

UNITED STATES COURT OF APPEALS FOR THE SIXTH CIRCUIT

United States v. Jaron Howard Morgan

No. 22-1445, United States Court of Appeals for the Sixth Circuit (June 26, 2023)

SUMMARY

The Sixth Circuit held that the community-caretaking doctrine does not justify opening a car door of a seemingly passed-out driver without first attempting less intrusive means (e.g., knocking, shining a light). The officer’s unannounced door opening was an unreasonable seizure under the Fourth Amendment because no exigency existed, and the scope of the intrusion did not match the caretaking function. The court reversed the denial of the motion to suppress, vacated the conviction and sentence, and remanded. This case limits the community-caretaking exception for occupied vehicles and requires officers to use minimal steps to rouse an occupant before physical intrusion.

CASE DETAILS

COURT	United States Court of Appeals for the Sixth Circuit
WRITING FOR THE COURT	Sutton, Chief Judge; Batchelder, Circuit Judge; Stranch, Circuit Judge
JURISDICTION	Federal
DECIDED	June 26, 2023
DOCKET	22-1445
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Appeal from denial of motion to suppress
STANDARD OF REVIEW	De novo for legal conclusions; clear error for factual findings (implied)
PRECEDENTIAL VALUE	Published
PARTIES	Jaron Howard Morgan v. United States of America

TOPICS

- fourth amendment
- search and seizure
- criminal procedure
- appellate procedure

PRACTICE AREAS

- Criminal Law
- Constitutional Law

QUESTIONS PRESENTED

1. Whether Officer Zolnai violated the Fourth Amendment when he opened Morgan's car door without warning to check on his well-being under the community-caretaking doctrine.

HOLDINGS

1. The officer's actions were unreasonable and violated the Fourth Amendment because there was no exigency and less intrusive means were available.

KEY QUOTATIONS

“The Fourth Amendment protects '[t]he right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures.’” (Page 3)

“Consistent with this history and tradition of allowing officers to respond to 'special needs' beyond normal law enforcement, the Fourth Amendment permits reasonable searches and seizures under the circumstances.” (Page 5)

“Community caretaking, for example, does not amount to a reasonable ground for entering a house without a warrant or without some other well-delineated and carefully cabined exigency.” (Page 6)

“Judged by these standards, Officer Zolnai unreasonably seized and searched Morgan when, without warning, he opened Morgan's car door to check on him.” (Page 7)

“In the end, this novel theory for permitting officers to open car doors without warning lacks support, creates an exploitable exception to the Fourth Amendment, and defies common sense.” (Page 8)

FACTUAL BACKGROUND

Early on a February morning in Lansing, Michigan, Officer Zolnai noticed Jaron Morgan seemingly passed out at the wheel of a stopped, still-running car. Without knocking or shining a light, the officer opened the car door and asked if Morgan was okay. Morgan responded groggily. The officer asked for ID, and a struggle ensued. Morgan was arrested, and a firearm and drugs were found. Morgan was indicted for drug and firearm offenses.

PROCEDURAL HISTORY

The district court denied Morgan's motion to suppress evidence under the Fourth Amendment based on the community-caretaking doctrine. Morgan conditionally pleaded guilty and was sentenced to 204 months. He appealed the suppression ruling.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand for proceedings consistent with the opinion, including suppression of the evidence.

CASES CITED

- *Caniglia v. Strom*, 141 S. Ct. 1596 (2021)
- *Kentucky v. King*, 563 U.S. 452 (2011)
- *Florida v. Jardines*, 569 U.S. 1 (2013)
- *Carroll v. United States*, 267 U.S. 132 (1925)
- *Whren v. United States*, 517 U.S. 806 (1996)
- *Pennsylvania v. Mimms*, 434 U.S. 106 (1977)
- *Arizona v. Gant*, 556 U.S. 332 (2009)
- *Mich. Dep't of State Police v. Sitz*, 496 U.S. 444 (1990)
- *California v. Carney*, 471 U.S. 386 (1985)
- *Cady v. Dombrowski*, 413 U.S. 433 (1973)
- *South Dakota v. Opperman*, 428 U.S. 364 (1976)
- *Griffin v. Wisconsin*, 483 U.S. 868 (1987)
- *Clemons v. Couch*, 3 F.4th 897 (6th Cir. 2021)
- *United States v. Rodriguez-Morales*, 929 F.2d 780 (1st Cir. 1991)
- *United States v. Rideau*, 949 F.2d 718 (5th Cir. 1991)
- *United States v. King*, 990 F.2d 1552 (10th Cir. 1993)
- *United States v. Johnson*, 410 F.3d 137 (4th Cir. 2005)
- *United States v. Harris*, 747 F.3d 1013 (8th Cir. 2014)
- *Vargas v. City of Philadelphia*, 783 F.3d 962 (3d Cir. 2015)
- *Dix v. Edelman Fin. Servs., LLC*, 978 F.3d 507 (7th Cir. 2020)
- *Taylor v. City of Saginaw*, 922 F.3d 328 (6th Cir. 2019)
- *United States v. Lewis*, 869 F.3d 460 (6th Cir. 2017)
- *United States v. Washington*, 573 F.3d 279 (6th Cir. 2009)
- *United States v. Rohrig*, 98 F.3d 1506 (6th Cir. 1996)
- *United States v. Coffee*, 434 F.3d 887 (6th Cir. 2006)
- *United States v. Koger*, 152 F. App'x 429 (6th Cir. 2005)
- *United States v. Mason*, No. 21-3225, 2022 WL 853304 (6th Cir. Mar. 23, 2022)
- *United States v. Greene*, No. 20-6316, 2021 WL 3199239 (6th Cir. July 29, 2021)
- *United States v. Townsend*, 206 F. App'x 444 (6th Cir. 2006)
- *United States v. See*, 574 F.3d 309 (6th Cir. 2009)
- *State v. Bridewell*, 759 P.2d 1054 (Or. 1988)
- *State v. Grmoljez*, 438 P.3d 802 (Mont. 2019)
- *State v. Hinton*, 112 A.3d 770 (Vt. 2014)
- *State v. Short Bull*, 928 N.W.2d 473 (S.D. 2019)
- *Davis v. United States*, 110 A.3d 590 (D.C. 2015)