No. 19-292

In the Supreme Court of the United States

ROXANNE TORRES, *PETITIONER*,

v.

JANICE MADRID AND RICHARD WILLIAMSON, *RESPONDENTS*.

On Writ of Certiorari to the U.S. Court of Appeals for the Tenth Circuit

BRIEF FOR RESPONDENTS

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QUESTIONS PRESENTED

Is an unsuccessful attempt to detain a suspect by use of physical force a "seizure" within the meaning of the Fourth Amendment or must physical force be successful in detaining a suspect to constitute a "seizure"?

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SUMMARY OF ARGUMENT

Since the founding, the Fourth Amendment's term “seizure” meant intentionally taking possession, custody, or physical control of a person, not mere application of physical force. Therefore, the Supreme Court should rule that in order for a seizure to take place within the meaning of the Fourth Amendment, physical force must be successful in detaining a suspect to constitute a “seizure”. The proper way to analyze claims is to use the “objective reasonableness” standard, rather than a substantive due process standard. Since the petitioner was never under the physical control of the officers nor submitted as a result of “show of authority”, she was never seized. The supreme court should reaffirm the Tenth Circuit’s conclusion that the petitioner was not seized under the definition of the Fourth Amendment, in alignment with its ruling in *California v. Hodari D.* and *Brower v. Inyo County* that a seizure only occurs when physical force is used to successfully detain, or obtain physical control of, the subject.

In this case, the petitioner, Torres, did not submit to the officers, nor did the officers obtain physical control of Torres. Despite the officers being in their

identifiable uniforms and demanding Torres to stop her movements, Torres did not submit nor stop her actions. In fact, she was capable of stealing a car and fleeing to another city after her encounter with the officers. Thus, no seizure took place. The use of force for seizure by the officers in this case was necessary because the officers had probable cause to retain her out of safety concerns and obligation. The force they used was also not excessive because the shots were unable to detain the petitioner from leaving the scene.

ARGUMENT

I. The definition of "seizure" within the meaning of the Fourth Amendment

The Fourth Amendment protects "the right of the people against unreasonable … seizures, but upon probable cause, … to be seized." U.S. Const. amend IV. Seizure occurs when "police's conduct would communicate to a reasonable person, taking into account the circumstances surrounding the encounter, that the person is not free to ignore the police presence and leave at his will" with two requirements -- show of authority and submission to the authority ("Fourth Amendment").

a) Framers' initial intent of the application of the Fourth Amendment

In James Madison's "Bill of Rights as Proposed", he established that "The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized." The bill was ratified to ensure all citizens are protected from governmental accusations and incrimination done with unjust approaches. However, governmental officials are granted the power to conduct search or seizure when there is a probable cause, such as increment evidence of criminal actions or threats to others, during emergencies or speial circumstances. The interpretation and application of the two clauses has been inherently fluid in history and was adapted overtime.

b) The evolution of the interpretation and application of the Fourth Amendment

Seizure was not always regulated by the strictures of the Fourth Amendment in the United States history. Until the twentieth century, no exclusionary rule was adopted to regulate federal authorities to provide citizens with a justified reason to question an arrest incident. The locality of most legal incidents also makes the Fourth Amendment tangential. Thus, the concept of arrest and seizure was formulated and evolved outside the scope of the

Fourth Amendment.

The definition of arrest is usually taken from the common law, which is "proven very malleable and has been engrafted with factual considerations and burdened by broad generalizations" (Clandcy, 2003). There are lots of conflicting definitions of what constituted an arrest within the common law. However, at the essence of the common law, eliminating extraneous definitions created by various authorities, the common law of arrest has two requisites of a successful arrest: 1) the officer must display a show of authority; and 2) the successful detention of the subject. In other words, an arrest only occurs when an officer achieves physical control over a subject. This definition of arrest has been applied and affirmed repeatedly. In *Bouldin v. State*, the Maryland Court of Appeals held that because "the requisite police constraint or control of Bouldin's person at the time the searches were made" was not met, no arrest happened during the search. *Bouldin v. State*, 26 Md. App. 545 (1975).

In *California v. Hodari D.*, this Court held that a common law arrest occurs when a law enforcement officer has physical contact (aka. touching) with a suspect or when submission of the suspect takes place.*California v. Hodari D.*, 499 U.S. 621 (1991) However, for a custody to be "complete", the suspect must be actually restrained or submits to a "show of authority" (Cornell Law School). Even though no arrival at the police station is required, a custody must be obtained for an arrest to be complete. Furthermore, the facts of the Hodari D. case are irrelevant in determining this precedent to begin with. Respondent Hodari D was never touched until he was tackled, of which there is no dispute at which he was seized, which is thus not part of the facts of the case. To state that there is substantial reason from a police chase in which no physical touch was applied to say that mere touch, but not control, is a seizure is irrelevant, and thus should not be applied to Torres v. Madrid.

Currently, this Court is using the common law of arrest to determine whether a seizure has taken place in an incident since the 1991 *California v. Hodari D.* Despite the changes, the very essence of the meaning of seizure has always been "intentionally taking possession, custody, or physical control of a person" since the founding. *Brower v. County of Inyo*, 489 U.S. 593, 396 (1989); *California v. Hodari D.*, 499 U.S. 621, 624 (1991).

c) Application of the definition of "seizure" to the current case

Since detaining the subject is a requisite of a seizure, no seizure took place in the current case because the officers had no physical contact with the Petitioner, failed to hold her in custody, and the Petitioner was only detained by other law officials one day after this incident had taken place. This court ruled in *Brendlin v. California* that a person in a car was detained when a stop was produced by legal actions, meaning that the subject submitted the authority. Following the logic and definition, in this case, because Torres was never stopped by the officers and never voluntarily submitted to the officers during their encounter, no seizure was performed by the officers.

II. Application of "objective reasonableness" to the evaluation of excessive force.

This court has stated that the proper interpretation of the case to have all "claims properly analyzed under the Fourth Amendment's "objective reasonableness" standard, rather than under a substantive due process standard." *Graham v. Connor,* 490 U.S. 386 (1989). In this case, the officers did not obtain physical control at all during their encounter with the petitioner. Even though the officers intended to stop the petitioner for reasonable and legitimate questioning, their intention does not determine the result of their actions. This court has long believed in the objective approach when evaluating criminal cases. Justice Stewart asserted that the intent of officers to detain a subject is not determinative of whether a "seizure" occurred. United States v. Mendenhall, 446 U.S. 544 (1980). Therefore, the officers'

initial intent to restrain petitioner does not determine that they have seized the Petitioner. The court's decision in *Scott v. The United States* also aligns with this reasoning: "An officer's evil intentions will not make a Fourth Amendment violation out of an objectively reasonable use of force; nor will an officer's good intentions make an objectively unreasonable use of force constitutional." *Scott v. United States*, supra, at 138, citing United *States v. Robinson*, 414 U. S. 218 (1973).

Therefore, the justified use of force must be objectively reasonable actions in light of the facts and circumstances confronting the police officers, without regard to their underlying intent or motivation. *Scott v. United States,* 436 U. S. 128, 137-139 (1978); see also *Terry v. Ohio, supra,* at 21. Police officers have to make immediate judgments under intense and fast-changing circumstances about the right force to use. The officers in the case felt threatened by the Petitioner's actions of attempting to run over the officer with her car to escape. The circumstances left them with no choice other than shooting at the Petitioner in an attempt to stop her maneuvering of the vehicle.

a) The reason that substantive due process should not be applied

In *Graham v. Connor*, this court rejected the notion "that all excessive force claims brought under § 1983 are governed by a single generic standard" *Graham v. Connor,* 490 U.S. 386 (1989), which is the four-part "substantive due process" used in *Johnson v. Glick* to assess excessive force usage. Rather, the substantive due process is merely "a method for vindicating federal rights elsewhere conferred." *Baker v. McCollan*, 443 U. S. 137, 144, n. 3 (1979). There is a particular constitutional provision that should be considered, so it would be wrong to assume that there is a generic "right" to be free from excessive force based on the "basic principles of § 1983 jurisprudence". *Justice v. Dennis,* 834 F.2d 380 (1987). The explicit textual source from which this Court can interpret the Constitutional protection in the Fourth Amendment provides the most accurate guidelines to determine excessive use of force. This court held that "all claims that law enforcement officers have used

excessive force — deadly or not...should be analyzed under the Fourth Amendment and its "reasonableness" standard, rather than under a "substantive due process" approach." Therefore, this current case should not be viewed via the "substantive due process". *Graham v. Connor,* 490 U.S. 386 (1989).

III. **The Fourth Amendment does not apply when attempted seizures fail to obtain physical control of the subject.**

The Fourth Amendment states clearly that citizens have the "right to be free from the use of excessive force in the course of an arrest." For the use of excessive force to be evaluated, the prerequisite of an "arrest" must happen. Since the petitioner did not submit to the officers and was never detained by them, she was never arrested, so there should not be any discussion of whether excessive force is used in this incident. The petitioner fails to prove that an arrest occurred during the encounter with the officer, and provides no legal basis for her accusation of use of excessive force.

Rebuttal of Objection

I. The officers' actions do not constitute an arrest within the meaning of the Common Law of Arrest

The petitioner argues that a seizure took place because the officers' actions constitute an arrest within the limit of common law based on the principle that all common law arrests are seizures. However, the Common Law of Arrest requires "an assertion of authority and purpose to arrest followed by submission of the arrestee constitutes an arrest. There can be no arrest without either touching or submission." Perkins, The Law of Arrest, 25 Iowa L. Rev. 201, 206 (1940). This definition is acknowledged by this court in *California v. Hodari D.* (1991), where the opinion concluded "an arrest requires either physical force... or, where that is absent, submission to the assertion of authority." *California v. Hodari D.*, 499 U.S. 621 (1991). Since the officers did not obtain physical possession of the petitioner as she managed to elude the officers, no arrest happened within the meaning of Common Law of Arrest and thereby no seizure happened under the meaning of the fourth amendment.

II. A framework for evaluating the "probable cause" and reasonable force

The petitioner alleges the actions of the officers were unreasonable and excessive. However, they were only performing their duty and exercising their constitutional rights. The reasonableness of the force "depends on facts and circumstances of each particular case, including the severity of the crime at issue, whether the suspect poses an immediate threat to the safety of the officers or others, and whether he is actively resisting arrest or attempting to evade arrest by flight." *Graham vs. Connor,* 490 U.S. 386 (1989). To determine under what circumstances a probable cause is present to use certain force, we must reason from the perspective of a reasonable officer on the scene. In this case, the petitioner's actions fit into all three situations in which a probable cause exists, which justify the use of deadly force by the officers at the scene.

a) Probable cause applied to the current case: The petitioner was posing immediate danger to the officers

When officers approached the petitioner in her car, intending to stop her and ask questions about a warrant, the petitioner started the engine. Officer Madrid was standing near the front wheel. The officers perceived that the petitioner was trying to escape the scene by force that endangered their lives. JA 23, 52, 55, 60. The officer had limited space to elude the oncoming vehicle due to confined space in a relatively crowded parking lot. According to officer Madrid's testimony, the petitioner "drove at [her]" or "lung[ed] at [her]," and she fired "at the driver through the windshield" "to stop the driver from running [her] over." JA 63. Officer Wiliamson thought he would be "crush[ed]" between the petitioner's car and the neighboring parked cars, so he fired the shots to both save his life and "to stop the action of [the car] going towards [Officer] Madrid." JA 63. Both officers had no options, other than shooting at the petitioner, to stop her from driving them over and securing their lives.

b) Probable cause applied to the current case: The petitioner was threatening public safety

During their encounter, the officers recognized that Torres "was tripping out bad [f]or a couple of days" due to consumption of methamphetamine, which, according to the National Institution of Drug Abuse, is a drug that affects the central nervous system and distorts a driver's perception, obstructs hand coordination, and prolongs reaction time. It can also incur methamphetamine Psychosis and prolonged sleep loss, which both gravely undermine one's ability to drive safely (Glasner-Edward). The likelihood of the petitioner harming the public made the arrest an obligation of the officers. The fact that the petitioner stole a car during her flee shows both her willingness to perform illegal acts and her unrestrained freedom after the encounter with the officers, further justifying the officers' behaviors and corroborating that a

seizure had not taken place. Before the incident, the officers were about to locate and arrest a known dangerous suspect Kayenta Jackson, who lived in the same apartment complex in Albuquerque, where they encountered the petitioner. The officers saw two individuals standing in front of the apartment and made contact to determine who is the subject of their arrest warrant. Since Kayenta Jackson was, "involved with an organized crime ring." *Torres v. Madrid*, No. 18-2134 (10th Cir. 2019), the officers were cautious of their behaviors. They became suspicious of the petitioner as she panicked and aggressively attempted to drive away. Seeing her erratic behaviors and knowing her potential of being a dangerous criminal, the officers acted what they perceived as necessary to detain the petitioner to both check her identity and prevent her from potentially harming others when she was under influence.

c) Probable cause applied to the current case: The petitioner resisted arrest and attempted to fleet the scene

The petitioner alleged that she thought she was "carjacked" and "freaked out", *Torres v. Madrid*, No. 18-2134 (10th Cir. 2019) so she drove away. However, the officers were wearing tactical vests with police markings, which is very identifiable. Besides, there is no dispute that the petitioner resisted the arrest and fled the scene. Officer Williamson demanded repeatedly for the petitioner to "show [they her] hands" when he perceived that she was making "furtive movements", which is reasonable because "[he] couldn't really see because of the [car's] tint[ed]" JA 103. Despite both verbal and visual showing of identity and authority, the petitioner did not stop at all and drove toward the officers to flee the parking lot. She did not stop even when two bullets struck her and never submitted to the authorities until the next day when she was arrested by other legal officials.

III. **The "show of authority" without producing a stop of the petitioner does not constitute an "seizure"; two requisites must be met.**

According to Cornell Law School, there are two elements that officiate a seizure according to the fourth amendment. The first is the, “show of authority”. This includes not the use, but the mere presence of restraining items such as handcuffs or weapons, as well as intense language. This also applies to that of common law arrest, which is what *California v. Hodari D.* failed to realize in their majority decision. The fact that both respondents drew their firearms with the intent of seizing Ms. Torres by no means affirms that they were in any way successful. In fact, Torres was able to escape in both her vehicle and another stolen vehicle, driving a total of 75 miles before she was taken into custody after being airlifted to the hospital. Indeed, the two bullets that struck her did not even seem to faze her in the slightest, as it wasn’t until many hours later she finally realized she was injured. Therefore, the seizure is rendered as incomplete.

The second element is that the person or target actually submits to the authority of the police officer. Torres did not fully surrender to the authority of the police until after she was taken into the hospital. At no time before were the police in any physical control of her.

IV. **The petitioner was free and did not feel not allowed to leave or restrained.**

Despite the bullets temporarily paralyzed Ms. Torres’s left arm, leaving her unable to control or use it, she was able to continue driving. She was capable of stealing a car, driving over 75 miles to an entirely different city, and seeking treatment at a hospital unassisted. If this is considered seizure or freedom-restrainment, then Ms. Torres will be considered seized even if she were to cause a fatal car accident during the flight. The amount of freedom that allowed her to commit an additional crime and flee to another city cannot be considered as restrained.

The Petitioner argues that the bullets that struck Ms. Torres made her feel unable to leave. However, Ms. Torres was unaware of her injury when she fled the initial scene. She first noticed that she had been shot when she arrived in Grants. Without knowing that she was injured, the petitioner has not proven how she could have felt her freedom restrained.

V. **The fact that the officers were in possession of a warrant does not by any means dictate an automatic seizure of Torres**

Petitioner claims that according to the original meaning of a "seizure", only the intent to take possession of is needed, without the actual taking control of. However, this is wrong on multiple levels. First and foremost, the warrant that Madrid and Williamson arrived at the complex for was not issued for Torres. However, this does not mean they were not justified in their choice to approach and question Torres. As stated earlier, her suspicious activity and possibility as the target gave reasonableness for the officers to question her. Once Torres started operating her vehicle in a dangerous manner, the officers were acting in defense and for the safety of the surrounding area. Secondly, even if the officers had the intent to seize Torres before they arrived, they still would have not succeeded, as they did not attain physical control of her. Petitioner's heavy reliance on common law is proved false again and again by cases such as *Payton v. New York,* which dictated that common law was unfit to be adapted in modern standards due to the extreme difference of the time period. Also, the petitioner ignores the important prerequisite of the officers formally obtaining custody of the subject. (Cornell Law School)

VI. **Application of the Founding Fathers' original intention of the Constitution is inappropriate**

It would be impossible for the founding fathers to foresee the incident where a subject fleeing in a vehicle that can travel 80 miles per hour and police officers shooting with firearms that can be highly penetrating when they wrote the Fourth amendment, just as the Founding Fathers didn't envision an America where African Americans and White Americans can share communal facilities and compete for the same opportunities. Thomas Jefferson said famously that to require a growing nation to be bound only by original covenants would be as silly as to require a grown man to wear the same suit of clothes he had as a young child. To apply the original meaning of the Constitution to a much more technologically

advanced and complicated modern world is not appropriate and reasonable. They are too outdated to be based upon for the optimal jurisdiction.

VII: **Common Law of Arrest and the Fourth Amendment**

This Court has been using the Common Law of Arrest as the legal basis for interpreting the Fourth Amendment since its ratification. Despite the fluid interpretation and application, the Common Law of Arrest's two prerequisites of 1) show of authority and 2) successfully detaining the suspect have not changed. In *Atwater et al. v. City of Lago Vista et al* and *Payton v. New York*, this Court held that "[a]n examination of the common-law understanding of an officer's authority to arrest sheds light on the obviously relevant, if not entirely dispositive, consideration of what the Framers of the Amendment might have thought to be reasonable." *Payton v. New York, 445 U. S. 573, 591 (1980); Atwater et al. v. City of Lago Vista et al 532 U.S. 318 (2001)*. Since the interpretation of the Fourth Amendment based on Common law of Arrest is affirmed by this Court, this court should uphold the precedents and make the decision accordingly.

CONCLUSION

In conclusion, Petitioner fails to uphold her case in court using both ancient common law and the modern understanding of the fourth amendment as decided by court precedents. *California v. Hodari D* ruled that a common law arrest could be conducted by simple touch, and that all of these "common law" arrests also happen to be seizures. However, regardless of whether the court accepts this as true, a common law arrest was never conducted in the first place, as only one of the two precedents was fulfilled. The Respondents both drew their firearms and shot at Torres, but ultimately failed to achieve custody of her, for she never surrendered to authority. However, because of its long and complicated history and formation, the precedent of common law does not fit properly into the modern day interpretation of a seizure as put forth by this proposal. In *Payton v. New York,* it was made clear that common law was developed in a different scope of reality than is presented today, and may not be the best precedent to rely on for making modern day court decisions. For example, one major difference between the time period around the founding of the fourth amendment and today is the presence (or lack thereof) of a police force. In addition, most common law cases were a result of debt collection practices in which civil damage to property occurred. This, and many other countless cases like this one, do not resemble anything merely close to the situation at hand. This is why it is nearly impossible to find a common law case in which projectiles are considered in the subject of "touch", as common law originally claims. Police today are equipped with a certain set of laws that allow them the ability to use excessive force is they

deem necessary. As covered in the previous rebuttal statement, these officers possessed every right and intention to use force, as they were concerned for their own safety and the safety of others in the nearby area, given that the petitioner was noticeably disoriented and in control of a motorized vehicle. The police officers were simply following protocol by asking Ms. Torres questions about her identity and exercising their constitutional rights to attempt a seizure without a warrant upon probable cause. It was Torres who initiated the violence that caused the officers to make quick decisions to guard their own safety. Hodari was tackled to the ground in *Hodari D. v. California*, whereas Torres was not legally seized until the following day in the current case; thus, "submitting to authority" was not met to constitute a seizure in the current case. Anyone reading and interpreting the fourth amendment with a clear head and modern understanding can easily see that the Respondents failed to seize Ms. Torres and the Fourth Amendment does not apply to this case.

This Court should respectfully affirm the Court of Appeals decision.

Respectfully submitted,

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