

Miranda at the Supreme Court: A History with Ebbs and Flows

1966

Miranda v. Arizona

The Supreme Court held that statements resulting from police interrogation of defendants could not be used in court unless they demonstrated the use of procedural safeguards “effective to secure the privilege against self-incrimination.” The Court specifically outlined the necessary aspects of police warnings to suspects, including warnings of the right to remain silent and the right to have counsel present during interrogations.

1968

Greenwald v. Wisconsin

When Greenwald was arrested for burglary, he was interrogated by police, and, during that process, was denied food, sleep, and medication, and his assertion that he was “entitled” to a lawyer was ignored. He ultimately confessed to the crimes because he thought “they weren’t going to leave me alone until I did,” and was convicted. He appealed his conviction, and the Supreme Court ruled that his confession was not voluntary, based on the “totality of the circumstances” surrounding it.

1977

Oregon v. Mathiason

An Oregon state police officer suspected Mathiason of burglary and asked him to come to the police station for questioning. Mathiason came freely, spoke with the officer, and was not arrested at the time. He was arrested later and a trial court used evidence obtained during the questioning to convict him. Mathiason moved to suppress the evidence since he was not read his *Miranda* rights before the questioning. The court admitted the evidence since Mathiason was not in custody during the questioning. The Supreme Court ruled that the admission of evidence was constitutional. *Miranda*, the Court ruled, only required law enforcement officials to recite a suspect’s rights when the suspect had been “deprived of his freedom of action in any significant way.” The Court determined that in this case there was “no indication that the questioning took place in a context where respondent’s freedom to depart was restricted in any way.” Even if the police coercively pressured Mathiason during the interview, he came to the police station freely and was free to leave at any time. Therefore, *Miranda* rights did not apply.

1980

Rhode Island v. Innis

During a conversation in the police car on the way to the police station for questioning, Innis led authorities to a weapon used in a robbery. Prior to the conversation taking place, however, Innis had been advised of his *Miranda* rights and asked for a lawyer. The Supreme Court considered whether or not the conversation in the police car violated Innis’s rights. The Court ruled that *Miranda* safeguards applied to “questioning or its functional equivalent,” or “any words or actions on the part of the police that [they] should know are reasonably likely to elicit an incriminating response from the subject.” Innis’s conversation with police did not qualify as “questioning” under this definition, the Court ruled.

1984

New York v. Quarles

The Supreme Court considered the admissibility of a statement elicited by a police officer who apprehended a rape suspect who was thought to be carrying a firearm. The arrest took place in a grocery store. When the officer arrested the suspect, he found an empty shoulder holster, handcuffed the suspect, and asked him where the gun was. The suspect nodded in the direction of the gun (which was near some empty cartons) and said, “The gun is over there.” The suspect later argued that his statement about the gun was inadmissible in evidence because he had not first been given the *Miranda* warning. Since the gun was found as a direct result of the statement, he argued that the presence of the gun was also inadmissible. In a 5-4 decision, the Supreme Court found that the jurisprudential rule of *Miranda* must yield in “a situation where concern for public safety must be paramount,” thus establishing the “public safety” exception to *Miranda*.

2000

Dickerson v. United States

The Court struck down a law passed by Congress in 1968 designed to overturn the *Miranda* ruling. The provision 18 U.S.C. Section 3501 stated that “a confession shall be admissible in evidence if it is voluntarily given,” regardless of whether or not the defendant had been made aware of his or her *Miranda* rights. The Court held that *Miranda*, not Section 3501, governed the admissibility of statements in court. “*Miranda* has become embedded in routine police practice to the point where the warnings have become part of our national culture,” wrote Chief Justice William Rehnquist. “[It] announced a constitutional rule that Congress may not supersede legislatively.”

2010

Maryland v. Shatzer

The Court ruled that police may reopen questioning of a suspect who has asked for counsel if there has been a 14-day break, or longer, between incidents of questioning and police custody. Thus, the suspect must reassert the right to counsel during the second questioning incident, as it constitutes a new incident. The Court justified this period by noting that 14 days “provide[] plenty of time for the suspect to get re-acclimated to his normal life, to consult with friends and counsel, and to shake off any residual coercive effects of his prior custody.”

2011

Howes v. Fields

The Court held that investigators do not have to read *Miranda* rights to inmates during jailhouse interrogations about crimes unrelated to their current reasons for incarceration. “Imprisonment alone,” the Court ruled, “is not enough to create a custodial situation within the meaning of *Miranda*.”

2013

Salinas v. Texas

The defendant, Salinas, was convicted of murder and claimed that the prosecution’s use of his silence during police questioning, as an indicator of deception, violated his Fifth Amendment rights. The Court held that a witness generally must expressly invoke the Fifth Amendment privilege against self-incrimination in order to benefit from it. In other words, Fifth Amendment protections do not extend to individuals who simply choose to stay silent during police questioning.

2015