

SUPREME COURT OF CONNECTICUT

State v. Belcher

State v. Belcher · No. SC 20531 · Decided February 22, 2022

SUMMARY

The Connecticut Supreme Court held that the sentencing court substantially relied on materially false and unreliable information when it characterized juvenile offender Keith Belcher as a member of a purported teenage “superpredator” group. The court concluded that the theory was debunked and that its use implicated racial stereotypes and improperly treated characteristics of youth as aggravating factors. The judgment denying Belcher’s motion to correct an illegal sentence was reversed, and the case was remanded for resentencing.

CASE DETAILS

COURT	Supreme Court of Connecticut
WRITING FOR THE COURT	Mullins, J.; Robinson, C. J.; McDonald, J.; D’Auria, J.; Kahn, J.; Ecker, J.; Keller, J.
JURISDICTION	Connecticut
DECIDED	February 22, 2022
DOCKET	SC 20531
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	The defendant appealed from the denial of his motion to correct an illegal sentence. The Supreme Court of Connecticut reviewed whether the sentencing court substantially relied on materially false information in imposing a sixty-year sentence for offenses committed when the defendant was fourteen.
STANDARD OF REVIEW	A denial of a motion to correct an illegal sentence is ordinarily reviewed for abuse of discretion. Whether the sentencing court relied on materially false information is evaluated under the rule requiring the defendant to show that the information was materially false or unreliable and that the sentencing court substantially relied on it.
PRECEDENTIAL VALUE	published Connecticut Supreme Court opinion
PARTIES	Keith Belcher v. State of Connecticut

TOPICS

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QUESTIONS PRESENTED

1. Whether the sentencing court imposed the defendant's sentence in an illegal manner by substantially relying on the materially false and unreliable superpredator theory.
2. Whether the trial court abused its discretion in denying the defendant's motion to correct an illegal sentence on that ground.

HOLDINGS

1. The superpredator theory was materially false and unreliable information that a sentencing court should not consider when sentencing a juvenile offender.
2. The sentencing court substantially relied on the superpredator theory because it expressly identified the defendant as a "charter member" of the group, devoted a substantial portion of its brief sentencing remarks to the theory, and based the sentence at least in part on that characterization.
3. Reliance on the materially false and unreliable superpredator theory infected the sentencing proceeding and caused the defendant's sentence to be imposed in an illegal manner, in violation of due process.

KEY QUOTATIONS

"We conclude that the superpredator theory was baseless when it originally was espoused and has since been thoroughly debunked and universally rejected as a myth, and it therefore constituted false and unreliable information that a sentencing court ought not consider in crafting a sentence for a juvenile offender."

"The superpredator theory, and the court's application of that theory to the defendant, was central to the court's sentencing determination. It was the prism through which the court viewed this defendant."

"The defendant's sentence was imposed in an illegal manner, in violation of his right to due process."

FACTUAL BACKGROUND

Keith Belcher was fourteen when he committed kidnapping, sexual assault, robbery, burglary, and attempted sexual assault in 1993. He was convicted of all seven counts and received a total effective sentence of sixty years. Before imposing sentence, the sentencing judge described Belcher as a "charter member" of Professor John DiIulio's alleged group of teenage "superpredators," a theory that was later discredited and rejected as a myth. Belcher challenged the sentence decades later, asserting that the sentencing court had relied on materially false information and had thereby imposed the sentence illegally.

PROCEDURAL HISTORY

The defendant was charged in the Superior Court for the judicial district of Fairfield, convicted by a jury of seven offenses, and sentenced to a total effective term of sixty years. The Appellate Court affirmed the judgment.

The defendant later filed a motion to correct an illegal sentence; the trial court dismissed or denied portions of the motion, including the claim concerning reliance on the superpredator theory. The appeal was transferred to the Supreme Court of Connecticut, which reversed the denial of the materially-false-information claim and remanded for resentencing.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The case was remanded to the trial court with direction to grant the defendant's motion to correct an illegal sentence and conduct resentencing.

CASES CITED

- State v. Belcher, 51 Conn. App. 117, 721 A.2d 899 (1998)
- Roper v. Simmons, 543 U.S. 551, 125 S. Ct. 1183, 161 L. Ed. 2d 1 (2005)
- Miller v. Alabama, Miller v. Alabama, 567 U.S. 460, 132 S. Ct. 2455, 183 L. Ed. 2d 407 (2012)
- Casiano v. Commissioner of Correction, 317 Conn. 52, 115 A.3d 1031 (2015), cert. denied sub nom. Semple v. Casiano, 577 U.S. 1202 (2016)
- State v. Riley, 315 Conn. 637, 110 A.3d 1205 (2015), cert. denied, 577 U.S. 1202 (2016)
- State v. Williams-Bey, 333 Conn. 468, 215 A.3d 711 (2019)
- State v. McCleese, 333 Conn. 378, 215 A.3d 1154 (2019)
- State v. Boyd, 323 Conn. 816, 151 A.3d 355 (2016)
- State v. Delgado, 323 Conn. 801, 151 A.3d 345 (2016)
- State v. Bischoff, 337 Conn. 739, 258 A.3d 14 (2021)
- State v. Parker, 295 Conn. 825, 992 A.2d 1103 (2010)
- State v. Bletsch, 281 Conn. 5, 912 A.2d 992 (2007)
- State v. Collette, 199 Conn. 308, 507 A.2d 99 (1986)