



Miller v. Alabama; Jackson v. Hobbs, 132 S.Ct. 2455 (U.S. 2012)

Topics Covered: Criminal Law, Minors' Rights

Outcome: Neutral

Issue

The issue in this case is whether a sentence of life imprisonment without possibility of parole, when imposed on a person who committed a homicide at the age of 14, violates the Eighth Amendment prohibition against cruel and unusual punishments.

AMA Interest

The AMA supports the United Nations Convention on the Rights of the Child. Article 37 of this convention, in turn, opposes the imposition of sentences of life imprisonment without possibility of release for offenses committed by persons below 18 years of age.

Case Summary

During the course of a robbery, Evan Miller savagely beat and killed a man. He then set a fire to try and hide the crime. He did this when he was 14 years old. An Alabama court sentenced Miller to life imprisonment without parole. By statute, the trial court did not consider possibly mitigating circumstances, such as Miller's youth. The case was appealed to the United States Supreme Court. On June 25, 2012, the Supreme Court held that these criminal sentences did indeed violate the Eighth Amendment. The Court held that Miller was entitled to a hearing on whether mitigating circumstances might mandate a lesser sentence.

AMA Involvement

The AMA and the American Academy of Child and Adolescent Psychiatry submitted an *amicus* brief to the Supreme Court. Although the brief did not explicitly support either party and did not urge the Court to rule one way or the other on the ultimate constitutional question, it did point out how the brains of 14 year old children differ physiologically from adult brains and how such differences are likely to affect their personalities and ability to make considered judgments.

United States Supreme Court brief