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SUPREME COURT, U.S.

25 - 7223

Supreme Court of the United States

Case No. USCA7

John A. Trakselis,

Petitioner,

v.

Village of Justice, et al.

Respondent,

On Petition for a Writ of Certiorari to the

United States Court of Appeals for the 7th Circuit

No. 24-3282

Counsel of Record

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Attorney for Petitioner/Respondent

Date: 1-6-2026

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QUESTIONS PRESENTED

1.) Whether probable cause may be established at summary judgment based solely on an officer's vague recollection of a prior license revocation, when contemporaneous CAD/dispatch logs and dashcam video demonstrate that the officer's claimed pre-stop confirmation occurred only after the arrest.

2.) Whether courts may disregard objective electronic evidence

Contradicting officer testimony in resolving Fourth Amendment claims at summary judgment, contrary to this court's directive in *Scott v. Harris*, 550 U.S. 372 (2007).

LIST OF ALL PARTIES TO THE PROCEEDING

Pursuant to Rule 14.1(b) of the Rules of the Supreme Court of the United States, the following list identifies all parties appearing in the proceedings in the court whose judgment is sought to be reviewed, together with contact information.

Petitioner

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Respondents

Village of Justice, Illinois
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Joseph R. Pavlik, Jr.
Ronald M. Ward

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TABLE OF AUTHORITIES

Beck v. Ohio 379 U.S. 89 (1964)

Scott v. Harris 550 U.S. 372 (2007)

Bigford v. Taylor 834 F 2d 1213 (5th Cir. 1988)

U.S. Constitution amendment IV

28 U.S.C. 1254 (1)

Jurisdiction

The judgement of the court of appeals for the seventh circuit Chicago, Illinois 60604 was entered after Plaintiff-Appellant filed a petition for rehearing and rehearing en banc on September 10, 2025. On September 26, 2025 all of the judges on the panel voted to deny rehearing and rehearing en banc.

Case No. 24-3282

Honorable Frank H. Easterbrook, presiding

Honorable Thomas L. Kirsch II, presiding

Honorable Doris L. Pryor, presiding

CONSTITUTIONAL PROVISION INVOLVED

U.S. Const. amend. IV: “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.”

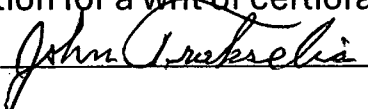
STATEMENT OF THE CASE

In 2018, Officer Pavlik of the Village of Justice Police Department arrested petitioner John A. Trakselis, alleging that he was driving with a revoked license. Pavlik testified that he confirmed Mr. Trakselis’s revoked status prior to the stop, based on prior knowledge and a supposed pre-stop records check. The record evidence, however, demonstrates the opposite. Dashcam footage shows Pavlik initiating the arrest immediately upon the stop. CAD/dispatch logs confirm that the revocation was not verified until several minutes later, after Mr. Trakselis had been already handcuffed and secured. The district court nonetheless granted summary judgement for the defendants, reasoning that Pavlik’s testimony created probable cause. The Seventh Circuit affirmed, treating the conflict between sworn testimony and objective records as a credibility issue rather than a material factual dispute.

REASONS FOR GRANTING THE WRIT

1. The Decision Conflicts with this Court's Precedent – Beck v. Ohio (1964) requires probable cause at the moment of arrest. – Scott v. Harris (2007) requires reliance on objective video evidence when it contradicts testimonial assertions. The Seventh Circuit's decision directly conflicts with both principles.
2. The Circuits are Divided – The fifth Circuit in Bigford v. Taylor (1988) rejected probable cause where officers relied on vague recollection contradicted by objective facts. – Other circuits require contemporaneous, corroborated knowledge rather than retroactive justification. – The Seventh Circuit's ruling allows officers to rely on memory even when contradicted by dispatch records, deepening a circuit split.
3. The Question is of Exceptional Importance if officers can retroactively justify arrests based on vague memory contradicted by objective records, Fourth Amendment protections are severely eroded.
4. This Case is an Ideal Vehicle – The factual conflict is clear and preserved. – The contradiction between sworn testimony and electronic records is undisputed. – The outcome turns entirely on the legal standard for probable cause at summary judgement.

CONCUSION

For the forgoing reasons, the petition for a writ of certiorari should be granted, Respectfully submitted,  John A. Trakselis,
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