

SUPREME JUDICIAL COURT OF MAINE

State of Maine v. William A. Wiley

2013 ME 30 (2013) (Supreme Judicial Court of Maine 2013) · No. Wal-11-479 · Decided March 14, 2013

SUMMARY

The Maine Supreme Judicial Court vacated William A. Wiley’s convictions for unlawful sexual contact because his statements to a detective were involuntary. The court held that the detective’s repeated representations that cooperation would result in a short county-jail sentence and probation constituted an improper inducement that motivated Wiley’s confession. The case was remanded to the Superior Court for a new trial.

CASE DETAILS

COURT	Supreme Judicial Court of Maine
WRITING FOR THE COURT	Levy, J.; Saufley, C.J.; Alexander, J.; Silver, J.; Mead, J.; Gorman, J.; Jabar, J.
JURISDICTION	Maine
DECIDED	March 14, 2013
DOCKET	Wal-11-479
DISPOSITION	vacated
PROCEDURAL POSTURE	Wiley appealed from judgments of conviction entered after a jury trial, challenging the denial of his motion to suppress statements made during a police interrogation and after his arrest.
STANDARD OF REVIEW	The denial of a suppression motion is reviewed for clear error as to factual findings and de novo as to legal issues. Voluntariness findings are reviewed for clear error, while the application of law to the factual findings is reviewed de novo. Custody for Miranda purposes was reviewed based on the preponderance-of-the-evidence standard.
PRECEDENTIAL VALUE	published precedential opinion
PARTIES	William A. Wiley v. State of Maine

TOPICS

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PRACTICE AREAS

criminal procedure

constitutional criminal procedure

evidence

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QUESTIONS PRESENTED

1. Whether Wiley was subjected to custodial interrogation before his arrest such that Miranda warnings were required.
2. Whether Wiley's statements before and after his arrest were involuntary because police inducements and the circumstances of the interrogation overcame his free will.
3. Whether the detective's concrete representations of a short jail sentence and probation, coupled with Wiley's confession, required suppression of the statements.

HOLDINGS

1. Wiley was not in custody during the pre-arrest interview, so Miranda warnings were not required at that stage.
2. A confession is involuntary when an interrogating officer with only apparent authority leads a suspect to believe that confessing will secure a favorable, concrete sentence and that belief motivates the confession.
3. The suppression motion should have been granted because the State failed to prove beyond a reasonable doubt that Wiley's statements were voluntary.

KEY QUOTATIONS

"A confession is not voluntary where an interrogating officer, with no more than apparent authority, leads a suspect to believe that a confession will secure a favorable, concrete sentence, and that belief motivates the suspect to confess." (¶ 31)

"The conclusion that this concrete representation was, in effect, an improper offer of leniency is inescapable." (¶ 25)

"We would need to disregard both experience and common sense to conclude that Detective Bosco's concrete representation of a short jail sentence followed by probation in exchange for Wiley's cooperation was not the primary motivating force for the ensuing confession." (¶ 30)

FACTUAL BACKGROUND

Wiley voluntarily accompanied a detective in an unmarked cruiser to the sheriff's office for questioning about allegations that he had sexually abused his stepdaughter. During a nearly two-hour interrogation in a closed interview room, the detective repeatedly contrasted a short county-jail sentence and probation with a much longer state-prison sentence, urged Wiley to confess to preserve his relationship with his son, and characterized the opportunity as temporary. Wiley became extremely distressed and eventually confessed to most of the allegations. He was arrested afterward and received Miranda warnings at the jail.

PROCEDURAL HISTORY

Wiley was indicted on eleven sex-offense counts and pleaded not guilty. The Superior Court denied his motion to suppress, finding that he was not in custody for Miranda purposes and that his statements were voluntary. Following a jury trial, he was convicted of ten counts and sentenced to fifteen years' imprisonment with all but three years suspended, followed by six years of probation. The Supreme Judicial Court vacated the convictions and remanded for a new trial.

DISPOSITION

vacated

REMAND INSTRUCTIONS

The judgment of conviction was vacated, and the case was remanded to the Superior Court for a new trial consistent with the opinion.

CASES CITED

- State v. Kent, 2011 ME 42, ¶ 2, 15 A.3d 1286
- State v. Dodge, 2011 ME 47, ¶¶ 10, 12, 17 A.3d 128
- State v. McCarthy, 2003 ME 40, ¶¶ 7, 10-14, 819 A.2d 335
- State v. Sawyer, 2001 ME 88, ¶¶ 8-9, 772 A.2d 1173
- State v. Mikulewicz, 462 A.2d 497, 501 (Me. 1983)
- State v. Nightingale, 2012 ME 132, ¶ 33, 58 A.3d 1057
- State v. Tardiff, 374 A.2d 598, 601 (Me. 1977)
- State v. Lavoie, 2010 ME 76, ¶¶ 18, 21, 24, 1 A.3d 408
- State v. Coombs, 1998 ME 1, ¶¶ 10-11, 704 A.2d 387
- State v. Nadeau, 2010 ME 71, ¶ 57, 1 A.3d 445
- State v. Wood, 662 A.2d 908, 910-11 (Me. 1995)
- State v. Hutchinson, 597 A.2d 1344, 1346 (Me. 1991)
- State v. Dominique, 2008 ME 180, ¶ 25, 960 A.2d 1160