

## ***Colorado v. Connelly (1986)***

**Nature:** Competence to waive Miranda Rights.

**Facts:** On August 18, 1983, respondent Francis Connelly approached an officer of the Denver Police Department who was in uniform, working in an off-duty capacity in downtown Denver. Without prompting, Connelly stated that he had murdered someone and wanted to talk about it. The officer immediately advised him of his Miranda rights, but respondent said he understood these rights but still wanted to talk about the murder because his conscience was bothering him. Another police man arrived and advised him again of his Miranda Rights but Connelly went on to say that he had come all the way from Boston to confess to the murder of a young girl who had been killed in Denver. He was taken to the police headquarters where he provided a detailed story about the murder including the showing of the exact location of the murder. Connelly was held overnight. The next morning he became visibly disoriented and stated that “voices” had told him to come to Denver and confess.

**Procedure:** Respondent was sent to a state hospital where he was evaluated by a psychiatrist who later testified that the man was experiencing “command hallucinations” and that this psychotic condition had motivated his confession. The psychiatrist also testified that Connelly’s mental condition had not impaired his ability to understand his Miranda rights. Respondent was initially found incompetent to stand trial, however in March of 1984, he was found to be competent to proceed with trial. At a preliminary hearing, Connelly moved to suppress all his previous statements regarding the murder. The Colorado Trial Court decided that Connelly’s statements must be suppressed because they were involuntary, that a confession is admissible only if it is a product of respondent’s rational intellect and free will. The Court found that there was no police coercion involved in the confession and that Connelly’s mental state impaired his ability to rationally waive the right and not self-discriminate. The Colorado Supreme Court affirmed stating that the Due process clause of the Fourteenth Amendment supports the fact that confession was not a product of a rational intellect and free will.

**Issue:** Is an individual with symptoms of schizophrenia, experiencing “command hallucinations” able to competently waive his/her Miranda Rights and have an admissible and voluntary confession?

**Holding:** On cert, the United States Supreme Court reversed and remanded

**Rationale:** Coercive police activity is a necessary predicate to the finding that a confession is not voluntary under the 14th Amendment Due Process Clause. The Colorado Trial and Supreme Court had erred stating there was a mistaken view of voluntariness with regard to the Due Process of the 14th Amendment. Absent proof of police coercion, the Colorado Supreme Court erred in holding that the waiver of Miranda Rights was involuntary.

- The taking of statements and their admission into evidence did not constitute a violation of due process.
- The state bears the burden of proving waiver of Miranda Rights meets that burden if it proves waiver by a preponderance of the evidence.
- A mental condition without police coercion does not justify that confession is involuntary.