

SUPREME COURT OF CONNECTICUT

State v. Donald, 325 Conn. 346

157 A.3d 1134 (2017) · No. SC 19786 · Decided May 2, 2017

SUMMARY

The Connecticut Supreme Court considered whether a defendant’s signed confession should be suppressed because police questioned him about a robbery while he was in custody before providing Miranda warnings. The court held that, even assuming the initial questioning was custodial interrogation, the later warnings were sufficiently separated from the initial questioning to make the subsequent waiver and written confession admissible, and it affirmed the judgment.

CASE DETAILS

COURT	Supreme Court of Connecticut
WRITING FOR THE COURT	Rogers, C. J.; Palmer, J.; Eveleigh, J.; McDonald, J.; Espinosa, J.; Robinson, J.
JURISDICTION	Connecticut
DECIDED	May 2, 2017
DOCKET	SC 19786
DISPOSITION	affirmed
PROCEDURAL POSTURE	The defendant appealed from the judgment of conviction after the trial court denied his motion to suppress a signed confession made after Miranda warnings.
STANDARD OF REVIEW	The legal conclusions underlying a motion to suppress are reviewed plenary. The court also reviewed the adequacy of the record de novo because the material facts were undisputed and the suppression issue presented a legal question.
PRECEDENTIAL VALUE	Published Connecticut Supreme Court opinion; precedential.
PARTIES	Ravon Donald v. State of Connecticut

TOPICS

- miranda rights
- suppression of evidence
- criminal procedure
- fifth amendment
- due process

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the record was adequate for appellate review despite the trial court's oral denial of the suppression motion without factual findings or an articulated legal basis.
2. Whether the defendant's written confession was inadmissible because it followed a brief unwarned custodial questioning at Keney Park and the later Miranda warnings were ineffective.
3. Whether any error in admitting testimony concerning the defendant's brief statement at Keney Park was harmless.

HOLDINGS

1. The record was adequate for review because the material facts were undisputed and the suppression issue was subject to plenary review, even though the trial court did not issue a written decision or articulate its factual and legal basis for denying suppression.
2. The trial court properly denied the motion to suppress the defendant's written confession because the later Miranda warnings were effective under the circumstances and the defendant's waiver and confession were voluntary.
3. The court declined to decide whether the detective's question at Keney Park constituted custodial interrogation requiring Miranda warnings; assuming that the statement should have been suppressed, any error was harmless beyond a reasonable doubt.

KEY QUOTATIONS

"We hold that regardless of whether the trial court's denial of the motion to suppress testimony regarding the initial questioning of the defendant was error, any such error was harmless."

"Therefore, we conclude that the trial court properly denied the defendant's motion to suppress the written statement he made at the police station."

FACTUAL BACKGROUND

Police suspected Donald of participating in a masked robbery and shooting at a Hartford grocery store. After Donald agreed to accompany detectives to the police station on an outstanding warrant, a detective briefly asked him at Keney Park whether he knew about the robbery, and Donald responded that he knew about it. Several hours later, after being transported to the station, booked, given Miranda warnings, and signing a waiver, Donald provided a detailed confession and later signed a written statement.

PROCEDURAL HISTORY

The trial court denied the defendant's motion to suppress statements concerning a grocery-store robbery. A first jury trial resulted in a mistrial, and a second jury trial resulted in convictions on all charged counts. The trial court sentenced the defendant to a total effective term of seventy-five years of incarceration, including a fifteen-year mandatory minimum, followed by ten years of special parole; the defendant appealed.

DISPOSITION

affirmed

CASES CITED

- Computer Reporting Service, LLC v. Lovejoy & Associates, LLC, 167 Conn. App. 36, 41 n.2, 145 A.3d 266 (2016)
- Ammirata v. Zoning Board of Appeals, 264 Conn. 737, 744–46, 826 A.2d 170 (2003)
- Community Action for Greater Middlesex County, Inc. v. American Alliance Ins. Co., 254 Conn. 387, 396, 757 A.2d 1074 (2000)
- State v. Smith, 321 Conn. 278, 289, 138 A.3d 223 (2016)
- State v. Gonzalez, 302 Conn. 287, 294–96, 306–07, 25 A.3d 648 (2011)
- Miranda v. Arizona, 384 U.S. 436, 444, 86 S. Ct. 1602, 16 L. Ed. 2d 694 (1966)
- State v. Betances, 265 Conn. 493, 500–01, 828 A.2d 1248 (2003)
- State v. Edwards, 299 Conn. 419, 428, 11 A.3d 116 (2011)
- State v. Canady, 297 Conn. 322, 335–36, 998 A.2d 1135 (2010)
- State v. Ramos, 317 Conn. 19, 29–30, 114 A.3d 1202 (2015)
- State v. Lawrence, 282 Conn. 141, 153, 920 A.2d 236 (2007)
- Oregon v. Elstad, 470 U.S. 298, 309, 314, 318, 105 S. Ct. 1285, 84 L. Ed. 2d 222 (1985)
- Missouri v. Seibert, 542 U.S. 600, 613–18, 124 S. Ct. 2601, 159 L. Ed. 2d 643 (2004)
- State v. Brunetti, 279 Conn. 39, 77–78, 901 A.2d 1 (2006), cert. denied, 549 U.S. 1212 (2007)