

SJC rules mandatory life without parole is unconstitutional for adults under 21

Ruling impacts 18 to 20 year-olds convicted of first-degree murder

By [Ivy Scott](#) Globe Staff, Updated January 11, 2024, 33 minutes ago

The state's highest court ruled Thursday to raise the minimum age a person can be sentenced to mandatory life without parole from 18 to 21.

“Advancements in scientific research have confirmed what many know well through experience: the brains of emerging adults are not fully mature. Specifically, the scientific record strongly supports the contention that emerging adults 16 have the same core neurological characteristics as juveniles have,” Chief Justice Kimberly S. Budd wrote in the Supreme Judicial Court's decision in the case of *Commonwealth v. Sheldon Mattis*.

The highly anticipated 4-3 ruling is a landmark decision in Massachusetts that juvenile justice advocates are hailing as a major step forward for the reform-minded state. It will impact those 18 to 20 who have been convicted of first-degree murder. Lawyers for Mattis had argued that the then-18-year-old's mandatory life without parole sentence constituted cruel and unusual punishment, in violation of the state constitution Massachusetts Declaration of Rights.

“We know that a 16-year-old, a 17-year-old are simply not the same person by the time they’re 35. There’s an enormous amount of growth that happens and that you need to have another look,” at their development, said Lael Chester, Director of Columbia University’s Emerging Adult Justice Project.

“If you had to pick some period of time where you say a young person has transitioned from adolescence into adulthood, the research is pretty clear that 21 would make the most sense,” she added. “And 18 really doesn’t make much sense at all.”

In 2013, Mattis was convicted of first-degree murder under the joint venture theory and given a mandatory sentence of life without parole. Mattis was 18 in 2011 when he handed a gun to a friend, Nyasani Watt, on a Dorchester street. Watt fatally shot 16-year-old Jaivon Blake and wounded his friend. Both Mattis and Watt were convicted of first-degree murder for the slaying, but because Watt was 10 days shy of turning 18, he will be eligible for parole in 15 years because mandatory life sentences are banned for juvenile killers.

First degree murder convictions are automatically reviewed by the Supreme Judicial Court. The court affirmed the factual basis for both convictions in June 2020, but raised questions about the constitutionality of the disparate sentences. The court wrote in Watt’s decision that “it likely is time for us to revisit the boundary” between 17- and 18-year-old defendants when sentencing teenagers to life in prison.

A ruling on this revision, however, would require “an updated record reflecting the latest advances in scientific research on adolescent brain development and its impact on behavior.”

Mattis’ case was sent back to the Superior Court, which ruled in July 2022 that life

sentences for defendants 18 to 20 where a judge does not have the discretion to grant someone parole are unconstitutional.

The Commonwealth, represented by Suffolk District Attorney Kevin Hayden's office, agreed with the Superior Court's decision. Prosecutors wrote that, because there is the possibility — however small — for certain young adults to be fully mature, cold-blooded killers, judges should have the option to sentence someone to life with or without parole, depending on the circumstances.

However, Mattis appealed the decision back up to the Supreme Judicial Court, arguing that a life without parole sentence for 18- to 20-year-olds is cruel and unusual punishment regardless of the circumstances.

Mattis' attorneys pointed to a previous [Supreme Judicial Court ruling](#) where justices concluded in 2013 that all life without parole sentences for defendants under 18 are unconstitutional. In their brief, they pointed to brain science research reviewed by the Superior Court demonstrating that young adults, like younger teenagers, “are more prone to recklessness, impulsivity, and risk-taking; are more susceptible to peer-influence; and are more capable of changing as they mature.”

They added: “Because these were the very reasons the Supreme Court struck down mandatory [life without parole] and this Court struck down any imposition of [life without parole] for those under 18, this Court should do the same for late adolescents.”

This is a breaking story and will be updated.



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