

Miller V. Alabama And Jackson V. Arkansas

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Juvenile Life Sentences in Miller and Jackson

In the two cases Miller V. Alabama and Jackson V. Arkansas, two 14-year-old juveniles were found guilty of murder and received life imprisonment sentences without parole. The Supreme Court, in a landmark decision, overturned the decision, citing the decision to be unconstitutional, and prohibited mandatory life sentences for juvenile offenders without parole in consideration of the juvenile's potential for change (AP, 2017).

Case Background and the Homicide Offenses

The case background involves Miller and Jackson, who had committed and participated in acts of homicide. Miller, along with his friend, had beaten another boy and set his trailer on fire, resulting in his death. Miller was charged initially as a juvenile but later shifted to an adult hearing, where he was found guilty of murder by arson. He was given a life sentence without parole. Jackson accompanied two other boys to commit a robbery at a video store in which one of his co-conspirators had carried a shotgun and fired at the store manager. Jackson was also charged with aggravated robbery and capital felony murder (Miller v. Alabama and Jackson v. Hobbs, 2012).

The Supreme Court's Eighth Amendment Decision

The Supreme Court of the United States, in a 5-4 vote in 2012, declared that sentencing juveniles to a life sentence without parole amounted to an unusual and cruel punishment and was unconstitutional. The Eighth Amendment prohibition by the majority of the jury prohibits unusual and cruel punishments and grants individuals the right not to be subject to excessive sanctions. The judicial principle behind this is that an offender should be handed only a punishment that is graduated and proportionate to the offence (AP, 2017). The decision stated:

Mandatory Sentencing and Juvenile Culpability

"In neither case did the sentencing authority have any discretion to impose a different punishment. Such a scheme prevents those meting out punishment from considering a juvenile's 'lessened culpability' and greater capacity for change" (Miller Vs Alabama, 2012).

Family Environment and Adolescent Development

According to Justice Kagan, “It prevents taking into account the family and home environment that surrounds him – and from which he cannot usually extricate himself – no matter how brutal or dysfunctional” (Adam Liptak, 2012).

Precedent on Juvenile Punishment

The Supreme Court put into review a previous case law related to children’s criminal sentences. It previously held that capital punishment cannot be given to children on account of the Eighth Amendment, and neither can parole be denied to a juvenile who is given a life sentence on account of a non-homicide offence. Those case lines also noted that a life sentence for juveniles without parole is comparable to the death penalty. Another line of Supreme Court cases required authorities to take into consideration the defendant’s characteristics and offence details before passing the death sentence (*Miller v. Alabama* and *Jackson v. Hobbs*, 2012). Based on the above case lines, the Court declared that juveniles must not be handed life sentences without parole as it is a violation of the Eighth Amendment. It was also acknowledged that children must be constitutionally regarded as different from adults due to an underdeveloped sense of responsibility and a lack of maturity that can lead to impulsivity, recklessness and heedless risk-taking.

Dissenting Judicial Opinions

The dissenting positions argued against the majority decision, as Judges Scalia, Roberts, Alito and Thomas said that the Eighth Amendment lays only a prohibition against unusual and cruel punishments, whereas a life without parole cannot reasonably be labelled as unusual since there are already 2500 prisoners that are serving their life sentences for homicide offences committed before they were 18, with many of them mandated statutorily. Furthermore, the court’s precedents that require taking into account ‘evolving standards of decency’ and an “objective indicia of society’s standards” also conclude that the punishment may not be termed unusual. Judge Scalia and Thomas remarked that the decision was not consistent with how the unusual and cruel punishment clauses were understood in the precedents the court relied upon since they were only meant to be applicable to the methods of punishment that were adopted (Barnes, 2012). Judge Alito also remarked that the trend of Eighth Amendment precedent adopted by the court actually ignores indicia according to the legislatures of the majority of the states, when they decided to decrease juvenile offenders sentences for those who were 17 at the time of committing the offence and had a maturity level almost the same as an adult.

Neuroscience and the Capacity for Change

The decision by the Supreme Court was considered a victory for neuroscience as in earlier cases such as *Roper v. Simmons*, 543 U.S. 551 (2005) and *Graham v. Florida*, 130 S. Ct. 2011 (2010), the American Psychological Association also supported the position that developmental psychology and neuroscience suggested that juveniles were not as culpable as adults. Therefore, their vulnerability, immaturity, and changeability should be taken into account before they are handed sentences (APA, 2012). However, although psychologically, they may have a less sense of responsibility than adults, if the level of crime is the same, then they deserve a similar punishment. Because it is not always a question of science but ultimately a moral and legal question. Science alone should not drive a court decision but only serve as a rhetorical leverage for judges when they write an opinion. I find myself agreeing more with the line of reasoning adopted by the dissenting judges since the case has multiple implications. The rights of the victim's family and the social effects of the decision must also be taken into account before relying on ever-evolving psychological research, especially when the constitutional clause could also be interpreted differently.

References

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