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SC Court of Appeals

STATE OF SOUTH CAROLINA
IN THE COURT OF APPEALS

Appeal from Laurens County
Honorable Frank R. Addy, Jr., Circuit Court Judge
Appellate Case No. 2018-002133

THE STATE,

Appellant,

vs.

SYLVESTER FERGUSON, III,

Respondent.

PETITION FOR REHEARING

On June 1, 2022, this Court issued a published opinion in which it affirmed the circuit court judge's order granting Ferguson's motion to suppress his illegal drugs and other incriminating items. State v. Ferguson, Op. No. 5915 (S.C. Ct. App. filed June 1, 2022). In affirming the circuit court judge's ruling, this Court concluded: (1) the need for reasonable suspicion was triggered by the officers' actions in approaching the apartment building in Ferguson's case; and (2) the facts and circumstances known to the officers at the time they approached the apartment building were not sufficient to constitute reasonable suspicion. Pursuant to Rule 221(a) of the South Carolina Appellate Court Rules, the State respectfully petitions for rehearing because it believes this Court misapprehended and overlooked several critical facts and aspects of the law in affirming the circuit court judge's decision to suppress the incriminating evidence in Ferguson's case.

As this Court correctly recognized, our Supreme Court in State v. Counts, 413 S.C. 153, 167, 776 S.E.2d 59, 67 (2015), addressed the question of whether a law enforcement officer's approach of a home to knock on its door and speak with an occupant for investigative purposes constitutes a violation of the South Carolina Constitution. After analyzing the issue, a majority of the Supreme Court determined "there must be some threshold evidentiary basis for law enforcement to approach a private residence" based on "the potential for abuse" that could occur if officers were permitted to approach citizens' homes "*indiscriminately*" without any limitations. Id. at 172, 776 S.E.2d at 69 (emphasis added). As a result, the majority articulated a new rule of criminal procedure in South Carolina holding "law enforcement must have reasonable suspicion of illegal activity at a targeted residence prior to approaching the residence *and* knocking on the door." Id. at 172, 776 S.E.2d at 70 (emphasis added). Accordingly, despite the fact a "knock-and-talk" would be constitutionally proper under the Fourth Amendment due to the implicit license extended by our citizenry, officers in South Carolina must possess reasonable articulable suspicion before conducting a "knock-and-talk" when investigating a potential crime. Id.; see Florida v. Jardines, 569 U.S. 1, 8 (2013) ("[T]the knocker on the front door is treated as an invitation or license to attempt an entry, justifying ingress to the home by solicitors, hawkers and peddlers of all kinds. This implicit license typically permits the visitor to approach the home by the front path, knock promptly, wait briefly to be received, and then (absent invitation to linger longer) leave. . . . Thus, a police officer not armed with a warrant may approach a home and knock, precisely because that is no more than any private citizen might do." (citations and internal quotations omitted)); Kentucky v. King, 563 U.S. 452, 469 (2011) ("[W]hen law enforcement officers who are not armed with a warrant knock on a door, they do no more than any private citizen might do.").

As to what "reasonable articulable suspicion" has been recognized to mean, it is a flexible standard grounded in common sense that simply requires a showing of "a *minimal* level of objective justification" in order to be satisfied. Illinois v. Wardlow, 528 U.S. 119, 123 (2000) (emphasis added); see State v. Lesley, 326 S.C. 641, 644, 486 S.E.2d 276, 277 (Ct. App. 1997) ("The term reasonable suspicion requires a particularized and objective basis that would lead one to suspect another of criminal activity" (citation and internal quotations omitted)); see also Robinson v. State, 407 S.C. 169, 184, 754 S.E.2d 862, 870 (2014) ("[T]he facts and inferences relied on by the officer must be articul*able*, not necessarily articulat*ed*."). Significantly, the reasonable suspicion standard "is not a high bar." United States v. Coker, 648 F. App'x 541, 544 (6th Cir. 2016) (citing Navarette v. California, 572 U.S. 393 (2014)); see Kaley v. United States, 571 U.S. 320, 338 (2014) (recognizing even the probable cause standard "is not a high bar"); United States v. Ramos, 826 F. App'x 131, 133 (3d Cir. 2020) ("Reasonable suspicion is a *very* low bar." (emphasis added)). Thus, pursuant to that standard, the presence of factors seemingly consistent with innocent behavior can—and frequently does—suffice to establish the existence of reasonable suspicion to believe criminal activity *may* be afoot when those factors are viewed collectively as required. United States v. Sokolow, 490 U.S. 1, 9 (1989); Wardlow, 528 U.S. at 125-126 (recognizing factors that are "susceptible of an innocent explanation" can establish reasonable suspicion and probable cause); see also United States v. Arvizu, 534 U.S. 266, 273 (2002) (instructing courts are precluded from conducting a "divide-and-conquer analysis" when considering the totality of the circumstances); United States v. Whitfield, 634 F.3d 741, 744 (3d Cir. 2010) ("It is not necessary that the suspect actually have done or is doing anything illegal; reasonable suspicion may be based on acts capable of innocent explanation." (citation and internal quotations omitted)); United States v. Pack, 612 F.3d 341, 356 (5th Cir. 2010)

("Requiring police to have particularized facts that support a finding that 'criminal activity may be afoot' is different from requiring the police to articulate particularized facts that support a finding that a particular specific crime *is* afoot." (emphasis added)).

In Ferguson's case, the officers received a face-to-face tip from a concerned citizen relaying information about Ferguson's current location and indicating Ferguson was presently engaged in an inherently dangerous criminal activity inside a multi-unit apartment building. See State v. Hudgins, 672 S.E.2d 717, 719 (N.C. Ct. App. 2009) (recognizing information relayed to an officer through a face-to-face encounter can provide reasonable suspicion because it enables the officer to judge the credibility of the tipster firsthand); see also Hatcher v. State, 762 N.E.2d 170, 173 (Ind. Ct. App. 2002) (characterizing the manufacturing process used to produce methamphetamine as "inherently dangerous"); cf. State v. Sailo, 910 S.W.2d 184, 188 (Tex. App. 1995) ("The information provided by the citizen was in person, and was neither vague as to the time of the criminal activity nor imprecise as to the kind of crime being committed. . . . There is nothing in the record of the present case which should have caused Officer Andrews to doubt the reliability or good faith of the informant tendering the information. We hold that in the present case, the informant, although unknown to the officers, was sufficiently reliable because he came forward in person to give the officers the information."). Significantly, the information provided by the concerned citizen was *also* fully consistent with the officers' knowledge of both the nature of the area where Ferguson was reported to be manufacturing the methamphetamine and Ferguson's past connections to illegal activity involving methamphetamine. See United States v. Calvetti, 836 F.3d 654, 667 (6th Cir. 2016) (recognizing a prior criminal history can constitute a "strong" indicator of criminal activity for purposes of a reasonable suspicion analysis); United States v. Lender, 985 F.2d 151, 154 (4th Cir. 1993) ("While the defendant's

mere presence in a high crime area is not by itself enough to raise reasonable suspicion, an area's propensity toward criminal activity is something that an officer may consider."). Although that information might not have alone been sufficient to rise to the level of probable cause, it was sufficient to give the officers an objectively reasonable basis to go to the apartment building where the dangerous activity was reported to be occurring for investigative purposes. See Wardlow, 528 U.S. at 123 (instructing the reasonable suspicion standard only requires "a minimal level of objective justification"); see also District of Columbia v. Wesby, __ U.S. __, 138 S. Ct. 577, 586 (2018) (recognizing even the probable cause standard is not a high bar to meet). In fact, from the perspective of responsible law enforcement designed to protect the citizens the officers had a duty to serve, the information provided to the officers necessarily *required* them to take some action to investigate the citizen's tip and confirm or dispel whether dangerous criminal activity was actively ongoing in an apartment building potentially inhabited by people other than the ones reported to be engaged in the hazardous process of methamphetamine production. See Adams v. Williams, 407 U.S. 143, 145 (1972) ("The Fourth Amendment does not require a policeman who lacks the precise level of information necessary for probable cause to arrest to simply shrug his shoulders and allow a crime to occur or a criminal to escape. On the contrary, . . . it may be the essence of good police work to adopt an intermediate response."); see also Graham v. Connor, 490 U.S. 386, 396-397 (1989) ("The calculus of reasonableness must embody allowance for the fact that police officers are often forced to make split-second judgments—in circumstances that are tense, uncertain, and rapidly evolving[.]"). Moreover, the tempered and limited actions the officers did ultimately undertake in response to the non-anonymous tipster's troubling report could not reasonably be described as indiscriminate, which was our Supreme Court's primary concern when rendering its decision in

Counts.[1] See State v. Counts, 413 S.C. 153, 172, 776 S.E.2d 59, 69 (2015) ("Because the privacy interests in one's home are the most sacrosanct, we believe there must be some threshold evidentiary basis for law enforcement to approach a private residence. Otherwise, we foresee the potential for abuse if law enforcement targets a neighborhood and *indiscriminately* knocks on doors with the hope of discovering contraband without a search warrant." (emphasis added)).

In disagreeing with such a conclusion and affirming the circuit court judge's ruling suppressing the incriminating evidence uncovered in Ferguson's case, this Court initially found—while focusing in insolation on a portion of our Supreme Court's holding in the Counts decision—the need for reasonable suspicion was triggered prior to their first contact with Davis by virtue of the officers' actions in merely beginning their approach of Davis's apartment *building*. See Counts, 413 S.C. at 172, 776 S.E.2d at 70 ("[W]e hold that law enforcement must have reasonable suspicion of illegal activity at a targeted residence prior to *approaching the residence* and knocking on the door." (emphasis added)). Importantly though, the encounter with Davis occurred *outside* Davis's individual apartment's curtilage since the officers were on the multi-unit apartment building's shared stairwell when Davis exited his apartment, realized they were there, and verified to them Ferguson was inside just as the citizen tipster had reported. See United States v. Brooks, 645 F.3d 971, 975-976 (8th Cir. 2011) (holding a staircase connected to a multi-family dwelling was not part of the curtilage of Brooks's individual apartment since it was a common area shared by all the dwelling's tenants and noting it is "well-settled" there exists no generalized expectation of privacy in the common areas of apartment buildings); see also United States v. Dunn, 480 U.S. 294, 300 (1987) (explaining the question of whether an area constitutes the curtilage of a home such that it is entitled to the special

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[1] Notably, both the circuit court judge and defense counsel agreed the officers' actions in Ferguson's case were *not* indiscriminate. (R. pp. 130-131).

constitutional protections afforded to a person's residence hinges on "whether the area harbors the intimate activity associated with the sanctity of a man's home and the privacies of life" (citation and internal quotations omitted)). That critical fact is incredibly important because: (1) the Supreme Court's holding in Counts was focused on and solely addressed a situation in which officers were in an apartment's curtilage by virtue of being physically present at the apartment's door when they made contact with an individual under investigation, which meant the Supreme Court was *not* addressing—and, thus, could not have been resolving—any questions concerning a situation in which officers had not yet encroached upon a residence's curtilage at the time of the constitutionally-challenged conduct; and (2) the officers in Ferguson's case were able to corroborate a key piece of the information provided by the in-person informant *before* they entered a portion of the apartment considered to be constitutionally sacrosanct, which meant significant corroboration was present before the need for reasonable suspicion was triggered contrary to the findings of this Court and the circuit court judge.[2] See Oliver v. United States, 466 U.S. 170, 180 (1984) (explaining "only the curtilage" of a home is entitled to the special constitutional protections afforded to a person's residence while further noting such a rule is consistent with respect for an individual's reasonable expectations of privacy); see also Hutto v. S. Farm Bureau Life Ins. Co., 259 S.C. 170, 173, 191 S.E.2d 7, 8-9 (1972) ("It is, of course, settled law that 'a case cannot be considered as a binding precedent on a legal point that was not argued in the case and not mentioned in the opinion.' " (citation omitted)). As a result, this Court's conclusion the informant's tip "lacked *any* indicia of reliability" was inaccurate, and the

[2] Significantly, the officers' confirmation of Ferguson's presence in the apartment *prior to* them entering the apartment's curtilage is particularly significant since this Court's conclusion reasonable suspicion was lacking was justified in part on the basis the officers purportedly "had no reason to suspect Ferguson of being inside the apartment" and "did not . . . know that he was inside."

officers were in possession of sufficient information to meet the reasonable suspicion standard's minimal requirements such that the circuit court judge's ruling granting the suppression motion should have been—and still should be—reversed. See Navarette v. California, 572 U.S. 393, 397 (2014) ("[T]he level of suspicion the [reasonable suspicion] standard requires is considerably less than proof of wrongdoing by a preponderance of the evidence, and obviously less than is necessary for probable cause[.]" (citations and internal quotations omitted)).

Furthermore, even if the officers' mere approach of the residence was sufficient to trigger a need for reasonable suspicion before they were able to corroborate Ferguson's presence at the apartment from outside its curtilage, the circuit court judge's suppression ruling was nevertheless still clearly erroneous because the officers actually possessed reasonable suspicion when the information known to them is properly evaluated in light of the low bar set out by the reasonable suspicion standard. Looking to the information known to the officer before they headed to the apartment building where Ferguson and his illegal drugs were found, the officers had received a *face-to-face* tip from a concerned citizen who had done nothing to hide his identity or remain anonymous to law enforcement. See United States v. Heard, 367 F.3d 1275, 1280 (11th Cir. 2004) (holding a tip offered by an informant through a face-to-face encounter may provide a law enforcement officer with reasonable suspicion). By personally engaging in a face-to-face encounter with Deputy Hall, the concerned citizen in Ferguson's case enabled the officer to directly evaluate the credibility of the tip firsthand and determine for himself whether the information provided was sufficiently reliable. See United States v. Perkins, 363 F.3d 317, 323 (4th Cir. 2004) ("Where the informant is known or where the informant relays information to an officer face-to-face, an officer can judge the credibility of the tipster firsthand and thus confirm whether the tip is sufficiently reliable to support reasonable suspicion."); cf. Giles v.

Commonwealth, 529 S.E.2d 327, 329-330 (Va. Ct. App. 2000) ("Although Officer Devoti did not obtain the women's names or addresses, their reports were not an anonymous tip. He stood face to face with them and listened to their accounts. He was able to assess their credibility and the reliability of their information."). Furthermore, since the concerned citizen was—just as this Court recognized—*not* anonymous and, instead, was fully visible to the officer, the concerned citizen exposed himself to potential liability in the event the tip had been untruthful. See State v. Driggers, 322 S.C. 506, 511, 473 S.E.2d 57, 60 (Ct. App. 1996) ("[A] non-confidential informant should be given higher level of credibility because he exposes himself to public view and to possible criminal and civil liability should the information he supplied prove to be false."); cf. Navarette, 572 U.S. at 400 (finding an anonymous 911 call reporting erratic driving was sufficient to establish reasonable suspicion for a stop based, in part, on the fact the call provided "some safeguards against making false reports with immunity" since the caller *potentially* could have been traced and identified under the circumstances). Under such circumstances, the tip provided to the officers was categorically different than an anonymous tip and was sufficiently reliable *by itself* to warrant a limited investigative response from the officers. See Milbin v. State, 792 So. 2d 1272, 1274 (Fla. Dist. Ct. App. 2001) ("A witness who provides information to a police officer through 'face to face' communication is deemed to be sufficiently reliable."); State v. Fudge, 42 S.W.3d 226, 232 (Tex. App. 2001) (finding a law enforcement officer possessed sufficient reasonable suspicion to justify an investigatory detention based on the fact he received unsolicited information about criminal activity in a face-to-face manner from an individual who was neither connected to police nor a paid informant, which made the information provided "inherently reliable"); cf. State v. Hutz, 144 So. 3d 618, 621 (Fla. Dist. Ct. App. 2014) ("The officer received information from the security guard through face to face

communication. The security guard thus was a citizen informant *whose tip was sufficiently reliable by itself to provide the officer with reasonable suspicion* to conduct an investigatory stop of the defendant without further investigation or corroboration." (emphasis added)). Accordingly, the circuit court judge's conclusion the face-to-face tip—which, as this Court appears to have recognized, was incorrectly treated by the circuit court judge as anonymous—was not sufficiently reliable to establish reasonable suspicion was clearly erroneous, and, therefore, this Court erred by affirming that erroneous conclusion on appeal. See Illinois v. Gates, 462 U.S. 213, 230 (1983) (rejecting the idea an informant's veracity, reliability, and basis of knowledge are elements that "should be understood as entirely separate and independent requirements to be rigidly exacted in every case" when a probable cause analysis is being conducted); see also United States v. Valentine, 232 F.3d 350, 354 (3rd Cir. 2000) (recognizing older, more rigid standards regarding informants have been replaced with "a flexible standard that assesses the relative value and reliability of an informant's tip in light of the totality of the circumstances").

Beyond that, corroborating the information supplied by the concerned citizen and further supporting the existence of reasonable suspicion, the officers were aware the general area where Ferguson was reported to be engaged in the manufacture of methamphetamine was a known area having a high level of both methamphetamine-related activity and drug trafficking. See Wardlow, 528 U.S. at 124 (recognizing the nature of particular area and its connection to criminal activity is a pertinent factor in a reasonable suspicion analysis); Milledge v. State, 422 S.C. 366, 377, 811 S.E.2d 796, 802 (2018) ("A person's presence in a known high-crime area is one relevant consideration in analyzing reasonable suspicion[.]"). More importantly though, the officers were also aware Ferguson had personally been connected to *the exact type of activity*

described in the tip in the past based on their knowledge of him. See United States v. Lewis, 920 F.3d 483, 493 (7th Cir. 2019) ("Criminal histories can support reasonable suspicion."); United States v. Green, 897 F.3d 173, 187 (3rd Cir. 2018) (recognizing an individual's criminal history—although not alone sufficient to establish reasonable suspicion—"is a valid factor" in a reasonable suspicion analysis with a value that "is enhanced when the prior offenses relate to the crime being investigated"); United States v. Simpson, 609 F.3d 1140, 1147 (10th Cir. 2010) ("In conjunction with other factors, criminal history *contributes powerfully to the reasonable suspicion calculus*." (citations, internal quotations, and brackets omitted)); United States v. Sprinkle, 106 F.3d 613, 617 (4th Cir. 1997) ("[A]n officer can couple knowledge of prior criminal involvement with more concrete factors in reaching a reasonable suspicion of current criminal activity."). In light of their knowledge of independent information corroborative of the information reported by the non-anonymous concerned citizen during the face-to-face encounter, the officers—much like the officers in Counts—possessed sufficient information to satisfy the minimal requirements of the reasonable suspicion standard such that it was entirely reasonable for them to follow up and investigate the tip, and both the circuit court judge's and this Court's conclusions to the contrary erroneously elevated the level of information needed to establish the existence of reasonable suspicion beyond what is actually required.[3] See Kansas v. Glover, __

[3] In finding the information known to the officers to be insufficient to satisfy the reasonable suspicion standard, this Court cited multiple times—including once with emphasis—to the following quote that originally appeared in its now-reversed decision in State v. Taylor, 388 S.C. 101, 116, 694 S.E.2d 60, 68 (Ct. App. 2010): "[A]n officer's impression that an individual is engaged in criminal activity, *without confirmation*, does not amount to reasonable suspicion." (emphasis added). Notably though, the Fourth Circuit Court of Appeals authority identified in Taylor as support for that particular quote did *not* actually contain or articulate such a proposition. See Sprinkle, 106 F.3d at 613-620 (containing no statement indicating or suggesting confirmation of criminal activity is necessary for reasonable suspicion to exist). Even more importantly, a requirement for confirmation of criminal activity before reasonable suspicion could exist would be strikingly at odds with the standard itself, which only requires an officer to

U.S. __, 140 S. Ct. 1183, 1190 (2020) (rejecting an interpretation of what is required to satisfy the reasonable suspicion standard because the rejected interpretation "would considerably narrow the daylight between the showing required for probable cause and the 'less stringent' showing required for reasonable suspicion"); see also W. Logan Caldwell, Criminal Law—Reasonable Suspicion: Not Just Based on Training and Professional Experience, 96 N.D. L. Rev. 63 (2021) ("While the two standards remain different, the reasonable suspicion standard has been inching upward, requiring officers provide more evidence or have more training to justify a simple investigatory traffic stop. The United States Supreme Court in Glover reiterated and anchored reasonable suspicion as a very low threshold." (footnote omitted)).

For all those reasons coupled with the reasons articulated in the State's brief and during oral argument before this Court, the officers in Ferguson's case engaged in nothing other than good police work by reasonably acting on information supplied to them by a non-anonymous concerned citizen during a face-to-face encounter that was inherently reliable based upon the

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be in possession of sufficient articulable facts to reasonably believe criminal activity *may* be afoot. See Sokolow, 490 U.S. at 7 (instructing the reasonable suspicion standard merely requires an officer to possess "a reasonable suspicion supported by articulable facts that criminal activity may be afoot" and noting what is required to satisfy that standard "is considerably less than *proof of wrongdoing* by a preponderance of the evidence" (emphasis added and citations and internal quotations omitted)). In fact, if such a confirmation requirement did exist, the seminal case articulating the reasonable suspicion standard—Terry v. Ohio, 392 U.S. 1 (1968)—could not have been decided as it was since the officer in that case had confirmed *nothing* prior to physically seizing Terry and his confederates for investigatory purposes. Cf. Terry v. Ohio, 392 U.S. 1, 28 (1968) (holding an officer's actions in effectuating a detention and frisk search were constitutionally reasonable because they were not "the product of a volatile or inventive imagination" or "undertaken simply as an act of harassment" and, instead, were reasonably tempered based on the officer observing Terry and his confederate repeatedly walk by and look in a store window in a manner that appeared suggestive of criminal activity to the officer). As a result, this Court should strongly reconsider its reference to, reliance upon, and emphasis of that particular quote from Taylor, which itself was a decision that was *reversed* on the basis its reasonable suspicion analysis was legally wrong. See State v. Taylor, 401 S.C. 104, 113, 736 S.E.2d 663, 667 (2013) (holding "the court of appeals erred in finding that police did not have reasonable suspicion to justify an investigatory stop").

manner in which it was supplied coupled with the fact it was fully consistent with the officers' knowledge of Ferguson and the area in which he was reported to be manufacturing methamphetamine, and the circuit court judge clearly erred by finding their actions were constitutionally unreasonable. See United States v. Christmas, 222 F.3d 141, 145 (4th Cir. 2000) ("A community might quickly succumb to a sense of helplessness if police were constitutionally prevented from responding to the face-to-face pleas of neighborhood residents for assistance. Officers in turn are entitled to investigate such reports without jeopardizing their personal safety. Any other constitutional rule would destroy the basis for effective community police work."); cf. Terry, 392 U.S. at 23 (instructing "[i]t would have been poor police work indeed" for an officer not to do anything further to investigate after developing a reasonable basis to believe criminal activity was afoot). Accordingly, the State respectfully requests this Court reconsider this matter pursuant to Rule 221(a) of the South Carolina Appellate Court Rules, vacate its prior opinion, and issue a new opinion reversing the circuit court judge's erroneous suppression ruling upon finding Ferguson's constitutional rights were not violated under the specific facts and circumstances of his case.

Respectfully submitted,

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June 16, 2022

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PROOF OF SERVICE

I, Leigh Ann Stone, certify I have served the within Petition for Rehearing on Respondent by sending an electronic copy via email to the address listed in AIS for the following individual:

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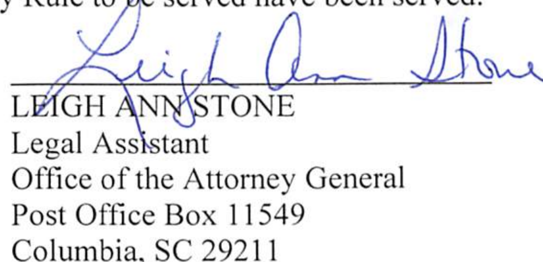
I further certify all parties required by Rule to be served have been served.
This 16th day of June, 2022.



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SC Court of Appeals

Good Afternoon Mr. Alexander,

Attached please find a copy of the Petition for Rehearing in The State v. Sylvester Ferguson, III (2018-002133). This petition will be submitted to the South Carolina Court of Appeals today via the AIS One Drive System.

Please let us know if further information is needed.

Thank you,

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