

CASE NO. 17-001
SUPREME COURT

PC v. STATE OF MINNESOTA

Parties: **Appellants – PC**
 Respondent – State of Minnesota

Issues:

- (1) Whether Cruman’s Fourth Amendment rights against unlawful search and seizure were violated when the principal compelled him to relinquish access to his Facebook account.
- (2) Whether Cruman’s Fifth Amendment rights against self-incrimination were violated when the principal questioned him and procured his confession.

Facts:

Scrava School of Health Sciences and Engineering is a public high school located in the state of Minnesota with a student body of approximately 2,500 students. Over the past few years, an increasingly alarming number of students at Scrava have been caught engaging in marijuana use and sale on campus. In 2014, Principal Lyons instituted a number of preventive measures to counteract this trend, and additionally began cracking down on drug possession on campus. Students began seeing more and more sweeps by school administrators with trained drug-sniffing dogs, as well as regular bookbag checks.

As a result, drug use on campus sharply decreased on the whole. Unfortunately, there were several students who responded in the opposite manner, turning to more clever means to hide drugs on campus and conduct illicit transactions. To facilitate their efforts, these students formed a Facebook group, which in total accumulated about 30 members.

In the Facebook group, students made posts offering to either buy or sell illicit substances, which were most commonly marijuana. The group was created and maintained as a secret group, meaning that the existence of the group, its membership, and its contents were private to its members, and the only way to gain access to the group was by invitation from an existing member.

On October 22nd, 2014, Principal Lyons received an anonymous tip that Peter Cruman, a current junior at Scrava, had posted in the Facebook group that he would be conducting a few sales on campus after school that day. The school resource officer (SRO) pulled Cruman out of class and escorted him to the administrative office to be questioned by the principal regarding his planned drug deals. Prior to receiving the anonymous tip, the existence of the group was not known to school administrators, and aside from Principal Lyons, none of the other school administrators maintained active Facebook accounts.

Initially, Cruman denied both involvement with the Facebook group and plans to conduct drug deals on that day. When the principal requested that he log onto his Facebook account on the principal’s computer, Cruman refused to do so. However, after two and a half hours of questioning, Cruman finally acquiesced to the principal’s persistent requests and logged in using a nearby computer, thus allowing the principal to see the contents of his profile and his posts.

Once logged in, Principal Lyons found the Facebook group, where he saw the incriminating

posts indicated by the anonymous tip. Cruman then admitted to dealing drugs, and hand-wrote and signed a confession which was turned over to the school. Cruman also led both the Principal and the SRO to a location on school grounds outside the building where he had hidden marijuana. The school later referred the case to law enforcement, and Cruman was formally charged.

The SRO did not assist Principal Lyons in questioning Cruman, nor did the Vice Principal or any other school official. At no point did Cruman attempt to leave the principal's office. In addition, Cruman's parents were not called until after his questioning and subsequent confession.

During his trial, Cruman moved to have both his confession and the evidence acquired from the Facebook group suppressed. Cruman argued that his statements under questioning and subsequent confession were inadmissible as a violation of the self-incrimination clause of the Fifth Amendment because he was not read his Miranda rights by the principal. Additionally, Cruman argued that his online posts were found as the result of an unlawful search, and were thus invalid under the exclusionary principle. Nonetheless, the court allowed the admission of all of the above as evidence, and Cruman was convicted and sentenced.

Upon appeal, the Court of Appeals upheld this ruling. Cruman appealed to the Supreme Court, which granted certiorari.

Authorities:

The following is a brief summary of some things you should think about and keep in mind when you read the cases and as you prepare your briefs and arguments. You are not limited to these points. Instead, they are just good starter questions to think about. You will also notice some cases are available on the YIG website. These cases represent some of the materials you can use to begin your research.

Summary:

Issue #1 – Right Against Unreasonable Search and Seizure

Does the Fourth Amendment protect Cruman against actions by school officials?
Is any information stored on Facebook protected by the Fourth Amendment?
Is information on Facebook that is private or secret entitled to greater protection?

Issue #2 – Right Against Self-Incrimination

Was Cruman voluntarily speaking with Principal Lyons?
Should someone's age be taken in account to determine if a Miranda Warning is necessary?
Was Cruman in custody?

Cases and Related Materials:

Miranda v. Arizona (384 U.S. 436)

Safford United School Dist. #1 v. Redding (557 U.S. 364)

J.D.B. v. North Carolina (564 U.S. ____) (Docket 09-11121)

In re Gault (387 U.S. 1)

US Constitution, Fourth Amendment

US Constitution, Fifth Amendment