

Crane v. Kentucky (1986)

Nature: Confessions, admission of evidence based on reliability, credibility, and voluntariness

Facts: A clerk was shot to death in the liquor during the course of robbery. A week later, the police arrested a 16-year-old Mr. Crane for his suspected participation in an unrelated service station robbery. Per police, Mr. Crane “out of the clear blue sky” started to confess to numerous past crimes and, after being moved to a formal interrogation facility, eventually confessed to the murder in questions. The police had no physical evidence against Mr. Crane, only the confession. While interrogated, he was detained in a small windowless room for a long period of time, was surrounded by six police officers, and repeatedly requested and was denied permission to phone his mother. There were many discrepancies between the confession and the facts. For example, Mr. Crane reported the shooting took place during daylight and he stole a sum of money from the cash register. In fact, the crime occurred at 10:40pm and no money was stolen. Mr. Crane sought to suppress his confession at trial, but the judge ruled the voluntariness issue had been addressed and could not be relitigated before a jury. The jury returned a verdict of guilty and sentenced Mr. Crane to 40 years in prison.

Procedure: Trial court did not allow Mr. Crane to present the concerning circumstances of his confession. Mr. Crane appealed and was denied by Kentucky Supreme. Then he appealed with the U.S. Supreme Court and his petition was granted.

Issues: Did the exclusion of testimony about the circumstances of the confession violate the Mr. Crane’s constitutional rights (the Sixth and Fourteenth Amendments)?

Holdings/Rationale: Reversed and remanded for new trial; unanimous opinion. The physical and psychological environment that yielded the confession can also be of substantial relevance to the ultimate factual issue of the defendant’s guilt or innocence. Whether rooted directly in the Due Process Clause of the 14th Amendment or in the Compulsory Process or Confrontation clauses of the 6th Amendment, the Constitution guarantees criminal defendants “a meaningful opportunity to present a complete defense. Essential component of procedural fairness is an opportunity to be heard.”

Implications: Evidence about the manner in which confession was obtained is often highly relevant to its reliability and credibility.