

COURT OF APPEALS OF MARYLAND

Thomas v. State

429 Md. 246 (2012) · Decided October 26, 2012

SUMMARY

The Maryland Court of Appeals reviews whether statements made by Thomas during a police-station interview were obtained during a custodial interrogation requiring Miranda warnings. The court holds that a suspect’s belief that police may have probable cause to arrest is insufficient by itself to establish custody and concludes that, under the totality of the circumstances, Thomas was not in custody when he confessed. The court therefore determines that the motion to suppress should have been denied.

CASE DETAILS

COURT	Court of Appeals of Maryland
WRITING FOR THE COURT	Battaglia, J.; Bell, C.J.; Greene, J.; Adkins, J.
JURISDICTION	Maryland
DECIDED	October 26, 2012
DISPOSITION	affirmed
PROCEDURAL POSTURE	The State appealed the circuit court's order suppressing Thomas's statements made during a police-station interrogation without Miranda warnings. The Court of Special Appeals reversed, and the Court of Appeals granted Thomas's petition for certiorari.
STANDARD OF REVIEW	Review of a suppression ruling is limited to the suppression-hearing record. The appellate court accepts the suppression court's first-level factual findings and credibility determinations unless clearly erroneous, views the evidence in the light most favorable to the prevailing party, and independently appraises the constitutionality of the statements by applying the law to the facts.
PRECEDENTIAL VALUE	published precedential opinion
PARTIES	State v. Thomas

TOPICS

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

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether a suspect's belief that police have sufficient evidence or probable cause to arrest him renders him in custody for purposes of Miranda.
2. Whether, under the totality of the circumstances, Thomas was subjected to custodial interrogation when he voluntarily went to a police station, was questioned by two plainclothes detectives in an unlocked room, was told he was not under arrest, and confessed before being arrested.

HOLDINGS

1. A suspect's belief that police may have probable cause or sufficient evidence to arrest him is not, by itself, sufficient to establish custody for Miranda purposes. The objective circumstances of the interrogation, rather than the subjective beliefs of the suspect or officers, control.
2. Thomas was not in custody for Miranda purposes when he made the statements. The totality of the circumstances—including his voluntary arrival, lack of physical restraint, the unlocked door, repeated statements that he was not under arrest, and the detectives' unarmed and nonconfrontational manner—would have led a reasonable person to feel free to end the encounter and leave.

KEY QUOTATIONS

“We shall hold that a belief held by a suspect that police may have probable cause to arrest him or her is not sufficient to render the individual in custody for Miranda purposes.” (252)

“Our review of a grant or denial of a motion to suppress is limited to the record of the suppression hearing.” (259)

“Given these facts, even when viewed in the light most favorable to Thomas, a reasonable person in Thomas’s situation would have felt free to end the encounter and leave.” (272)

FACTUAL BACKGROUND

Thomas voluntarily drove to a police station after police asked to speak with him and his wife told him the matter concerned allegations that he had sexually abused their daughter. Two plainclothes, unarmed detectives questioned him for approximately an hour and a half in a room with an unlocked door, told him repeatedly that he was not under arrest, but did not tell him expressly that he was free to leave. Thomas confessed to sexually abusing his daughter and was arrested approximately twenty minutes after the interview ended.

PROCEDURAL HISTORY

Thomas moved to suppress statements he made during an approximately ninety-minute police interview. The Circuit Court for Montgomery County granted the motion, finding that the interview was custodial. The State appealed under Maryland Courts and Judicial Proceedings Article section 12-302(c)(3)(i). The Court of Special Appeals reversed in a reported opinion, and the Court of Appeals affirmed that reversal.

DISPOSITION

affirmed

CASES CITED

- State v. Thomas, 202 Md. App. 545, 33 A.3d 494 (2011)
- Thomas v. State, 425 Md. 227, 40 A.3d 39 (2012)
- Abeokuto v. State, 391 Md. 289, 893 A.2d 1018 (2006)
- State v. Tolbert, 381 Md. 539, 850 A.2d 1192 (2004)
- Miranda v. Arizona, 384 U.S. 436 (1966)
- J.D.B. v. North Carolina, 131 S. Ct. 2394 (2011)
- Whitfield v. State, 287 Md. 124, 411 A.2d 415 (1980)
- Vines v. State, 285 Md. 369, 402 A.2d 900 (1979)
- Thompson v. Keohane, 516 U.S. 99 (1995)
- Owens v. State, 399 Md. 388, 924 A.2d 1072 (2007)
- Ransome v. State, 373 Md. 99, 816 A.2d 901 (2003)
- Stansbury v. California, 511 U.S. 318 (1994)
- Berkemer v. McCarty, 468 U.S. 420 (1984)
- United States v. Moya, 74 F.3d 1117 (11th Cir. 1996)
- United States v. Woods, 720 F.2d 1022 (9th Cir. 1983)
- United States v. Chee, 514 F.3d 1106 (10th Cir. 2008)
- Locke v. Cattell, 476 F.3d 46 (1st Cir. 2007)
- Commonwealth v. Hilton, 443 Mass. 597, 823 N.E.2d 383 (2005)
- State v. Oney, 187 Vt. 56, 989 A.2d 995 (2009)
- State v. Pinder, 250 Conn. 385, 736 A.2d 857 (1999)
- State v. Smith, 546 N.W.2d 916 (Iowa 1996)
- State v. Isaac, 2004 Ohio 4683
- Buck v. State, 181 Md. App. 585, 956 A.2d 884 (2008)