

SUPREME JUDICIAL COURT OF MAINE

State v. Leonard

802 A.2d 991 (Me. 2002) · Decided August 2, 2002

SUMMARY

The Maine Supreme Judicial Court affirmed Thomas Leonard's convictions and the denial of his motion to suppress. The court held that statements made during the standoff were not the product of custodial interrogation, statements made during transport were voluntary and spontaneous, and the warrantless search of Leonard's residence was supported by probable cause and exigent circumstances.

CASE DETAILS

COURT	Supreme Judicial Court of Maine
WRITING FOR THE COURT	Alexander, J.; Saufley, C.J.; Clifford, J.; Rudman, J.; Dana, J.; Calkins, J.; Levy, J.
JURISDICTION	Maine
DECIDED	August 2, 2002
DISPOSITION	affirmed
PROCEDURAL POSTURE	Thomas Leonard appealed his jury convictions and the denial of his motion to suppress statements and evidence obtained during and after a police standoff at his residence.
PRECEDENTIAL VALUE	Published and precedential opinion of the Supreme Judicial Court of Maine
PARTIES	Thomas Leonard v. State of Maine

TOPICS

- suppression of evidence
- search and seizure
- miranda rights
- probable cause
- criminal procedure

PRACTICE AREAS

- criminal law
- criminal procedure
- search and seizure
- evidence

QUESTIONS PRESENTED

- Whether police were lawfully present at Leonard's residence and had probable cause to arrest or question him regarding the reported robbery.

2. Whether statements Leonard made during the standoff and while being transported to the hospital were obtained during custodial interrogation requiring Miranda warnings.
3. Whether the warrantless search of Leonard's residence immediately after his arrest was justified by probable cause and exigent circumstances, and whether evidence from the subsequent warrant search was tainted as fruit of the poisonous tree.

HOLDINGS

1. Because the officers reasonably believed Leonard had recently committed a Class A felony robbery, they had probable cause to be on his property to question him and could have attempted to arrest him.
2. Statements Leonard made and actions he took during the standoff, before he was seized by police, were not made during custodial interrogation and therefore did not require Miranda warnings.
3. Statements Leonard made while being transported to the hospital after his arrest did not require Miranda warnings because he was not subject to interrogation and the statements were voluntary and spontaneous.
4. The warrantless search immediately after Leonard's arrest was lawful because it was supported by probable cause and exigent circumstances.

KEY QUOTATIONS

“The statements that Leonard made and the actions that he took during the stand-off, prior to his seizure by the police, were not statements made during a custodial interrogation.” (at 993)

“A warrantless search is, as a matter of law, unreasonable unless: (1) “it is supported by probable cause”; and (2) “exigent circumstances exist requiring a prompt search, without the delay occasioned by the need for a warrant”; or (3) the search is pursuant to another recognized exception to the warrant requirement.” (at 994)

FACTUAL BACKGROUND

After threatening and beating a contractor and forcing him to write a \$15,000 check, Leonard was located at his separate residence. Police contacted him at the residence, where he made statements, refused to leave, and ultimately engaged in an armed standoff during which tear gas was deployed and shots were fired. Leonard was arrested after exiting the residence, and officers immediately conducted a safety search before obtaining a warrant for a further search that resulted in the seizure of evidence.

PROCEDURAL HISTORY

After a jury trial in the Penobscot County Superior Court, Leonard was convicted of assault, criminal threatening, three counts of criminal threatening with a dangerous weapon, and reckless conduct with a dangerous weapon. The Superior Court denied his motion to suppress. The Supreme Judicial Court of Maine affirmed the judgment. Leave to appeal the sentence was denied.

DISPOSITION

affirmed

CASES CITED

- State v. Foy, 662 A.2d 238, 240 (Me. 1995)
- State v. Swett, 1998 ME 76, ¶ 4, 709 A.2d 729, 730
- State v. Michael M., 2001 ME 92, ¶ 6, 772 A.2d 1179, 1181
- State v. St. Yves, 2000 ME 97, ¶ 9 n.8, 751 A.2d 1018, 1023
- State v. York, 324 A.2d 758, 762-63 (Me. 1974)
- Miranda v. Arizona, 384 U.S. 436, 86 S. Ct. 1602, 16 L. Ed. 2d 694 (1966)