

Landmark Decisions of the Supreme Court

Chapter 20

Miranda v. Arizona, 1966

Proponents of Miranda rights argue that they are essential protections against unlawful police interrogation methods. Confessions obtained by force or mistreatment are prohibited. On the other hand, police assert that at times Miranda warnings permit the guilty to go free if the Miranda rights are unintentionally mishandled by law-enforcement authorities. Constitutional tests reflecting these opposing views of Miranda sometimes reach the Supreme Court through appeal. Two such tests include the following cases.

Dickerson v. U.S. The 2000 *Dickerson v. U.S.* ruling involved the case of Charles Thomas Dickerson, a man convicted of a 1997 Arlington, Virginia, armed bank robbery, a federal crime. He had voluntarily offered incriminating statements to the FBI without being told his Miranda rights. During the appeals process, the question of a 1968 congressional law's affect upon the *Dickerson* case was discussed by both a U.S. District Court and U.S. Court of Appeals. This law, essentially overruling Miranda, gave federal trial judges the power to allow confessions as evidence if those confessions were made voluntarily, even if the Miranda rules were not read to defendants. The District Court ruled that Dickerson's confession was inadmissible while the Appeals Court sided with Congress validating the confession's legality. The case proceeded to the Supreme Court for final disposition.

On June 26, 2000, the Supreme Court, in a 7–2 vote led by Chief Justice William Rehnquist, ruled that the Miranda warnings had “become embedded in routine police practice,” were a “part of the national culture,” and had “constitutional foundations” that could not be overridden by an act of Congress. In short, through its enacting of the 1968 law, Congress had exceeded its authority, intruding into the “realm of constitutional law-making.” The Court's decision in this case renewed the validity of Miranda.

Montejo v. Louisiana The 2009 Supreme Court ruling in *Montejo v. Louisiana* dealt with the case of Jesse Montejo, a Slidell, Louisiana, man who had been given the death penalty for the September 2002 robbery and murder of Louis Ferrari, an owner of a laundry business. When arrested, Montejo was read his Miranda rights. During police interrogation, Montejo “repeatedly changed his story, at first blaming a former employee, then admitting that he had shot the victim during a botched burglary.”

The judge in Montejo's preliminary hearing ordered the appointment of a public defender. However, Mr. Montejo did not meet with his attorney until after he agreed to help detectives locate the murder weapon and had written a letter of apology to the victim's wife, which was later admitted into evidence. Mr. Montejo was then convicted of the crime and his lawyer appealed the decision to the State's Supreme Court.

The Louisiana Supreme Court upheld Montejo's conviction, because, under Louisiana law, low-income defendants are automatically awarded attorneys, thus complying with the 6th Amendment portion of Miranda. However, Montejo's lawyer had not been with him during Montejo's trip or the writing of his letter of apology. Nevertheless, the United States Supreme Court, through a 5–4 ruling, overturned its 1986 opinion (*Michigan v. Jackson*) that “forbade the police from

Landmark Decisions of the Supreme Court *(Continued)*

interrogating a defendant once he invoked his right to counsel at an arraignment or a similar proceeding.” In short, the Court had “made it easier for the police and prosecutors to question suspects, lifting some restrictions on when defendants can be interrogated without their lawyers present.” The ruling was harshly criticized by the media as well as the dissenting Supreme Court justices. In his dissenting opinion, Justice John Paul Stevens reminded the Court that the 1986 ruling “was designed to ensure the right to counsel at every critical stage of prosecution. The court has now put the fairness, integrity and credibility of the justice system at unnecessary risk.”

Reflection Questions

1. How do the *Dickerson* and *Montejo* cases and the Supreme Court rulings in each case illustrate the continuing legacy of *Miranda v. Arizona*?
2. Does the police’s reading of the Miranda rights prior to interrogation increase the likelihood that a significant number of truly guilty individuals will go free? Why or why not?