

A man entered the police station and announced that he wanted to confess to a murder. The police advised the man of the Miranda warnings, and the man signed a written waiver. The man then described the murder in detail and pinpointed the location where a murder victim had been found a few weeks before.

Later, a court-appointed psychiatrist determined that the man was suffering from a serious mental illness that induced his confession. The psychiatrist also stated that the mental illness did not interfere with the man's ability to understand his rights.

Is the man's confession admissible at trial?

- A. No, because the man's confession was a product of his mental illness and was therefore involuntary.
- B. No, because under these circumstances, there was no valid waiver of Miranda warnings.
- C. Yes, because the man was not in custody.
- D. Yes, because there was no coercive police conduct in obtaining the man's statement.

## Explanation:

### Constitutional protections for involuntary confessions

<b>5th Amendment</b>	Miranda warnings required when suspect is both:
(self-incrimination)	in custody <i>and</i> subjected to police interrogation
<b>6th Amendment</b>	Suspect has right to assistance of counsel:
(attorney)	once judicial proceedings commence <i>and</i> during all critical stages of prosecution thereafter
<b>14th Amendment</b>	Confession must be voluntary:
(due process)	product of free & deliberate choice rather than police coercion

The **due process** clause of the Fourteenth Amendment precludes the use of **involuntary confessions** at trial. A confession is involuntary if the **totality of the circumstances** shows that it was a **product of police coercion**—ie, when police use physical force, threats, or psychological pressure to force a suspect to confess. But a confession is admissible if it was induced by a suspect's mental illness—not by police coercion.

Here, the man entered the police station and stated that he committed a murder. After being informed of his **Miranda rights**, he signed a written waiver and explained the details of the murder. And though the man's mental illness induced his confession, at no point did the police coerce him into confessing. Therefore, the man's confession was voluntary and is admissible at trial **(Choice A)**.

**(Choice B)** A defendant's waiver of his/her Miranda rights is valid if it was given knowingly, intelligently, and voluntarily (ie, free from police coercion). Here, the man's waiver is likely valid because he understood his Miranda rights despite his mental illness, and his waiver was not coerced.

**(Choice C)** A person is in custody when he/she is formally arrested *or* his/her freedom of movement is restrained to such a degree that a reasonable person would not feel free to leave. Here, the man *was* in custody since a reasonable person would not feel free to leave a police station after announcing that he/she had committed murder.

### Educational objective:

A defendant's confession is involuntary if the totality of the circumstances shows that the confession was the product of coercive police conduct. Therefore, a confession induced by the defendant's mental condition—not police coercion—is still admissible.

### References

U.S. Const. amend. XIV (due process clause).

Colorado v. Connelly, 479 U.S. 157, 167 (1986) (holding that mental illness alone is insufficient to show that a confession was involuntary).

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