

NEW YORK COURT OF APPEALS

People v. Doll

21 N.Y.3d 665, 998 N.E.2d 384 (2013) · Decided October 17, 2013

SUMMARY

The New York Court of Appeals held that police questioning and related evidence were justified under the emergency doctrine where the defendant was found covered in fresh blood and could not provide a reasonable explanation. The court also held that statements the defendant made to a female acquaintance in the presence of an investigator were not the product of custodial interrogation. The court affirmed the Appellate Division's order upholding the denial of suppression, while noting that the continued viability of the emergency doctrine's second factor was unresolved.

CASE DETAILS

COURT	New York Court of Appeals
WRITING FOR THE COURT	Graffeo, J.
JURISDICTION	New York
DECIDED	October 17, 2013
DISPOSITION	affirmed
PROCEDURAL POSTURE	Defendant appealed from an order affirming the denial of his motion to suppress statements and physical evidence following his conviction for second-degree murder.
STANDARD OF REVIEW	The applicability of the emergency doctrine is a mixed question of law and fact that is beyond the Court of Appeals' review when the record supports the lower courts' findings. The legality of the detention and admissibility of the statements were reviewed under the applicable constitutional suppression standards.
PRECEDENTIAL VALUE	published precedential opinion of the New York Court of Appeals
PARTIES	Scott Doll v. The People of the State of New York

TOPICS

[criminal procedure](#)[miranda rights](#)[right to counsel](#)[search and seizure](#)[suppression of evidence](#)

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the emergency doctrine justified the police detention and questioning of Doll before police knew definitively that a crime had occurred or identified a victim.
2. Whether evidence derived from the police questioning and investigation should be suppressed because the questioning violated Doll's Miranda protections or indelible right to counsel.
3. Whether Doll's statements to a female acquaintance in the presence of a police investigator constituted custodial interrogation or its functional equivalent.
4. Whether Doll's detention by the police was lawful.

HOLDINGS

1. The emergency doctrine justified the police questioning because the officers reasonably believed, based on the fresh blood, Doll's conduct, and his inadequate explanations, that a person might have been seriously injured and required imminent assistance. Definitive knowledge of a crime or the victim's identity was not required.
2. The courts properly denied suppression of the statements Doll made to police before the victim was discovered and of evidence derived from that information because the questioning was justified under the emergency doctrine.
3. The conversation did not constitute interrogation or its functional equivalent, and Doll's statements were voluntary and admissible.
4. There was no merit to Doll's challenge to the legality of his detention.

KEY QUOTATIONS

“It recognizes that the Constitution “is not a barrier to a police officer seeking to help someone in immediate danger”” (at 670)

“the emergency doctrine is premised on reasonableness, not certitude” (at 671)

“The purpose of the Miranda rule is to “prevent[] government officials from using the coercive nature of confinement to extract confessions that would not be given in an unrestrained environment”” (at 672)

FACTUAL BACKGROUND

Police responding to a 911 report found Doll walking along a public road wearing clothing covered with fresh, wet blood and carrying a lug wrench. Doll gave inconsistent or incomplete explanations for the blood and declined to say whether it came from a human or an animal. Police detained him, searched or impounded his van, and investigated whether someone might be injured; they eventually found Doll's business partner dead in a driveway. While in custody and after asking to speak with his divorce lawyer, Doll made incriminating statements to a female acquaintance while a police investigator sat nearby and took notes.

PROCEDURAL HISTORY

County Court held an evidentiary hearing and ruled that the police detention and questioning were justified under the emergency doctrine, although it suppressed the DNA-test results because the police could have obtained a warrant. A jury convicted defendant of second-degree murder, and he was sentenced to 15 years to life. The Appellate Division, Fourth Department, affirmed, with two Justices dissenting; a dissenter granted leave to appeal to the New York Court of Appeals, which affirmed.

DISPOSITION

affirmed

CASES CITED

- People v. Ramos, 99 N.Y.2d 27, 35 (2002)
- People v. Gibson, 17 N.Y.3d 757, 759 (2011)
- Michigan v. Fisher, 558 U.S. 45, 47, 49 (2009)
- Brigham City v. Stuart, 547 U.S. 398, 403-405 (2006)
- New York v. Quarles, 467 U.S. 649, 655-656 (1984)
- People v. Molnar, 98 N.Y.2d 328, 331-335 (2002)
- People v. Krom, 61 N.Y.2d 187, 198-201 (1984)
- People v. Mitchell, 39 N.Y.2d 173, 177-178 (1976)
- People v. McBride, 14 N.Y.3d 440, 446-447 n. (2010)
- People v. Dallas, 8 N.Y.3d 890, 891 (2007)
- Arizona v. Mauro, 481 U.S. 520, 524 n.2, 527-530 (1987)
- People v. Lopez, 16 N.Y.3d 375, 381-382 (2011)
- People v. Naradzay, 11 N.Y.3d 460, 468 (2008)
- People v. Williams, 17 N.Y.3d 834, 835-836 (2011)