

Essay about Case of Miranda v. Arizona

Character of action: The case was first tried to a jury in Arizona's Maricopa County Superior Court where the defendant, Ernesto Miranda, was convicted of rape and kidnapping. Miranda appealed the conviction to the Supreme Court of Arizona which affirmed the trial court conviction finding that Miranda's constitutional rights had not been violated. Miranda then petitioned for the case to be heard by the United States Supreme Court who accepted to hear the case during their spring 1966 term. Oral arguments for the case were heard on February 28, March 1 and March 2, 1966. The Court issued its decision on June 13, 1966.

Facts of case: In early March 1963, the rape and kidnapping of a young woman was reported to the Phoenix Police Department. Based on statements from the victim and witnesses, police suspected that Ernesto Miranda, who had previously been in arrested for similar charges, was responsible. On March 13, Phoenix detectives arrested Ernesto Miranda at his home and brought him to the police station where he was positively identified by the victim, in a four-man lineup. Miranda was then taken to a "special interrogation room" and questioned by detectives for two hours. At no point during the interrogation was Miranda informed of his right to remain silent or have an attorney present during questioning. Miranda eventually told the detectives that he had indeed raped the woman. The detectives then had Miranda write out and sign a statement confessing his involvement. At the top of the statement was a typed disclaimer stating that the confession was made with Miranda's full knowledge of his legal rights and his understanding that any statement made may be used against him and that he had knowingly given up or waived those rights. At trial, over the objections of Miranda's defense attorney, prosecutor's used both the written statement and police testimony of Miranda's oral confession to secure a guilty verdict from the jury. Miranda was sentenced to 20 to 30 years in prison for each charge.

Legal issue in the case: Was Miranda's Fifth Amendment privilege against self-incrimination violated when Phoenix detectives, after his arrest but prior to interrogation, failed to inform him of his rights: (1) to remain silent and (2) to consult an attorney and have that attorney to be present during interrogation prior?

Decision of the Supreme Court: In a 5-4 decision, the Supreme Court found that Miranda's Fifth Amendment privilege against self-incrimination was indeed violated when the detectives failed to inform him of his rights prior to obtaining his confession. The Court, citing the officers' testimony at trial that they had not informed Miranda of his rights, reversed the decisions of the Arizona Supreme Court and the conviction of the Maricopa County Superior Court and held that the written and oral confessions entered into testimony were illegally obtained and therefore inadmissible at trial. According to the Court's holding, even though the written confession stated that Miranda had "known his rights and waived them" the facts of the case showed that his waiver of those rights did not satisfy constitutional standards.

Majority Opinion: In the majority opinion, which was written by Chief Justice Earl Warren, the Court first explained in detail how the Fifth Amendment's privilege against self-incrimination was a fundamental part of the American criminal justice system with a long history in custom, tradition and law. The Court then went on to explain how "incommunicado" custodial interrogations, where the defendant is cut off from the outside world and at the mercy of police officers trained in ways to get a suspect to talk, were by their very nature coercive and extremely effective at getting a defendant waive their Fifth Amendment privilege against self-incrimination.

The Court further held that rather than blindly placing their trust in the police, prosecutors and state to refrain from violating a defendant's rights or where questions exist analyzing the circumstances on case by case basis, the Fifth Amendment required that if the state wanted to use any testimony obtained from a defendant in custody at trial, it would first need to demonstrate that adequate safeguards were taken to protect a defendant's privilege against self-incrimination and "dispel" the inherently coercive environment of an in custody interrogation.

While the Court left open the specific safeguards the state can implement to demonstrate they had not violated the defendant's right, the Fifth Amendment required, at a minimum, that prior to interrogation, a defendant must be informed of his right to remain silent and that anything he says can be used against him.

The Court also held that a defendant's privilege against self-incrimination also included the right to consult an attorney and have an attorney present during an interrogation. The presence of an attorney, according to the Court,

was needed to make sure that a defendant though informed of his rights could still be coerced, bullied or intimidated by the police or a prosecutor to give up his rights. Accordingly, in addition to being informed of his right to remain silent, the Court held that a proper Fifth Amendment safeguard also required that a defendant be informed that he has a right to consult an attorney and have that attorney present during interrogation.

Moreover, based on principles of equity, the Court further held that no one should be denied an attorney simply because they do not have the funds, all indigent defendants should also be informed that if they wanted to consult with an attorney one would be provided to them free of charge. Finally, the Court held that since interrogation were often a lengthy process of hours, days or weeks were at any time a defendant might give in to the coercive environment, the Fifth Amendment necessitated that a defendant be able to invoke the above-mentioned rights at any time during the interrogation. Without proof that these minimum safeguards had been used prior to a custodial interrogation, the Court said that the state had a heavy burden to prove that any obtained statements had not been coerced and were the product of the defendant's free choice.

Concurring Opinion: Justice Clark wrote an opinion that both concurred and dissented from the majority opinion. Justice Clark agreed with the majority's finding that failure to give a defendant warning, in some cases should render a confession inadmissible and that while some defendant confessions were indeed the result of police coercion, he found that the majority provided no evidence that this was the rule rather than the exception. Justice Clark wrote that rather than having a bright line rule requirement for every interrogation, courts should analyze each case according to its particular factpattern to determine if the state, prior to interrogation, had warned the defendant of his rights. Justice Clark further said that failing to provide the warnings, courts should not automatically dismiss a confession as involuntary but rather look to the "totality of the circumstances" of the interrogation to determine a confessions voluntariness. Justice Clark though that the due process requirement rather than the Fifth Amendment was not only the better and more flexible standard to apply in analyzing state actions but it was also the standard the Court had historically used for these types of cases.

Dissenting Opinion: Two dissenting opinions were made to the case by Justice Harlan and Justice White. While written separately both dissents mainly focused on the same criticisms of the majority opinion. Both accused the majority of improper judicial activism. Justice Harlan argued that since the determinations of a confession's voluntariness were so fact specific, that the Court should have stayed with its prior analysis which was sophisticated, elaborate and flexible enough to make determinations on a case by case basis. Justice Harlan agreed with Justice Clark's argument that there was no need for one strict rule bright line rule requirement. Moreover, Justice Harlan disagreed with the majority's criticism of police interrogation saying that case precedent showed that the Court, in the past, found police interrogation tactics and methods to get confessions, even ones that were clearly coerced was an effective tool of law enforcement to solve crimes. Both Justice Harlan and White questioned the majority's use of the Fifth Amendment as the standard to be applied. They found that there was neither any basis in the Fifth Amendment to extend the privilege against self-incrimination into the police station interrogation nor did the Fifth Amendment include a right to counsel, which was more properly handled by the Sixth Amendment's right to counsel at trial. Justice Harlan also question whether any statement could really ever be completely voluntary and that simply enforcing bright line rule would have no effect in decreasing involuntary confessions or the coercive tactics of the state. Finally, Justice White predicted that the majority's decision would more likely hamper the ability of police to do their jobs and stop criminal activity because more defendants would be less likely to make confessions.

Comment by Student: All in all, I think that the majority opinion was correct. I think that the Court's findings that custodial police interrogations are inherently coercive and that if left to their own devices either police would actively pressure defendants to incriminate themselves or that defendants themselves would succumb to their own fears without police pressure and unknowingly waive their rights. I also agree that simply informing a defendant of his rights was a powerful tool for both the state and the defendant. It protects the state from arguments that it coerced a confession and from the defendant it provides a useful defense to any state coercion protects him from saying too much in the heat of the moment. It puts both sides on equal footing and as mentioned in the majority opinion it, "maintains a fair state-individual balance."

Principles of the Case: In-custody police interrogations are inherently compulsive. Compulsion is not only the result of physical force or threat of force but can and often is brought about by psychological manipulation and

intimidation. Accordingly, unless another means can be shown that effectively eliminates the threatening atmosphere, custodial interrogations will only be admissible in court if, prior to interrogation, the defendant is: (1) informed of his right to remain silent; (2) informed that anything he says can and will be used against him; (3) informed that he has a right to consult an attorney; (4) informed that if he cannot afford an attorney one would be provided for him free of charge and (5) informed the he had the right to terminate his interrogation at any time.

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