

CHAPTER 8: COURT CASES

CASE	RULING	ISSUE
Probable Cause		
Illinois v. Gates (1983)	An anonymous letter stated that Mr. and Mrs. Gates were engaged in selling drugs, and that arrangements had been made to pick up a large quantity of drugs in Florida and be brought back to Illinois by car. The letter also stated that the Gates' had drugs in their home. The police obtained a search warrant for the home and vehicle based on the letter and the officer's affidavit of foregoing facts, upon the Gates' arrival the home and vehicle were searched. Marijuana and other contraband were discovered in the vehicle and home. The court initially ruled that all evidence seized must be suppressed because the letter and affidavit were inadequate to sustain a determination of probable cause for issuance of the search warrant under <i>Aguilar v. Texas</i> and <i>Spinelli v. United States</i> . <i>The U.S. Supreme Court ruled that in establishing probable cause for the issuance of a search warrant, magistrates may make a commonsense decision, given all the circumstances set forth in an affidavit, whether there is a fair probability that contraband can be found in a particular place.</i>	Totality of circumstances – probable cause
Search Incident to Lawful Arrest (warrantless search)		
Chimel v. California (1969)	Police officers arrived at the home of Chimel with an arrest warrant for the burglary of the coin shop. Chimel was arrested upon his arrival home, but objected to the house being searched. Officers searched the home with his wife stating that "a search could be conducted on the basis of the lawful arrest." Officers seized a variety of items, including some coins. Upon appeal to the <i>U.S. Supreme Court</i> , Chimel's conviction was reversed. <i>The U.S. Supreme court ruled that a search incident to a lawful arrest in a home must be limited to the area into which an arrestee might reach in order to grab a weapon or other evidentiary items.</i>	Search incident to lawful arrest in a home – search limited to arms length
Stop and Frisk		
Terry v. Ohio (1968)	A 35-year veteran police officer observed Terry and two companions standing on a Cleveland street corner. They moved up and down the street, looking in store windows, returning frequently to the corner and conversing. The officer was suspicious of this behavior and confronted them about their identities and business. He patted down Terry and discovered a revolver. Terry was charged with carrying a concealed weapon and convicted. Terry appealed, and the Supreme Court eventually heard the case. The argument was whether the police officers may "pat down and frisk" suspicious persons if they have reasonable suspicion that a crime is being contemplated. <i>The U.S. Supreme Court upheld Terry's conviction, determining that police officers may pat down suspects as a means of protecting themselves and determining whether suspicious persons may be armed and pose a danger to them.</i>	Pat down of suspects is permitted for the safety of the officer
Fruit of the Poisonous Tree (1963)	Evidence that is spawned or directly derived from an illegal search or an illegal interrogation is generally inadmissible against a defendant because of its original taint.	
California v. Hodari (1991)	Hodari was a juvenile who was observed by police late at night with others huddled around a vehicle in a high-crime neighborhood of Oakland. Everyone fled in different directions when seeing the approaching police vehicle. One officer, Petroso, drove around the block to intercept one of the fleeing persons, Hodari. Hodari ran into Petroso, and a brief scuffle ensued. Hodari broke free, began to run away again, and threw away what appeared to be a small rock. The officer tackled Hodari and arrested him. The recovered rock turned out to be crack cocaine. After Hodari was convicted, he appealed, contending that he had been seized unreasonably and that Petroso had lacked probable cause to arrest him and use the thrown-away cocaine against him. <i>The U.S. Supreme Court disagreed with Hodari and upheld his conviction, saying that the thrown-away cocaine constituted abandonment, that Petroso had not seized Hodari before this abandonment, and thus, that the cocaine was admissible against Hodari. If Petroso had tackled Hodari and arrested him before Hodari threw away the crack cocaine, then the eventual discovery of cocaine would have been excluded as evidence against Hodari because Petroso would not have been able to establish probable cause for his arrest.</i>	Chase does not constitute seizure – evidence dropped during chase is admissible
"Plain Feel" Doctrine	When police officers conduct Terry-type searches for weapons, they are free to seize items detected through their sense of touch, as long as the "plain feel" makes it "immediately apparent" that the item is contraband.	

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Automobile Searches		
Carroll v. U.S. (1925)	Carroll was a suspected bootlegger of illegal liquor. Police had tried several times to stop his car but had failed to do so. One evening officers saw Carroll's car returning to Grand Rapids from Detroit. They stopped the car and proceeded, without warrant, to search it extensively. Eventually, after tearing apart seats and other automobile components, they discovered illegal whiskey. Carroll was convicted of transporting intoxicating liquor. He appealed, arguing that the whiskey evidence was the result of an illegal search of his vehicle without probable cause and also without a valid search warrant. <i>The U.S. SC upheld his conviction, saying that officers did indeed, have probable cause to stop him and did not need a search warrant. It stressed that automobiles, unlike houses, are highly mobile entities, & therefore the police were authorized to search it before its occupants could destroy any illegal contraband.</i>	Warrantless searches of vehicles are permissible where reasonable suspicion of illegal actions exists
Fresh Pursuit	<i>Warrantless arrest and search is permissible in situations of fresh pursuit (or "hot pursuit"), which involves chasing an escaping criminal or suspect into a house – and consequently search that house – or into a neighboring jurisdiction.</i>	
Consent Searches		
Florida v. Bostick (1991)	Bostick was a passenger on a bus from Miami to Atlanta. Florida police boarded the bus without any suspicion but rather with a simple intent to catch drug smugglers. They approached Bostick, asked him a few questions, asked to see his ticket, and then asked if they could search his bag. They advised Bostick he had a right to refuse, but he gave his consent. They discovered cocaine in his bag and he was subsequently convicted of cocaine possession. He appealed and the SC upheld the conviction, because given the totality of circumstances, Bostick had not been under arrest and had given his consent at the time of the search. Further, the fact that Bostick was on a bus did not constitute a seizure in the Fourth Amendment context. The SC concluded that the governing test is whether a reasonable person would feel free to decline the police offer to search his or her luggage, given the totality of the circumstances.	Totality of circumstances
Plain View Doctrine	<i>Authorizes officers conducting a search to seize any contraband or illegal substances or items if they are in the immediate vision of officers, when officers are in a place where they have a legal right to be (i.e.: on a sidewalk, in a public place...).</i>	
Harris v. U.S. (1968)	Harris' automobile had been observed leaving the scene of a bank robbery. Later, Harris was arrested by police and his car was impounded. The car was subjected to a routine search. Incriminating evidence was obtained from his car and later used against him in court, when he was convicted. He appealed, but the <i>U.S. Supreme Court upheld his conviction, saying that anything in plain view in an automobile during an inventory search is subject to seizure and admissible in court later.</i>	Plain View Doctrine
Protective Sweep Doctrine	<i>The rule that when police officers execute an arrest on or outside private premises, they may conduct a warrantless examination of the entire premises for other persons whose presence would pose a threat, either to their safety or to evidence capable of being removed or destroyed.</i>	
Exclusionary Rule	<i>Rule that provides that where evidence has been obtained in violation of the privileges guaranteed by the United States Constitution, such evidence may be excluded at trial. (The judicially established rule that prohibits, in court, the use of illegally obtained evidence).</i>	
Adams v. New York (1904)	The admissibility of evidence is not affected by the illegality of the means by which it was obtained – continuing the tradition of English common law. If the evidence was "material, relevant and competent," it was admissible in court.	Admissibility of evidence
Weeks v. U.S. (1914)	Weeks was arrested for using the mail to transport tickets for a lottery – a federal offense. He was arrested at his place of business, and a search was done of his home and business by federal officers without a warrant. <i>The U.S. Supreme Court overturned Weeks' conviction, ruling that evidence illegally seized by federal law enforcement officers is not admissible in federal criminal prosecutions. Weeks made the "silver platter doctrine" possible.</i>	Illegally seized evidence by federal law enforcement not allowed in federal cases
Silver Platter Doctrine (Weeks)	<i>The Silver Platter Doctrine permitted federal prosecutors to use evidence obtained by state agents through unreasonable search and seizure (handed to them on a "silver platter") – provided that the evidence was obtained without federal participation and was turned over to federal officials.</i>	
Wolf v. Colorado (1949)	Police seized Dr. Wolf's appointment book during a warrantless search and interrogated patients whose names appeared in the book. Based on this information, they arrested and charged Wolf with performing illegal abortions. <i>The U.S. Supreme Court ruled that the "Exclusionary Rule" was not binding at the State level, however some states voluntarily required warrants and followed the Exclusionary Rule.</i>	Exclusionary Rule not binding to the states

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<p>Rochin v. California (1952)</p>	<p>Police had information that Rochin was selling narcotics, and when they forced their way into his room without a search warrant, they saw two capsules on his nightstand. When they asked Rochin about the pills, he popped them into his mouth and swallowed them. After a futile attempt to retrieve the pills, the police took Rochin to the hospital and forced him to have his stomach pumped. The pills were morphine and Rochin was arrested. <i>The U.S. Supreme Court ruled that although state courts were not bound by the Exclusionary Rule, some searches were so shocking to the conscience that the fruits of such searches should be excluded from courts. Although they threw out Rochin's conviction, it was because his "due process" rights had been violated, and did not apply the Exclusionary Rule at the state level at this time.</i></p>	<p>Evidence acquired in a manner that shocks the conscience is a violation of the 4th Amendment</p>
<p>Elkins v. U.S. (1960)</p>	<p>Eliminated "Silver Platter Doctrine." <i>The U.S. Supreme Court ruled that evidence illegally seized by state or local law enforcement officers may not be used in Federal prosecutions, regardless of how relevant or competent it was.</i></p>	
<p>Mapp v. Ohio (1961)</p>	<p>While conducting a warrantless search of Dolly Mapp's home for a bombing suspect, police found "lewd and lascivious" books and photographs. She was arrested for possession of pornography. <i>The U.S. Supreme Court ruled that all police officers, whether federal, state or local are required to have a search warrant; if any evidence is collected in an illegal fashion, it will not be allowed in any State or Federal court.</i></p>	<p>Illegal evidence is not allowed in state/federal court - Exclusionary Rule</p>
<p>Retreat From Mapp</p>		
<p>U.S. v. Calandra (1974)</p>	<p>Federal agents obtained a warrant to search Calandra's business to discover evidence of bookmaking records and gambling paraphernalia. No gambling or bookmaking stuff was found, but evidence of a loan-sharking enterprise was found. When Calandra was called to testify in front of the Grand Jury, he argued that the loan-sharking information was discovered without probable cause, and was therefore inadmissible. <i>The U.S. Supreme Court ruled that the Grand Jury proceedings are primarily to determine if a crime may have been committed and if there is adequate evidence against the defendant in the case to press charges. Since the Grand Jury does not determine guilt or innocence, then any evidence that the police can obtain is admissible.</i></p>	<p>Any evidence is admissible in a Grand Jury proceeding because the Grand Jury does not determine guilt or innocence.</p>
<p>Stone v. Powell (1976)</p>	<p>An inmate filed a habeas corpus petition in a federal court seeking release from prison. The prisoner had already filed the same petition in a state court and the petition had been denied. <i>The SC heard the appeal and rejected the argument of the inmate, concluding that a habeas corpus petition will not be heard in federal court after it has already been rejected in a state court. The SC stressed the fact that the inmate had a full and fair opportunity to argue the case in a state appellate court.</i></p>	<p>Habeas corpus petition denied at the state level will not be heard at the federal level</p>
<p>U.S. v. Leon (1984)</p>	<p>Acting on information provided by an informant, officers initiated a drug trafficking investigation against Leon. Based on their observations, search warrants were prepared for three residences and several automobiles under Leon's control, reviewed by three District Attorneys and issued by a state court judge. Ensuing searches turned up large quantities of drugs, and Leon was arrested and indicted on drug charges. He moved to suppress (exclude) the evidence because he argued that the information provided to the police had been insufficient to establish probable cause (invalid search warrants). The evidence was suppressed, and Leon was acquitted. <i>The SC ruling that the Fourth Amendment exclusionary rule does not bar the use of evidence obtained by police officers acting in objectively reasonable reliance on a search warrant issued by a magistrate but ultimately found to be unsupported by probable cause. The case created the "good faith" exception to the exclusionary rule.</i></p>	<p>"Good faith" exception to the exclusionary rule</p>
<p>Massachusetts v. Sheppard (1984)</p>	<p>Sheppard was a suspect in a murder case. The investigating officer provided affidavit to search Sheppard's residence for the victim's clothing and a blunt instrument. It was a Sunday, court was closed and the officer had to go to the judge's home for issuance of the warrant. The only form available was a form for "search for controlled substances," which the officer modified with the judge's approval. The judge assured the officer that this warrant was valid and legal. The officer conducted the search, located the incriminating evidence and Sheppard was arrested, tried and convicted of murder. <i>The U.S. Supreme Court upheld Sheppard's conviction based on the same argument as Leon – the purpose of the Exclusionary Rule is to deter police misconduct, and in this case, the officer's conduct was entirely appropriate and legal.</i></p>	<p>"Good faith" exception to the exclusionary rule</p>

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Custodial Interrogation

Hopt v. Utah (1884)	In order for a confession to be admissible as evidence in <u>federal</u> cases, it had to be given voluntarily	
Twining v. New Jersey (1908)	The defendants, Albert C. Twining and David C. Cornell, executives of the Monmouth Safe and Trust Company, were indicted by a grand jury for having knowingly displayed a false paper to a bank examiner "with full intent to deceive him" as to the actual condition of their firm. At trial, Twining and Cornell refused to take the stand. The jury rendered a verdict of guilty, at which point Twining and Cornell appealed to the USSC. They contended that the exemption from self-incrimination was one of the privileges and immunities that the Fourteenth Amendment forbade the states to abridge. They claimed that the judge's statement amounted to compulsory self-incrimination and therefore constituted a denial of due process. The SC ruled against Twining and Cornell stating that the privilege against self-incrimination was "not fundamental in due process of law, not an essential part of it." The SC inferred that defendants in state cases did not enjoy the Fifth Amendment privilege against compelled self-incrimination.	Fifth Amendment right against self-incrimination does not apply to the states
Brown v. Mississippi (1936)	Brown was a suspect in a murder. He was visited at his home by a deputy sheriff and brought to the murder scene. He denied committing the murder. The deputy and others hanged him from a tree, let him down, then hanged him again. Later they tied him to a tree and beat him. A few days later the deputy came to his home again and arrested him. Brown was taken to jail, where he was beaten repeatedly and told that the beatings would continue until he confessed. He confessed to the murder and was subsequently convicted and sentenced to death. He filed an appeal on the grounds that he had been denied due process under the Fourteenth Amendment. The SC agreed. It argued further that the brutality of police officers had rendered his confession and other statements inadmissible in court against him. Coerced confessions to crimes are unconstitutional. His conviction was overturned.	Coerced confessions are unconstitutional – denial of due process
McNabb v. United States (1943)	The McNabb family in Chattanooga, Tennessee, was a clan of mountaineers dealing in illegal whiskey by operating an illegal still. Agents from the Alcohol Tax Unit raided their settlement one evening when it was learned that they planned to sell a large quantity of illegal liquor. During their raid, one federal officer was shot and killed. Later, federal agents visited the home of the McNabbs and arrested the brothers Freeman and Raymond. They took the men to the federal building in Chattanooga, where they were not brought before any United States magistrate or other judicial official but kept in a small room for three days and not permitted to see relatives or lawyers. There is no evidence that they requested counsel. Neither had passed the fourth grade in school. Following intensive questioning by agents, they eventually confessed to the killing and were tried, convicted of murder, and sentenced to 45 years in prison. They appealed. The SC reversed their convictions, holding that confessions coerced after three days of interrogation, in the absence of any counsel are not admissible. The interrogation conditions were inherently illegal and contrary to due process, such interrogation was the "third degree". Thus, their confessions had been improperly received as evidence against them.	Coerced confessions by the "third degree" and without access to counsel are a violation of due process. Reinforced the "Prompt Arraignment" rule
Mallory v. United States (1958)	In an apartment house in the early morning hours of April 7, 1954, a woman doing laundry in the basement encountered trouble with the washing machine. She called the janitor, Mallory, who lived in the building with his wife and two sons. The janitor fixed the washing machine, left the laundry room, and later reappeared masked with his two sons. These men raped the woman and left the apartment shortly thereafter. The victim gave an account of the rape to police and named Mallory as a key suspect. Later that afternoon, Mallory and his sons were arrested and taken to police headquarters and questioned. Mallory was subjected to intensive questioning and a lie detector test, after 18 hours of questioning he confessed. Because a magistrate could not be found, Mallory was brought before a commissioner the following morning and arraigned. Because of various delays, Mallory's trial occurred a year later. He was convicted. He appealed, arguing that he had not been brought before a magistrate without undue delay and that his extensive interrogation by police had been without probable cause and of unreasonable duration. The SC heard Mallory's case and overturned his conviction, holding that police had had only reasonable suspicion when Mallory was originally arrested, and that the subsequent detention and interrogation yielded probable cause for which rape charges could be filed against Mallory. The SC also noted that during the afternoon when Mallory was first arrested, numerous magistrates had been available to police. Thus Mallory had not been brought before them without undue delay, a violation of his due-process rights. The SC said that it is not the function of police to arrest, as it were, at large and to use an interrogating process at police headquarters to determine whom they should charge before a committing magistrate on "probable cause."	Undue delay in being brought before a magistrate – violation of the Prompt arraignment rule – and Mallory's due process rights

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<p>Escobedo v. Illinois (1964)</p>	<p>Escobedo was arrested without a warrant for the murder of his brother-in-law, and interrogated for some 15 hours. During that period, he made no statements to the police and was released after his attorney had obtained a writ of habeas corpus. Eleven days after the shooting of Valtierra, Escobedo was arrested for a second time and again taken to a police station for questioning. Shortly after Escobedo was brought to the Chicago police station, his attorney also arrived but the police would not permit him to see his client. Escobedo was told that he could not see his attorney until the police had finished their questioning. Escobedo made certain incriminating statements that would be construed as his voluntary confession to the crime. Escobedo was sentenced to a 22-year prison term. He appealed arguing that he was told "he would be permitted to go home if he gave the statement and would be granted an immunity from prosecution." The Illinois SC reversed Escobedo's conviction, but the state petitioned for, and the court granted, a rehearing of the case. The decision was again reversed, and Escobedo still faced a 22-year sentence. Escobedo's attorney appealed to the US SC, and was granted certiorari. <i>The SC overturned the conviction on the grounds that Escobedo had been denied counsel and that interrogation had proceeded despite his plea to have counsel present. Thus, the denial of counsel to Escobedo when he requested it had violated his right to due process. The case is also significant because the SC stressed the fact that initially, police officers were merely investigating a murder. At some early point, their mode shifted to accusation, where they accused Escobedo of murder. Thus, whenever police officers shift their questioning from investigatory to accusatory, defendants are entitled to counsel and to refrain from conversing with officers unless counsel is present.</i></p>	<p>Denial of counsel and lack of being advised of right to remain silent</p>
<p>Miranda v. Arizona (1966)</p>	<p>Miranda was arrested on suspicion of rape & kidnapping. He was not permitted to talk to an attorney, nor was he advised of his right to one. He was interrogated by police for several hours, eventually confessing & signing a written confession. He was convicted. Miranda appealed, contending that his right to due process had been violated because he had not first been advised of his right to remain silent and to have an attorney present during custodial interrogation. <i>The SC agreed & set forth the Miranda warning. This monumental decision provided that confessions made by suspects who were not notified of their due-process rights cannot be admitted as evidence. Suspects must be advised of certain rights before they are questioned by police; these rights include the right to remain silent, the right to counsel, the right to free counsel if suspects cannot afford one, & the right to terminate questioning at any time.</i></p>	<p>Denial of counsel – not advised of certain rights (Miranda warnings)</p>
<p>The Erosion of Miranda</p>		
<p>Harris v. New York (1971)</p>	<p>Harris was indicted for selling heroin. During his trial, statements were admitted into evidence that Harris had made to police, both before and after he was told his Miranda rights. Some of these statements involved transactional details of his heroin sales. Harris was cross-examined by the prosecutor about these pre-Miranda statements. He was convicted. He sought to suppress these statements from his case and appealed to the SC. <i>The SC affirmed Harris' conviction, saying that Harris could not invoke the Fifth Amendment concerning statements he had already made to police. Harris' past inconsistent and conflicted statements were within the proper scope of cross-examination by the prosecutor and unprotected by any Fifth Amendment claim.</i></p>	<p>Fifth Amendment</p>
<p>Michigan v. Tucker (1974)</p>	<p>Tucker, an indigent, was arrested by police as a rape suspect. He was told that he could remain silent & had a right to counsel, but he was not advised of his right to counsel if indigent. Tucker told police, without the presence of counsel, that he was with a friend, Henderson, at the time of the alleged rape. However, the police later determined from questioning Henderson that Henderson only had incriminating information about Tucker & did not support his alibi. Henderson was later called to testify in court against Tucker & gave the incriminating statements, nullifying Tucker's alibi. Tucker was convicted of rape. He sought an appeal through a habeas corpus petition, alleging that his Miranda rights had not been observed by police, & that Henderson's testimony ought to have been suppressed, inasmuch as Henderson came to police attention only after Tucker brought up his name as an alibi witness. A lower court agreed and reversed the conviction. The government appealed, and the SC heard the case. <i>The SC reinstated Tucker's rape conviction, holding that the failure of police to advise Tucker of his right to appointed counsel had no bearing on the reliability of Henderson's testimony, which was subjected to cross-examination in a fair trial later. The use of testimony of a witness discovered by police as the result of Tucker's statements under these circumstances did not violate Tucker's 5th, 6th, and 14th Amendment rights. The SC further declared that although the police failed to afford Tucker the full measure of procedural safeguards later set forth in Miranda, this failure did not deprive Tucker of his privilege against self-incrimination, since the record clearly indicates that Tucker's statements during police interrogation were not involuntary or the result of potential legal sanctions. The evidence derived from the police interrogation was therefore admissible.</i></p>	<p>Exception to Miranda – lack of observance of Miranda did not deprive suspect of privilege against self-incrimination</p>

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<p>Brewer v. Williams (1977)</p>	<p>Williams was a suspect in a the disappearance of a ten-year old girl from a YMCA building on Christmas Eve, in Des Moines, Iowa. He was seen leaving the building with something wrapped in a blanket, with skinny legs sticking out. William's car was spotted later about 150 miles from Des Moines, and he was apprehended in Davenport. Des Moines police went to Davenport to bring Williams back to Des Moines, and during their return trip they asked him various questions. As it was beginning to snow heavily, the speculated out loud that a small girl's body would be difficult to find out in the snow and that the girl should at least have a proper "Christian burial." Williams broke down, admitted to the crime of murder, and led police to the girl's body. He was subsequently convicted of murder, but he appealed and his conviction was overturned because police had interrogated him without an attorney present during their trip back to Des Moines. (A subsequent retrial resulted in Williams's conviction on other grounds, as there was additional incriminating evidence in his automobile.) But the Christian burial case, as it is known, clearly illustrates that police officers may not conduct interrogations of suspects without first advising them of their right to counsel.</p>	<p>No interrogation without advising of right to counsel</p>
<p>New York v. Quarles (1984)</p>	<p>A woman reported that she had just been raped by an armed man, who ran into a supermarket. Police went into the market and saw Quarles. They approached him and had him place his hands on his head. A pat-down led to the discovery of an empty shoulder holster. Fearing that a firearm was near Quarles, making the issue of public safety of paramount concern, police asked Quarles where the gun was. He identified where he had thrown it among some empty cartons. The officers retrieved the gun and then read Quarles his Miranda rights. He was charged with rape and convicted. Quarles appealed, arguing that the initial statements he gave about the whereabouts of his gun should have been excluded as evidence against him, since officers had not told him his rights prior to questioning him about the gun's whereabouts. <i>The SC upheld Quarles's conviction, saying that officer concern for public safety, where a firearm was near a potentially dangerous suspect, overrides the matter of advising suspects of their right to silence & other Miranda warnings. Thus the SC created a public safety exception to allow investigating officers to bypass the Miranda warning when public safety is believed to be in jeopardy.</i></p>	<p>Exception to Miranda – Public Safety</p>
<p>Nix v. Williams (1984)</p>	<p>On Christmas Eve, a 10-year old girl was missing from a YMCA building in Des Moines, Iowa. Eyewitnesses reported later observing Williams leaving the YMCA building carrying a large bundle wrapped in a blanket, with two skinny legs protruding. Officers found Williams's car the next day 160 miles east of Des Moines. At a rest stop between where the car was found and the YMCA building they discovered items of clothing and other articles. They assumed that the girl's body was probably somewhere between Des Moines and where Williams's car was found. Williams was subsequently found in a nearby town and arrested. While he was being driven back to Des Moines in a police vehicle, police officers engaged him in a conversation relating to the girl's whereabouts. Because it had recently snowed, finding her body would be difficult. Officers suggested to Williams that he ought to tell them where her body was so that they could give her a "Christian burial." Williams confessed and directed officers to the girl's body. Williams was charged with and convicted of first-degree murder. He appealed, and his conviction was overturned inasmuch as police officers had not advised him of his Miranda rights. He was subjected to a second trial, in which his original confession was excluded. He was convicted again, but this time because the prosecutor showed that the girl's body would have been discovered eventually, thus providing the conclusive evidence against Williams. The significance of this case is that it introduced the inevitable-discovery exception to the exclusionary rule, whereby prosecutors may argue that inculpatory evidence may be introduced against criminal suspects if it can be shown that police would have eventually discovered the incriminating evidence.</p>	<p>Inevitable discovery exception to Exclusionary Rule</p>