

SUPREME COURT OF THE UNITED STATES

Elonis v. United States

575 U.S. 723 (2015) · No. No. 13-983

SUMMARY

The document appears to concern *Elonis v. United States* based on the supplied filename. The document text contains no visible opinion content, so its facts, holding, reasoning, and procedural history cannot be determined from the provided material.

CASE DETAILS

COURT	Supreme Court of the United States
WRITING FOR THE COURT	Chief Justice Roberts; Roberts, C. J.; Scalia; Kennedy; Thomas; Ginsburg; Breyer; Alito; Sotomayor; Kagan
JURISDICTION	Federal
DOCKET	No. 13-983
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	On writ of certiorari to the United States Court of Appeals for the Third Circuit.
STANDARD OF REVIEW	Question of law involving statutory interpretation of the mens rea element.
PRECEDENTIAL VALUE	high
PARTIES	Anthony Douglas Elonis v. United States of America

TOPICS

- mens rea
- criminal procedure
- first amendment
- free speech

PRACTICE AREAS

- Criminal Law
- Federal Crimes
- Statutory Interpretation
- First Amendment

QUESTIONS PRESENTED

- Whether a conviction under 18 U.S.C. § 875(c) requires the government to prove that the defendant had a subjective mental state regarding the threatening nature of the communication, or whether it is sufficient that a reasonable person would view the communication as threatening.

HOLDINGS

1. Section 875(c) requires proof that the defendant had some mental state regarding the threatening nature of the communication. The statute does not permit conviction based solely on an objective reasonable-person or negligence standard.
2. The Court did not decide the precise mental state required under § 875(c), leaving that question for the lower courts on remand.

KEY QUOTATIONS

“The ‘reasonable person’ standard is a familiar feature of civil liability in tort law... but ‘the existence of a mens rea is the rule of, rather than the exception to, the principles of Anglo-American criminal jurisprudence.’” (575 U.S. at 734)

“We do not believe that the government must prove that the defendant intended to carry out the threat... but we hold that the government must prove that the defendant had some mental state regarding the threatening nature of the communication.” (575 U.S. at 735)

FACTUAL BACKGROUND

After his wife left him, Anthony Elonis posted Facebook messages containing graphically violent language concerning his wife, co-workers, law enforcement, and a kindergarten class. Some posts adapted rap lyrics, while others were original, and Elonis included disclaimers characterizing the material as fictional or artistic expression. He was charged under 18 U.S.C. § 875(c), which prohibits transmitting in interstate commerce a threat to injure another person; trial evidence included testimony that his wife was extremely afraid and that co-workers were seriously worried.

PROCEDURAL HISTORY

Elonis was convicted under 18 U.S.C. § 875(c) for transmitting threats in interstate commerce based on Facebook posts. The District Court instructed the jury that conviction required only that a reasonable person would regard the communications as threats, and the Third Circuit affirmed. The Supreme Court granted certiorari to resolve a circuit split concerning the mental state required under § 875(c).

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Vacate the conviction and remand for further proceedings consistent with the opinion, including consideration of the proper mens rea standard and whether the instructional error was harmless.

CASES CITED

- *Morissette v. United States*, 342 U.S. 246 (1952)
- *Staples v. United States*, 511 U.S. 600 (1994)

- United States v. X-Citement Video, Inc., 513 U.S. 64 (1994)
- United States v. Balint, 258 U.S. 250 (1922)
- Virginia v. Black, 538 U.S. 343 (2003)
- Watts v. United States, 394 U.S. 705 (1969)
- United States v. Cassel, 408 F.3d 622 (9th Cir. 2005)
- United States v. Bagdasarian, 652 F.3d 1113 (9th Cir. 2011)
- United States v. Jeffries, 692 F.3d 473 (6th Cir. 2012)
- United States v. White, 670 F.3d 498 (4th Cir. 2012)
- United States v. Elonis, 730 F.3d 321 (3d Cir. 2013)