BENCH MEMORANDUM

TO: Judges of the 2014 National High School Moot Court Competition
FROM: The Marshall-Brennan Constitutional Literacy Project
SUBJECT: Bench Memorandum for R.J.N. v. North Redding

On behalf of the Marshall-Brennan Constitutional Literacy Project, we would like to express our gratitude and welcome you to the 2014 William H. Karchmer National High School Moot Court Competition. Your efforts on behalf of the Washington College of Law and the Marshall-Brennan Constitutional Literacy Project are greatly appreciated and will serve to enhance the legal education of high school students by helping them improve their appellate advocacy skills.

In this Bench Memo, please find the following:

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We also encourage you to read the Petitioner’s and Respondent’s Briefs for a more detailed analysis and to become familiar with the materials given to the competitors. In addition to the parties’ full arguments, the Briefs include a transcript of the in-school police interview at the center of this case, a school policy on school relations with law enforcement, and a New York Times newspaper article about delaying Miranda warnings for the suspect in the Boston Marathon bombing case.

A list of sample questions for the Petitioner and Respondent will be provided at the competition.

THINGS TO KEEP IN MIND

Scope of Questions: Please confine questions to the Fifth Amendment. Competitors are not expected to answer questions about standing, ripeness, mootness, standard of review, remedy, and other substantive areas of the law.

Competitors’ Inexperience: Please consider the competitors’ relative inexperience as you formulate questions and evaluate responses. Competitors are high school students, not law students. For many, this is the first time they have taken part in a competition where they are judged on their public speaking skills and ability to answer questions before a panel of judges.

Bases of Evaluation: To the extent possible, please evaluate competitors based on the quality of their responses and overall presentation—not against their opponent. Also, please do not evaluate competitors based on how professionally they are dressed.
**Learning Experience:** Please keep in mind that this is a learning experience for all of our competitors. This is especially important as you give feedback to competitors after each round. Some competitors may go on to college and law school, while some will use these skills to become better advocates in their daily lives. To the extent possible, provide feedback that will be beneficial to competitors across that spectrum.

**SYNOPSIS**

*R.J.N. v. North Redding* is a Fifth Amendment case dealing with an in-school police interview of a twelve-year-old student. In this case, R.J.N. is a middle school student who is pulled out of class and questioned by a police officer—without being informed of his *Miranda* rights—about a bomb threat posted on his Twitter account. This case presents two questions: (1) whether R.J.N. was subject to custodial interrogation at the time, thus requiring *Miranda* warning, and (2) whether the Public Safety Exception applied to exempt the police officer from the *Miranda* requirement.

Competitors representing the Petitioner, R.J.N., will argue that *Miranda* warnings were constitutionally required. They will use facts and cases to argue that R.J.N. was in custody and under interrogation at the time of the questioning, and furthermore, that the Public Safety Exception to the *Miranda* requirement did not apply.

Competitors representing the Respondent, the fictional state of North Redding, will argue that *Miranda* warnings were not constitutionally required for two independent reasons. First, they will use facts and cases to argue that R.J.N. was neither in custody nor under interrogation at the time of the questioning. Second, they will argue that even if R.J.N. was subject to custodial interrogation, the Public Safety Exception applied to exempt the police officer from informing R.J.N. of his *Miranda* rights.

**STATEMENT OF FACTS**

At 7:22 a.m. on the morning of Tuesday, May 1, 2007, the Hillcrest Police Department in Hillcrest, North Redding, received a 911 phone call about a bomb threat at the local middle school. The unidentified caller directed police officers to the Twitter account of @SkoolSux115, who had tweeted at 6:52 a.m., “6th period today…get ready to get bombed hillcrest #thisisnotadrill.” Police officers traced the Twitter account to a Hillcrest Middle School sixth-grade student named R.J.N., who was twelve years old at the time.

Police Officer Finch arrived at the school at 7:45 a.m., twenty minutes after the start of first period. She went directly to the main office, where she informed the school principal of the bomb threat. Principal Weatherby immediately paged the guidance counselor, Ms. Clearwater, and asked her to call R.J.N.’s parents. Ms. Clearwater called R.J.N.’s home phone twice, but there was no answer. She did not leave a message either time. While Ms. Clearwater waited in the principal’s office, Principal Weatherby and Officer Finch walked to R.J.N.’s first-period science class, removed him from class, and escorted him to the principal’s office. On the walk down the hall, R.J.N. reached for his phone in his pocket and started to record what was happening, without Principal Weatherby or Officer Finch noticing.
The principal’s office was large, bright, and decorated with Hillcrest Middle School colors, flags, and athletic uniforms. Other than the principal’s desk and chair, the only furniture in the room was a small round table surrounded by four wooden chairs. R.J.N. was told to sit at the table with Officer Finch, Principal Weatherby, and Ms. Clearwater. The door to the principal’s office remained closed.

Once seated, Officer Finch informed R.J.N. that she was a police officer from the Hillcrest Police Department. She wore a full police uniform, with her baton and gun visibly attached to her belt. She started by asking R.J.N. if he knew why she wanted to speak with him. R.J.N. shrugged. Officer Finch then unfolded a piece of paper from her pocket—a computer printout of the bomb threat from @SkoolSux115’s Twitter account—and placed it on the table before him. She asked if R.J.N. recognized the tweet. R.J.N. shrugged again and said he had to go back to science class. As he stood up to leave, Ms. Clearwater explained that he was not in trouble and could go back to class as soon as he helped Officer Finch understand that she did not need to worry about a bomb at the school. R.J.N. sat back down.

Officer Finch again asked if he recognized the tweet on the piece of paper. R.J.N. eventually admitted that @SkoolSux115 was his Twitter account, but he denied tweeting the bomb threat. He explained that somebody must have hacked his Twitter account and posted the tweet. Officer Finch asked R.J.N. if he knew who might have hacked his account. R.J.N. hesitated before naming several other sixth-grade students. When Officer Finch asked why these students might have hacked his Twitter account, R.J.N. mumbled something about other students “having it out for him,” but he did not explain further when asked.

Officer Finch then asked R.J.N. where he was at 6:52 a.m. that day, when the tweet was posted on @SkoolSux115’s Twitter account. R.J.N. replied that he was either waiting for the school bus or had just gotten on the school bus. He then added that another student might have taken his phone while he was napping on the bus and sent the tweet using his phone. Officer Finch asked if R.J.N.’s phone was passcode protected. R.J.N. answered that it was but that his passcode was not difficult to guess. At this point, Officer Finch leaned forward so her face was less than one foot away from R.J.N., who seemed uncomfortable and backed away slightly. Still leaning in, Officer Finch asked, “What if I told you, R.J.N., that I have a record of your text messages and phone calls from the bus this morning? Would you tell me that whoever stole your phone and tweeted from your account also texted and called your friends?” R.J.N. turned red and wiped his palms on his shirt several times before he eventually confessed to sending the tweet himself. He quickly followed up and said it was a joke and he didn’t actually have a bomb. With this confession, Officer Finch informed R.J.N. that he was under arrest for making a bomb threat and read R.J.N. his Miranda rights. The entire questioning process that occurred in the principal’s office lasted fifteen minutes. At no point did anyone ask R.J.N. if he wanted to have a parent or attorney with him, nor did R.J.N. ask for a parent or attorney.

While R.J.N. sat handcuffed in Principal Weatherby’s office, the 700 other students and staff members were evacuated from the school, and Officer Finch called the Hillcrest Police Department’s bomb squad to search the school for a possible bomb. Almost one hour later, the bomb squad concluded that there was no bomb, and the students and staff were allowed to return to their normal classes. Even though the bomb squad did not find a bomb in the school, Officer
Finch took R.J.N. to the police station anyway. Ms. Clearwater called R.J.N.’s home phone number again. When nobody responded, she left a message informing R.J.N.’s parents that he had been arrested for making a bomb threat on Twitter. Ms. Clearwater then called R.J.N.’s mother at work and explained that R.J.N. had been arrested. R.J.N.’s mother said she would be at the police station in five minutes.

**PROCEDURAL POSTURE**

In juvenile court, R.J.N.’s attorney filed a Motion to Suppress, asking the judge to disregard R.J.N.’s confession because Officer Finch had violated R.J.N.’s Fifth Amendment privilege against self-incrimination. The judge denied the motion and found R.J.N. guilty of making the bomb threat. The North Redding Court of Appeals and the North Redding Supreme Court both affirmed this decision. R.J.N. now appeals to the United States Supreme Court.

**QUESTIONS PRESENTED**

I. Was R.J.N. under custodial interrogation for *Miranda* purposes when a police officer removed him from class and questioned him in the principal’s office during school hours about an alleged bomb threat that was posted on R.J.N.’s personal Twitter account?

II. Did the alleged bomb threat endanger school safety when it was posted on R.J.N.’s Twitter account at 6:52 a.m., warning that a bomb would explode at Hillcrest Middle School about six hours later that day?

**LEGAL STANDARD**

**CUSTODIAL INTERROGATION**

Under *Miranda v. Arizona*, 384 U.S. 436 (1966), police officers are required to inform a suspect of his or her Fifth Amendment right to remain silent and right to counsel anytime a suspect is subject to custodial interrogation.

A suspect is in custody when a reasonable person in the suspect’s position would not feel free to leave. *See id.* at 444 (equating “custody” with being “deprived of [a suspect’s] freedom of action in any significant way”). When determining whether a suspect was in custody, courts must take into account all of the surrounding circumstances. *Rhode Island v. Innis*, 446 U.S. 291 (1980). The suspect’s age is one factor for courts to consider. *J.D.B. v. North Carolina*, 131 S. Ct. 2394, 2406 (2011).

A suspect is under interrogation when a police officer’s words or actions are reasonably likely to elicit an incriminating response from the suspect and the officer either intends to elicit such a response or should know such a response is likely. *Rhode Island v. Innis*, 446 U.S. 291, 301 (1980).
PUBLIC SAFETY EXCEPTION

The Public Safety Exception exempts police officers from the *Miranda* requirement. The Supreme Court created the Public Safety Exception in *New York v. Quarles*, 467 U.S. 649 (1984), recognizing that in situations where a threat to public safety compels a police officer to question a suspect immediately, the need for answers outweighs the need for *Miranda* protections. *Id.* at 657.

OUTLINE OF THE ARGUMENTS

PETITIONER’S ARGUMENT

I. Officer Finch violated R.J.N.’s Fifth Amendment rights when she removed him from class and interrogated him in the principal’s office about a bomb threat without informing him of his Miranda rights.

R.J.N. was in custody and under interrogation, so Officer Finch was constitutionally required to inform R.J.N. of his Miranda rights. Because she did not do so, Officer Finch obtained R.J.N.’s confession through a violation of his Fifth Amendment rights. Thus, the juvenile court should have suppressed R.J.N.’s confession, and R.J.N. is entitled to a new trial in which the jury does not hear his confession.

A. R.J.N. was in custody because no reasonable twelve-year-old would have felt free to leave the principal’s office during the questioning.

First, R.J.N. was removed from his science class and escorted to the principal’s office by a uniformed police officer carrying a gun. Even a reasonable adult would not feel free to walk away from an armed police officer, so a twelve-year-old child certainly would not feel free to leave.

Second, the presence of R.J.N.’s principal and guidance counselor in the principal’s office indicated to R.J.N. that he was not only in trouble with the police but also with his school. Students are taught to listen when teachers and principals talk to them—not to walk away when they do not like the conversation.

Third, the door to the principal’s office remained closed throughout the questioning. No reasonable twelve-year-old would understand this to mean he is free to walk out of the room. In fact, a closed door sends just the opposite message: Nobody is allowed to leave the room.

Finally, even though there were four adults in the room with R.J.N. during the questioning, none of them told R.J.N. that he was free to leave, and none of them asked him if he wanted to speak with his parents. Given these circumstances, any twelve-year-old would have felt intimidated by this situation, and no twelve-year-old would have felt free to leave. For these reasons, R.J.N. was clearly in custody while he was questioned in the principal’s office.
B. R.J.N. was under interrogation because Officer Finch used intimidating, accusatory words and actions to pressure R.J.N. into confessing to the tweet.

Officer Finch’s words and actions were reasonably likely to—and actually did—cause R.J.N. to confess to making the bomb threat on Twitter. For example, Officer Finch tricked R.J.N. and scared him into believing that she had proof that R.J.N. had posted the bomb threat on Twitter that morning. Her exact words were, “What if I told you, R.J.N., that I have a record of your text messages and phone calls from the bus this morning? Would you tell me that whoever stole your phone and tweeted from your account also texted and called your friends?” This was a lie that Officer Finch told R.J.N. for one reason only: to scare R.J.N. into confessing.

In addition to this accusatory question, Officer Finch’s actions were intimidating as well. She leaned her face in, until she was less than twelve inches from R.J.N.’s face, before she asked this question. R.J.N. was visibly shaken by Officer Finch’s action, as he turned red and his palms became sweaty. Because Officer Finch’s words and actions were meant to scare R.J.N. into confessing, R.J.N. was under interrogation at the time.

II. Furthermore, the facts of the case did not trigger the Public Safety Exception to the Miranda requirement because no emergency existed when Officer Finch arrived at Hillcrest Middle School.

In this case, no emergency allowed Officer Finch to subject R.J.N. to custodial interrogation without informing him of his Miranda rights. After the Hillcrest Police Department learned about the bomb threat, it did not respond as though an emergency existed. For instance, the police department did not send its bomb squad to the middle school, even though 700 lives would have been in danger if a bomb exploded at Hillcrest. Instead, the police department sent only one officer, Officer Finch, by herself. Even when Officer Finch arrived, the school did not evacuate students and staff. If a true emergency existed, the Hillcrest Police Department would have sent its bomb squad and multiple police officers to handle the situation right away, and the school would have evacuated students and teachers as soon as they learned of the bomb threat.

Furthermore, if public safety was truly at risk, questioning R.J.N. about the bomb threat—as opposed to the bomb itself—would not likely have kept the school safe. This is different from Quarles because in Quarles, the Court found that asking the suspect where the gun was located allowed police to find the gun and prevent anyone from using it. But in this case, asking R.J.N. whether he tweeted the bomb threat would not have stopped a bomb from exploding. Importantly, it does not matter that Officer Finch called the bomb squad and that Principal Weatherby evacuated the school after R.J.N. had confessed to posting the tweet. When determining whether the Public Safety Exception applies, courts look at whether an emergency existed before custodial interrogation took place—not after.
RESPONDENT’S ARGUMENT

I. Officer Finch did not violate R.J.N.’s Fifth Amendment rights when she and two school administrators got R.J.N. to voluntarily confess that he posted a bomb threat on his Twitter account.

R.J.N. was neither in custody nor under interrogation. Therefore, Officer Finch was under no obligation to inform R.J.N. of his Miranda rights. R.J.N. confessed to tweeting the bomb threat on his own, without being forced, and Officer Finch did not obtain this confession by violating R.J.N.’s Fifth Amendment rights. Therefore, R.J.N.’s confession was admissible at trial and the juvenile court was correct to deny his motion to suppress his confession.

A. R.J.N. was not in custody during questioning because he was free to leave the principal’s office at any time.

The circumstances clearly show that the environment in the principal’s office was not very coercive, and a reasonable person in R.J.N.’s situation would have felt free to leave. The fact that R.J.N. actually tried to leave Principal Weatherby’s office to go back to class shows that he felt like he was free to leave. Even though he ultimately chose to stay, he did this because he wanted to—not because anyone made him. When he stood up to go, nobody told him he had to stay, and nobody made a move to stop him from leaving.

The fact that the door to the principal’s office was closed does not indicate that R.J.N. was in custody. Most conversations between school administrators and students take place in private when they relate to disciplinary issues. One student’s misconduct is rarely the business of any other student, and for the same reason that students’ academic files are kept in closed cabinets behind closed doors, school administrators make a habit of closing the office door when speaking with students about the student’s academic performance and behavior in school. Nothing indicates that the door to Principal Weatherby’s office was locked, and a closed door on its own is not enough to indicate that R.J.N. was not free to leave.

Furthermore, Petitioner’s argument that the presence of school administrators placed R.J.N. in custody is plainly wrong. First, for purposes of Miranda warnings, custody is a question that relates only to police—not to school principals and guidance counselors. Second, Principal Weatherby and Ms. Clearwater did not make the situation more intimidating for R.J.N. than it would have been if R.J.N. was alone with Officer Finch. If anything, Ms. Clearwater was a comforting presence throughout the brief fifteen-minute questioning, particularly when she explained nicely to R.J.N. why Officer Finch wished to speak with him. Also, Principal Weatherby did not escalate the situation because she did not speak throughout the questioning.

Most significantly, custodial interrogations ordinarily take place inside small, windowless interrogation rooms inside police stations. R.J.N. was questioned in a large, bright office at his middle school, surrounded by familiar faces. As the Supreme Court recognized in J.D.B. v. North Carolina, a police interview that does not take place in custody does not raise the risk that the suspect’s confession is involuntary. Here, the environment in the principal’s office was not
highly coercive. These circumstances indicate that R.J.N. was not in custody during his questioning, meaning Officer Finch was not required to inform R.J.N. of his *Miranda* rights.

**B. R.J.N. was not under interrogation because Officer Finch asked honest and unthreatening questions that were not intended to cause R.J.N. to confess.**

Officer Finch said and did nothing that was reasonably likely to cause R.J.N. to confess to sending the tweet. Her questions were open-ended, rather than accusatory. When she handed R.J.N. a printout of the tweet, she asked, “It’s a tweet sent by @SkoolSux115. Do you know who that might be?” She did not say, for instance, “It’s a tweet sent by @SkoolSux115. That’s your account, isn’t it?” Also, she never asked R.J.N. if he had made the bomb threat. She asked R.J.N. whether someone had taken his phone while he was sleeping on the bus and if he knew who might have posted the tweet, but she never asked R.J.N. if he himself had tweeted the bomb threat. Her questions were not likely to cause R.J.N. to confess.

Furthermore, Petitioner’s assertion that Officer Finch lied to R.J.N. is false. At no point did Officer Finch lie to, or mislead R.J.N. Her question about what he would say if she told him she had a record of his texts and phone calls was merely a hypothetical question. She did not say that she in fact had such a record. Because none of Officer Finch’s words or actions were reasonably likely to cause R.J.N. to confess, R.J.N.’s questioning did not rise to the level of interrogation.

**II. Even if R.J.N. was under custodial interrogation, Officer Finch was not required to read R.J.N. his *Miranda* rights because the Public Safety Exception to the Fifth Amendment applied.**

An emergency situation existed when a student threatened to bomb the entire middle school. The safety of all 700 students and staff was immediately in danger when the bomb threat was posted on Twitter at 6:52 a.m. The tweet was very specific: not only did it indicate that a bomb was going to explode, but the tweet also included the date, time, and location of the explosion, as well as a warning that this was not a drill. Public safety was at risk whether or not the bomb was real. If Officer Finch did not immediately question R.J.N. about the bomb threat, she would have been unable to find the bomb before it exploded or make sure there was no bomb in the school. Reading R.J.N. his Miranda rights would have prevented Officer Finch from adequately ensuring the safety of the school, students, and staff.

The fact that the bomb squad did not accompany Officer Finch to the school and that the school was not evacuated right away does not demonstrate a lack of emergency, as Petitioner attempts to argue. When an emergency exists, it exists whether or not people panic or respond calmly. How people respond to a situation does not change the existence of that situation—rather, it only affects the outcome of the situation. But the outcome is irrelevant here, as the Public Safety Exception is not concerned with how safe the public is after the emergency has ended. It is only concerned with whether the public is at risk before an emergency has had a chance to unfold. As further indication that the police department recognized the emergency situation, Officer Finch arrived at the school approximately twenty minutes after receiving the phone call.
CASE SUMMARIES


A kidnapping and sexual assault occurred in Phoenix, Arizona, in 1963. Ernesto Miranda was arrested and questioned without being informed of his right to counsel. Miranda confessed and was convicted. In a 5–4 opinion, the United States Supreme Court overturned Miranda’s conviction, holding that his confession was inadmissible because his privilege against self-incrimination was not protected. After this case, all police officers were required to inform criminal suspects of their right to remain silent and right to counsel prior to any custodial interrogation. These two rights are known today as “Miranda rights.”


In 2005, J.D.B. was a thirteen-year-old special education student in North Carolina. Suspecting that J.D.B. was involved in two recent burglaries, a police officer went to J.D.B.’s middle school and questioned him for thirty to forty-five minutes. The door to the conference room was closed, the police officer did not read J.D.B. his Miranda rights, J.D.B. was not given an opportunity to speak to his grandmother, and nobody informed J.D.B. that he was free to leave the room. J.D.B. eventually confessed to the burglaries. In a 5–4 opinion, the Supreme Court recognized the “very real differences between children and adults” and held that age is a relevant factor for courts to consider in determining whether a person is in custody.


Just after midnight in Queens, New York, in 1980, a woman approached two police officers on the road and informed them she had just been raped. She told the police officers the alleged rapist had just entered a nearby supermarket with a gun. At the supermarket, the police officer chased the suspect (Quarles) with his gun drawn, ordering him to stop. The officer then approached Quarles and frisked him, discovering an empty gun holster. When the police officer asked where the gun was, Quarles nodded in the direction of some empty cartons and said, “The gun is over there.” At trial, the judge excluded this statement because Quarles had not been informed of his Miranda rights. But the Supreme Court reversed and held that Miranda rights were not required in this case because public safety was in danger. In this case, the Supreme Court created the Public Safety Exception to the Miranda requirement.


A taxicab driver was shot and killed in Providence, Rhode Island, in 1975. Several days later, another taxicab driver was robbed at gunpoint. The police later found the suspect, Innis, and read him his Miranda rights. On the way to the police station, where Innis would be appointed a lawyer, the three police officers started a conversation in the car about a missing shotgun. One officer explained that a number of handicapped children went to school in the area and said, “God forbid one of them might find a weapon with shells and they might hurt themselves.” Another officer said, “It would be too bad if a little girl picks up the gun, maybe kills herself.” At this point, Innis interrupted the conversation and told the officers he would show them where
the gun was. The Supreme Court held that Innis was not under interrogation because it could not be said that the officers should have know that their conversation would cause Innis to confess.


A high school teacher found an empty prescription pill bottle for a prescription painkiller on the floor of the boys’ bathroom. The label indicated that the prescription belonged to N.C., a seventeen-year-old student. After some questioning about the pill bottle, N.C. admitted to giving two pills to a friend, at the insistence of the friend. The Kentucky Supreme Court applied the factors set forth in *J.D.B.* and held that the facts unequivocally indicated that N.C. was in custody at the time of his questioning: He was taken from his classroom by an armed police officer, he was questioned in a closed room, and he was never informed that he was free to leave. His mother was not contacted until after the questioning. The court held that no reasonable student under these circumstances would have felt free to remain silent or leave. Therefore, N.C. was subject to custodial interrogation and entitled to *Miranda* warnings.


In the Dean’s office, a high school Dean and school resource officer (SRO) questioned fifteen-year-old Marquita M. about a weapon she was rumored to have brought to school. Although she initially denied having a weapon, Marquita eventually admitted to maybe having a knife in her locker. She then admitted she had a knife in the pocket of her sweatshirt. A conversation then took place about why Marquita had a steak knife at school. At first, Marquita said she didn’t know what she planned to do with the knife, but she later admitted that she was having problems with another student, T.H., and they were supposed to fight later that day. When the SRO asked what might happen if the two fought, Marquita stated that T.H. would probably get stabbed.

The Illinois Court of Appeals held that Marquita was not in custody because neither the circumstances nor the questions indicated a custodial environment. She was questioned in the Dean’s office—not the police station—and throughout the questioning, she was not handcuffed, physically restrained, or searched. At no point did Marquita ask to speak with a family member. Further, the SRO’s questions were not confrontational. His questions were inquiosity—not accusatory. For instance, the SRO asked, “What would have happened if you and T.H. got into a fight?” rather than “You were going to stab T.H., weren’t you?” Considering all the circumstances, the court held that Marquita was not in custody, so *Miranda* warnings were not required.


A teacher discovered that her iPhone was stolen from her handbag while she was using the restroom, and a surveillance tape revealed that seventeen-year-old S.G. may have been involved. The principal questioned S.G. in the principal’s office about the theft, in the presence of a school resource officer (SRO)—an armed police officer assigned to the school—and without informing S.G. of his *Miranda* rights or giving him an opportunity to speak with his parents or guardians. S.G. confessed to participating in the iPhone theft. The Indiana Court of Appeals held that the questioning was proper. While the court acknowledged that under certain circumstances, a
police officer’s presence in conjunction with a school official’s presence may be significant enough to create a custodial environment, the court held that S.G. had not been subject to custodial interrogation in this case. The principal did not act as the SRO’s law enforcement agent, and there was no evidence that the SRO’s presence was threatening. Although the SRO was present during the questioning, he did not ask any questions or participate in any other way. Finally, there was no evidence about the size of the meeting room, whether the door was open or closed, or how long the meeting lasted. Because the questioning was not custodial, the *Miranda* warnings were not required.