

THE FEDERAL LAW ENFORCEMENT —INFORMER—

A MONTHLY LEGAL RESOURCE AND COMMENTARY FOR LAW
ENFORCEMENT OFFICERS AND AGENTS

Welcome to this installment of *The Federal Law Enforcement Informer (The Informer)*. The Legal Training Division of the Federal Law Enforcement Training Centers' Office of Chief Counsel is dedicated to providing law enforcement officers with quality, useful and timely United States Supreme Court and federal Circuit Courts of Appeals reviews, interesting developments in the law, and legal articles written to clarify or highlight various issues. The views expressed in these articles are the opinions of the author and do not necessarily reflect the views of the Federal Law Enforcement Training Centers. *The Informer* is researched and written by members of the Legal Division. You can join *The Informer* Mailing List, and have *The Informer* delivered directly to you via e-mail by clicking on the link below.

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The Informer – April 2025

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FLETC Informer Webinar Schedule: May - July 2025

1. Officer Liability: Supervisor's Edition (Episode 4, Common Law Torts) (1-hour)

Presented by Mary Mara and Samuel A. Lochridge, Attorney Advisors / Senior Instructors, Federal Law Enforcement Training Centers, Glynco, Georgia.

In part four of this six-part series covering the liability of supervision, we will explore civil lawsuits, along with different forms of immunity that might be available when officers are faced with a lawsuit alleging negligent or intentional torts. Please join Attorney Advisors Sam Lochridge and Mary Mara as they continue this journey in Episode 4: Common Law Torts.

Monday, May 19, 2025: 3:00 p.m. Eastern / 2:00 p.m. Central / 1:00 p.m. Mountain / 12:00 p.m. Pacific

To join: [Officer Liability: Supervisor's Edition \(Episode 4, Common Law Torts\)](#)



2. Michigan v. Summers: Detaining Individuals During Search Warrant Executions

Presented by James Stack, Attorney Advisor / Senior Instructor, Federal Law Enforcement Training Center, Charleston, South Carolina.

What do you do if, during the execution of a search warrant, you encounter individuals on the premises? Can you keep them there? Can they help you with the search? The Michigan v. Summers decision addressed these questions and reinforced the balance between law enforcement's need to ensure officer safety and the Fourth Amendment rights of individuals. Please join James Stack as he examines the Constitutional basis for law enforcement officers to detain the occupants of a house during the execution of a search warrant.

Thursday, May 22, 2025: 2:30 p.m. Eastern / 1:30 p.m. Central / 12:30 p.m. Mountain / 11:30 p.m. Pacific

To join: [Michigan v. Summers: Detaining Individuals During Search Warrant Executions](#)



3. Officer Liability: Supervisor's Edition (Episode 5, Negligent Hiring) (1-hour)

Presented by Mary Mara and Samuel A. Lochridge, Attorney Advisors / Senior Instructors, Federal Law Enforcement Training Centers, Glynco, Georgia.

In part five of this six-part series covering the liability of supervision, we will examine some of the potential areas of liability for managers, including such claims as failure to train and failure to properly supervise employees. Please join Attorney Advisors Sam Lochridge and Mary Mara as they continue this journey in Episode 5: Negligent Hiring.

Monday, June 16, 2025: 3:00 p.m. Eastern / 2:00 p.m. Central / 1:00 p.m. Mountain / 12:00 p.m. Pacific

To join: [Officer Liability: Supervisor's Edition \(Episode 5, Negligent Hiring\)](#)



4. 109A Felonies (1-hour)

Presented by Robert Duncan, Attorney Advisor / Senior Instructor, Federal Law Enforcement Training Centers, Artesia, New Mexico.

Sexually based offenses, when committed in areas of federal jurisdiction such as in Indian Country or federal enclaves, e.g., military installations and federal prisons, are known as 109A Felonies (18 U.S.C. Sections 2241 - 2244). This webinar will outline the elements of these offenses, distinguish between “acts” and “contact” as defined by 18 U.S.C. Section 2246, compare and contrast state offenses with the federal elements, and discuss the required elements of report writing to ensure a successful prosecution.

Wednesday, June 18, 2025: 5:30 p.m. Eastern / 4:30 p.m. Central / 3:30 p.m. Mountain / 2:30 p.m. Pacific

To join: [109A Felonies](#)



5. Officer Liability: Supervisor’s Edition (Episode 6, Important Free Speech Considerations) (1-hour)

Presented by Mary Mara and Samuel A. Lochridge, Attorney Advisors / Senior Instructors, Federal Law Enforcement Training Centers, Glynco, Georgia.

In the final part of this six-part series covering the liability of supervision, we will explore how the First Amendment can affect the ability to exercise free speech in the workplace. Please join Attorney Advisors Sam Lochridge and Mary Mara as they continue this journey in Episode 6: Important Free Speech Considerations.

Tuesday, July 1, 2025: 3:00 p.m. Eastern / 2:00 p.m. Central / 1:00 p.m. Mountain / 12:00 p.m. Pacific

To join: [Officer Liability: Supervisor's Edition \(Episode 6, Important Free Speech Considerations\)](#)



6. Indian Country Criminal Jurisdiction (1-hour)

Presented by Robert Duncan, Attorney Advisor / Senior Instructor, Federal Law Enforcement Training Centers, Artesia, New Mexico.

There are three sovereign entities in the United States – federal, state, and tribal. Tribal governments are unique among the three, as they possess a separate sovereignty that has never been formally incorporated into the American constitutional framework. The discussion of “Indian” and “non-Indian” concepts, as matters of political recognition, is distinguishable from racial, genetic, cultural, or ethnic identity and are especially important in light of public interest, as well as recent Supreme Court cases involving Indian Country Criminal Jurisdiction. This webinar will discuss the history behind the recognition through political status – especially in criminal jurisdiction – and why concepts unique to Indian law exist in a historical context.

Thursday, July 3, 2025: 5:30 p.m. Eastern / 4:30 p.m. Central / 3:30 p.m. Mountain / 2:30 p.m. Pacific

To join: [Indian Country Criminal Jurisdiction](#)



CASE SUMMARIES

Circuit Courts of Appeals

Fifth Circuit

McClain v. Delgado, 23-250879 (5th Cir. 2025)

In March 2020, Texas Game Warden Dustin Delgado conducted a traffic stop of Joshua McClain after observing McClain “quickly jerk” his truck to the right shoulder of the road and “cross the solid white line several times.” During the stop, McClain apologized and explained that he was “messing with” the radio, which was why the vehicle had been veering out of the lane. When asked to take Standard Field Sobriety Tests, McClain consented and three tests were performed.

The first test was the horizontal gaze nystagmus (HGN), which tracks the involuntary jerking of the eyes as they gaze to the side, and the officer observed all six possible clues of intoxication on this test. Next, the officer administered the walk-and-turn test, which revealed two of the eight possible clues of intoxication. Finally, the one-leg stand test was conducted and the officer reported observing no possible clues of intoxication based on that examination. Based on the overall results of these tests, McClain was placed under arrest for driving while intoxicated. A second officer arrived on scene and then conducted another HGN test and confirmed the same results. When the second officer told McClain that “what [Delgado] saw, is the same thing I just saw,” McClain responded with, “I don’t doubt it, maybe I’ve got something going on.”

McClain was taken to the hospital for a blood test and that test did not show any presence of alcohol or drugs so the county attorney dropped the charges. McClain then filed suit under 42 U.S.C. § 1983 claiming false arrest and malicious prosecution against Delgado. Delgado moved for summary judgment on both claims, asserting that he was entitled to qualified immunity. The district court granted the motion for the malicious prosecution claim but denied it for the false arrest claim and Delgado appealed.

The Fifth Circuit Court of Appeals disagreed with the district court’s decision to deny the motion for summary judgment for the false arrest claim stating that summary judgment would be proper in this case because there is no genuine dispute of material fact. The court stated that once qualified immunity is asserted, the burden “shifts to the plaintiff, who must rebut the defense by establishing a genuine fact issue as to whether the official’s allegedly wrongful conduct violated clearly established law.” In the case of false arrest, the court referenced its previous decision in [Loftin v. City of Prentiss](#), stating that the plaintiff must show that no reasonable officer would have made the complained-of arrest.

In the case at hand, the court determined that McClain cannot establish that a genuine dispute of material fact exists as to whether the officer’s conduct violated the Fourth Amendment. First, the court said that the officer did have reasonable suspicion for the traffic stop due to McClain’s swerving towards the side of the road. In addition, the court noted that McClain did not dispute

the officer's claim that the vehicle had crossed the solid white line and, in fact, had repeatedly offered the same reason – changing the radio station – for why the vehicle seemed to jerk to the right several times.

Next, the court agreed that Delgado had developed probable cause to arrest McClain when he observed all six possible clues on the HGN test and two of the eight possible clues on the walk-and-turn test. In addition, McClain does not dispute that the findings of the field test would support probable cause, nor does McClain dispute the fact that a second officer also reported the same findings of the HGN test.

Because there was no dispute that the officer had reasonable suspicion to stop McClain, and then developed probable cause to arrest him after the field sobriety tests, the court determined that there was no violation of his constitutional rights. Since McClain did not satisfy the burden to overcome Delgado's assertion of qualified immunity by showing a genuine dispute of material fact, the court reversed the district court's denial of Delgado's motion for summary judgment.

For the court's opinion: <https://cases.justia.com/federal/appellate-courts/ca5/23-50879/23-50879-2025-03-20.pdf>

U.S. v. Turner, 23-50461 (5th Cir. 2025)

On January 27, 2021, officers from the San Antonio Police Department were dispatched to an apartment complex to investigate a report of gunshots, phoned in by an anonymous caller. One witness on-scene directed the officers to a particular group of units in the 2200 apartment building but no contact was made. Within an hour of the original call, an additional call was received alleging there was a shooting in progress. Upon arrival, officers met with a complainant in Unit 2202, who told them she had heard a commotion in Unit 2204 and maybe a gunshot. She also showed them a bullet hole in her wall, which would be consistent with a perpetrator shooting from Unit 2204. While she was being evacuated from the apartment, the complainant was noted as saying that she hoped everyone was okay next door and “they have a baby in there.”

Officers began to set up a protective perimeter around the area, during which time they encountered Jonte Turner who identified himself as residing in Unit 2204. Turner told the officers he had not been inside the apartment, and he gave the officers consent to search him for weapons. He refused to consent to law enforcement entering his apartment, asserting no one was inside. During the encounter with Turner, it was discovered he had a significant amount of criminal history.

Approximately 20 minutes after the arrival of the last group of officers, and more than an hour after the initial anonymous call, detectives and officers on-scene decided to make entry into the apartment to conduct a protective sweep to ensure no offenders or victims were hidden inside. To get into the apartment, the officers used the keys that were taken from Turner during the earlier consensual search. During the protective sweep, officers observed two pistols in plain view on a kitchen counter. A bullet hole in the wall shared with Unit 2202 was also observed. The officers restricted their sweep to places where offenders or victims could be hidden, without searching in drawers, shelves or other spaces that could not conceal people.

Detectives subsequently obtained a search warrant based on the circumstances leading up to the protective sweep, coupled with the observations made while clearing the apartment. During the execution of the warrant, law enforcement seized five or six firearms and a quantity of marijuana. Turner ultimately pled guilty to drug and firearms charges, which he later appealed and asserted that his Fourth Amendment rights had been violated when the officers entered his apartment without a warrant.

The Fifth Circuit Court of Appeals disagreed and held that the warrantless entry of a home would be reasonable where the government could demonstrate exigent circumstances and probable cause a crime is occurring inside or that contraband is within it. Here, the court found that, faced with the circumstances known to officers at the time of entry, it would be reasonable to have harbored a concern for human life, and for the lives of the officers on-scene. In response to Turner's assertion that the entry was unreasonable because officers did not see or hear anyone inside, the court held that this was not a requirement of the exception; the exception required only that it was reasonable for the officers to believe someone was inside.

With the finding of exigency, the court turned to the issue of whether it was reasonable to believe a crime was occurring within, or that contraband would be located inside, the unit being searched. The court stated that, based upon the circumstances, there existed a fair probability of an unaccounted-for firearm – and perhaps a hidden accomplice – within Unit 2204 so the initial entry was reasonable. The court also found that the protective sweep, along with the evidentiary items discovered in plain view during it, did not violate the Fourth Amendment.

Finally, Turner challenged the validity of the warrant due to what he characterized as misstatements in the affidavit, with the court finding no merit in the claims. The court found that the officers had not obtained the warrant using “deliberately or recklessly false information or unlawfully obtained evidence.”

For the court's opinion: <https://cases.justia.com/federal/appellate-courts/ca5/23-50461/23-50461-2025-01-13.pdf>

Sixth Circuit

Erickson v. Gogebic County, 24-1311 (6th Cir. 2025)

In February 2020, Randy Erickson was serving his sentence for operating a vehicle while intoxicated at the Gogebic County Jail in Michigan. Deputy Sheriff Scott Voit came by Erickson's cell on February 18, 2020. Erickson made a disrespectful comment to Voit and, as a result, Voit canceled Erickson's family visit. Voit's punishment upset Erickson, and he repeatedly hit and kicked the cell door. Voit was watching Erickson's behavior through the jail's video system. Voit returned to Erickson's cell and ordered him out of the cell. Voit handcuffed Erickson and took him to a holding cell. A video (without audio) recorded what took place in the holding cell.

Once in the holding cell, Voit walked Erickson to a mattress. To remove the handcuffs, Voit asked Erickson to kneel on the mattress while facing the wall. Erickson failed to put both knees

fully on the mattress. Voit suddenly threw the still-handcuffed Erickson to the ground by grabbing his right arm and swinging him around in a circular motion. Erickson hit the ground on his knees. Voit immediately dropped on top on Erickson and started pulling him by the neck and wrist to get him to lie flat. Voit quickly got Erickson on his side, but Erickson was still not on his stomach. Once Voit got Erickson on his stomach, Voit placed his knee on Erickson's back right below his neck. Voit kept his knee in this place during the forty or so seconds that it took him to uncuff Erickson's hands. Voit then took his knee off Erickson's back and walked out of the cell. An upset Erickson jumped up and shouted out the cell window.

The next day, another deputy came by Erickson's cell to discuss this incident and informed him that he could file a complaint against Voit. Erickson told this deputy that he needed medical attention. However, Erickson still had not received any medical care two days after the incident. As a result, he completed a medical form asserting that Voit had assaulted him and that he continued to suffer neck, back, and wrist pain. This request led jail personnel to take him to a hospital. A doctor diagnosed Erickson with back contusions and a fractured upper rib near where Voit had placed his knee on Erickson's back. Erickson also claimed that Voit's use of force damaged several teeth and left him with chronic shoulder and wrist pain.

The Michigan Attorney General's Office investigated Voit's conduct and charged him with assault and battery. The Gogebic County Sheriff also suspended him over this encounter. A jury later found Voit not guilty of the charged crime.

Erickson brought a civil suit under 42 U.S.C. § 1983 against several defendants, although he eventually dismissed the case against everyone but Voit. Erickson alleged that Voit had violated the Eighth Amendment both by using excessive force during the encounter and by acting with deliberate indifference to his medical needs after it. Voit moved for summary judgment on qualified immunity grounds. The district court denied the motion, finding that a reasonable jury could conclude that Voit used excessive force maliciously and sadistically to cause harm. In addition, the court also ruled that a reasonable jury could find that Voit deliberately disregarded Erickson's medical needs. Voit appealed.

The Sixth Circuit Court of Appeals reviewed the case and agreed, in part, with the lower court's decision to deny Voit qualified immunity but disagreed with the decision that Voit deliberately disregarded Erickson's medical needs.

Regarding the qualified immunity, the court agreed with the district court that a reasonable jury could find that Voit used excessive force in violation of the Eighth Amendment, as the force used was disproportionate to the threat posed by Erickson, who was handcuffed and compliant. The deputy maliciously used force to retaliate against Erickson for his disrespectful language and for no reason other than to injure him. The court held that Voit was not entitled to qualified immunity on the excessive force claim because the law clearly established that malicious and sadistic use of force violated the Eighth Amendment.

However, the Sixth Circuit disagreed with the district court that a reasonable jury could find that the deputy deliberately disregarded the inmate's medical needs. The court found no evidence that Voit knew of – and consciously disregarded – Erickson's need for medical care on the day of the incident. Erickson showed no visible signs of injury at that time, and he never requested medical care from Voit. In addition, Voit had the next two days off work and did not return to the prison

until after Erickson received care at the hospital. Therefore, the court held that Voit did not act with deliberate indifference to Erickson's medical needs.

For the court's opinion: <https://cases.justia.com/federal/appellate-courts/ca6/24-1311/24-1311-2025-04-07.pdf>

Seventh Circuit

United States v. Jackson, 23-3205 (7th Cir. 2025)

Police arrested Jackson on June 30, 2019, and seized his cell phone incident to his arrest. On August 9, 2019, a detective with the Oshkosh, Wisconsin, police obtained a warrant to search the contents of Jackson's phone and, when officers searched the phone, they discovered photographs, text messages, and a video. Jackson ultimately pled guilty to sex trafficking of a minor and transportation of child pornography, while retaining his right to appeal the district court's denial of his motion to suppress the evidence that was discovered on his phone.

On appeal, Jackson argued the evidence should have been suppressed because the forty-day delay in obtaining the search warrant was unreasonable.

The Seventh Circuit Court of Appeals recognized that the Fourth Amendment provides that every search, with or without a warrant, must be reasonable, and that delay could make a search unreasonable under some circumstances. For instance, if an informant told police on Day 1 that a person had drugs in his house, but the police did not conduct a search until Day 40, by then the drugs might be gone, or a different family might be living in the house. In this example, delay reduces the chance of finding evidence and increases the risk of disrupting innocent persons' lives; therefore, the passage of time might make the search unreasonable.

However, in the case at hand, Jackson's phone has remained in the government's possession since his arrest on June 30, 2019, and it contained exactly the same evidence on the day it was searched as it did when the police seized it. The court reasoned that, under these circumstances, the 40-day delay in obtaining the warrant to search Jackson's phone was reasonable, as the delay did not allow the police to obtain any evidence that they would not have received had they sought a warrant immediately. In addition, a search in August 2019 created no greater risk of intruding on an innocent person's privacy that a search 40 days earlier would have done.

The court also found that the 40-day delay in obtaining the search warrant was reasonable because Jackson never requested that the government return his phone. Although Jackson was not entitled to possess it while incarcerated, Wisconsin law authorized him to request the return of his phone to a third party. However, Jackson had made no such request. Had Jackson sought to regain or transfer the phone's possession or indicated any concern about delay in searching its contents, that might have motivated the police to seek a warrant quickly; however, he did not, so they did not. As such, the court found the delay to be reasonable.

The court added that its conclusion was supported by the Eighth and Ninth Circuits. In [U.S. v. Bragg](#), the Eighth Circuit held that a 24-day delay in the search of a laptop computer was reasonable when the suspect was in custody. In [U.S. v. Sullivan](#), the Ninth Circuit held that a 21-day delay in search of a laptop computer was reasonable when the suspect was in custody.

For the court's opinion: <https://cases.justia.com/federal/appellate-courts/ca7/23-3205/23-3205-2025-03-28.pdf>

Ninth Circuit

United States v. Holcomb, 23-469 (9th Cir. 2025)

On January 28, 2020, officers with the Burlington Police Department responded to a 911 call at the home of John Holcomb. Upon arrival they met with Holcomb, who told them that he had recently rescued his ex-girlfriend “J.J.” from sex slavery, that she had started acting crazy, and he wanted her to leave. When the police spoke with J.J., she told them she had been sexually assaulted by Holcomb and that he had filmed the assault. Hoping to clear his name, Holcomb provided officers with his password for his computer and gave consent for them to watch the video of what he characterized as a consensual sexual encounter. He would later revoke this consent prior to law enforcement viewing the footage. Holcomb was arrested later in the day for rape and law enforcement obtained a warrant which authorized the seizure, but not the search, of Holcomb's computer and cell phone.

On February 4th, 2020, police obtained a search warrant for the search of the computer seeking five categories of evidence. Four of these categories were limited to date ranges between June of 2019 and the dates surrounding the incident, and sought videos, images, communications, and other data related to the alleged rape. The fifth category of evidence sought was data which would demonstrate “dominion and control” over the device, though this category was not limited to any particular period or specific type of file. During the search of the computer by a forensic examiner, video of the alleged incident was recovered which seemed to corroborate Holcomb's account. However, the examiner continued to search the computer by scrolling through files and observed that several of the thumbnails seemed to depict child pornography. When the examiner opened the thumbnails, the videos appeared to be recordings of Holcomb sexually assaulting his underaged daughter, along with other images of underaged persons in various stages of undress. All of the latter videos and photos were dated from 2016.

While the sexual assault case was dismissed, the child pornography case was referred to FBI and Holcomb was ultimately charged in the U.S. district court. He filed a motion to suppress the evidence against him, arguing that the warrant authorizing the search was overbroad and not sufficiently particularized to comply with the Fourth Amendment. The court denied his motion, finding that even if the warrant failed the constitutional muster, it would have been admissible under the “good faith” exception to the Exclusionary Rule. While he later pled guilty, he had reserved the right to appeal and exercised that right.

The Ninth Circuit Court of Appeals first addressed the issue of whether the warrant amounted to what may be described as a “general warrant”, which would be unconstitutional. General warrants are one of the chief evils that the Fourth Amendment was drafted to prevent because, in colonial times, agents of the Crown would search persons, houses, papers, and effects without particularly describing the places to be searched, or the persons or things to be seized.

The court noted that the warrant authorized the search of the entire computer without limitation on the dates of the files, adding that dominion and control were not really at issue given that Holcomb had not denied ownership and had provided law enforcement with passwords and described how to access his computer. Considering that the Government had not addressed why dominion and control evidence was relevant in this case, the lack of limitation on the dates for which evidence was sought, and the fact that the searcher was given unlimited discretion in examining files of any type by the warrant, the court found that it amounted to the authorization of a general rummaging and violated the Fourth Amendment. The court opined that while the absence of temporal or date-related limitations would not invalidate a warrant in every circumstance, here the Government failed to tailor the warrant in circumstances which would allow the sort of specificity commanded by the Constitution.

Next, the court turned to the issue of whether the evidence, though violative of the Fourth Amendment, was admissible based on the good faith exception to the Exclusionary Rule. Under the good faith exception, if officers conduct a search pursuant to a warrant that is later invalidated, they still satisfy the Fourth Amendment so long as they acted in objectively reasonable reliance on the warrant. The court examined the good faith exception in the context of good faith immunity (also known as qualified immunity). That type of immunity, which applies in civil Fourth Amendment tort cases, is afforded to officers where their actions are objectively reasonable or where the law is not clearly established, with the Government relying on the latter provision as a proposition for the evidence to be admissible.

The court acknowledged that, while there may be a relationship between the good faith exception and good faith immunity, there was clearly established law which would put a reasonable officer on notice that such a provision in the warrant which allowed for a blanket search for evidence of dominion and control – absent any additional justification – would violate the Fourth Amendment. The court cited several cases where law enforcement failed to include, specifically, the type of evidence sought or to provide temporal limitations for the search, which had been previously established as violating the Fourth Amendment. Based on these findings, the court found that the evidence did not meet the good faith exception since the law was clearly established.

Lastly, the court addressed whether the evidence was admissible under the Plain View Doctrine since the examiner located the thumbnails while executing the warrant and it was readily apparent as contraband. The court quickly dismissed this contention, since it found the warrant was in the category of a general warrant, and any resulting discoveries were invalid.

For the court's opinion: <https://cases.justia.com/federal/appellate-courts/ca9/23-469/23-469-2025-03-27.pdf>
