainly appears by the record to have been raised in or decided by the trial court[.]” As we have explained:

The purpose of Maryland Rule 8-131 is to allow the court to correct trial errors, obviating the necessity to retry cases had a potential error been brought to the attention of the trial judge. The Rule is also designed to prevent lawyers from “sandbagging” the judge and, in essence, obtaining a second “bite of the apple” after appellate review.

Sydnor v. State, 133 Md. App. 173, 183 (2000), *aff’d*, 365 Md. 205 (2001). Nonetheless, an appellate court should address an error that has not been objected to when the error is “compelling, extraordinary, exceptional or fundamental to assure the defendant of fair trial.” *Rubin v. State*, 325 Md. 552, 588 (1992) (cleaned up). The standard is high, “[e]very error that, if preserved, might have led to a reversal does not thereby become extraordinary.” *Perry v. State*, 150 Md. App. 403, 436 (2002). We have said, “the notion of ‘plain error’ requires, as a rock-bottom minimum, a legal error by the judge, not a

tactical miscalculation by defense counsel; the judge does not sit as co-counsel for the defense. Neither does the appellate court.” *Nelson v. State*, 137 Md. App. 402, 423 n.5 (2001). “[A]ppellate review under the plain error doctrine 1) always has been, 2) still is, and 3) will continue to be a rare, rare phenomenon.” *Hammersla v. State*, 184 Md. App. 295, 306 (2009) (cleaned up).

The Supreme Court of Maryland has articulated a four-part test to determine whether to address unobjected to error:

(1) there must be an error or defect—some sort of deviation from a legal rule—that has not been intentionally relinquished or abandoned, *i.e.*, affirmatively waived, by the appellant; (2) the legal error must be clear or obvious, rather than subject to reasonable dispute; (3) the error must have affected the appellant’s substantial rights, which in the ordinary case means he must demonstrate that it affected the outcome of the proceedings; and (4) the error must seriously affect the fairness, integrity or public reputation of judicial proceedings.

Beckwitt v. State, 477 Md. 398, 464 (2022) (cleaned up). All four conditions must be satisfied. *Id.*

Here, the parties’ closing argument took place over thirty-four pages of typed transcript. The State’s two allegedly improper remarks occurred during rebuttal closing, which comprised five typed pages of transcript. The first remark was in response to defense’s argument in closing that Mr. Hossain gave the police his return flight information and that this action was consistent with innocence. The State responded:

Detective Mizansky said that she -- did not . . . [get] his booking information or his return flight information from [Mr. Hossain]. She testified that she got it from his friend.

The friend convinced him to come back to the United States. He didn’t come back on his own. He knew about the warrant. He knew these charges were coming. The protective order was already in place. He left for

what reason? **He came back because he was convinced to come back not because he wanted to.** Okay.

(Emphasis added.) The State made the second remark two pages later:

The two interviews [of the children], like I said, I gave it to you guys because I don't want to hide any parts for you. And it is very telling, again, between the first interview and the second interview that something was bothering those kids in that first interview and they just didn't want to talk. [The oldest daughter] didn't deny what was happening. Just because she wanted her dad, the dad who digitally penetrated her, the dad who grinded on her, the dad who dragged her by her hair. He is not a dad. **He is a monster.**

(Emphasis added.) The State then moved on to address the children's interviews.

Defense counsel did not object to either of the prosecutor's remarks or move for a mistrial either during or after closing arguments. Moreover, the circuit court instructed the jury on closing arguments at the outset of the case when providing an overview of the trial, stating: "[After] my instructions, the lawyers are permitted to give closing arguments. These arguments are not evidence. They are an opportunity for the lawyers to summarize and to comment on the evidence that you have heard and to argue to you how to decide the charges in this case." At the close of evidence, the court again instructed the jury on closing arguments, stating: "closing arguments of lawyers are not evidence. They are intended only to help you to understand the evidence and to apply the law. Therefore, if your memory of the evidence differs from anything the lawyers or I may say, you must rely on your own memory of the evidence."

A. *The "Convinced" Remark*

We are persuaded that the State's remark in closing argument that a friend "convinced" Mr. Hossain to return to the United States was a fair inference drawn from

Detective Mizansky’s testimony. Therefore, this remark did not constitute error, let alone plain error. We explain.

The defense called Detective Mizansky as a witness and questioned her about her knowledge of Mr. Hossain’s travel plans and return to the United States. During her testimony, the defense elicited from the detective that she received Mr. Hossain’s return flight information. On cross-examination by the State, the following occurred:

[THE STATE]: Isn’t it true, Detective Mizansky, that the Defendant had to be convinced to return to the U.S.?

[DEFENSE COUNSEL]: Objection, Your Honor.

[THE COURT]: If she knows. I think that is opened. I will overrule. If you know on personal knowledge.

[DETECTIVE MIZANSKY]: I’m not sure if ... he had to be convinced.

[THE STATE]: The person that you received the information from about the Defendant’s return to the U.S. was from Stephanie Shirzai, correct?

[DETECTIVE MIZANSKY]: Yes.

[THE STATE]: And did Ms. Shirazi share with you that she told the Defendant to return to the U.S.?

[DETECTIVE MIZANSKY]: Yes.

Under the circumstances, we are persuaded that a fair inference can be made from the detective’s testimony that Mr. Hossain was “convinced” to return to the United States by his friend. The elicited testimony showed that Mr. Hossain left the country when he had a scheduled police interview about sexual molestation charges that he knew were imminent and later a friend “told [him] to return” to the United States. This testimony could lead one to rationally infer that Mr. Hossain’s friend convinced Mr. Hossain to

return to the United States. Accordingly, we are persuaded that this remark was not made in error.

B. The “Monster” Remark

Citing *Lawson*, 389 Md. at 597, Mr. Hossain argues that the “monster” remark requires reversal and, recognizing that he did not object to the remark, urges us to review the remark under the doctrine of plain error. He argues that the court’s failure to take any action, *sua sponte*, contributed to the jury’s guilty verdict because the remark was severe and intended to inflame the jury; the court’s instructions to the jury were insufficient to cure the remark because they were not made contemporaneously with the remark; and the evidence against him was questionable as his three children gave different responses in their first and second interviews and Mother testified that she wanted to regain custody of her children. The State concedes, as it must, that the monster remark was improper. *Cf. Lawson*, 389 Md. at 599 (holding remark in closing argument improper when the State implied that the defendant was a monster and child molester). Nonetheless, the State argues that we should not exercise plain error review. We agree with the State.

First, we cannot say that the court plainly erred because defense counsel may have had a strategic justification for not objecting to the remark, such as not wanting to emphasize it to the jury. *See Kulbicki v. State*, 207 Md. App. 412, 452 (2012) (recognizing that defense counsel’s failure to object may have been “a strategic decision not to call further attention to what it considered a damaging piece of evidence.”), *rev’d on other grounds*, 440 Md. 33 (2014), *rev’d*, 577 U.S. 1 (2015). We also cannot say that the single isolated remark within the lengthy closing arguments affected the verdict. *Cf.*

Spain v. State, 386 Md. 145, 159 (2005) (holding improper comment harmless when it was “an isolated event that did not pervade the entire trial.”). Moreover, and contrary to Mr. Hossain’s argument, the evidence here was strong. Although the victims did not disclose abuse in their first interviews, their disclosure in their second interviews were specific and consistent with each other—describing that Mr. Hossain slapped them with an open hand; beat them with coat hangers; and dragged them across the floor by their hair. The oldest daughter’s disclosure of sexual abuse was likewise specific, and the jury was shown the interviews of all the children’s interviews. Moreover, the children’s account of being pulled by the hair was corroborated by Mother’s testimony.

Lawson, 389 Md. at 596–605, does not provide the support Mr. Hossain hopes for. In *Lawson*, the defendant was convicted of various sex offenses against a child. On appeal, invoking plain error, he argued that the convictions should be reversed because the prosecutor made numerous improper arguments in closing. Specifically, the prosecutor twice made an improper “golden rule” argument, asking the jurors to place themselves in the shoes of the victim’s mother; accused the defense of not introducing evidence of a motive for the victim to lie, thereby suggesting to the jurors that the burden of proof rested on the defendant; called the defendant a “monster”; and insinuated that, if the jury were to acquit the defendant, he would be free to molest more children. *Id.* at 579–80, 593–94. Our Supreme Court noted that, standing alone, each argument might not have warranted reversal, but “*when taken as a whole*, [the remarks] could have prejudiced the jury in such a way as to deny the defendant a fair and impartial trial.” *Id.* at

604–05 (emphasis added). Exercising its discretion to engage in plain error review, the Court considered the propriety of the prosecutor’s remarks, in total, and reversed. *Id.*

The facts before us are a far cry from those in *Lawson*. The disparaging remarks in *Lawson* were profoundly inflammatory, and the monster remark was just one of several improper remarks. *Id.* at 593–94. That was not the case here. Additionally, the State’s remarks here could have been easily and promptly corrected by the circuit court had Mr. Hossain objected. He did not. Under the circumstances, notwithstanding that the prosecutor’s “monster” reference was improper, we are not persuaded that it rose to a level so prejudicial as to affect Mr. Hossain’s fundamental right to a fair trial. Plain error review is reserved for those circumstances of “truly outraged innocence[.]” *Gross v. State*, 229 Md. App. 24, 37 (2016) (cleaned up). To permit Mr. Hossain to raise the issue for the first time on appeal, when an objection easily could have been lodged and dealt with below, would run counter to considerations of fairness and judicial efficiency. *See Chaney v. State*, 397 Md. 460, 468 (2007) (noting that the discretion granted to the appellate courts under Md. Rule 8-131(a) should be rarely exercised, “as considerations of both fairness and judicial efficiency ordinarily require that all challenges that a party desires to make to a trial court’s ruling, action, or conduct be presented in the first instance to the trial court[.]”). Accordingly, we decline to exercise our discretion to engage in plain error review.

**JUDGMENTS OF THE CIRCUIT COURT
FOR CARROLL COUNTY AFFIRMED.
COSTS TO BE PAID BY THE
APPELLANT.**