

SUPREME COURT OF THE UNITED STATES

Vega v. Tekoh

Vega v. Tekoh, 597 U.S. ____ (2022) · No. 21-499 · Decided June 23, 2022

SUMMARY

****Vega v. Tekoh**** (2022): The Supreme Court held that a violation of the prophylactic **Miranda** rules does not constitute a violation of the Fifth Amendment and therefore cannot serve as the basis for a damages claim under 42 U.S.C. §1983. The Court reaffirmed that **Miranda** rules are prophylactic safeguards designed to protect the Fifth Amendment privilege against compelled self-incrimination, but their violation does not necessarily equate to a constitutional deprivation cognizable under §1983. Key topics: section 1983 liability, Miranda warnings, Fifth Amendment self-incrimination, prophylactic rules, and qualified immunity.

CASE DETAILS

COURT	Supreme Court of the United States
WRITING FOR THE COURT	Samuel Alito; John Roberts; Clarence Thomas; Neil Gorsuch; Brett Kavanaugh; Amy Coney Barrett
JURISDICTION	Federal
DECIDED	June 23, 2022
DOCKET	21-499
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Certiorari to the United States Court of Appeals for the Ninth Circuit
PRECEDENTIAL VALUE	published
PARTIES	Carlos Vega v. Terence B. Tekoh

TOPICS

- constitutional law
- fifth amendment
- miranda rights
- civil rights
- section 1983
- criminal procedure

PRACTICE AREAS

- Civil Rights
- Constitutional Law
- Criminal Procedure

QUESTIONS PRESENTED

1. Whether a violation of the Miranda rules provides a basis for a claim under 42 U.S.C. §1983.

HOLDINGS

1. A violation of the Miranda rules does not provide a basis for a §1983 claim because a Miranda violation is not necessarily a violation of the Fifth Amendment, and the costs of allowing such a claim outweigh the benefits.

KEY QUOTATIONS

“A violation of the Miranda rules does not provide a basis for a claim under §1983. We hold that it does not.”
(at 4–5)

“Miranda did not hold that a violation of the rules it established necessarily constitute a Fifth Amendment violation.” (at 5)

“Since Miranda, the Court has repeatedly described the rules it adopted as ‘prophylactic.’” (at 6)

“In sum, a violation of Miranda does not necessarily constitute a violation of the Constitution.” (at 11)

“We therefore refuse to extend Miranda in the way Tekoh requests.” (at 13)

FACTUAL BACKGROUND

Deputy Carlos Vega questioned Terence Tekoh, a certified nursing assistant, at a Los Angeles medical center regarding a sexual assault accusation. Vega did not give Tekoh Miranda warnings. Tekoh eventually provided a written statement apologizing for inappropriately touching a patient's genitals. Tekoh was prosecuted for unlawful sexual penetration, and his statement was admitted at trial. The jury returned a verdict of not guilty.

PROCEDURAL HISTORY

Tekoh was acquitted in state court after his un-Mirandized statement was admitted. He then sued Vega under §1983. The Ninth Circuit held that the use of an un-Mirandized statement violates the Fifth Amendment and may support a §1983 claim. The Supreme Court granted certiorari.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The case is remanded for further proceedings consistent with this opinion.

CASES CITED

- *Miranda v. Arizona*, 384 U.S. 436 (1966)
- *Dickerson v. United States*, 530 U.S. 428 (2000)
- *Harris v. New York*, 401 U.S. 222 (1971)
- *Michigan v. Tucker*, 417 U.S. 433 (1974)
- *Oregon v. Elstad*, 470 U.S. 298 (1985)

- New York v. Quarles, 467 U.S. 649 (1984)
- Maryland v. Shatzer, 559 U.S. 98 (2010)
- Withrow v. Williams, 507 U.S. 680 (1993)
- Doyle v. Ohio, 426 U.S. 610 (1976)
- Chavez v. Martinez, 538 U.S. 760 (2003)
- United States v. Patane, 542 U.S. 630 (2004)
- Arizona v. Roberson, 486 U.S. 675 (1988)
- Howes v. Fields, 565 U.S. 499 (2012)
- J.D.B. v. North Carolina, 564 U.S. 261 (2011)
- Montejo v. Louisiana, 556 U.S. 778 (2009)
- Davis v. United States, 512 U.S. 452 (1994)
- Brecht v. Abrahamson, 507 U.S. 619 (1993)
- McNeil v. Wisconsin, 501 U.S. 171 (1991)
- Michigan v. Harvey, 494 U.S. 344 (1990)
- Duckworth v. Eagan, 492 U.S. 195 (1989)
- Connecticut v. Barrett, 479 U.S. 523 (1987)
- South Dakota v. Neville, 459 U.S. 553 (1983)
- United States v. Henry, 447 U.S. 264 (1980)
- North Carolina v. Butler, 441 U.S. 369 (1979)
- Brown v. Illinois, 422 U.S. 590 (1975)
- Michigan v. Payne, 412 U.S. 47 (1973)
- Mincey v. Arizona, 437 U.S. 385 (1978)
- Bram v. United States, 168 U.S. 532 (1897)
- Malloy v. Hogan, 378 U.S. 1 (1964)
- Minnesota v. Murphy, 465 U.S. 420 (1984)
- Lefkowitz v. Turley, 414 U.S. 70 (1973)
- Orozco v. Texas, 394 U.S. 324 (1969)
- Wong Sun v. United States, 371 U.S. 471 (1963)
- Stone v. Powell, 428 U.S. 465 (1976)
- Heck v. Humphrey, 512 U.S. 477 (1994)
- Preiser v. Rodriguez, 411 U.S. 475 (1973)
- Parklane Hosiery Co. v. Shore, 439 U.S. 322 (1979)
- Rancho Palos Verdes v. Abrams, 544 U.S. 113 (2005)
- Blessing v. Freestone, 520 U.S. 329 (1997)
- Dennis v. Higgins, 498 U.S. 439 (1991)
- Hague v. Committee for Industrial Organization, 307 U.S. 496 (1939)
- Gomez v. Toledo, 446 U.S. 635 (1980)

- Thompson v. Keohane, 516 U.S. 99 (1995)
- County of Riverside v. McLaughlin, 500 U.S. 44 (1991)
- Smith v. Robbins, 528 U.S. 259 (2000)
- Egbert v. Boule, 596 U.S. ____ (2022)

CITED IN

- Vega v. Tekoh, Vega v. Tekoh, 597 U.S. 134, 141 (2022)
- Vega v. Tekoh, Vega v. Tekoh, 597 U.S. 134 (2022)
- Vega v. Tekoh, Vega v. Tekoh, 597 U.S. 134 (2022)
- Vega v. Tekoh, Vega v. Tekoh, 597 U.S. 134, 152 (2022)
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