

SUPREME COURT OF THE UNITED STATES

Mapp v. Ohio

367 U.S. 643 (1961) · No. No. 236 · Decided October 9, 1961

SUMMARY

The Supreme Court held that the exclusionary rule applies to the states through the Fourteenth Amendment. Evidence obtained through searches and seizures that violate the Fourth Amendment is therefore inadmissible in state criminal proceedings. The Court reversed the judgment of the Supreme Court of Ohio and remanded the case.

CASE DETAILS

COURT	Supreme Court of the United States
WRITING FOR THE COURT	Mr. Justice Clark; Black; Clark; Douglas; Frankfurter; Harlan; Whittaker; Brennan; Stewart
JURISDICTION	Federal
DECIDED	October 9, 1961
DOCKET	No. 236
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Mapp appealed her Ohio conviction to the Supreme Court of the United States. The Court noted probable jurisdiction and reviewed whether evidence obtained through an unconstitutional search could be admitted in a state criminal prosecution.
STANDARD OF REVIEW	Constitutional review of the admissibility of evidence obtained through an unreasonable search and seizure and review of the constitutionality of the state conviction.
PRECEDENTIAL VALUE	landmark binding Supreme Court precedent
PARTIES	Mapp v. Ohio

TOPICS

- fourth amendment
- search and seizure
- exclusionary rule
- suppression of evidence
- criminal procedure

PRACTICE AREAS

- criminal procedure
- constitutional law
- evidence
- civil rights

QUESTIONS PRESENTED

1. Whether the Fourth Amendment exclusionary rule applies to state criminal prosecutions through the Fourteenth Amendment.
2. Whether evidence obtained by an unconstitutional search and seizure is inadmissible in a state court.
3. Whether Mapp's conviction could stand when it was based primarily on evidence unlawfully seized from her home.

HOLDINGS

1. The exclusionary rule is an essential part of the Fourth Amendment and is enforceable against the States through the Due Process Clause of the Fourteenth Amendment.
2. All evidence obtained by searches and seizures in violation of the Constitution is inadmissible in a state court.
3. Mapp's conviction could not stand because it was based primarily on evidence obtained through an unconstitutional search and seizure.

KEY QUOTATIONS

"We hold that all evidence obtained by searches and seizures in violation of the Constitution is, by that same authority, inadmissible in a state court." (655)

"In short, the admission of the new constitutional right by Wolf could not consistently tolerate denial of its most important constitutional privilege, namely, the exclusion of the evidence which an accused had been forced to give by reason of the unlawful seizure." (656)

"The ignoble shortcut to conviction left open to the State tends to destroy the entire system of constitutional restraints on which the liberties of the people rest." (660)

FACTUAL BACKGROUND

Cleveland police officers entered Mapp's home by force after she refused entry without a search warrant. The officers displayed but did not produce a valid warrant, handcuffed Mapp, and conducted a broad search of the residence, including bedrooms, personal effects, and the basement. They discovered books, pictures, and photographs that formed the basis of Mapp's conviction. No warrant was produced at trial, and the record contained substantial doubt that any warrant existed.

PROCEDURAL HISTORY

Mapp was convicted under Ohio Revised Code § 2905.34 for possessing obscene materials discovered during a warrantless and allegedly unlawful search of her home. The Supreme Court of Ohio affirmed, holding that the conviction remained valid despite the unlawful seizure because the evidence had not been taken from Mapp's person through brutal or offensive physical force. The United States Supreme Court reversed and remanded.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The cause was remanded to the Supreme Court of Ohio for further proceedings not inconsistent with the opinion.

CASES CITED

- Boyd v. United States, 116 U.S. 616 (1886)
- Weeks v. United States, 232 U.S. 383 (1914)
- Wolf v. Colorado, 338 U.S. 25 (1949)
- Elkins v. United States, 364 U.S. 206 (1960)
- Silverthorne Lumber Co. v. United States, 251 U.S. 385 (1920)
- Byars v. United States, 273 U.S. 28 (1927)
- Olmstead v. United States, 277 U.S. 438 (1928)
- Irvine v. California, 347 U.S. 128 (1954)
- People v. Cahan, People v. Cahan, 44 Cal. 2d 434, 282 P.2d 905 (1955)
- Jones v. United States, 362 U.S. 257 (1960)
- Rea v. United States, 350 U.S. 214 (1956)
- United States v. Rabinowitz, 339 U.S. 56 (1950)
- Rogers v. Richmond, 365 U.S. 534 (1961)
- Feldman v. United States, 322 U.S. 487 (1944)
- Rochin v. California, 342 U.S. 165 (1952)
- Bram v. United States, 168 U.S. 532 (1897)
- Miller v. United States, 357 U.S. 301 (1958)
- Lustig v. United States, 338 U.S. 74 (1949)
- People v. Defore, 242 N.Y. 13, 150 N.E. 585 (1926)
- State v. Mapp, 170 Ohio St. 427, 166 N.E.2d 387 (1960)
- State v. Lindway, 131 Ohio St. 166, 2 N.E.2d 490 (1936)
- Wilson v. Schnettler, 365 U.S. 381 (1961)
- McNabb v. United States, 318 U.S. 332 (1943)
- Palko v. Connecticut, 302 U.S. 319 (1937)