NO:

IN THE
SUPREME COURT OF THE UNITED STATES

AMNON LEVI,

Petitioner,

v.

UNITED STATES OF AMERICA,

Respondent.

On Petition for Writ of Certiorari to the
United States Court of Appeals
for the Eleventh Circuit

PETITION FOR WRIT OF CERTIORARI

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QUESTIONS PRESENTED FOR REVIEW

I. Whether factors of police domination and isolation can result in custodial interrogation within the meaning of *Miranda v. Arizona*, 384 U.S. 436 (1966) before formal arrest, even though the interrogation occurs in familiar or neutral locations and the defendant is informed he can move around.

II. Whether under *Miranda v. Arizona*, 384 U.S. 436 (1966) and this Court's "totality of the circumstances" standard, language abilities are a significant factor in the assessment of voluntariness.

INTERESTED PARTIES

There are no parties to the proceeding other than those named in the caption of the case.

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PETITION FOR WRIT OF CERTIORARI

Petitioner Amnon Levi (hereinafter "petitioner" or "Levi") respectfully petitions the Supreme Court of the United States for a writ of certiorari to review the judgment of the United States Court of Appeals for the Eleventh Circuit, rendered and entered in case number 17-13942 in that court on February 28, 2019, which affirmed the judgment and commitment of the United States District Court for the Southern District of Florida.

OPINION BELOW

A copy of the decision of the United States Court of Appeals for the Eleventh Circuit, which affirmed the judgment and commitment of the United States District Court for the Southern District of Florida, is contained in the Appendix (A-1).

STATEMENT OF JURISDICTION

Jurisdiction of this Court is invoked under 28 U.S.C. § 1254(1) and PART III of the RULES OF THE SUPREME COURT OF THE UNITED STATES. The decision of the court of appeals was entered on February 28, 2019. This petition is timely filed pursuant to SUP. CT. R. 13.1. The district court had jurisdiction because petitioner was charged with violating federal criminal laws. The court of appeals had jurisdiction pursuant to 28 U.S.C. § 1291 and 18 U.S.C. § 3742, which provide that courts of appeals shall have jurisdiction for all final decisions of United States district courts.

STATUTORY AND OTHER PROVISIONS INVOLVED

Petitioner intends to rely on the following constitutional and statutory provisions:

Fifth Amendment to the United States Constitution:

No person shall . . . . be compelled in any criminal case to be a witness against himself . . . . .

STATEMENT OF THE CASE

This petition presents two important questions concerning the Fifth Amendment and application of *Miranda v. Arizona*, 384 U.S. 436 (1966). The first relates to the amount of coercion that is necessary for a finding of custody. The second relates to the role that language abilities and limitations of an accused play when courts assess whether defendants have made voluntary statements as required under *Miranda*.

When FBI agents interrogated petitioner Amnon Levi in connection with an investigation concerning child pornography without informing him about his Fifth Amendment rights, Levi was an individual who had spent the first 40 years of his life in Israel speaking Hebrew. He had moved to the United States in 2005, and became a naturalized citizen in 2013. While in the United States he became an accomplished airplane instructor with high ratings. Mr. Levi had also been divorced from his wife for approximately four years. He focused on his business as an airplane instructor and had no incidents or connection to the American criminal justice system. Although he was well-versed in aviation terminology which he studied on a regular basis, his speech patterns revealed less than proficient English in more general matters.

Before the interrogation, FBI agent Heath Graves ("Graves") had conducted internet surveillance in July 2016, through a peer-to-peer file sharing network called eMule to search for subscribers who were suspected of possessing or sharing child pornography images. He conducted the surveillance by searching for hashtag

numbers which were believed to match child pornography images. When he ran his search he identified IP addresses that contained the target hashtag values of suspected child pornography. According to Graves, he was able to download a suspected video from an IP address to verify that it was child pornography. This led Graves to subpoena internet provider information concerning the IP address. The information showed that the IP address was registered to petitioner. The information also provided petitioner's home address. Graves then obtained a search warrant for petitioner's apartment.

On September 26, 2016, Graves and a group of agents executed the search warrant for petitioner's apartment. They arrived at 6:00 am. and proceeded to bang on petitioner's front door until he woke up and answered the door. Once the door was opened, Mr. Levi was escorted out of his apartment and down the stairs to the parking lot of his apartment building. At the same time, other officers entered and began searching Mr. Levi's apartment. Once in the parking lot, Mr. Levi was directed to sit in agent Graves' minivan. Graves then interrogated Mr. Levi about child pornography without providing Miranda warnings before the interrogation. The interrogation was taped, transcribed and ultimately used as evidence at trial. (The transcript of the interrogation is attached hereto as A-3).

The recording of the interrogation revealed that Mr. Levi had an accent and that he had difficulty understanding Agent Graves during the interrogation. As an initial matter, Mr. Levi did not understand basic legal concepts – like the word "warrant" and "prosecute" that Agent Graves mentioned. For example, when

Graves stated "we have a search warrant for your house." Levi asked, "That mean what?" (A-3, p. 7). As if to clarify, Graves then said, "Hmm, we have a warrant, a judge signed a warrant." To which Levi responded, "uh hm." (A-3, p. 7).

Graves noticed the language barrier, but did not obtain an interpreter. Instead, Graves asked, and then answered his own question about Levi's language abilities, ultimately concluding that an interpreter would not be retained. Initially, Graves noticed that Mr. Levi had a thick accent which led him to inquire whether Levi had "dual citizenship somewhere." Graves began asking, and then answered his own question inquiring whether Levi, had, "any trouble with En-, English is good, right? You've been here six to eight years. No problem with English? You're a flight instructor I figured." To which Levi answered, "no." (A-3, pp. 3-4).

Petitioner's language deficiencies were exploited during the interrogation. As the interrogation progressed, petitioner did not fully understand Graves' questions, and he answered questions believing he was talking about adult pornography. When Graves broached the subject of child pornography, he received the same equivocal responses as when he discussed the search warrant. Graves said, "So what's brought us here is that your computer [OV], or the sharing of child pornography. Do you know what child pornography is?" To which Levi responded, "[OV] uh hmm. Uh hmm." (A-3, p. 15). Although Graves interspersed his questions with "young" and "younger people," it is clear that the term that Mr. Levi recognized was "pornography," as he made clear that he began looking at adult pornography after his wife left him and that he, "was not looking into a specific age.

Just you know whatever, age was not uh, a parameter for me." (A-3, p. 16). Later when Graves asked Levi why he looked at such materials, Levi responded in terms of pornography, not child pornography, stating, "Are you serious? . . . What would a guy stay on the computer see something pornography for?" (A-3, p. 23). Later when Graves asked Levi if he had "ever touched a child," Levi responded, "I don't have any child. . . . I don't have kids. I have, I have student flying with me but you know seventeen. . . . But I don't , I don't have any, but I don't' have any desire to get close to kids." (A-3, p. 24).

Also during the interrogation, Levi attempted to explain that his computer had been infected with a virus that had downloaded all types of materials onto his computer. Because the virus was so crippling, Levi had to save his files onto an external hard drive and erase his computer's internal hard drive. Then he reset the internal hard drive with the computer's original software. (A-3, p. 25). Although the agents understood at that point that Mr. Levi's computer had been infected with a virus, the agents did not factor that circumstance into their subsequent investigative analysis. And the government never offered proof at any time ruling out the virus as the source of the child pornography on Mr. Levi's computer.

After the initial interrogation, Mr. Levi was accompanied back to his apartment where he was permitted to use the bathroom. Although he was told he was not under arrest and could move around, he was also informed that he would be followed around by an agent everywhere he went. (Graves: "Yea like I said you're, you're free to move around. I mean for our safety *I'll sort of follow you* but you're free

to do whatever you need to do.") (A-3, p. 29) (emphasis added). "Free to leave," does not mean "free" to have a continuous police escort everywhere. Such evidence shows that Levi – contrary to the Eleventh Circuit's decision was required to accompany Graves, and based on the totality of the circumstances, was in custody.

After agents completed searching petitioner's computers, petitioner was formally arrested. This resulted in a one-count indictment charging Mr. Levi with possession of visual depictions of minors under the age of 12 engaged in sexually explicit conduct in violation of 18 U.S.C. § 2252(a)(4)(B) and (b)(2). Petitioner did not file a pretrial motion to suppress the statements he made during the interrogation, nor did he object to their admission during trial. However as part of the defense counsel stated that he did not agree that he knowingly possessed child pornography on his computers. Instead, he argued that the child pornography was a result of the computer virus that had invaded petitioner's computer and which petitioner had informed the government about.

At trial, the government presented two main witnesses, agent Graves, and another FBI forensics computer analyst, Agent Etter ("Etter"). Graves recounted his investigation and the interrogation. Graves and Etter also testified that a large collection of child pornography was present, and the majority of the child pornography was on an external hard drive that petitioner had moved his files to when the virus had invaded his main laptop computer. The agents also claimed that there were small remnants of child pornography on a thumb drive and on petitioner's main laptop computer. The witnesses also dismissed that a virus was

responsible for the child pornography, although they offered nothing in the way of proof. The parties also stipulated to the element of interstate commerce, and to the fact that some of the images involved child pornography involving minors under the age of 12.

Mr. Levi did not present any witnesses, but his attorney moved for a judgment of acquittal pursuant to Fed. R. Crim. P. 29. The court denied Mr. Levi's motions. After deliberations, the jury found Mr. Levi guilty of the charge in the indictment.

At sentencing, Mr. Levi's guideline level was calculated to be 33 with a criminal history category I, resulting in a guideline range of 135-168 months imprisonment. The statutory penalty range was 0- 20 years. The district court sentenced Mr. Levi to 168 months imprisonment, a term of supervised release of 15 years, and a $100 special assessment. Subsequently, the district court ordered restitution in the amount of $8,700.

Mr. Levi appealed his conviction and sentence. On appeal, Mr. Levi challenged his statements as erroneously admitted in violation of his Fifth Amendment rights and *Miranda v. Arizona*, 384 U.S. 436, 86 S. Ct. 1602 (1966). Mr. Levi argued that his statements were not accurately related to the jury, and that he did not voluntarily, knowingly, or intelligently waive his rights under *Miranda*. Mr. Levi also argued that his statements were not voluntarily made. He argued that although he spoke English on a casual level, his English language skills were not sufficient to competently handle a police interrogation, and it interfered with his ability to understand and communicate with the agent during the interrogation.

The Eleventh Circuit affirmed. *United States v. Levi*, 762 Fed. Appx. 778 (11th Cir. 2019). The court first noted that it was reviewing the issue under the plain error standard because petitioner had failed to file a motion to suppress before the trial, and had failed to object to the admission of these statements when they were admitted at the trial. *Levi*, 762 Fed. Appx. at 783. The court then found that the circumstances in Mr. Levi's case would not have led a reasonable person to feel that his freedom was restrained to a degree associated with formal arrest. The court acknowledged that some coercive factors were present, but it put great weight on the fact that Mr. Levi's interrogation occurred in "familiar or least neutral surroundings," and that Levi had been told he could move around. *Levi*, 762 Fed. Appx. at 783. It further stated that for circumstances to reach the necessary level of coercion, it would require, "an exhaustingly long interrogation, the application of physical force or the threat to do so, or the making of a promise that induces a confession." *Id.* at 784. The court stated that none of those factors were present in Mr. Levi's case. *Id.* at 784. The court also found that Mr. Levi's statements were voluntary, and that the record showed that Mr. Levi had sufficient command of the English language to understand and communicate during the interrogation and throughout the legal proceedings. Accordingly, the Court concluded that Levi was not in custody and that his statements were voluntarily made.

REASON FOR GRANTING THE WRIT

I. Factors of police domination and isolation can result in custodial interrogation within the meaning of *Miranda v. Arizona*, 384 U.S. 436 (1966) before formal arrest, even though the interrogation occurs in familiar or neutral locations and the defendant is informed he can move around.

The Fifth Amendment provides that no person "shall be compelled in any criminal case to be a witness against himself." U.S. Const. Amend. V. Fifth Amendment rights attach when an individual is in custody and subject to interrogation by officers. *Miranda v. Arizona*, 384 U.S. 436, 86 S. Ct. 1602 (1966).

Pursuant to *Miranda*, a person is in custody when a reasonable person in the suspect's position would feel restrained in his freedom of movement to such an extent he would not feel free to leave or would feel "otherwise deprived of his freedom of action in any significant way." *Miranda*, 384 U.S. at 444; *see also id.* at 477-78. More recently this Court defined "custody" as:

> [A] term of art that specifies circumstances that are thought generally to present a serious danger of coercion. In determining whether a person is in custody in this sense, the initial step is to ascertain whether, in light of 'the objective circumstances of the interrogation,' a 'reasonable person [would] have felt he or she was not at liberty to terminate the interrogation and leave.' And in order to determine how a suspect would have 'gauge[d]' his 'freedom of movement,' courts must examine 'all of the circumstances surrounding the interrogation.'

Howes v. Fields, 565 U.S. 499, 509, 132 S.Ct. 1181, 1189 (2012) (citations omitted).

While the appellate court in the instant case addressed other surrounding

circumstances, citing to *California v. Beheler*, 463 U.S. 1121, 1124, 103 S. Ct. 3517, 3519 (1983), it placed great weight on its finding that the interrogation of petitioner was conducted in a familiar or neutral setting, and that the agent, at some point, told petitioner that he was "not under arrest" and was "free to move around." *Levi*, 762 Fed. Appx. at 783. While this Court also put great weight on those factors in *Howes* and *Beheler*, it did not put exclusive weight on those factors. Even under *Beheler* and *Howes*, *Miranda*'s overarching principle of prohibiting police coercion provides for custodial interrogations that require *Miranda* warnings before formal arrest. *See, J.D.B. v. North Carolina*, 564 U.S. 261, 280, 131 S. Ct. 2394, 2407 (2011) (rejecting "formal arrest" as test for custody because that would encourage police manipulation and circumvention of *Miranda* limitations on custodial interrogations).

Thus, lower federal courts have found prearrest custody when there is sufficient police domination, even when the interrogation takes place in settings familiar to the defendant, and when the objective circumstances have contradicted agents who have stated that the defendant was free to leave. *United States v. Hashime*, 734 F.3d 278, 283 (4th Cir. 2013) (in custody for *Miranda* purposes when defendant was questioned in his basement while other agents executed search warrant, even though agents told defendant he could leave at any time); *United States v. Borostowksi*, 775 F.3d 851 (7th Cir. 2014) (in custody for *Miranda* purposes when defendant was questioned in his home by FBI agents, even though agents told defendant he was not under arrest or in custody). Neither the familiar

surroundings nor statements by the agents that the defendant was free to leave had a talismanic effect to dissipate the coercive elements of Fifth Amendment, *Miranda*-based custody.

The Eleventh Circuit's limited analysis – even under the plain error standard -- is in conflict with this Court's more broad inquiry that considers the entirety of the circumstances to determine from an objective point of view whether a reasonable person would feel free to leave.

In the instant case, petitioner was confronted by a team of agents at 6:00 a.m. at his front door. They banged on his door long enough and loud enough that it awoke him from his sleep. After opening his door, petitioner was ushered down to the parking lot of his apartment by agents, while other agents entered his apartment to conduct a search. An agent directed petitioner into a van and conducted an interrogation about child pornography. Petitioner had no attorney and was not aware that he could request one. Thus petitioner did not know he had rights which he could claim, and he was by himself in a police-dominated atmosphere. After the initial interrogation ended, agents told petitioner that he was not under arrest and that he was free to move about. However, those statements came after the fact and were belied by the fact that petitioner was also informed that he would have a police escort following him around everywhere he chose to move. Miranda warnings are mandated during such police-dominated interrogations because such scenarios generate, "'inherently compelling pressures which work to undermine the individual's will to resist and to compel him to speak where he would not otherwise

do so freely.'" *Illinois v. Perkins*, 496 U.S. 292, 296, 110 S. Ct. 2394, 2397 (1990) (quoting *Miranda*, 384 U.S. at 467). Above all else, the constant police escort demonstrated objectively that petitioner was not free to leave. Mr. Levi reasonably believed that he was not free to leave because – in fact – he was not free to do so. Thus, Mr. Levi's circumstances were clearly coercive – even under the plain error standard -- to require Fifth Amendment protections. The Eleventh Circuit's limited review is not consistent with the broad inquiry mandated by *Miranda*. Accordingly, this court should grant Mr. Levi's petition for a writ of certiorari.

II. Under *Miranda v. Arizona*, 384 U.S. 436 (1966) and this Court's "totality of the circumstances" standard, language abilities are a significant factor in the assessment of voluntariness.

The Eleventh Circuit also found that no plain error was committed because it determined that Mr. Levi's statements were voluntary. However, statements are voluntary only if they result from a defendant's free and rational choice, and are not the product of intimidation, coercion, deception or official overreaching. *Miranda*, 384 U.S. at 476, 86 S.Ct. at 1629; *Moran v. Burbine*, 475 U.S. 412, 421, 106 S. Ct. 1135, 1141 (1986). This requires the court to assess the "totality of all the surrounding circumstances – both the characteristics of the accused and the details of the interrogation." *See Schneckloth v. Bustamonte*, 412 U.S. 218, 226, 93 S.Ct. 2041 (1973); *Withrow v. Williams*, 507 U.S. 680, 690, 113 S. Ct. 1745, 1752 (1993); *see also Miller v. Fenton*, 474 U.S. 104, 106 S. Ct. 445 (1985).

In the case at bar, the Eleventh Circuit reduced this standard by glossing over factors that clearly showed Levi's statements were involuntary, including the show of authority at his front door at 6:00 am., and the language barrier which made it difficult for Levi to understand and communicate significant details during the interrogation. In light of this Court's voluntariness standard which requires evaluating the characteristics of the accused, the Eleventh Circuit's truncated analysis reduced *Miranda* to an empty protection. However, this Court has held for several decades the importance of Fifth Amendment rights as fundamental and "not simply a preliminary ritual." *Miranda*, 384 U.S. at 476; see *Burbine*, 475 U.S. 412, 421; *Berghuis v. Thompkins*, 560 U.S. 370, 382 (2010).

As part of the totality of the circumstances standard, this Court has required an examination of "the particular facts and circumstances surrounding the case, including the background, experience, and conduct of the accused." United States v. *Edwards*, 451 U.S. 477, 482, 101 S.Ct. 1880 (1981). Among the circumstances this Court has focused on for inclusion in the totality standard are the defendant's age, education, background, and intelligence, as well as his capacity to understand. *See J.D.B., 564 U.S. at 280-81,* 131 S.Ct. at 2408. Thus, courts are to consider the defendant's characteristics to ensure under the totality standard that the defendant possesses the "requisite level of comprehension" before relinquishing Fifth Amendment rights or making voluntary statements. *Moran*, 475 U.S. at 421. There is no exception under the totality standard to ignore a defendant's limited

understanding of the English language or how the criminal justice system works. The Eleventh Circuit's holding that glossed over record examples of Mr. Levi's language barrier undermined the fundamental requirement of voluntariness under *Miranda*, 384 U.S. at 476.

Instead of the high level of awareness and comprehension that this Court has traditionally upheld, the Eleventh Circuit seems to have adopted a lesser or minimal standard for voluntariness. It concluded, for example, that Mr. Levi's basic lack of understanding of certain words and concepts relating to the criminal justice system had no bearing on the voluntariness of his statements. For example, the court was not troubled by the fact that Levi had no understanding of basic legal concepts such as "prosecute" and "warrant." As noted above, from the beginning, Mr. Levi expressed a lack of understanding of these terms. Additionally, his answers of "uh hm" to critical questions left it unclear as to whether he really understood the questions during the interrogation or whether he was listening for more clues in the conversation until he could gain the gist of what was being said. His expressions in non-standard English also signaled that he spoke on a more basic level, and that he had some struggles with English that could create very important misunderstandings during important conversations like Agent Graves' interrogation.

Furthermore, the agent's exploitation of Levi's language abilities were not factored in. With respect to Mr. Levi's communication issues, the record shows that the interrogating agent perceived, but failed to remedy the situation by asking and

intentionally answering his own question about Levi's ability to communicate in English. (A-3, p. 3-4) (Agent Graves asking, "any trouble with En-, English is good, right? You've been here six to eight years. No problem with English? You're a flight instructor I figured." To which Levi answered, "no.").

However, Mr. Levi's language idiosyncrasies are apparent from the interrogation, and his statements were exploited and spun to the government's liking. It became substantially prejudicial when Graves focused in on soliciting inculpatory statements concerning child pornography. When asked if Levi knew what "child pornography" was, Mr. Levi responded "uh hmm," (A-3, p. 15), and Graves continued to talk. Trying to focus on child pornography, Graves interspersed his questions with "young" and "younger people." However, when Mr. Levi spoke, he indicated that he looked at regular pornography (as opposed to child pornography) because he "was not looking into a specific age. . . . age was not . . . a parameter for [him]." (A-3, p. 16). Instead, Mr. Levi explained that he was looking at pornography because he was divorced and alone. Graves continued to frame his questions carefully to reference "young" and "younger people." However, Mr. Levi did not understand that Graves was using the terms "young" and "younger person" synonymously with child pornography. Indeed, even to English-speaking people, the terms "young" and "younger person" are vague and do not necessarily refer to pornography involving minors under 18 years of age. Levi's failure to pick up on the distinction Graves was making was evident with Levi, who continually responded by

referencing "pornography" rather than speaking in terms of "child pornography." (See A-3, pp. 16, 42, referencing "pornography," not "child pornography").

The court of appeals stated that Mr. Levi admitted to searching for six and eight-year-olds. Levi, 762 Fed. Appx. at 784. However, a closer look at Mr. Levi's statements indicate that Mr. Levi was confused about what was being asked at the interrogation. At first, Mr. Levi was asked what type of pornography (in terms of age) he searched for, and he stated that he did not look for any "specific age" because age "was not a parameter." (A-3, p. 16). Moments later, however, Levi referenced six and eight. In these references, Mr. Levi struggled to explain that he searched for "young" (meaning young adult women), but that some results came back referencing six- and eight-year-olds. (See A-3, pp. 16-18). Since he was searching for young adult women, he did not view the results that referenced six and eight, and he did not view pictures from this age group. Mr. Levi did not have adequate command of the English language to convey his true meaning. However, looking at the conversation as a whole, it does not make logical sense that he would say that age was not a parameter and then shortly thereafter say that he searched for the ages of six and eight. Instead, the contradiction in Mr. Levi's statements showed that he was confused in his speech and had difficulty expressing exactly what he was saying due to his language barrier. Mr. Levi's deficient language skills enabled the government to characterize his statements as a confession which substantially prejudiced his rights and created plain error.

In spite of the ambiguities raised by Mr. Levi's language abilities, the

Eleventh Circuit dismissed his challenges by finding that Levi specifically denied having problems with the English language, and declined the option of using a Hebrew interpreter at trial. *Levi*, 762 Fed. Appx. at 784. As noted above, Graves asked and answered the question about whether Mr. Levi had difficulty understanding English during the interrogation. At trial, Mr. Levi declined an interpreter after conferring with his counsel, and stated that he understood things in general, but admittedly he did not understand everything. At the very least, this record indicated that petitioner's comprehension due to his language deficiencies was impaired. An impaired understanding is not what *Miranda* requires.

The Eleventh Circuit's analysis omitted or dismissed evidence that it was required to consider under the totality standard to determine if Levi's statements were voluntary, and thus, it contradicted the governing law set forth by this Court. *Miranda* will be emptied of much of its meaning if courts can simply disregard the effect of a defendant's language abilities. Yet that is what the Eleventh Circuit endorsed in this case when it ignored crucial aspects of Mr. Levi's communication difficulties and lack of understanding of the criminal justice system based on his background, experience, and education, all of which are required under this Court's established standards. This Court's review is needed to ensure that fundamental Fifth Amendment rights do not turn on the happenstance of language difficulties or misunderstandings. Accordingly, this Court should grant Mr. Levi's petition for a writ of certiorari.

CONCLUSION

Based upon the foregoing petition, the Court should grant a writ of certiorari to the Court of Appeals for the Eleventh Circuit.

Respectfully submitted,

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