No. 25-637

In the Supreme Court of the United States

MARK HANNEMAN, IN HIS INDIVIDUAL CAPACITY AS A MINNEAPOLIS POLICE OFFICER, AND THE CITY OF MINNEAPOLIS,
Petitioners,

v.

KAREN WELLS AND ANDRE LOCKE AS CO-TRUSTEES FOR THE NEXT OF KIN OF AMIR RAHKARE LOCKE,
Respondents.

ON PETITION FOR WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE EIGHTH CIRCUIT

BRIEF OF MINNESOTA POLICE AND PEACE OFFICERS ASSOCIATION AS *AMICUS CURIAE* IN SUPPORT OF PETITIONER

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The MPPOA submits this brief in support of Petitioner Officer Mark Hanneman ("Officer Hanneman") and urgers reversal of the decision below in *Karen Wells, et al. v. Mark Hanneman et al.*, 144 F.4th 1015 (8th Cir. 2025).

STATEMENT OF INTEREST OF AMICUS CURIAE

Founded in 1922, the Minnesota Police and Peace Officers Association ("MPPOA") is the largest association representing licensed peace officers in the State of Minnesota.[1] As the legislative voice for public safety professionals, the MPPOA seeks to promote laws and policies that support public safety and the working conditions and retirement benefits for the professionals that uphold it, while opposing those laws and policies that do not. The MPPOA provides training and promotes high ethical standards in policing across the state of Minnesota. It also provides legal representation to member officers acting in their official capacities for, *inter alia,* critical incidents that might expose the officer to criminal liability.

The MPPOA has a strong interest in this case because it bears directly on the liability and legal scrutiny its members face when suddenly confronted with individuals wielding firearms in dangerous situations. As a result, it also impacts how the MPPOA's members respond in these situations—when their

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[1] Pursuant to this Court's Rule 37.6, counsel for the MPPOA states that no part of this brief was authored by counsel for any party, and no person or entity other than the MPPOA or its members made any monetary contribution to the preparation or submission of the brief. Parties received timely notice of the MPPOA's intent to file this brief.

safety and the safety of the community is most in jeopardy.

The MPPOA respectfully submits this brief to emphasize the significant negative impact that the decisions below will have on peace officers' ability to act when suddenly confronted with armed, noncooperative suspects in the most dangerous and uncertain of circumstances.

SUMMARY OF THE ARGUMENT

Officer Hanneman was confronted with a sudden, immediate threat of death or serious bodily injury while executing a high-risk search warrant targeting a suspect in a recent murder when decedent Amir Locke (1) grabbed a pistol in response to the officer's presence (2) ducked out of view and underneath a blanket, then (3) suddenly emerged from the blanket holding the pistol mere feet from Officer Hanneman. In response to this sudden and imminent threat, Officer Hanneman shot and killed Locke. All this is established on the body-worn camera videos of the incident.

Both the trial court and Eighth Circuit ruled based on the mistaken assumption that clearly established law. Held that unless Amir Locke pointed his weapon at Officer Hanneman or others, then Officer Hanneman's use of deadly force could not be reasonable under the circumstances and denied qualified immunity. Specifically, the District Court recognized that Officer Hanneman was forced into a split-section decision and that no warning was feasible. But the District Court found that the videos of the incident did not establish that Locke pointed his gun at one of the officers and that absent such a clear showing, Officer

Hanneman's shooting could not have been justified under clearly established law. But this finding was contradicted by recent Eighth Circuit precedent holding that deadly force can be justified *before* the subject points the firearm at another person.

Rather than correcting the District Court's error, the Eighth Circuit compounded upon this error by holding that it lacked jurisdiction to hear Officer Hanneman's appeal because the videos were insufficiently definite, creating a dispute of fact over whether Locke had pointed his weapon at officers or was attempting to comply with orders to show his hands.

Both the Eighth Circuit and the District Court erred in these holdings. Consistent with this Court's repeated instruction, both lower courts should have considered, at the earliest possible stage, whether Officer Hanneman was entitled to qualified immunity irrespective of whether Locke pointed the gun in his direction. But they failed or declined to do so, despite recent precedent to that effect. This decision, if left in place, not only complicates Eighth Circuit precedent regarding use of force, but sows doubt in the minds of officers everywhere regarding perhaps the *most* difficult circumstance for an officer to face.

This Court should grant the petition and take this opportunity to both clarify that individuals holding firearms can be an immediate threat to officers even if they are not actively pointing the gun at the officers, and to reinforce its instruction that issues of qualified immunity be resolved as early in the case as possible.

ARGUMENT

I. THIS COURT HAS REPEATEDLY EMPHASIZED THE SPECIFICITY REQUIRED FOR CONDUCT TO VIOLATE "CLEARLY ESTABLISHED" LAW

"The doctrine of qualified immunity shields officers from civil liability so long as their conduct 'does not violate clearly established statutory or constitutional rights of which a reasonable person would have known.'" *City of Tahlequah v. Bond*, 595 U.S. 9, 12, 142 S. Ct. 9, 11 (2021) (quoting *Pearson v. Callahan*, 555 U.S. 223, 231 (2009)). The doctrine protects "all but the plainly incompetent or those who knowingly violate the law." *Id.* (quoting *District of Columbia v. Wesby*, 583 U.S. 48, 63 (2018)). "A clearly established right is one that is 'sufficiently clear that every reasonable official would have understood that what he is doing violates that right.'" *Mullenix v. Luna*, 577 U.S. 7, 11, 136 S. Ct. 305, 308 (2015) (quoting *Reichle v. Howards*, 566 U.S. 658, 664 (2012)).

For an asserted right to be clearly established, this Court has explained that existing precedent must have placed the statutory or constitutional question "beyond debate." *Rivas-Villegas v. Cortesluna*, 595 U.S. 1, 5 (2021) (per curiam). And the right may not be defined at a general level. To the contrary, the inquiry must be undertaken "in light of the specific context of the case, not as a broad general proposition." *Brosseau v. Haugen*, 543 U.S. 194, 198 (2004) (per curiam) (internal quotation marks omitted). This specificity "is especially in the Fourth Amendment context, where . . . it is sometimes difficult for an officer to determine how the relevant legal doctrine, here excessive force, will apply to the factual situation the officer

confronts." *Mullenix*, 577 U.S. at 12 (alternations and internal quotation marks omitted)).

Whether an officer has used excessive force depends on "the facts and circumstances of each particular case, including the severity of the crime at issue, whether the suspect poses an immediate threat to the safety of the officers or others, and whether he is actively resisting arrest or attempting to evade arrest by flight." *Graham v. Connor*, 490 U.S. 386, 396 (1989). And where an officer has probable cause to believe that a suspect poses a threat of serious physical harm or death, either to the officer or others, the use of deadly force is not unreasonable. *Tennessee v. Garner*, 471 U.S. 1, 11 (1985). "However, *Graham*'s and *Garner*'s standards are cast 'at a high level of generality.'" *Rivas-Villegas*, 595 U.S. at 5 (quoting *Brosseau*, 543 U.S. at 199). "Given its imprecise nature, officers will often find it difficult to know how the general standard of probable cause applies in the precise situation encountered." *Wesby*, 583 U.S. at 64 (internal quotation marks omitted).Therefore, outside of the obvious case, these standards are not sufficient to "clearly establish" the reasonableness of the use of force. *Rivas-Villegas*, 595 U.S. at 5. In a not-obvious case, the plaintiff "must identify a case that put [the officer] on notice that his specific conduct was unlawful." *Id. See also Wesby*, 583 U.S. at 64 (explaining that it is crucial for a plaintiff to "identify a case where an officer acting under similar circumstances . . . was held to have violated the Fourth Amendment.") (quoting *White v. Pauly*, 580 U.S. 73, 79 (2017)) (per curiam)).

II. THE DISTRICT COURT ERRED IN PERFORMING ITS "CLEARLY ESTABLISHED" ANALYSIS

Relying on *Cole v. Hutchins*, 959 F.3d 1127, 1132 (8th Cir. 2020), the District Court held that Locke needed to point his gun at another individual, or take other similar "menacing action," for Officer Hanneman to have probable cause to believe that Locke posed an immediate threat of death or serious bodily injury. (App. 18a-19a.) But in *Cole* itself the Eighth Circuit recognized that this proposition is true only in a *general* sense. *See Cole*, 959 F.3d at 1132 ("*Generally*, an individual's mere possession of a firearm is not enough for an officer to have probable cause to believe that individual poses an immediate threat of death or serious bodily injury; the suspect must also point the firearm at another individual or take similar menacing action." (internal quotation marks omitted, emphasis added)). And generalized propositions do not suffice to render an alleged rule of law clearly established, as discussed *supra*. In any event, neither Respondents nor the District Court identified a case with a similar fact pattern holding that a subject emerging from concealment wielding a firearm failed to qualify as a "menacing action" within the meaning of *Cole*.

Perhaps recognizing the high level of generality with this initial rule, the District Court also held, "Well before February 2, 2022, it was clearly established that an officer violates the Fourth Amendment when he uses deadly force on an armed individual who is moving his gun in compliance with officers' commands." (App. 19a (citing *Partridge v. City of Benton*, 70 F.4th 489, 792 (8th Cir. 2023); *Craighead v. Lee*, 399 F.3d 954, 961 (8th Cir. 2005)). But *Partridge* concerns

officers shooting an individual who was pointing a gun at himself (*i.e.*, was apparently suicidal) that they approached knowing he possessed a gun and shot him from 45 feet away. *See Partridge*, 70 F.4th at 490. And *Craighead* concerns an officer firing a shotgun at two individuals, knowing that one of whom was not suspected of any criminal activity and was holding a pistol high above his head pointed upward, keeping it away from the other man, and did not issue a warning despite one being feasible. *Craighead*, 399 F.3d at 962-63. Neither case is comparable to the situation that confronted Officer Hanneman, who was executing a high-risk search warrant searching for a murder suspect when suddenly he emerged, mere feet away, holding a pistol he had grabbed in response to the officers' presence. This is particularly true given the District Court's finding that no warning was feasible for Officer Hanneman, unlike the officers in *Craighead* and *Partridge*.

Consequently, neither the District Court nor Respondents have identified a prior case with facts sufficiently like those facing Officer Hanneman such that "every reasonable officer" would have understood that firing his weapon was prohibited by law. As a result, the District Court's holding that the facts as alleged and revealed in the videos show a violation of clearly established law is in error. *Mullenix*, 577 U.S. at 12.

III. THE DISTRICT COURT ERRED BY DISREGARDING *LIGGINS* AND THIS COURT'S CLEAR COMMAND TO RESOLVE QUALIFIED IMMUNITY AT THE EARLIEST POSSIBLE OPPORTUNITY

At bottom, the thrust of the District Court's holding is that because the videos did not clearly show Locke pointing gun at the officers at the time Officer Hanneman fired, Officer Hanneman was not entitled to qualified immunity at the pleading stage. But as discussed above, there was no precedent in the Eighth Circuit that would put Officer Hanneman on notice that it was unlawful for him to fire upon Locke when he suddenly emerged holding a firearm, or that he needed to wait until Locke actually pointed the firearm at him or the other officers.

To the contrary, Eighth Circuit precedent establishes that "[i]n dangerous situations where an officer has reasonable grounds to believe that there is an imminent threat of serious harm, the officer may be justified in using a firearm before a subject actually points a weapon at the officer or others." *Liggins v. Cohen*, 971 F.3d 798, 801 (8th Cir. 2020). In fact, the Eighth Circuit previously held that an officer need not even *see* a weapon to be justified in using deadly force for fear of a weapon in certain circumstances. *See, e.g.*, *Thompson v. Hubbard*, 257 F.3d 896, 899 (8th Cir. 2001) ("An officer is not constitutionally required to wait until he sets eyes upon the weapon before employing deadly force to protect himself against a fleeing suspect who turns and moves as though to draw a gun.").

The District Court acknowledged, and the video shows, that less than eight seconds elapsed between

when Officer Hanneman entered the apartment and when he fired—and less than two seconds elapsed between when Sgt. Carlson kicked the couch that Locke was on and when Officer Hanneman fired. (App. 14a.) Even less time, therefore, passed between when Locke emerged from the blanket mere feet from Officer Hanneman and holding the gun by the handle and pointed in—at least—Officer Hanneman's general direction and when Officer Hanneman fired. This is simply not enough time to issue a warning or definitively determine whether the gun Locke was holding when he suddenly popped out was aimed sufficiently directly at the officers to satisfy later scrutiny of the video in slow-motion. *See Dooley v. Tharp*, 856 F.3d 1177, 1182–83 (8th Cir. 2017) ("[L]aw enforcement officers are not afforded the opportunity of viewing in slow motion what appears to them to constitute life-threatening action.").

Compare the situation confronting Officer Hanneman to the one in *Liggins*. In *Liggins*, defendant Officer Cohen arrived at an apartment complex in response to a call regarding possession of a stolen pistol (not executing a search warrant looking for a murder suspect who used armor-piercing bullets). *Liggins*, 971 F.3d at 800. "B.C.," a minor, was in possession of the stolen pistol when officers arrived, carrying it in an over-the-shoulder bag while standing in the apartment's breezeway. *Id.* When onlookers shouted, "Police!" in response to the arriving the officers, B.C. began running down the breezeway, as officers positioned themselves on either side of the breezeway. *Id.* As B.C. ran down the breezeway, he pulled the gun out of the bag and held it by the barrel (not the handle), pointed down, in his right hand. *Id.* Officer Cohen, who had just arrived in the parking lot behind

the complex when he saw B.C. merge from the breezeway holding the gun, exited the vehicle, rounded the back of a truck and, without warning and within two seconds of exiting his vehicle, shot B.C. three times. *Id.* The district court denied summary judgment and qualified immunity, holding there was a dispute of facts about "whether a reasonable officer in Cohen's position 'would have perceived' that B.C. was running toward the officer before he fired and whether it was feasible for the officer to give a warning before shooting." *Id.* The Eighth Circuit disagreed.

In reversing the district court in *Liggins*, the Eighth Circuit explained, "Once the court has assumed a particular set of facts about where and how B.C. was running in relation to Cohen's position, whether B.C.'s actions rose to a level warranting Cohen's use of force is a question of law for the court, not a question of fact." *Id.* at 801. And, this Court explained, "B.C. was running in Cohen's general direction, even if not directly at him," was "carrying in his right hand a gun that moved while he ran[,]" the "officers were investigating a report of a stolen firearm," and "B.C. was fleeing from police who had arrived at the front of the building." *Id.* Under these facts, the Eighth Circuit held that "a reasonable officer was justified in discharging his firearm." *Id.* The Eighth Circuit emphasized that Cohen had "only a second or two to react as he rounded the parked truck . . . had reasonable grounds to believe that the fleeing subject who was running toward the back of the property could raise the gun and shoot" and "[i]t would only take an instant to do so if the person were ready to fire." *Id.* Regarding the way the gun was held or pointed, the Eighth Circuit emphasized that it "was a split-second decision for the officer. It was not practical in that moment for Cohen

to discern whether B.C. was carrying the gun in an unusual manner or to shout a warning and wait for him to react. There was simply no time." *Id.*

All these considerations apply here. Even if the District Court could not conclude that Locke pointed the gun *at* Officer Hanneman, he was facing Officer Hanneman's "general direction." *Cf. id.* (holding dispute over whether B.C. was running directly *at* officer was not material because individual was running in officer's "general direction"). Officer Hanneman, like the officer in *Liggins*, had at most "a second or two to react" to seeing Locke emerge feet from him with gripping a pistol. While *Liggins* concerned only a stolen firearm, Officer Hanneman was executing a high-risk search warrant looking for a murder suspect who had used armor piercing bullets—and was suddenly confronted by an individual who had grabbed a pistol in response to his entry into the apartment. And like in *Liggins*, "[i]t was not practical in that moment for [Officer Hanneman] to determine whether" Locke had his finger on the trigger or was pointing it directly at him rather than merely in his general direction. *Id.* "There was simply no time." *Id.*

The District Court acknowledged that "like the officer in *Liggins*, Officer Hanneman faced a 'split-second decision.'" (App. 20a.)[2] And the District Court

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[2] In fact, the District Court further recognized that Officer Hanneman would reasonably perceive an immediate threat from Locke and did not have time to fully evaluate, because the District Court held that it was not feasible for Officer Hanneman to issue a warning before shooting. (App. 21a-22a.) Specifically, citing *Liggins*, the District Court rejected Appellees' argument that Officer Hanneman's failure to warn was unreasonable, because "[w]hen the hesitation involved in giving a warning could readily cause such a warning to be the officer's last, then a warning is

recognized that "the Supreme Court has found an officer's conduct reasonable when the officer 'had mere seconds to assess the potential danger.'" (*Id.* (quoting *Kisela v. Hughes*, 584 U.S. 100, 105 (2018)))

But despite these findings, the District Court held that "*Liggins* [was] nonetheless distinguishable for its procedural posture"—meaning that *Liggins* was decided on summary judgment, not on a motion for judgment on the pleadings. (App. 21a.) But the District Court provides no explanation for why that, alone, justifies disregarding the Eighth Circuit's clear holding in *Liggins*. To the contrary, this Court has "repeatedly . . . stressed the importance of resolving immunity questions at the earliest possible stage in litigation." *Pearson*, 555 U.S. at 231 (quotations omitted). Indeed, this Court has emphasized that the "driving force behind creation of the qualified immunity doctrine was a desire to ensure that insubstantial claims against government officials [will] be resolved prior to discovery." *Id.* at 232-33 (internal quotation marks omitted, other alterations supplied by *Pearson*, quoting *Anderson v. Creighton*, 483 U.S. 635, 640, n.2 (1987)). In light of this Court's clear command in *Pearson* and repeated in other cases, the District Court cannot distinguish *Liggins* merely by referencing the procedural

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not feasible." (*Id.*) The District Court cannot hold both that Officer Hanneman was confronted with such an immediate threat that a warning was not feasible before shooting *and* find that Officer Hanneman's use of force in response to that threat was unreasonable—even plausibly so. It is paradoxical. The District Court's holding in this respect—an implicit finding that it was objectively reasonable for Officer Hanneman to perceive an immediate threat of death or serious bodily injury—demonstrates that, irrespective of the procedural process of the case, the facts as they are established in the video show that Officer Hanneman is entitled to qualified immunity.

posture of the latter case. To do so effectively robs Officer Hanneman of the benefit of qualified immunity—the immunity from *suit* rather than merely from liability. *Pearson*, 555 U.S. at 231.

Under *Liggins*, between what is alleged and easily discernible from the video recordings, Officer Hanneman's actions were reasonable under the circumstances.

And in light of *Liggins* itself, and its similarity to the circumstances here, it cannot be said that any reasonable officer in Officer Hanneman's position should have known that the law clearly prohibited them from responding with deadly force when suddenly confronted with an individual emerging from hiding holding a pistol during the execution of a no-knock search in connection with a murder using armor-piercing rounds. Nor would a reasonable officer understand that they were required to wait until Locke pointed his firearm directly at officer or another—particularly not when required to act within a split second and without opportunity for a warning, as the District Court recognized. Consequently, regardless of whether Officer Hanneman's actions were reasonable, they cannot be said to have violated clearly established law.

IV. THE EIGHTH CIRCUIT WRONGLY REFUSED TO CONSIDER THESE ARGUMENTS

As discussed above, the Eighth Circuit held that it lacked jurisdiction over the appeal, citing the fact disputes and the lack of clarity in the videos of the incident. Specifically, the Eighth Circuit held that the District Court's assumed facts were not blatantly contradicted by the record, the Eighth Circuit lacked jurisdiction "to address whether the evidence is sufficient to support the allegations in the complaint[.]" (App. 6a (citing *Evans v. Krook*, 1006 F.4thh 790, 792 (8th Cir. 2024)). But an appellate court has jurisdiction to consider the merits of a qualified immunity defense if, even accepting the factual allegations, officers contend that their conduct did not violate the Fourth Amendment or clearly established law. *Plumhoff v. Rickard*, 572 U.S. 765, 773 (2014).

Despite *Plumhoff*, the Eighth Circuit declined to consider whether Officer Hanneman would be entitled to qualified immunity even if Locke did not point his weapon at the officers. (App. 6a-7a.) Namely, the Eighth Circuit noted MPPOA's brief *amicus curiae* advancing this argument but declined to consider because the Eighth Circuit believed that Officer Hanneman had not raised it in the District Court or on appeal. (*Id.*)

The Eighth Circuit was mistaken. While MPPOA focused its amicus brief on this specific issue, Officer Hanneman raised (and thereby preserved) arguments that Locke need not have pointed his weapon at the officers for Officer Hanneman to be entitled to qualified immunity—and in particular on *Liggins* and similar cases. In support, MPPOA seconds Officer

Hanneman's thoughtful discussion of the record on this issue. (*See* Pet. 24-26.)

V. THIS COURT SHOULD NOT LEAVE THE UNDERLYING DECISIONS IN PLACE

This Court should grant the Petition and reverse the decisions of the lower courts in the interest of clarity of law and officer safety not just in the Eighth Circuit, but nationwide. At bottom, the District Court failed to grant the consideration due to officers making split-second judgments in situations that are tense, uncertain, and rapidly evolving as required by *Graham*, *Liggins*, and similar cases. This Court's precedents require this deference for good reason. Hesitation in these circumstances puts officers' and bystanders' lives in danger. Indeed, according the Federal Bureau of Investigation, between January 2020 and October 2024, there were 240 felonious killings of peace officers in the line of duty.[3] From January through September of 2024, there were 54 felonious killings, a 12.5 percent increase compared to the same time period for both 2023 and 2022.[4] Firearms were used in 75.9 percent of these killings.[5]

In 2024 in the Twin Cities area alone, multiple officers were murdered with firearms. These include

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[3] Federal Bureau of Investigation, *Statistics on Law Enforcement Officer Deaths in the Line of Duty from January through September 2024*, FBI Resources for Law Enforcement, FBI.gov (available at https://le.fbi.gov/cjis-division/cjis-link/statistics-on-law-enforcement-officer-deaths-in-the-line-of-duty-from-january-through-september-2024) (accessed Oct. 30, 2024).

[4] *Id.*

[5] *Id.*

Minneapolis Police Department Officer Jamal Mitchell, ambushed and shot by a man who appeared to be a victim, rather than a suspect, while Officer Mitchell was attempting to render first aid to him[6]; and Burnsville Police Department Officers Paul Elmstrand and Matthew Ruge, murdered when a man opened fire on them without warning while they were responding to a domestic incident in his home (Burnsville Fire Department Firefighter/Paramedic Adam Finseth was also killed by the shooter while attempting to render aid to the officers).[7]

These incidents are merely the most recent, and most local, examples of the risks posed to law-enforcement officers when dealing with armed individuals—whether or not they are suspects. And they underscore why controlling precedent requires Courts to grant deference to officers acting in, what the District Court acknowledges, was a situation requiring a split-second decision with no time to give a warning. The District Court erred by failing to grant that deference,

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6 Steve Karnowski & Mark Thiessen, *Minneapolis Police Officer Dies in Ambush Shooting that Killed 2 Others, including Suspected Gunman*, APNews.com (May 31, 2024) (available at https://apnews.com/article/minneapolis-police-shooting-injured-ca68f99b50603ac905237d407514485b).

7 Steve Karnowski, *Investigators: Man Who Killed 3 Minnesota Responders Opened Fire Without Warning, Inside His House*, APNews.com (Feb. 23, 2024) (available at https://apnews.com/article/burnsville-minnesota-police-shooting-details-9fbfc2bd2bc54dcf8e95b5577507e591); Trisha Ahmed, Anita Snow, & Jim Salter, *Three Slain Minnesota First Responders Remembered for Their Commitment to Service*, APNews.com (Feb. 20, 2024) (available at https://apnews.com/article/information-of-responders-killed-minnesota-9812539198ab57a855f4edcbf6cdc243).

and the Eighth Circuit compounded that error by refusing to consider Officer Hanneman's meritorious arguments. This Court should take the opportunity to correct these errors and protect the safety of officers and bystanders in accord with the Court's well-settled precedents.

CONCLUSION

For the foregoing reasons, the Court should grant the petition and reverse the decision below.

Respectfully submitted,

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