

SUPREME COURT OF THE UNITED STATES

Danforth v. Minnesota

128 S. Ct. 1029 (2008) · No. No. 06-8273 · Decided February 20, 2008

SUMMARY

The Supreme Court held that the Teague rule, which limits the retroactive application of new constitutional criminal-procedure rules in federal habeas proceedings, does not restrict state courts from providing broader retroactive remedies in their own post-conviction proceedings. The Court concluded that Minnesota was free to apply the rule announced in Crawford v. Washington to convictions that became final before Crawford was decided, even though federal law did not require that result.

CASE DETAILS

COURT	Supreme Court of the United States
WRITING FOR THE COURT	Justice Stevens; Chief Justice Roberts; Justice Kennedy; Justice Souter; Justice Thomas; Justice Ginsburg; Justice Breyer; Justice Alito; Justice Scalia
JURISDICTION	Federal
DECIDED	February 20, 2008
DOCKET	No. 06-8273
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Petition for review of a Minnesota Supreme Court decision denying state postconviction relief based on the asserted retroactive application of Crawford v. Washington.
STANDARD OF REVIEW	De novo review of the legal question whether federal retroactivity doctrine limits a state court's authority to provide broader relief in state postconviction proceedings.
PRECEDENTIAL VALUE	Binding Supreme Court precedent
PARTIES	Stephen Danforth v. Minnesota

TOPICS

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

PRACTICE AREAS

constitutional law

criminal procedure

post-conviction relief

federalism

habeas corpus

QUESTIONS PRESENTED

1. Whether *Teague v. Lane* limits the authority of state courts to give broader retroactive effect in state postconviction proceedings to a new federal constitutional rule of criminal procedure than federal habeas law requires.
2. Whether any other federal rule of law prohibits state courts from providing such broader relief.

HOLDINGS

1. *Teague's* rule of nonretroactivity limits the availability of relief in federal habeas proceedings but does not constrain a state court's authority to provide a remedy for a new federal constitutional rule in its own postconviction proceedings.
2. No federal rule identified in the case prohibits state courts from adopting and applying broader state-law retroactivity standards in their own postconviction proceedings.

KEY QUOTATIONS

"We have never suggested that it does, and now hold that it does not." (at 1033)

"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 1041)

"The fundamental interest in federalism that allows individual States to define crimes, punishments, rules of evidence, and rules of criminal and civil procedure in a variety of different ways—so long as they do not violate the Federal Constitution—is not otherwise limited by any general, undefined federal interest in uniformity." (at 1047)

FACTUAL BACKGROUND

A Minnesota jury convicted Stephen Danforth in 1996 of first-degree criminal sexual conduct with a minor. The six-year-old victim did not testify, but the jury saw and heard a videotaped interview of the child. The Minnesota Court of Appeals upheld admission of the tape under *Ohio v. Roberts*, and the conviction became final in 1998. After *Crawford v. Washington* announced a new Confrontation Clause rule, Danforth sought a new trial in state postconviction proceedings.

PROCEDURAL HISTORY

Danforth was convicted in Minnesota state court of first-degree criminal sexual conduct after the jury viewed a videotaped interview of a six-year-old victim who did not testify. The Minnesota Court of Appeals affirmed, applying *Ohio v. Roberts*, and the conviction became final in 1998. After *Crawford v. Washington* announced a new Confrontation Clause rule, Danforth sought state postconviction relief. The Minnesota courts held that

Crawford was not retroactive under Teague and that state courts could not adopt a broader retroactivity rule. The Supreme Court reversed and remanded.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The judgment of the Supreme Court of Minnesota was reversed, and the case was remanded for further proceedings not inconsistent with the opinion. The Minnesota court remained free to reinstate its judgment disposing of the state postconviction petition.

CASES CITED

- Teague v. Lane, 489 U.S. 288 (1989)
- Crawford v. Washington, 541 U.S. 36 (2004)
- Ohio v. Roberts, 448 U.S. 56 (1980)
- Whorton v. Bockting, 549 U.S. 406 (2007)
- Michigan v. Payne, 412 U.S. 47 (1973)
- American Trucking Assns., Inc. v. Smith, 496 U.S. 167 (1990)
- Harper v. Virginia Department of Taxation, 509 U.S. 86 (1993)
- Griffith v. Kentucky, 479 U.S. 314 (1987)
- Linkletter v. Walker, 381 U.S. 618 (1965)
- 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)
- Oregon v. Hass, 420 U.S. 714 (1975)
- Yates v. Aiken, 484 U.S. 211 (1988)
- Marbury v. Madison, 5 U.S. (1 Cranch) 137 (1803)