

SUPREME COURT OF THE UNITED STATES

Sanders v. United States

593 U.S. ____ (2021) · No. No. 20-6400 · Decided June 1, 2021

SUMMARY

The Supreme Court granted, vacated, and remanded the case for reconsideration in light of *Caniglia v. Strom*, which rejected a standalone community-caretaking doctrine as a basis for warrantless entry into a home. Justice Kavanaugh concurred, explaining that the Eighth Circuit could still consider whether the entry was justified under precedents permitting warrantless entry when officers reasonably believe an occupant faces serious injury.

CASE DETAILS

COURT	Supreme Court of the United States
JURISDICTION	Federal
DECIDED	June 1, 2021
DOCKET	No. 20-6400
DISPOSITION	vacated
PROCEDURAL POSTURE	Petition for a writ of certiorari from the United States Court of Appeals for the Eighth Circuit following a conditional guilty plea and affirmance of the denial of a Fourth Amendment challenge to a warrantless entry into a home.
STANDARD OF REVIEW	Fourth Amendment reasonableness; the Supreme Court issued a grant, vacate, and remand order rather than resolving the merits.
PRECEDENTIAL VALUE	Supreme Court grant-vacate-remand order; accompanying merits discussion is in a concurrence.
PARTIES	Kenneth Lamont Sanders v. United States

TOPICS

- fourth amendment
- search and seizure
- warrant requirement
- writ of certiorari
- appellate procedure

PRACTICE AREAS

- criminal procedure
- constitutional law
- appellate procedure

QUESTIONS PRESENTED

1. Whether the Eighth Circuit's reliance on a standalone community-caretaking doctrine justified the warrantless entry into a home under the Fourth Amendment.
2. Whether the judgment should be vacated and remanded for reconsideration in light of *Caniglia v. Strom*.

HOLDINGS

1. Because the Eighth Circuit relied on a standalone community-caretaking doctrine to uphold the warrantless entry into the home, its judgment was vacated and the case was remanded for further consideration in light of *Caniglia v. Strom*.
2. On remand, the Eighth Circuit may consider whether the entry was justified under longstanding precedents permitting warrantless entry when officers have an objectively reasonable basis to believe an occupant is seriously injured or threatened with serious injury.

KEY QUOTATIONS

“The petition for a writ of certiorari is granted. The judgment is vacated, and the case is remanded to the United States Court of Appeals for the Eighth Circuit for further consideration in light of Caniglia v. Strom, 593 U. S. ____ (2021).” (at 1)

“To be clear, however, the fact that the Eighth Circuit used a now-erroneous label does not mean that the Eighth Circuit reached the wrong result.” (at 3)

FACTUAL BACKGROUND

Police responded to a 911 report that Sanders and Karina LaFrancois were fighting inside a Dubuque, Iowa, home where children were present. Officers observed signs of distress, heard a child crying after LaFrancois opened the door, and entered the home without a warrant. They later learned that a child had heard LaFrancois being choked and yelling to put down a gun, and officers found a firearm in a couch.

PROCEDURAL HISTORY

Sanders conditionally pleaded guilty in federal court to unlawfully possessing a firearm while preserving his challenge to the officers' warrantless entry into the home. The Eighth Circuit held that the entry was reasonable under the Fourth Amendment, relying on its community-caretaking precedent. The Supreme Court granted certiorari, vacated the judgment, and remanded for reconsideration in light of *Caniglia v. Strom*.

DISPOSITION

vacated

REMAND INSTRUCTIONS

The case is remanded to the United States Court of Appeals for the Eighth Circuit for further consideration in light of *Caniglia v. Strom*, including consideration of whether the entry may be justified under emergency-aid precedents such as *Brigham City v. Stuart*.

CASES CITED

- Caniglia v. Strom, 593 U.S. ____ (2021)
- Brigham City v. Stuart, 547 U.S. 398 (2006)

OPINION

PER CURIAM.

Cite as: 593 U. S. ____ (2021) 1 Statement KAVANAUGHof, K J.,AVANAUGH, J. concurring SUPREME COURT OF THE UNITED STATES KENNETH LAMONT SANDERS v. UNITED STATES ON PETITION FOR WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE EIGHTH CIRCUIT No. 20–6400. Decided June 1, 2021 The petition for a writ of certiorari is granted.

The judgment is vacated, and the case is remanded to the United States Court of Appeals for the Eighth Circuit for further consideration in light of Caniglia v. Strom, 593 U. S. ____ (2021). JUSTICE KAVANAUGH, concurring in the decision to grant, vacate, and remand.

In this Fourth Amendment case, the Eighth Circuit relied on the “community caretaking” doctrine to uphold the warrantless entry into a home. This Court’s recent decision in Caniglia v. Strom, ante, p. ____, rejected that doctrine as applied to homes. I therefore concur in the Court’s decision to grant, vacate, and remand to the Eighth Circuit in light of Caniglia.

As I will explain, however, the Eighth Circuit on remand may still consider whether to uphold the entry under this Court’s longstanding precedents allowing officers to enter a home without a warrant when officers reasonably believe that an occupant is threatened with serious injury. See, e.g., Caniglia, ante, at 1 (ROBERTS, C. J., concurring); Brigham City v. Stuart, 547 U. S. 398 (2006). * * * This case arises out of a domestic disturbance that occurred in Dubuque, Iowa.

On February 16, 2018, 11-year-old N. R. called her grandmother and said that N. R.’s mother, Karina LaFrancois, and Karina’s boyfriend, Kenneth Sanders, were “ ‘fighting really bad’ ” and “ ‘they need[ed] someone to come.’ ” 956 F. 3d 534, 537 (CA8 2020).

The grandmother called 911 and relayed that information 2 SANDERS v. UNITED STATES KAVANAUGH, J., concurring to the operator. The grandmother also told the operator that two other small children were in the home. When the Dubuque police officers arrived at Karina’s home shortly thereafter, one officer saw N. R. through an upstairs window “ ‘acting excited’ ” and gesturing.

Ibid. Karina then came out of the home to talk to the officers. Karina had red marks on her face and neck and appeared visibly upset. The officers asked to speak with her boyfriend Sanders, and Karina responded that she would have Sanders come outside. When Karina opened the door to get Sanders, the officers heard a child crying inside. At that point, the officers entered the home.

They found Sanders just inside the door and an infant in a nearby playpen. They then went upstairs and located N. R., who informed them that there was a gun downstairs and that she had heard Karina yelling, “ ‘Put the gun down! Put the gun down!’ ” *Id.*, at 538. N. R. also told the officers that she had heard what she thought was Sanders choking Karina.

The officers then spoke with Karina, who told them that Sanders had a gun and that it could be in a couch on the first floor. The officers found the gun in the couch. Sanders later conditionally pled guilty in federal court to the federal offense of unlawfully possessing a firearm, preserving his right to appeal with respect to the officers’ warrantless entry into Karina’s home.

On appeal, the Eighth Circuit held that the officers’ entry was reasonable under the Fourth Amendment. The court relied on Circuit precedent recognizing a “community caretaking” doctrine that justified certain warrantless entries into the home.

The court explained that the officers “reasonably believed an emergency situation existed that required their immediate attention in the form of entering” Karina’s “home to ensure that no one inside was injured or in danger.” *Id.*, at 539.

The Court today vacates and remands the Eighth Circuit’s judgment in light of *Caniglia*. In *Caniglia*, the Court cited as: 593 U. S. ____ (2021) 3 KAVANAUGH, J., concurring held that there is no standalone “community caretaking” doctrine that allows warrantless entries into the home. See ante, at 4.

Because the Eighth Circuit relied on just such a standalone “community caretaking” doctrine, today’s decision to vacate and remand for reconsideration in light of *Caniglia* is appropriate. To be clear, however, the fact that the Eighth Circuit used a now-erroneous label does not mean that the Eighth Circuit reached the wrong result. *Caniglia* did not disturb this Court’s longstanding precedents that allow warrantless entries into a home in certain circumstances.

See ante, at 1 (ROBERTS, C. J., concurring). Of particular relevance here, the Court has long said that police officers may enter a home without a warrant if they have an “objectively reasonable basis for believing that an occupant” is “seriously injured or threatened with such injury.” *Brigham City*, 547 U. S., at 400, 403.

On remand, the Eighth Circuit will be able to consider precedents such as *Brigham City*. With those comments, I concur in the Court’s decision to grant, vacate, and remand.