

SUPREME COURT OF THE UNITED STATES

Danforth v. Minnesota

552 U.S. 264 (2008) · Decided February 20, 2008

SUMMARY

The Supreme Court held that the *Teague v. Lane* nonretroactivity rule limits the authority of federal courts to grant habeas relief but does not restrict state courts from giving broader retroactive effect to new federal constitutional rules in state postconviction proceedings. The Court concluded that Minnesota was free to apply the confrontation rule announced in *Crawford v. Washington* more broadly than *Teague* required. The decision also distinguished federal habeas remedies from state-created remedies for constitutional violations.

CASE DETAILS

COURT	Supreme Court of the United States
WRITING FOR THE COURT	Justice Stevens; Chief Justice Roberts; Justice Scalia
JURISDICTION	Federal
DECIDED	February 20, 2008
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Petitioner sought state postconviction relief from a state criminal conviction based on <i>Crawford v. Washington</i> . The Minnesota Supreme Court held that state courts could not apply a broader retroactivity rule for a new federal constitutional criminal-procedure rule than the federal rule established by <i>Teague v. Lane</i> . The United States Supreme Court granted certiorari to determine whether <i>Teague</i> or other federal law constrained the authority of state courts to provide broader relief in their own postconviction proceedings.
STANDARD OF REVIEW	De novo review of the legal question whether federal retroactivity doctrine limits the authority of state courts in state postconviction proceedings.
PRECEDENTIAL VALUE	binding
PARTIES	Stephen Danforth v. Minnesota

TOPICS

- state post-conviction relief
- federal habeas corpus
- criminal procedure
- fourteenth amendment
- federalism

PRACTICE AREAS

criminal procedure

constitutional law

federal habeas corpus

state post-conviction relief

federalism

QUESTIONS PRESENTED

1. Whether *Teague v. Lane*'s federal habeas nonretroactivity rule limits the authority of state courts to apply a new federal constitutional rule of criminal procedure more broadly in their own state postconviction proceedings.
2. Whether *Michigan v. Payne*, *American Trucking Assns., Inc. v. Smith*, or other federal precedent prohibits a state court from providing relief for a constitutional violation that would not be redressable under *Teague* on federal habeas review.
3. Whether *Crawford v. Washington* was required to apply retroactively to Danforth's final state conviction under federal law.

HOLDINGS

1. *Teague v. Lane* does not constrain the authority of state courts to give broader effect to new rules of criminal procedure than *Teague* requires on federal habeas review.
2. Federal law does not require state courts to apply *Crawford v. Washington* to cases that were final when *Crawford* was decided, but federal law also does not prohibit state courts from doing so.
3. Neither *Michigan v. Payne* nor *American Trucking Assns., Inc. v. Smith* establishes that federal law limits the relief a state may provide in its own postconviction proceedings.

KEY QUOTATIONS

"We have never suggested that it does, and now hold that it does not." (at 267)

"It was intended to limit the authority of federal courts to overturn state convictions — not to limit a state court's authority to grant relief for violations of new rules of constitutional law when reviewing its own State's convictions." (at 280-281)

"In sum, the Teague decision limits the kinds of constitutional violations that will entitle an individual to relief on federal habeas, but does not in any way limit the authority of a state court, when reviewing its own state criminal convictions, to provide a remedy for a violation that is deemed "nonretroactive" under Teague." (at 282)

FACTUAL BACKGROUND

In 1996, a Minnesota jury convicted Stephen Danforth of first-degree criminal sexual conduct with a minor. The six-year-old victim did not testify, but the jury heard and saw a videotaped interview of the child, which the Minnesota courts admitted under *Ohio v. Roberts*. After Danforth's conviction became final, the Supreme Court decided *Crawford v. Washington*, and Danforth sought a new trial on the ground that admission of the interview violated the Sixth Amendment Confrontation Clause.

PROCEDURAL HISTORY

A Minnesota jury convicted Danforth of first-degree criminal sexual conduct with a minor, and the Minnesota Court of Appeals affirmed. After the conviction became final, the Supreme Court decided *Crawford v. Washington*. Danforth filed a state postconviction petition, but the Minnesota trial court and Court of Appeals denied relief under *Teague*; the Minnesota Supreme Court affirmed, and the United States Supreme Court reversed.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Minnesota Supreme Court was to reconsider the case consistently with the holding that *Teague* does not limit the authority of state courts to provide broader retroactive remedies in their own postconviction proceedings.

CASES CITED

- *Teague v. Lane*, 489 U.S. 288 (1989)
- *Crawford v. Washington*, 541 U.S. 36 (2004)
- *Whorton v. Bockting*, 549 U.S. 406 (2007)
- *Ohio v. Roberts*, 448 U.S. 56 (1980)
- *Michigan v. Payne*, 412 U.S. 47 (1973)
- *American Trucking Assns., Inc. v. Smith*, 496 U.S. 167 (1990)
- *Linkletter v. Walker*, 381 U.S. 618 (1965)
- *Griffith v. Kentucky*, 479 U.S. 314 (1987)
- *Brecht v. Abrahamson*, 507 U.S. 619 (1993)
- *Caspari v. Bohlen*, 510 U.S. 383 (1994)
- *State v. Fair*, 263 Ore. 383, 502 P.2d 1150 (1972)
- *Page v. Palmateer*, 336 Ore. 379, 84 P.3d 133 (2004)
- *State v. Preciose*, 129 N.J. 451, 609 A.2d 1280 (1992)