

No.
IN THE
SUPREME COURT OF THE UNITED STATES

FRANKLIN C. EDWARDS, Petitioner,

-vs-

PEOPLE OF THE STATE OF ILLINOIS, Respondent.

On Petition For Writ Of Certiorari

To The Supreme Court Of Illinois

PETITION FOR WRIT OF CERTIORARI

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QUESTION PRESENTED FOR REVIEW

During the early morning hours, a shooting took place in a parking lot of an apartment complex. The crime scene was large. There were a lot of shell casings scattered. There were multiple parking lots at the complex. Three vehicles were damaged during the shooting.

Specifically, an individual armed with a firearm stood on top of a vehicle in one of the apartment complex's parking lots and fired off shots. After determining that the car belonged to a woman who was seemingly not involved in the altercation, but rather a resident of the apartment building, police staked out the car and ordered an officer to follow it when a man drove the car away. The man committed no traffic violations, and there was no question that he was *not* the registered owner of the vehicle. Yet the police stopped him, and ultimately arrested him for having a suspended driver's license and no proof of insurance.

The question here is whether that traffic stop was lawful where the police had no idea who the driver was but knew the registered owner of the vehicle was neither involved in a crime nor driving the vehicle. This Court's decision in *Kansas v. Glover*, 140 S. Ct. 1183 (2020), established a presumption that the registered owner of a vehicle is most likely the driver of the vehicle, but where police have no reasonable suspicion to pull over the registered owner and have no other information regarding who is actually driving, police should not be allowed to make an investigatory stop absent some other factor.

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The petitioner, Franklin C. Edwards, respectfully prays that a writ of certiorari issue to review the judgment below.

OPINION BELOW

The Illinois Supreme Court's order (Appendix A) denying leave to appeal is reported and available at 147 N.E.3d 691, 439 Ill. Dec. 16 (No. 124885). The Illinois Appellate Court's decision (Appendix B) is reported at 2019 IL App (5th) 180300-U, and is unpublished. The St. Clair County, Illinois Circuit Court's decision is discussed at 2019 IL App (5th) 180300-U, ¶ 20.

JURISDICTION

On March 28, 2019, the Illinois Appellate Court issued its decision. No petition for rehearing was filed. On May 27, 2020, the Illinois Supreme Court denied a timely filed petition for leave to appeal. The jurisdiction of this Court is invoked pursuant to 28 U.S.C. § 1257(a).

CONSTITUTIONAL AND STATUTORY PROVISIONS INVOLVED

U.S. Const. amend. IV.

The Fourth Amendment of the United States Constitution provides:

The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon probable cause, supported by Oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized.

U.S. Const. amend. XIV, § 1.

The Fourteenth Amendment of the United States Constitution provides, in relevant part: “No State shall *** deprive any person of life, liberty, or property, without due process of law.”

STATEMENT OF THE CASE

During the early morning hours on June 13, 2015, one or more persons discharged firearms in a parking lot of the Freedom Drive apartment complex in Belleville, Illinois. *People v. Edwards*, 2019 IL App (5th) 180300-U, ¶ 6. The crime scene was large, where the apartment complex had multiple parking lots. *Id.*, ¶ 7; (R.R12,29). There were a lot of shell casings, and several vehicles had been damaged. *Id.*; (R.R12,25,76) Anna Hall, a resident at the apartment complex, called 9-1-1 to report the incident. *Id.*, ¶ 6. Several officers from the Belleville Police Department responded to the scene, including Detective Daniel Collins, who arrived at around 3 am and interviewed Hall. *Id.*, ¶ 7.

Hall told Collins that she saw a person firing rounds from a rifle and that although she did not know the person's name, she knew the shooter was *an associate* of Franklin Edwards, who was the apartment complex's maintenance man. *Id.*, ¶¶ 7-8. "The record does not include any description of the person Hall saw shooting or any elaboration on how she believed this person was 'associated' with" Mr. Edwards. *Id.*, ¶ 7. Hall also informed Collins that Mr. Edwards lived in an apartment unit inside building 217 of the apartment complex, but she did not know the exact unit. *Id.*, ¶ 8. Hall stated that Mr. Edwards was at the apartment complex that night, but she did not see him firing a weapon. *Id.* Hall also told Collins that Mr. Edwards was "associated with a maroon Ford Focus." *Id.*

Investigators were able to locate a parked maroon Ford Focus at the apartment complex. *Id.* Collins learned that a detective named Keilbach also responded to the apartment complex and spoke to Jeremy Gully. *Id.*, ¶ 9 "The record does not include

Keilbach's testimony or any indication of who Gully is or what he specifically told Keilbach about the incident except that, according to Collins, Gully told Keilbach that he saw the defendant 'out there shooting.'" *Id.* ¶¶ 9-10. As the investigation continued, the next shift of officers and detectives who reported for duty were briefed on what had transpired, including being informed of Keilbach's interview of Gully and of the "information that had been learned by either in-person investigation [or] statements from witnesses." *Id.*, ¶ 10. One of the detectives who attended the briefing was Detective Patrick Koebbe. *Id.*, ¶ 11.

Koebbe learned that interviews of witnesses took place and that the police wanted to make contact with Mr. Edwards, who lived in a unit inside building 217 or 219 of the complex. *Id.* Koebbe also learned that witnesses had stated that the maintenance man drove a maroon Ford Focus and that the shooter ran into apartment building 217. *Id.* Additionally, Koebbe learned that the shooter had been standing on the hood of a maroon Ford Focus, from which footwear impressions had been collected. *Id.*

While Koebbe was being briefed at the police station, patrol officer David Abernathy sat in a parking lot across the street from the crime scene, watching the maroon Ford Focus that officers had previously located. *Id.*, ¶¶ 12-13. "The maroon Ford Focus was parked in 'one of the parking lots of the apartment complex' and had remained in the same location since officers had arrived at the scene to investigate the incident." *Id.*, ¶ 12. While keeping watch on the vehicle, Abernathy saw the vehicle pull out of the apartment complex's parking lot and began following it. *Id.* While Abernathy may have seen a black male leave from an apartment building, enter the vehicle, and

drive off of the parking lot, he also admitted that it was possible that he did not see anyone get into the car and that he may have just seen the car beginning to pull out of the parking lot. *Id.*, ¶ 13. But as the vehicle passed in front of him, Abernathy saw that the driver of the vehicle was a black male. *Id.* However, at the time, Abernathy did not have any physical description of Mr. Edwards and did not know whether Mr. Edwards was a black male. *Id.* He only had a description of the maroon Ford Focus that he was assigned to watch. *Id.*

Abernathy advised “dispatch” that he had followed the maroon Ford Focus off of the apartment complex’s parking lot. *Id.*, ¶ 14. “Nothing in the record indicates that Abernathy included any description of the driver when he advised dispatch that the vehicle was moving.” *Id.* It appears that Abernathy did not advise dispatch or any other officers that the driver of the vehicle was a black male. *Id.*

While driving to the crime scene, Koebbe received a radio dispatch about the maroon Ford Focus leaving the apartment complex. *Id.*, ¶ 15. Koebbe ordered Abernathy to stop the vehicle “for investigative reasons”—because witnesses had informed the police that Mr. Edwards was a suspect and associated with a maroon vehicle, that a maroon vehicle had been parked in the area of the shooting, that evidence had been recovered from the hood of the parked maroon vehicle where witnesses stated that the shooter had stood, that the vehicle Abernathy was ordered to watch had remained at the crime scene since the investigation began, and that Abernathy had observed an individual leaving the apartment where Mr. Edwards was believed to have been residing and driving the maroon vehicle away from the crime scene. *Id.* The maroon Ford Focus being watched was registered to a female named

Rockell Bacon. *Id.* However, when Koebbe directed Abernathy to stop the vehicle, Koebbe did not know who was driving the maroon Ford Focus or if the driver was a black male; only Abernathy knew the driver was a black male. *Id.*, ¶¶ 14-16.

Even though Abernathy did not witness the driver commit any traffic violations, he stopped the vehicle as ordered. *Id.*, ¶ 17. Based on the traffic stop, Abernathy learned that the driver, Mr. Edwards, had a suspended license and no proof of insurance. *Id.* Abernathy placed Mr. Edwards under arrest. *Id.* At the police station, officer Shawn Odell conducted three video-recorded interviews of Mr. Edwards. *Id.*, ¶ 18. Based on the in-custody interviews, Mr. Edwards was charged with seven offenses: one count of aggravated battery; three counts of armed violence; and three counts of criminal damage to property. *Id.*, ¶ 19. Mr. Edwards' video-recorded statements were the subject matter of his motion to suppress. *Id.*, ¶¶ 18-19.

On May 18, 2018, after conducting a hearing on Mr. Edwards' motion to suppress, the circuit court took the motion under advisement. *Id.*, ¶ 20. On May 25, 2018, the circuit court granted the motion to suppress and suppressed "all evidence produced by virtue of the improper traffic stop." *Id.* The court found: "Based upon all of the facts and circumstances, the traffic stop made by [Abernathy] was not supported by a reasonable suspicion that the vehicle's operator had committed or was about to commit a criminal offense." *Id.*

Direct Appeal

The State appealed the trial court's order granting suppression of Mr. Edwards' video-recorded statements. *Id.*, ¶¶ 5, 21, 26. The Illinois Appellate Court reversed the circuit court's ruling. *Id.*, ¶¶ 1-3, 35-40. First, it determined that the issue on appeal

was “whether the police had knowledge of specific and articulable facts giving rise to reasonable suspicion that [Mr. Edwards] was the driver of the maroon Ford Focus,” enough for the officers to conduct an investigatory stop pursuant to the Fourth Amendment. *Id.*, ¶ 30.

In its decision, the Illinois Appellate Court relied heavily on *U.S. v. Hensley*, 469 U.S. 221 (1985), to reverse the circuit court’s ruling. *Id.*, ¶¶ 26-30, 32-33. It discussed that in *Hensley*, police officers in Ohio learned that the defendant drove a getaway car in connection with a robbery that had occurred six days earlier. *Id.*, ¶ 27. Some police officers in Kentucky, who were familiar with the defendant, learned that the defendant was wanted in Ohio. *Id.* About 12 days after the robbery, a police officer in Kentucky, who had seen the defendant’s wanted flyer, recognized the defendant as the driver of a white Cadillac convertible. *Id.* The officer reported the defendant, and a second officer, who had heard the report, pulled the white Cadillac over for an investigatory stop. *Id.* The stop in *Hensley* was a proper stop. *Id.* The Illinois Appellate Court noted a significant factual distinction between the facts in Mr. Edwards’ case and *Hensley*—that in *Hensley*, “prior to the stop, an officer recognized the defendant as being the driver of the white Cadillac that was investigated,” while in Mr. Edwards’ case, no officer knew who was driving the maroon Ford Focus prior to the stop. *Id.*, ¶¶ 27, 33. However, it found the factual distinction did not change its conclusion and determined that “the officers’ *suspicion* was that the defendant was the driver of the vehicle, and that this suspicion was reasonable under the circumstances. The mere possibility that the defendant was not the driver of the vehicle on this occasion does not negate reasonable suspicion.” *Id.*, ¶ 35 (emphasis in original).

Mr. Edwards filed a petition for leave to appeal, arguing that in Mr. Edwards' case, in *Hensley*, and in *Kansas v. Glover*, 140 S. Ct. 1183 (2020), the identity of the driver was at the heart of the decision to determine whether the Fourth Amendment allowed the law enforcement officers to initiate a traffic stop based on articulable and reasonable suspicion. The Illinois Supreme Court denied the petition. (Appendix A).

REASON FOR GRANTING CERTIORARI

Following this Court’s recent decision in *Kansas v. Glover*, 140 S. Ct. 1183 (2020), the question that naturally arises is whether an officer violates the Fourth Amendment by conducting a traffic stop of a vehicle when the officer has information negating the reasonable inference that the registered owner of the vehicle is the driver of the vehicle.

The Fourth Amendment question in the present case naturally follows this Court’s decision in *Kansas v. Glover*, 140 S. Ct. 1183 (2020). In *Glover*, this Court found that “Deputy Mehrer possessed no exculpatory information—let alone sufficient information to rebut the reasonable inference that Glover was driving his own truck—and thus the stop was justified.” *Glover*, 140 S. Ct. at 1191. The facts in the present case fall somewhere between *Glover* and *U.S. v. Hensley*, 469 U.S. 221 (1985), a case which the Illinois Appellate Court heavily relied on. It is necessary to compare the facts of *Glover*, *Hensley*, and Mr. Edwards’ case.

Kansas v. Glover

“Deputy [Mark] Mehrer was on routine patrol in Douglas County when he observed a 1995 Chevrolet 1500 pickup truck with Kansas plate 295ATJ.” *Glover*, 140 S. Ct. At 1187. After running the plate, the registration came back indicating that the truck was registered to Charles Glover Jr., who had a revoked driver’s license. *Id.* The deputy assumed that the registered owner of the truck was also the driver and initiated a traffic stop without observing any traffic infractions or attempting to identify the driver. *Id.* The truck’s driver ended up being the defendant, Glover. *Id.*

U.S. v. Hensley

After an armed robbery took place at a tavern in St. Bernard, Ohio, an informant advised the St. Bernard police that Thomas Hensley had been the getaway driver. *Hensley*, 469 U.S. at 223. A “wanted flyer,” explaining that Hensley was wanted for an armed robbery investigation and describing Hensley and the date and location of the crime, was sent to police departments near St. Bernard. *Id.* The flyer advised that other departments should pick up and hold Hensley for the St. Bernard police in the event that he was found and that officers should consider Hensley armed and dangerous. *Id.* The Covington police in Kentucky also received the wanted flyer, and because some Covington officers were familiar with Hensley, they periodically looked for him. *Id.* Days after the armed robbery, a Covington officer saw Hensley driving a white Cadillac convertible. *Id.* at 223-24. The officer inquired by radio whether there was a warrant outstanding for Hensley’s arrest, and while the dispatcher was checking, another Covington officer spotted a white Cadillac and pulled it over. *Id.* Hensley, the white Cadillac’s driver, was arrested after the police discovered weapons in the vehicle. *Id.* at 224-25.

Mr. Edwards’ case

A shooter stood on the hood of a maroon Ford Focus parked in an apartment complex’s parking lot and fired rounds. *People v. Edwards*, 2019 IL App (5th) 180300-U, ¶¶ 6-7, 11-12. The 9-1-1 caller advised the police that she saw a person, not Mr. Edwards, firing a rifle. *Id.*, ¶¶ 7-8. Other witnesses said that Mr. Edwards was “out there shooting,” that he drove a maroon Ford Focus, and that the shooter ran into the apartment building that Mr. Edwards lived in. *Id.*, ¶ 9-11, 15. The police located

a maroon Ford Focus with license plate E251625, which was registered to a female, not Mr. Edwards, and collected footwear impressions from its hood. *Id.*, ¶¶ 6-7, 11-12. The police learned that her vehicle's registration was in order and valid. *Id.*, ¶ 16; (R.R8,28). The police did not impound the vehicle as evidence or locate the female owner. *Id.*, ¶¶ 8, 11-17. Instead, the police continued watching her car until an officer saw her vehicle drive off of the parking lot. *Id.*, ¶¶ 12-14. None of the officers knew the identity of the black male driving the female's maroon Ford Focus. *Id.*, ¶¶ 12-17. A detective ordered the patrol officer trailing the car to stop the vehicle. *Id.* Prior to stopping the vehicle, the officer did not observe the driver committing any traffic violations. *Id.*, ¶ 17. During the stop, the officer arrested the driver, Mr. Edwards, who had a suspended license and no proof of insurance. *Id.*

If the question in *Glover* was whether it is reasonable for an officer to suspect that the registered owner of a vehicle is the person driving the vehicle, and the question in *Hensley* was whether it is reasonable for an officer to stop and briefly detain a driver who is the subject of a wanted flyer, the question presented here is whether it was reasonable for the police to suspect that Mr. Edwards, and not the registered driver or any other possible individual, was driving the maroon Ford Focus. See *Edwards*, 2019 IL App (5th) 180300-U, ¶¶ 33-37. Although reasonable and articulable suspicion is a less demanding standard than probable cause, an officer's suspicion must amount to more than an "inchoate and unparticularized suspicion or 'hunch'" of criminal activity. *Terry v. Ohio*, 392 U.S. 1, 27 (1968); U.S. Const. amends. IV, XIV. The reasonable suspicion standard is a "commonsense, nontechnical conception[] that deal[s] with the factual and practical considerations of everyday life

on which reasonable and prudent men, not legal technicians, act.” *Ornelas v. U.S.*, 517 U.S. 690, 695 (1996) (internal quotation marks omitted).

Law enforcement officers must be allowed “to make commonsense judgments and inferences about human behaviors.” *Glover*, 140 S. Ct. at 1188 (internal quotation marks omitted). This Court determined that a reasonable inference for officers to make is that the registered owner of a vehicle is most likely the driver of the vehicle. See *id.* at 1189-91. This logically leads to the question presented here: what is considered reasonable when officers know that the registered owner of a vehicle is *not* the driver of the vehicle?

The Belleville police officers and the Illinois Appellate Court determined that it was reasonable to stop Bacon’s maroon Ford Focus because witnesses reported that Mr. Edwards was associated with or had been seen driving *a maroon Ford Focus*. Where the record established no direct link between Bacon’s maroon Ford Focus and the vehicle the witnesses mentioned, and where the record was clear that there were multiple parking lots and a large crime scene, do commonsense judgments and inferences permit the stopping of Bacon’s vehicle? Recall, the shooter stood on Bacon’s vehicle, which was parked in one of the parking lots, and evidence had been collected from it. *Edwards*, 2019 IL App (5th) 180300-U, ¶ 11. There is nothing in the record connecting Bacon to the shooting incident or the shooter. Thus, Bacon’s car alone provides nothing like reasonable suspicion to assume that Mr. Edwards would be driving it; in fact, nothing in the record makes this leap possible. See *id.*, ¶¶ 32-33.

Further, Bacon’s car was not unique. It was located in a large apartment complex with numerous parking lots, so the fact that this car was of the same make

and model that Mr. Edwards might have been associated with also does not provide reasonable suspicion that he would be driving the vehicle. In fact, in 2018, approximately 273.6 million vehicles were registered in the United States.¹ Of the leading car manufacturers in the United States, “the Ford brand clocked in at number one in 2019, selling around 2.3 million vehicles in the United States alone.” *Id.* To illustrate generally, given that the incident occurred in 2015, in 2017 and 2018, the number of sales of the Ford Focus in the United States were respectively 158, 385 and 113, 345.² Given that Ford has manufactured a Ford Focus since 1998, there are hundreds of thousands of these cars on the road.³ Although Mr. Edwards was allegedly associated with a maroon Ford Focus, this is a common type of vehicle. Further, Mr. Edwards was a weak potential suspect, where there were conflicting witness accounts—where one witness claimed that Mr. Edwards was the shooter, and where the 9-1-1 caller stated that while she saw Mr. Edwards at the apartment complex, the actual shooter was an associate of Mr. Edwards. *Edwards*, 2019 IL App (5th)

¹ Statista, Number of cars in the U.S. 1990-2018 (published on Apr. 21, 2020), <https://www.statista.com/statistics/183505/number-of-vehicles-in-the-united-states-since-1990/>.

² Press Release. Ford F-Series Marks 42 Straight Years as America’s Best-Selling Pickup, Topping 900,000 Sold in 2018; Ford Hits Nine Straight Years as America’s Best-Selling Brand; Lincoln SUV Sales Up (published Jan. 3, 2019), <https://media.ford.com/content/dam/fordmedia/North%20America/US/2019/01/03/sales-dec-18.pdf>.

³ See The New York Times. Automobiles. Ford Focus Is Off to a Rousing Start (p u b l i s h e d N o v . 2 0 , 1 9 9 8) , <https://www.nytimes.com/1998/11/20/automobiles/ford-focus-is-off-to-a-rousing-start.html>; BBC Business News. Driving into the future at Geneva’s International Motor Show (published Mar. 4, 1998), <http://news.bbc.co.uk/2/hi/business/62027.stm>.

180300-U, ¶¶ 6-11, 15.

Thus, the decision creates a potentially recurring issue pursuant to the Fourth Amendment in terms of traffic stops—as to what conclusions, assumptions, and inferences law enforcement officers are permitted to make. See generally *Illinois v. Wardlow*, 528 U.S. 119, 124-25 (2000). Allowing the Illinois Appellate Court’s decision to go unreviewed would allow decisions by state and federal prosecutors to alter the Fourth Amendment’s protections where there are over 273 million registered vehicles in the United States. Even if the reasonable suspicion standard is a “minimal” standard, with over 273 million cars, was it reasonable for officers, without more, to stop any and all vehicles similar to the particular description? See *U.S. v. Sokolow*, 490 U.S. 1, 7 (1989); *Edwards*, 2019 IL App (5th) 180300-U, ¶ 34 (“An officer’s suspicion need not rise to the level of suspicion required for probable cause,” but must be more than a hunch).

The police investigated and checked out the damaged vehicles, including gathering information of the car the shooter had stood atop—that the registered owner of that particular maroon Ford Focus with license plate E251625 was Bacon and not Mr. Edwards. (R.R28) Unlike the facts in *U.S. v. Lucky*, 569 F.3d 101, 103-04, 106 (2d Cir. 2009), and *U.S. v. Hurst*, 228 F.3d 751, 755-57 (6th Cir. 2000), Bacon’s maroon Ford Focus was not actually involved in the commitment of a crime. All the direct evidence supports is that it was merely a parked car that the shooter stood on at some point. The car was not impounded or collected for evidence preservation. Officers did not locate the known registered owner of the vehicle or prevent the movement of the car at any point. Further, there was no mention as to whether Bacon’s vehicle was the

only Ford Focus in the apartment complex. Without more, where the officers knew that the registered owner was a female, the officers lacked a reasonable suspicion to stop Mr. Edwards.

“[R]easonable suspicion can be established from third-party information collectively received by officers working in concert, even if that information is not specifically known to the officer conducting the *Terry* stop.” *Edwards*, 2019 IL App (5th) 180300-U, ¶ 25. The collective knowledge doctrine, or the fellow officer rule, was developed from this Court’s decision in *Whiteley v. Warden, Wyo. St. Penitentiary*, 401 U.S. 560, 568 (1971), “in which the Court explained that the collective knowledge of all law enforcement agents may be taken into consideration in making a probable cause determination.” Kimberly J. Winbush, Annotation, Application in State Narcotics Cases of Collective Knowledge Doctrine or Fellow Officers’ Rule Under Fourth Amendment—Drugs Other than Marijuana and Cocaine and Unidentified Drugs, 12 A.L.R. 6th 553, § 2 (2006). This doctrine was expanded by this Court in *Hensley*, 469 U.S. at 229-34, in the context of reasonable and articulable suspicion analysis for investigatory stops.

But here, even with the Belleville police’s collective knowledge, there was no reasonable and articulable suspicion for stopping Bacon’s car. Abernathy stopped Bacon’s maroon Ford Focus based solely on Koebbe’s order to stop the vehicle. Thus, Abernathy’s traffic stop, on its own, was not based on a reasonable and articulable suspicion. *Edwards*, 2019 IL App (5th) 180300-U, ¶¶ 12-17. Even when considering the collective knowledge of the police department, no officer knew the identity of the black male driving Bacon’s car prior to the stop.

On appeal, Mr. Edwards agreed that *if* the officers had encountered *him on the street*, they would have reasonable suspicion to briefly detain him based on Gully's claim. *Id.*, ¶ 30. But for this to happen, the officers would have to be able to identify Mr. Edwards. Here, the officers provided no descriptions of Mr. Edwards or the shooter, and no officers testified to being familiar with Mr. Edwards or being able to identify him if they saw him on the street or in a car. *Id.*, ¶ 7, 13. In fact, officers, after checking the vehicle's registration during the initial investigation, knew that the maroon Ford Focus was registered to Bacon, not Mr. Edwards, and that Bacon's vehicle registration was in order and valid. (R.R25-26,41,62) Further, Abernathy's instruction to "sit" on the maroon Ford Focus with license plate E251625 was only related to the car itself since Bacon was not connected to the shooting incident. (R.8,19,27-28)

Therefore, while it is reasonable for officers to suspect that the registered owner of a vehicle is the person driving the vehicle, when an officer has information negating the inference, it is unreasonable for the officer to stop a vehicle without something more. See *Glover*, 140 S. Ct. at 1186. This Court should grant review to analyze cases that go against the presumption—whether it is reasonable for the officers to stop a vehicle where the officers know that the driver is not the registered owner of a vehicle.

CONCLUSION

For the foregoing reasons', petitioner, Franklin C. Edwards, respectfully prays that a writ of certiorari issue to review the judgment of the Illinois Supreme Court.

Respectfully submitted,



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