

IN THE
**SUPREME COURT OF
PENNSYLVANIA**

56 MAP 2017

COMMONWEALTH OF PENNSYLVANIA,
Appellee

v.

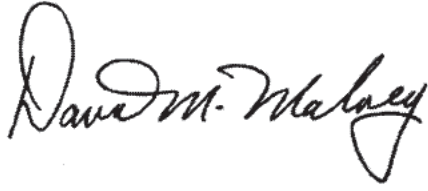
MICHAEL J. HICKS,
Appellant

**BRIEF OF *AMICI CURIAE* – MEMBERS OF THE PENNSYLVANIA
GENERAL ASSEMBLY, FIREARMS OWNERS AGAINST CRIME,
FIREARMS POLICY COALITION, AND FIREARMS POLICY
FOUNDATION – IN SUPPORT OF APPELLANT’S APPEAL FROM
THE JANUARY 11, 2016 JUDGMENT OF SENTENCE OF THE
LEHIGH COUNTY COURT OF COMMON PLEAS, DOCKET NO.
CP-39-CR-0005692-2014**

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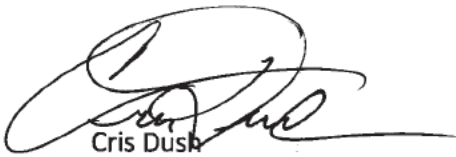
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I. STATEMENT OF INTEREST OF AMICUS CURIAE

Amici Curiae – those Members of the Pennsylvania General Assembly, whom have endorsed their names to this brief, Firearms Owners Against Crime, Firearms Policy Coalition, and Firearms Policy Foundation – submit this brief in support of the United States and Pennsylvania Constitutions and Appellant’s Appeal from the January 11, 2016 Judgment of Sentence of the Lehigh County Court of Common Pleas, docket no. CP-39-CR-0005692-2014.

The *Amici* Members of the Pennsylvania General Assembly are those Representatives that support and defend the Second and Fourth Amendments to the U.S. Constitution and Article 1, Sections 8, 21 and 25 of the Pennsylvania Constitution and protect freedom from transgression. The Representatives having endorsed their names to this brief are intimately familiar with the issue presented by Appellant and support the right of law-abiding citizens to openly and conceal carry firearms, in public, without their inviolate rights being infringed.

Firearms Owners Against Crime (“FOAC”) is a non-partisan, non-connected Political Action Committee organized to empower all gun owners, outdoors enthusiasts and supporters of the Second Amendment to the U.S. Constitution and Article 1, Sections 21 and 25 of the Pennsylvania

Constitution with the tools and information necessary to protect freedom from transgression. FOAC is a member-driven organization with more than 1600 members within the Commonwealth. Its members are active and well-informed on political issues at both the state and federal level. As a Pennsylvania organization with members being citizens of the Commonwealth, the questions before this Court and the decision this Court has been tasked to render, are of great significance to FOAC and its members.

Firearms Policy Coalition (FPC) is a 501(c)(4) nonprofit organization. It is interested in this case because FPC's mission is to protect and defend the Constitution of the United States, especially the fundamental, individual Second Amendment right to keep and bear arms.

Firearms Policy Foundation (FPF) is a 501(c)(3) nonprofit organization. It is interested in this case because FPF's mission is to protect and defend the Constitution of the United States and the People's rights, privileges and immunities deeply rooted in this Nation's history and tradition, especially the inalienable, fundamental, and individual right to keep and bear arms.

For these reasons, the *Amici* believe this Honorable Court will benefit from their perspective.

Pursuant to Pa.R.A.P. 531(b)(2), no individual or entity – other than the identified individuals, entities and counsel – have paid in whole or in part for the preparation of this brief or authored portions of this brief.

II. SUMMARY OF ARGUMENT

As protected by the Second and Fourth Amendments to the United States Constitution and Article 1, Sections 8, 21 and 25 of the Pennsylvania Constitution and supported by the legion of federal and state case law from across the United States, the mere open or conceal carrying of a firearm cannot establish reasonable articulable suspicion of criminal conduct, in the absence of additional indicia of unlawful activity.

III. ARGUMENT

A. Consistent With The Pennsylvania and United States Constitutions, The Mere Open Or Concealed Carrying Of A Firearm Does Not Establish Reasonable Suspicion Of Criminal Conduct.

As protected by the Second and Fourth Amendments to the United States Constitution and Article 1, Sections 8, 21 and 25 of the Pennsylvania Constitution, the mere open or conceal carrying of a firearm cannot establish reasonable articulable suspicion of criminal conduct.

1. U.S. Constitutional Protections

The Second Amendment to the United States Constitution provides:

“A well regulated Militia, being necessary to the security of a free State, the right of the people to keep and bear Arms, shall not be infringed.”

The Fourth Amendment to 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.

2. Pennsylvania Constitutional Protections

Similar to the Fourth Amendment to the United States Constitution,

Article 1, Section 8 of the Pennsylvania Constitution provides:

The people shall be secure in their persons, houses, papers and possessions from unreasonable searches and seizures, and no warrant to search any place or to seize any person or things shall issue without describing them as nearly as may be, nor without probable cause, supported by oath or affirmation subscribed to by the affiant.

More encompassing than the Second Amendment, Article 1, Section 21 of the Pennsylvania Constitution provides: “The right of the citizens to bear arms in defense of themselves and the State shall not be questioned.”

More importantly, in relation to all of Article 1 – inclusive of Sections 8 and 21 – Section 25 declares:

To guard against the transgressions of the high powers which we have delegated, we declare that everything in this article is excepted out of the general powers of government and shall forever remain inviolate.

Therefore, the inalienable rights acknowledged by Article 1 cannot be limited or otherwise restricted by the Commonwealth.

3. ***Under Both the Pennsylvania and United States Constitutions and the Prior Precedent of this Court, Reasonable Suspicion of Criminal Conduct is Not Established by the Mere Open or Concealed Carrying of a Firearm***

As protected by the Pennsylvania and United States Constitutions and the prior precedent of this Court, reasonable suspicion of criminal conduct cannot be established by the mere open or concealed carrying of a firearm.

i. ***This Court's Precedent***

This Court, based upon Article 1, Section 21, previously acknowledged that that firearms are constitutionally protected in the Commonwealth. *See, Ortiz v. Commonwealth*, 545 Pa. at 287.¹ Thereafter, in *Commonwealth v. Hawkins*, 547 Pa. 652, 657 (1997), in addressing whether the police had reasonable suspicion to stop Mr. Hawkins because of a police tip that he was seen with a gun, this Court declared:

¹ The Commonwealth Court previously recognized in *Caba v. Weaknecht*, 64 A.3d 39, 58 (Pa. Cmwlth. 2013) that “[t]hrough the United States Supreme Court has only recently recognized ‘that individual self-defense is ‘the central component’ of the Second Amendment right’, *McDonald*, — U.S. at —, 130 S.Ct. at 3036 (emphasis omitted) (quoting *D.C. v. Heller*, 554 U.S. 570, 599 (2008), *the right to bear arms in defense of self has never seriously been questioned in this Commonwealth.*” (emphasis added).

The Commonwealth takes the radical position that police have a duty to stop and frisk when they receive information from any source that a suspect has a gun. Since it is not illegal to carry a licensed gun in Pennsylvania, it is difficult to see where this shocking idea originates, notwithstanding the Commonwealth's fanciful and histrionic references to maniacs who may spray schoolyards with gunfire and assassins of public figures who may otherwise go undetected. Even if the Constitution of Pennsylvania would permit such invasive police activity as the Commonwealth proposes – which it does not – such activity seems more likely to endanger than to protect the public. Unnecessary police intervention, by definition, produces the possibility of conflict where none need exist.

This Court continued,

Contrary to the Commonwealth's view, the public will receive its full measure of protection by police who act within the restraints imposed on them by Art. I, § 8 of the Constitution of Pennsylvania and this court's relevant caselaw. Upon receiving unverified information that a certain person is engaged in illegal activity, the police may always observe the suspect and conduct their own investigation. If police surveillance produces a reasonable suspicion of criminal conduct, the suspect may, of course, be briefly stopped and questioned (the *Terry* investigative stop), and, if the officer has reasonable fear for his safety, police may pat down the suspect's outer garments for weapons.

Accordingly, based on this Court's precedent, pursuant to the Fourth Amendment to the United States Constitution and Article 1, Sections 8 and 21 of the Pennsylvania Constitution, reasonable articulable suspicion of criminal conduct cannot be established by the mere open or concealed carrying of a firearm. Rather, law enforcement must observe activity or receive verifiable information, beyond the mere open or concealed carrying of a firearm, establishing reasonable suspicion of an actual crime. Otherwise,

as discussed *infra*, the unintended consequences would result in law enforcement having reasonable suspicion to stop almost every person encountered, since most, if not all, objects possessed or utilized by citizens can be utilized either for lawful or unlawful purposes.

ii. The U.S. Supreme Court Has Held That Government Regulation, including Licensing, Does Not Create a Defacto Presumption of Non-Compliance or Unlawfulness

The U.S. Supreme Court in *Delaware v. Prouse*, 440 U.S. 648, 650 (1979) addressed the state of Delaware’s contention that it was constitutional to “stop an automobile, being driven on the public highway, for the purpose of checking the driving license of the operator and the registration of the car, where there is neither probable cause to believe nor reasonable suspicion that the car is being driven contrary to the laws governing the operation of motor vehicles or that either the car or any of its occupants is subject to seizure or detention in connection with the violation of any other applicable law.” In rejecting the contention, the Court declared that “[a]n individual operating or traveling in an automobile does not lose all reasonable expectation of privacy simply because the automobile and its use are subject to government regulation” (*Id.* at 662) and then held,

that except in those situations in which there is at least articulable and reasonable suspicion that a motorist is unlicensed or that an

automobile is not registered, or that either the vehicle or an occupant is otherwise subject to seizure for violation of law, stopping an automobile and detaining the driver in order to check his driver's license and the registration of the automobile are unreasonable under the Fourth Amendment.

Id. at 663.

Similarly, as this Court held in *Hawkins*, 547 Pa. at 657, “[s]ince it is not illegal to carry a licensed gun in Pennsylvania,” the mere possession of a firearm cannot constitute reasonable suspicion of a crime. This Court further explained that

[i]n all parts of Pennsylvania, persons who are licensed may carry concealed firearms. 18 Pa.C.S. § 6108. Except in Philadelphia, firearms may be carried openly without a license. *See Ortiz v. Commonwealth*, 545 Pa. 279, 681 A.2d 152, 155 (1996) (only in Philadelphia must a person obtain a license for carrying a firearm whether it is unconcealed or concealed; in other parts of the Commonwealth, unconcealed firearms do not require a license).

Id. at n.4.

Accordingly, as held by this Court in *Hawkins* and the U.S. Supreme Court in *Prouse*, even though the Commonwealth licenses the carrying of concealed firearms,² pursuant to the Fourth Amendment and Article 1, Section 8, in the absence of some articulable basis that an individual is unlicensed or prohibited from possessing firearms, that a firearm is illegal or that the individual is otherwise involved in unlawful activity, there cannot

² As mentioned *supra*, open carrying is lawful, absent a license, throughout Pennsylvania, except in Philadelphia, where an individual must obtain a license to carry firearms in order to open carry.

exist any reasonable suspicion of criminal activity in the mere open or conceal carrying of a firearm. Otherwise, as discussed *infra*, the police would be justified in seizing every individual, who possessed any object that could be used for lawful or unlawful purposes.

iii. The Mere Open or Concealed Carrying of a Firearm Does Not Constitute Reasonable Suspicion under U.S. Constitutional and Other State Precedent

While brief encounters between police and citizens require no objective justification, based on the U.S. Supreme Court's holding in *Terry v. Ohio*, 392 U.S. 1, 21 (1968), it is clearly established that an investigatory detention of a citizen by an officer must be supported by reasonable articulable suspicion that the individual is engaged in *actual* criminal activity.³ The fact that such conduct may be either lawful or unlawful is not reasonable articulable suspicion that the individual is engaged in criminal activity. *Id.* Based upon this binding precedent, numerous federal and state courts have found, under the Fourth Amendment to the United States Constitution, that the mere open or concealed carrying of a firearm does not constitute reasonable articulable suspicion of criminal activity.

³ See also, *Reid v. Georgia*, 448 U.S. 438, 440 (1980).

Almost two decades ago, in *United States v. Ubiles*, 224 F.3d 213, 214 (3d Cir. 2000), the Third Circuit Court of Appeals – the federal appellate court covering Pennsylvania – considered whether police had reasonable suspicion to stop an individual, who was carrying a gun, while attending a crowded street festival in the Virgin Islands. Although such activity was generally lawful in the Virgin Islands, the police nevertheless detained Ubiles even though they were unaware of “any articulable facts suggesting that the gun Ubiles possessed was defaced or unlicensed, [or] that Ubiles posed a safety risk.” *Id.* at 218. In rejecting the Government’s argument that Ubiles’s possession *might* have been illegal, the court declared the situation as “no different” from a setting in which the officers suspected “that Ubiles possessed a wallet, a perfectly legal act in the Virgin Islands, and the authorities stopped him for this reason. Though a search of that wallet may have revealed counterfeit bills—the possession of which is a crime under United States law—the officers would have had no justification to stop Ubiles based merely on information that he possessed a wallet.” *Id.*⁴

⁴ *See also, United States v. Navedo*, 694 F.3d 463, 468 (3d Cir. 2012)(finding that police officers lacked reasonable suspicion to detain a suspect in connection with their investigation of shooting in a neighborhood based on their observation of the suspect looking at a gun that another individual was showing him and engaging in a brief conversation with another individual and his companion, where officers had no prior information about suspect, there was no indication that suspect intended to purchase gun, and encounter occurred at different address than shooting); **(contd.)**

More recently, the Fourth Circuit Court of Appeals in *United States v. Black*, 707 F.3d 531, 535 (4th Cir. 2013) considered whether, *inter alia*, the mere open carrying of a firearm constituted reasonable suspicion. In turning to whether the mere open carrying of a firearm, even in the presence of individuals who may be prohibited from possessing and purchasing firearms, constitutes reasonable suspicion, the court explained,

it is undisputed that under the laws of North Carolina, which permit its residents to openly carry firearms, *see generally* N.C. Gen. Stat. §§ 14-415.10 to 14-415.23, Troupe’s gun was legally possessed and displayed. The Government contends that because other laws prevent convicted felons from possessing guns, the officers could not know whether Troupe was lawfully in possession of the gun until they performed a records check. Additionally, the Government avers it would be “foolhardy” for the officers to “go about their business while allowing a stranger in their midst to possess a firearm.” We are not persuaded.

707 F.3d at 540.

Thereafter, the court unequivocally stated that

where a state permits individuals to openly carry firearms, the exercise of this right, without more, cannot justify an investigatory

United States v. Lewis, 672 F.3d 232, 240 (3d Cir. 2012)(holding that “[o]ur conclusion here that the tip was insufficient to justify the traffic stop of Lewis’s vehicle flows logically from the reasoning in *Ubiles*. Jackson received a tip that individuals in a white Toyota Camry, bearing the number “181” in the license plate, had firearms in their possession. Jackson testified that his conversation with his source was brief and that no information was provided about the legality of the firearms. *This information alone does not permit an officer to suspect—let alone reasonably suspect—that possession of either firearm was illegal or that the firearms were being used in a criminal manner.* Jackson relayed the tip about innocuous conduct to Wharton, who proceeded to initiate a traffic stop of the vehicle. *Absent any information about the criminality of the firearms, the mere possession of the firearms could not provide Wharton with reasonable suspicion to stop the vehicle.*”)(emphasis added).

detention. Permitting such a justification would eviscerate Fourth Amendment protections for lawfully armed individuals in those states.

Id. (citing *United States v. King*, 990 F.2d 1552, 1559 (10th Cir. 1993)).⁵

Similarly, in *Northrup v. City of Toledo Police Dep't*, 785 F.3d 1128, 1132-33 (6th Cir. 2015), the Sixth Circuit Court of Appeals, in determining that the mere carrying of a firearm did not constitute reasonable suspicion, declared

What about the possibility that Northrup was not licensed to carry a gun or that he was a felon prohibited from possessing a gun? Where it is lawful to possess a firearm, unlawful possession “is not the default status.” *Black*, 707 F.3d at 540; *Ubiles*, 224 F.3d at 217. There is no “automatic firearm exception” to the *Terry* rule. *Florida v. J.L.*, 529 U.S. 266, 272, 120 S. Ct. 1375, 146 L. Ed. 2d 254 (2000).

...

And it has long been clearly established that an officer needs evidence of criminality or dangerousness before he may detain and disarm a law-abiding citizen.

In *Regalado v. State*, 25 So. 3d 600, 601 (Fla. Dist. Ct. App. 2009), the Florida Court of Appeals addressed whether an officer’s knowledge that an individual was carrying a concealed firearm, where such was lawful only pursuant to a properly issued permit, is sufficient reasonable articulable

⁵ See also, *United States v. Roch*, 5 F.3d 894, 899 (5th Cir. 1993)(rejecting that reasonable suspicion existed based on a confidential informant stating that Mr. Roch, a prohibited person, was in possession of a firearm and requiring some supporting corroboration to establish reasonable suspicion); *St. John v. McColley*, 653 F. Supp. 2d 1155, 1161 (D.N.M. 2009) (finding no reasonable suspicion where the plaintiff arrived at a movie theater openly carrying a holstered handgun, an act which is legal in the State of New Mexico).

suspicion of criminal activity. In rejecting the state’s argument, the court explained that

[d]espite the obvious potential danger to officers and the public by a person in possession of a concealed gun in a crowd, this is not illegal in Florida unless the person does not have a concealed weapons permit, a fact that an officer cannot glean by mere observation. Based upon our understanding of both Florida and United States Supreme Court precedent, stopping a person solely on the ground that the individual possesses a gun violates the Fourth Amendment.

Id. at 606.

Just several months ago, the Indiana Supreme Court, in *Pinner v. State*, 74 N.E.3d 226, 233 (Ind. 2017), reviewed and rejected the argument that the mere carrying of a firearm constitutes reasonable suspicion of criminal activity. In so holding, the court explained

We also disagree with the State that “the officers were permitted under the Fourth Amendment to briefly detain Defendant to ascertain the legality of the weapon and dispel any suspected criminal activity.” Br. of Appellee at 19. The United States Supreme Court has previously declared that law enforcement may not arbitrarily detain an individual to ensure compliance with licensing and registration laws without particularized facts supporting an inference of illegal conduct. *See Prouse*, 440 U.S. at 663, 99 S.Ct. 1391 (“hold[ing] that except in those situations in which there is at least articulable and reasonable suspicion that a motorist is unlicensed or that an automobile is not registered, or that either the vehicle or an occupant is otherwise subject to seizure for violation of law, stopping an automobile and detaining the driver in order to check his driver's license and the registration of the automobile are unreasonable under the Fourth Amendment”). In like fashion, we decline to endorse such behavior to ensure compliance with Indiana’s gun licensing laws. This is precisely the type of “weapons or firearm exception” that other jurisdictions refuse to employ and the United States Supreme Court expressly

disapproved of in *J.L.* See *J.L.*, 529 U.S. at 272, 120 S.Ct. 1375 (“Firearms are dangerous, and extraordinary dangers sometimes justify unusual precautions ... [b]ut an automatic firearm exception to our established reliability analysis would rove too far.”). “Were the individual subject to unfettered governmental intrusion every time he [exercised his right to bear arms], the security guaranteed by the Fourth Amendment would be seriously circumscribed.” *Prouse*, 440 U.S. at 662-63, 99 S.Ct. 1391. “This kind of standardless and unconstrained discretion is the evil the Court has discerned when in previous cases it has insisted that the discretion of the official in the field be circumscribed, at least to some extent.” *Id.* at 661, 99 S.Ct. 1391 (citations omitted). Once challenged, the State had the burden to show that under the totality of the circumstances the intrusion by police was reasonable. *Bannister v. State*, 904 N.E.2d 1254, 1256 (Ind. 2009). Based on this record, we find that it has not.

Id.

Numerous other state appellate courts have likewise held that the mere possession of a firearm does not result in reasonable articulable suspicion of criminal activity, including, but not limited to, Arizona⁶, Florida⁷, Illinois⁸,

⁶ The Arizona Supreme Court held that “[i]n a state such as Arizona that freely permits citizens to carry weapons, both visible and concealed, the mere presence of a gun cannot provide reasonable and articulable suspicion that the gun carrier is presently dangerous.” *State v. Serna*, 331 P.3d 405, 410 (Ariz. 2014).

⁷ The District Court of Appeal of Florida has declared that “we determine that there is no firearm or weapons exception to the Fourth Amendment and the bare-boned anonymous tip involved herein, by itself, did not provide the police with sufficient cause to stop and frisk.” *Regalado v. State*, 25 So. 3d 600, 606 (Fla. 4th Dist. App. 2009).

⁸ The Appellate Court of Illinois has also determined the defendant’s legal possession of firearms was not a sufficient basis to extend a traffic safety checkpoint stop so that the officer could obtain the defendant’s firearm owner’s identification card and confirm his valid possession of the firearms. *People v. Granados*, 332 Ill. App. 3d 860, 865 (2002).

Kentucky⁹, New Jersey¹⁰, and Tennessee¹¹.

Moreover, it is important to note that the U.S. Supreme Court in *Heller*, 554 at 584-85, held that the definition of “bear arms” was to “wear, bear, or carry ... upon the person *or in the clothing or in a pocket*, for the purpose of . . . being armed and ready for offensive or defensive action in a case of conflict with another person.” (*quoting, Muscarello v. United States*, 524 U.S. 125, 143 (1998)(emphasis added)). As a result, only several month ago the U.S. Court of Appeals for the District of Columbia in *Wrenn v. D.C.*, 864 F.3d 650, 659 (D.C. Cir. 2017) declared that the “[Second] Amendment’s core generally covers carrying in public for self-defense.”

Accordingly, based on the legion of precedent from the federal and state courts across the United States, the mere open or concealed carrying of

⁹ The Court of Appeals of Kentucky held that “states in which possession of an unconcealed firearm is legal, the mere observation or report of an unconcealed firearm cannot, without more, generate reasonable suspicion for a *Terry* stop and the temporary seizure of that firearm. . . . Lawful possession of a firearm is insufficient to justify a suspicion that such a person has committed, is committing, or is about to commit a crime.” *Pulley v. Cmwlth.*, 481 S.W.3d 520, 526–27 (Ky. App. 2016).

¹⁰ The Superior Court of New Jersey similarly stated that “[w]e decline to embrace a ‘man with a gun exception’ to the rule of individualized reasonable suspicion to ‘stop and frisk’.” *State v. Goree*, 742 A.2d 1039, 1050 (NJ. App. Div. 2000).

¹¹ The Tennessee Supreme Court held in *State v. Williamson*, 368 S.W.3d 468, 480–81 (Tenn. 2012) that “[i]n addition, one’s status as an ‘armed party’ is not per se illegal . . . While the carrying of a firearm under certain circumstances may constitute a crime, the caller did not offer any articulable facts indicating that the Defendant unlawfully possessed a gun, and the information at the scene did not demonstrate the unlawfulness of its possession until after the frisk.”

a firearm cannot constitute reasonable articulable suspicion of criminal activity, absent additional indicia of unlawful activity.

iv. Unintended Consequences of Holding that the Mere Open or Concealed Carrying of a Firearm Does Constitute Reasonable Suspicion under Pennsylvania and U.S. Constitutional Protections

In the event, *arguendo*, that this Court would consider holding that reasonable suspicion of criminal conduct can be established by the mere open or concealed carrying of a firearm, regardless of the Second and Fourth Amendments to the United States Constitution and Article 1, Sections 8, 21 and 25 of the Pennsylvania Constitution, this Court should consider the unintended consequences related thereto.

Everyday, law-abiding citizens, who lack any intent to commit a crime, possess or utilize objects, which can be used for either lawful or unlawful purposes. For example, a young man carrying a baseball bat down a street can elect to use that bat for either a lawful or unlawful purpose – but, the mere carrying of the baseball bat, alone, does not provide reasonable articulable suspicion that he intends to use it for an unlawful purpose. Similarly, and as we have unfortunately come to learn recently, the


individual driving a truck down the road can elect to drive it down the road for lawful purposes or use it to kill eighty innocent bystanders.¹²

While one could provide an almost unlimited number of examples, whereby everything possessed or utilized by an individual could be used for lawful or unlawful purposes, if this Court were to hold that the *mere possibility* of a lawful object being utilized unlawfully is sufficient for establishing reasonable articulable suspicion, it would open Pandora's box and eviscerate our sacred rights that many gave the ultimate sacrifice – their lives – to ensure.

IV. CONCLUSION

For all the foregoing reasons, *Amici* respectfully submit that mere act of open or conceal carrying a firearm does not provide reasonable articulable suspicion of criminal activity.

Respectfully Submitted,



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¹² See, <https://www.usatoday.com/story/news/2016/07/14/dozens-dead-nice-france-after-truck-plows-into-crowd-mayor-says/87101850>. See also, <http://abcnews.go.com/International/truck-hits-pedestrians-busy-barcelona-street/story?id=49272618>.

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WORD COUNT CERTIFICATION

I certify that based on the word count of Microsoft Word that this brief does not exceed 7,000 words, pursuant to P.A.R.A.P. 2135.



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