No. _____

IN THE SUPREME COURT OF THE UNITED STATES

MILTON MOSLEY, Petitioner

vs.

UNITED STATES OF AMERICA, Respondent

PETITION FOR WRIT OF CERTIORARI

In the United States Court of Appeals for the Third Circuit: Appeal Number 19-2050, On Appeal from the judgment entered in the United States District Court for the Middle District of Pennsylvania, on April 29, 2019, at 1:17-CR-155, (Rambo, J.)

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QUESTION PRESENTED (Rule 14.1(a))

The finding of the lower courts, where suspicion of criminal activity was clearly not "specific, individualized, and reasonable," is contrary to the Supreme Court's decision in Terry v. Ohio, 392 U.S. 1 (1968).

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Bates additionally noted seeing "a clear plastic sandwich bag sitting out on [Petitioner's] left leg area right next to the top part of [Petitioner's] left pant pocket." Officer Bates further noted that "the bag was folded into a small square shape and appeared to have several thick white spots in it....[i]t appeared the white spots were possibly a white rocky substance." In Officer Bates' experience and training, he felt the bag contained Crack Cocaine. This information was relayed to Officer Ishman while Officer Bates circled the block to make contact with the Petitioner. SAppx013a

Officer Bates, now travelling west bound on Park Street, approached the Petitioner's vehicle from behind, driving by slowly and as he passed, no longer saw a bag on the Petitioner's leg. SAppx016 Officer Bates parked his vehicle in front of Petitioner's – approximately 1.5 car lengths in front of said vehicle. Officer Bates then exited his vehicle and made contact with the Petitioner; it is noteworthy that Officer Ishman stood by the passenger side of the Petitioner's vehicle. SAppx017

Upon request, Petitioner provided the vehicle information from the driver's side visor to Officer Bates; Officer Bates noted that Petitioner was sweating. Officer Bates testified that "he had nothing really to stop [Petitioner]" [from leaving]– unless [Petitioner] did a traffic violation. SAppx017

While Officer Bates was speaking with the Petitioner, Officer Ishman mentioned to Officer Bates that he could smell burnt marijuana coming from the vehicle.

Officer Ishman also noted he could see what appeared to be a small marijuana roach sitting in the ashtray of the vehicle. SAppx019 Officer Bates, now bending down further also noted he could smell burnt marijuana coming from the vehicle. Petitioner was then told to turn off his vehicle as Officer Bates was going to "check" his vehicle – Officer Bates also referenced this interaction as why he was "approaching [Petitioner], stopping [Petitioner]." SAppx020 During this period, Officer Bates questioned Petitioner about drug sales and informed Petitioner that he previously saw a bag on Petitioner's leg that contained either Crack Cocaine or something else – he simply wasn't sure. SAppx017 Shortly thereafter, Officer Bates made reference to seeing the bag and now assumed the bag may have contained marijuana in it. SAppx019

Due to questioning by Officer Bates, the Petitioner turned over a small amount of marijuana from his pocket – and purportedly gave Officer Bates permission to search his vehicle. A search of the vehicle yielded a firearm and a search of the Petitioner incident to arrest yielded a pill bottle containing crack cocaine. After these items were located, Petitioner was asked if he had a permit to carry the firearm at which point, he denied ownership of the same; Officer Ishman at this point Mirandized the Petitioner. SAppx020-022

On May 10, 2017, a federal grand jury returned a three-count indictment charging Petitioner Milton Mosley with: possession with the intent to distribute cocaine base in violation of 21 U.S.C. § 841 (Count 1); possession of a firearm by a felon in violation of 18 U.S.C. § 922(g) (Count 2); and possession of a firearm in furtherance of drug trafficking in violation of 18 U.S.C. § 924(c) (Count 3). (Doc. 1.) Petitioner entered a plea of not guilty to the charges on May 16, 2017. (Doc. 10.) On November 27, 2017, Petitioner filed a motion to suppress evidence (Doc. 26), followed by a supporting brief on December 28, 2017 (Doc. 30), wherein he moved to suppress all evidence seized from his person and vehicle on the basis that Harrisburg City Police – Street Crimes Unit ("SCU") officers violated Petitioner's Fourth Amendment rights against illegal search and seizure when they stopped, questioned, and ultimately searched Petitioner and his vehicle without lawful consent. The Government filed a brief in opposition on January 9, 2018, arguing that the officers initially had a "mere encounter" with Petitioner. (Doc. 33.) They further argue that even if the officers' actions rose to the level of an investigatory stop, they had reasonable suspicion for the stop and subsequent search of Petitioner and his vehicle. (Id.) The court held an evidentiary hearing on January 30, 2018. At the suppression hearing, Petitioner testified on his own behalf, and Harrisburg Police Department SCU Officers Darrin Bates and Nick Ishman testified for the Government. The motion was denied. On December 4, 2018, the Petitioner was found Guilty by jury on Count 1, Not Guilty on Counts 2, and 3 related to the possession of a firearm. On

April 29, 2019 Mosley was sentenced to 168 months incarceration to be followed by three (3) years of supervised release, along with $1,000 fine and a $100 special assessment.

The trial court ruled on April 16, 2018, that Officers Bates and Ishman had the requisite reasonable suspicion to approach Petitioner, followed by his consent to search his vehicle, and subsequent probable cause to arrest and search his person, which are sufficient to satisfy the requirements of the Fourth Amendment at each stage of Petitioner's encounter with officers on January 4, 2017. Accordingly, all the evidence discovered during the search of Petitioner and his vehicle were lawfully obtained and were admissible at trial.

The United States Court of Appeals for the Third Circuit rejected petitioner's argument on the merits and affirmed his sentence. Appendix A-B.

REASONS FOR GRANTING THE PETITION

The lower court misapprehended *Terry v. Ohio, 392 U.S. 1 (1968)*, which makes it clear that the Fourth Amendment limits law enforcement's power to seize individuals to situations where their suspicion of criminal activity is specific, individualized, and reasonable. *Terry, 392 U.S. at 27.*

The search and seizure of Petitioner, the vehicle and its contents were in violation of his Fourth Amendment rights under the United States Constitution. Because police did not have reasonable suspicion to conduct a Terry stop when they seized him, the evidence discovered as a result of the stop and corresponding search should be suppressed.

The Fourth Amendment prohibits "unreasonable searches and seizures." *U.S. Const. amend. IV.* Though law enforcement officers ordinarily must obtain a warrant based on probable cause before conducting a seizure, in *Terry v. Ohio, 392 U.S. 1 (1968)*, the Supreme Court articulated an exception that allows law enforcement to conduct a brief investigatory stop in limited circumstances. Under Terry and its progeny, "an officer may, consistent with the Fourth Amendment, conduct a brief, investigatory stop when the officer has a reasonable, articulable suspicion that criminal activity is afoot." *Illinois v. Wardlow, 528 U.S. 119, 123*

seized for 4th Amendment purposes, as it was clear to any reasonable person that Mosley was not free to decline the officers' invitation to speak with them or leave.

In regard to the second question regarding the officers' reasonable suspicion determination, it is well settled that [p]olice may only seize a person consistent with the Fourth Amendment if they have reasonable, articulable, and individualized suspicion that a suspect is engaged in criminal activity. See *Wardlow, 528 U.S. at 123*; *Terry, 392 U.S. 1*.

In *United States v. Lowe, Crim. No. 11-111, 2014 WL 99452 at *1 (E.D. Pa. Jan. 8, 2014)* the Third Circuit Court of Appeals analyzed reasonable suspicion based upon the facts known to the officers at the time of the seizure. When officers first approached Lowe the information they possessed included "an anonymous tip that a male matching Mr. Lowe's description was [in possession of a gun], the fact that 914 North Markoe Street was located in a high-crime neighborhood in which a shooting had occurred over an hour earlier, [and] the late hour of the night." *Lowe, 2014 WL 99452, at 5*. Courts have consistently stated that the reasonable suspicion analysis must be limited to the facts known to the officers when they effected a Terry stop.

Turning the facts known to the officers at the time of the seizure of Mosley and whether or not the officer's had reasonable suspicion that a crime was afoot, one

must look to the testimony proffered by Officer Darren Bates of the Harrisburg Bureau of Police, Street Crimes Unit. In his testimony, Officer Bates initially notes that they were searching the area of Park Street for a wanted fugitive unrelated to Mosley. Officer Bates and Nicholas Ishman also had one anonymous and one known complaint from a week earlier regarding "drug activity" at 1925 Park Street in Harrisburg. The anonymous called [who did not leave a call back number] alleged witnessing two "transactions" involving a red Suzuki Forenza bearing PA Registration KCL8696. The second call, approximately a week prior to SCU Officers interaction with Mosley, left their contact information and said they witnessed a black male wearing all black nicknamed "Booby" leave the residence at 1925 Park and conduct a transaction with a white vehicle; this caller also alleged that this male would be carrying a Taurus firearm on his person. SAppx007

While driving by 1925 Park Street, Officer Bates noticed a black male that appeared to be dancing to the music inside a car. While driving past the vehicle, Officer Bates sees a clear plastic sandwich bag sitting on Mosley's upper left leg by his pants pocket. Initially, Officer Bates noted that based upon his training and experience, the bag contained Crack Cocaine. However, during his suppression testimony, Officer Bates testified that "he could see little white objects.... either it was balled up really tight plastic that made it look thicker white or it was crack

cocaine". SAppx013 Based on this uncertainly, it becomes clear that Officer Bates was unsure of what he saw, he drove around the block to "double-check to see if I can see it, get a better view on it." SAppx013

Officer Bates then proceeded to drive around the block and when he came upon Mosley in his vehicle the second time - the bag was gone. It is at this point that Officer Bates pulled one-and-a-half car lengths in front of Mosley and parked his SUV in the one-way street in which cars park on both sides and exited his vehicle and began asking Mosley for identification. SAppx013 It is noteworthy that while Officer Bates was at the driver's side of the vehicle, Officer Ishman was positioned at the passenger's side of Mosley's vehicle. It is during this interaction that Mosley posits he was initially seized when Officers parked in front of him on a one-way street in which cars park on both sides, in the alternative, he was seized when two officers exited their vehicle and stood on each side of his car – regardless, the fruits derived therefrom should be suppressed.

The facts at bar do not give rise to reasonable suspicion on the part of Officer Bates and/or Officer Ishman. Essentially, Officers possessed one non-anonymous report from a week earlier consisting of a black male wearing black clothes who goes by "Booby" that would be carrying a Taurus firearm. The genesis for approaching Mosley appears to be the one-time observation of what Officer Bates

believed to possibly be a clear plastic bag of crack cocaine that was high up on Mosley's left leg. Although Officer Bates references his initial thought that this was possibly Crack Cocaine, he later memorialized his observation by telling Mosley the reason for stopping and approaching his vehicle was that he previously observed a bag on his leg that contained either crack cocaine or marijuana.

It is further noted that Officer Bates, upon initially seeing what he thought was crack cocaine did not stop his vehicle. He circled the city block again and upon a second pass of Mosley's vehicle, the bag was no longer present. Officer Bates admitted that he did not have enough evidence to detain Mosley if he tried to leave the scene by stating, quite candidly, "I had nothing really to stop him.....I didn't have enough, just because I saw the clear plastic bag, and I wasn't 100 percent sure it was crack cocaine I saw, I didn't have enough to actually detain him." SAppx017

It is clear that the Fourth Amendment limits law enforcement's power to seize individuals to situations where their suspicion of criminal activity is specific, individualized, and reasonable. *Terry, 392 U.S. at 27*. Officers proceeding on the basis of an anonymous tip that does not itself give rise to reasonable suspicion have many tools at their disposal to gather additional evidence that could satisfy the requirements of *Terry* and therefore allow police to stop the individual under

appropriate circumstances. See *Adams v. Williams, 407 U.S. 143, 147 (1972)* ("Some tips, completely lacking in indicia of reliability, . . . require further investigation before a forcible stop of a suspect would be authorized."). These include investigation, surveillance, and even approaching the suspect without a show of authority to pose questions and to make observations about the suspect's conduct and demeanor. See *Alabama v. White, 496 U.S. 325, 331 (1990)* (describing how officers conducted surveillance to corroborate details in a tip and developed reasonable suspicion); *U.S. v. Mendenhall, 446 U.S. 544, 554 (1980)* (explaining that conversations between individuals and law enforcement officers do not necessarily implicate the Fourth Amendment).

It is noted that [o]fficers' observations during such an inquiry or investigation could create reasonable suspicion necessary to conduct a Terry stop. However, reasonable suspicion is always evaluated as of the moment of seizure, and [the court] cannot consider facts that develop after that moment. See *Campbell, 332 F.3d at 205*. Mosley posits that most, if not all of the reasonable suspicion obtained by officers occurred after he was already seized for Constitutional purposes.

In the instant case, the facts as alleged by law enforcement do not justify the seizure of Mosley as Officers did not have the reasonable suspicion necessary to

support the Terry stop. The evidence recovered as a result of the ensuing search is the fruit of the poisonous tree which must be suppressed. *Wong Sun v. United States, 371 U.S. 471, 487-88 (1963).*

CONCLUSION

For the foregoing reasons, petitioner requests that this Court grant the petition for certiorari.

Dated: 8/14/2020

Respectfully submitted,

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NOT PRECEDENTIAL

UNITED STATES COURT OF APPEALS
FOR THE THIRD CIRCUIT

No. 19-2050

UNITED STATES OF AMERICA

v.

MILTON MOSLEY,
Appellant

On Appeal from the United States District Court
for the Middle District of Pennsylvania
(D.C. Criminal No. 1-17-cr-00155-001)
District Judge: Honorable Sylvia H. Rambo

Submitted Under Third Circuit L.A.R. 34.1(a)
April 14, 2020

Before: CHAGARES, SCIRICA, and ROTH, Circuit Judges.

(Opinion filed: May 20, 2020)

OPINION*

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* This disposition is not an opinion of the full Court and pursuant to I.O.P. 5.7 does not constitute binding precedent.

APPENDIX A

CHAGARES, Circuit Judge.

Milton Mosley, the defendant, appeals from the District Court's judgment of conviction. Mosley contends that the District Court erred by failing to suppress the evidence seized at the time of his arrest. We disagree and will affirm.

I.

We write only for the parties and so recite just those facts necessary to our disposition. On January 4, 2017, two police officers, Darrin Bates and Nicholas Ishman, drove past 1925 Park Street in Harrisburg, Pennsylvania because of reported drug activity in the area. In front of that address, Officer Bates saw Mosley sitting in a parked car with a clear plastic bag on his lap. The bag appeared to contain a white substance that Officer Bates believed to be cocaine base, so the officers looped around the block and passed Mosley again. But the second time, neither officer saw the bag on Mosley's lap.

The officers parked and walked to Mosley's car. While Officer Bates was talking with Mosley on the driver side of the car, Officer Ishman smelled marijuana and saw a burnt marijuana roach in the ashtray from the passenger side. Officer Ishman informed Officer Bates of his observations, so Officer Bates bent down, and he smelled marijuana in the car, too.

Officer Bates asked Mosley to step out of the car and told him that he had seen what he believed to be cocaine base on Mosley's lap. Mosley responded that it was marijuana and handed Officer Bates a bag of marijuana from his pocket. Mosley then consented to Officer Bates' request to search his car, and during the search, Officer Bates found a handgun. When asked, Mosley told Officer Bates that he did not have a permit

to carry a weapon. Officer Ishman placed Mosley under arrest, searched his person incident to the arrest, and found a prescription bottle containing seven plastic bags of cocaine base.

A federal grand jury charged Mosley with possession with the intent to distribute cocaine base in violation of 21 U.S.C. § 841, possession of a firearm by a felon in violation of 18 U.S.C. § 922(g), and possession of a firearm in furtherance of drug trafficking in violation of 18 U.S.C. § 924(c). Before trial, Mosley moved to suppress all evidence seized at the time of his arrest, claiming violations of his Fourth Amendment rights. The District Court denied Mosley's motion.

Later, a jury found Mosley guilty of possession with the intent to distribute cocaine base and acquitted him on the other charges. After sentencing, Mosley timely appealed.

II.

Mosley argues that the District Court erred in denying his pretrial motion to suppress the evidence gathered on January 4, 2017 because the stop, search of the car, and search of his person each violated the Fourth Amendment. We are not persuaded.[1]

At the outset, we assume without deciding that when the officers approached Mosley to question him, they stopped him. Still, that stop did not violate the Fourth Amendment. "[A]n officer may, consistent with the Fourth Amendment, conduct a brief,

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[1] The District Court had jurisdiction under 18 U.S.C. § 3231. We have jurisdiction under 28 U.S.C. § 1291. In an appeal challenging the denial of a motion to suppress, "the District Court's factual findings are reviewed for clear error and its legal determinations are subject to plenary review." United States v. Green, 897 F.3d 173, 178 (3d Cir. 2018).

investigatory stop when the officer has a reasonable, articulable suspicion that criminal activity is afoot." United States v. Torres, 534 F.3d 207, 210 (3d Cir. 2008) (quoting Illinois v. Wardlow, 528 U.S. 119, 123 (2000)). Here, the officers had reasonable suspicion to stop Mosley because, in an area with reported drug activity, Officer Bates observed what he believed to be cocaine base on Mosley's lap, and after the officers' first pass, Mosley removed the bag. See United States v. Whitfield, 634 F.3d 741, 744, 745 & n.3 (3d Cir. 2010) (concluding there was reasonable suspicion to justify a stop when an officer believed he saw a "closed fist hand-to-hand" drug exchange and a later "effort to conceal something" in a "high crime area where there's been drug transactions" (quotation marks omitted)).

Next, the search of Mosley's car did not violate the Fourth Amendment because Mosley freely consented to that search. See United States v. Murray, 821 F.3d 386, 391 (3d Cir. 2016) ("While the Fourth Amendment prohibits unreasonable searches and seizures, consent is an exception to the requirements of both a warrant and probable cause." (quotation marks and alteration omitted)). Although Mosley disputes that he consented, the District Court's finding to the contrary was not clearly erroneous.

Finally, the search of Mosley's person incident to his arrest did not violate the Fourth Amendment, either. By the time of that search, the officers had determined that Mosley possessed marijuana and that he had a handgun without a permit. The officers therefore had probable cause to arrest Mosley and to search his person incident to that arrest. See Arizona v. Gant, 556 U.S. 332, 338 (2009) ("Among the exceptions to the [Fourth Amendment's] warrant requirement is a search incident to a lawful arrest.").

III.

For these reasons, the District Court did not err in denying Mosley's motion to suppress. We therefore will affirm the judgment of conviction.

UNITED STATES COURT OF APPEALS
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(D.C. Criminal No. 1-17-cr-00155-001)
District Judge: Honorable Sylvia H. Rambo

Submitted Under Third Circuit L.A.R. 34.1(a)
April 14, 2020

Before: CHAGARES, SCIRICA, and ROTH, Circuit Judges.

JUDGMENT

This cause came to be considered on appeal from the United States District Court for the Middle District of Pennsylvania and was submitted on April 14, 2020.

On consideration whereof, it is now hereby ORDERED and ADJUDGED by this Court that the Judgment of the District Court entered on April 29, 2019, is AFFIRMED. All of the above in accordance with the Opinion of this Court.

ATTEST:

s/Patricia S. Dodszuweit
Clerk

Dated: May 20, 2020

APPENDIX B

OFFICE OF THE CLERK

PATRICIA S. DODSZUWEIT

CLERK

UNITED STATES COURT OF APPEALS
21400 UNITED STATES COURTHOUSE
601 MARKET STREET
PHILADELPHIA, PA 19106-1790
Website: www.ca3.uscourts.gov

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215-597-2995

May 20, 2020

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Camp Hill, PA 17011

RE: USA v. Milton Mosley
Case Number: 19-2050
District Court Case Number: 1-17-cr-00155-001

ENTRY OF JUDGMENT

Today, **May 20, 2020** the Court entered its judgment in the above-captioned matter pursuant to Fed. R. App. P. 36.

If you wish to seek review of the Court's decision, you may file a petition for rehearing. The procedures for filing a petition for rehearing are set forth in Fed. R. App. P. 35 and 40, 3rd Cir. LAR 35 and 40, and summarized below.

Time for Filing:
14 days after entry of judgment.
45 days after entry of judgment in a civil case if the United States is a party.

Form Limits:
3900 words if produced by a computer, with a certificate of compliance pursuant to Fed. R. App. P. 32(g).
15 pages if hand or type written.

Attachments:
A copy of the panel's opinion and judgment only.
Certificate of service.
Certificate of compliance if petition is produced by a computer.
No other attachments are permitted without first obtaining leave from the Court.

Unless the petition specifies that the petition seeks only panel rehearing, the petition will be construed as requesting both panel and en banc rehearing. Pursuant to Fed. R. App. P. 35(b)(3), if separate petitions for panel rehearing and rehearing en banc are submitted, they will be treated as a single document and will be subject to the form limits as set forth in Fed. R. App. P. 35(b)(2). If only panel rehearing is sought, the Court's rules do not provide for the subsequent filing of a petition for rehearing en banc in the event that the petition seeking only panel rehearing is denied.

A party who is entitled to costs pursuant to Fed.R.App.P. 39 must file an itemized and verified bill of costs within 14 days from the entry of judgment. The bill of costs must be submitted on the proper form which is available on the court's website.

A mandate will be issued at the appropriate time in accordance with the Fed. R. App. P. 41.

Please consult the Rules of the Supreme Court of the United States regarding the timing and requirements for filing a petition for writ of certiorari.

Very truly yours,
Patricia S. Dodszuweit, Clerk

By: s/Carmella
Case Manager
267-299-4928

No. _____

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MILTON MOSLEY, Petitioner

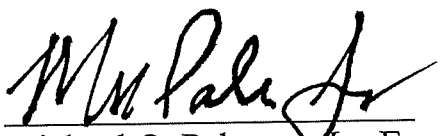
vs.

UNITED STATES OF AMERICA, Respondent

On PETITION FOR WRIT OF CERTIORARI
In the United States Court of Appeals for the Third Circuit: Appeal 19-2050

CERTIFICATE OF SERVICE

I, Michael O. Palermo, Jr., Esq., certify that on 8/14/20, a copy of the Petition for Writ of Certiorari and a copy of the Motion for Leave to Proceed In Forma Pauperis in the above-entitled case, and a copy of this Certificate, were mailed first-class, postage prepaid, to: Scott R. Ford, Esq. Office of United States Attorney, Middle District of Pennsylvania, 228 Walnut St., PO Box 11754, 220 Federal Building and Courthouse, Harrisburg, PA 17108; and to the United States Court of Appeals for the Third Circuit, 21400 United States Courthouse, 601 Market Street, Philadelphia, PA 19106-1790. I further certify all parties required to be served have been served.



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In the United States Court of Appeals for the Third Circuit: Appeal 19-2050

REQUEST TO EXPAND APPOINTMENT TO FILE PETITION FOR CERTIORARI IN THE UNITED STATES SUPREME COURT

Petitioner Milton Mosley, through appointed counsel, respectfully requests expansion of counsel's appointment to include filing a petition for a writ of certiorari *in forma pauperis* in the United States Supreme Court.

On May 20, 2020, the United States Court of Appeals for the Third Circuit denied Petitioner's appeal. The deadline to file a petition for certiorari in the United States Supreme Court is August 18, 2020

Accordingly, Petitioner respectfully requests expansion of counsel's appointment to include filing a petition for certiorari *in forma pauperis* in the U.S. Supreme Court.

Dated: 8/14/2020

Respectfully submitted,

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