

ILLINOIS PROSECUTOR SERVICES, LLC

PO Box 722, Carlinville, IL 62626
Phone: (217) 854-8041 Fax: (217) 854-5343
Website: www.ipsllonline.com
E-mail: don@ipsllonline.com



LAW ENFORCEMENT OFFICER TRAINING CASE OF THE MONTH

By Don Hays

Month of September – 2025

LAW ENFORCEMENT OFFICER TRAINING CASE OF THE MONTH

Month of September - 2025

Estate of Snukis v. Matthew O. Taylor, et al., No. 24-1946, 2025 WL 2104182, July 28, 2025.

THE CASE: A suspect died after being restrained by the police. Should the arresting Officers be held accountable?

FACTS: A 9-1-1 emergency dispatcher received a report that an impaired man had repeatedly entered onto a car dealership parking lot, was peering into windows, and was refusing to leave. The caller expressed concern that the man would be hit by a passing car. Two Officers (Officer One and Officer Two) responded to the call. As they arrived on the scene, both Officers activated their bodycams; the footage firmly established many of the facts that follow. In the parking lot the Officers encountered Edward Snukis, who matched the description of the man identified in the 9-1-1 call and appeared to be intoxicated. Officer One approached Snukis and asked him (twice) to put his hands on his head. When Snukis failed to do so, Officer One grabbed Snukis's arm and told him to turn around. Snukis resisted and a brief struggle ensued. As Snukis tried to get away, he struck Officer One with his arm. Both men fell to the ground. At that point, Officer Two fired his taser into Snukis and ordered him to remain on the ground with his hands up. When Snukis rolled over and started removing the barbs from his chest, Officer Two tased him a second time. Snukis then removed the barbs, got up, and fled.

After a brief foot pursuit, Snukis tripped and fell. Both Officers jumped on top of Snukis and attempted to handcuff him. Snukis continued to resist. While the officers commanded him to put his hands behind his back, Snukis grabbed at Officer Two's genitals, reached for his holster, and took hold of his leg. To get free of Snukis's grasp, Officer Two struck Snukis in the head approximately six times. Eventually the Officers were able to get Snukis's hands behind his back and handcuff him. Although Snukis was initially shouting and swearing at the officers when they got on top of him, Snukis became quieter as they struggled to handcuff him. Snukis also began making guttural and snoring sounds. Once Snukis was secured in handcuffs, one of the Officers observed that he appeared to be unconscious. The officers turned Snukis over to check that he was still breathing. He was, though he remained unresponsive. An officer began applying sternum rubs and another Officer called for medical assistance. The officers continued to monitor Snukis's breathing and pulse. When they could no longer detect a pulse, the officers removed his handcuffs and administered chest compressions until paramedics arrived. Snukis was pronounced dead later that evening.

The Estate of Snukis brought a civil rights action against the Officers and alleged that (1) both Officers used excessive force against Snukis; (2) Officer Two failed to intervene when Officer One used excessive force; and (3) the Officers failed to render medical aid. The officers moved for summary judgment. The district court granted the motion and the estate appealed.

ARGUMENT: On appeal, the Snukis Estate argued that the district court erred in granting summary judgment to the Officers.

QUESTION #1: When did the Officers first “seize” Snukis in this case?

FINDINGS: The Court of Appeals concluded that when a police officer uses physical force to restrain an individual, he effects a “seizure” within the meaning of the Fourth Amendment. Therefore, Snukis was “seized” when the Officers first used force against him.

QUESTION #2: How do the Courts determine whether the force police officers use to restrain an individual is objectively reasonable?

FINDINGS: According to this Court, the Fourth Amendment requires a case specific analysis that must be judged from the perspective of a reasonable officer on the scene, rather than with the 20/20 vision of hindsight.

QUESTION #3: What does a Court consider when determining whether the use of such force is reasonable?

FINDINGS: A court considers the severity of the crime at issue, whether the suspect posed an immediate threat to the safety of the officers or others, and whether he was actively resisting arrest or attempting to evade arrest by flight.

QUESTION #4: Did Officer Two's use of his stun gun on Snukis constitute the excessive use of force?

FINDINGS: In this case, the Court noted that the Officers approached Snukis while looking for someone suspected of minor crimes, Snukis refused the Officers' commands to put his hands on his head and when an officer attempted to grab Snukis's arm, Snukis struggled to break free of his grasp and struck an officer in the process, knocking him to the ground. The other officer then used a stun gun, but Snukis continued to resist. Snukis rolled over and started to remove barbs from his chest, ignoring the officer's commands to stay on ground with his hands up, and the officer then used the stun gun a second time. Based upon these facts, the Court declared that the acts of the Officers did not amount to excessive force.

QUESTION #5: Did the conduct of Snukis in this case constitute "active resistance" to the Officers?

FINDINGS: The Court declared that in this case, "active resistance to police officers", for purposes of determining whether the use of a stun gun was reasonable force under the Fourth Amendment, included Snukis' acts of kicking and flailing, declining to follow instructions while acting in a belligerent manner, and swatting an arresting officer's hands away while backpedaling. These facts led the Court to concluded that Snukis did, in fact, actively resist the Officers.

QUESTION #6: Did Officer Two use greater force than was necessary when he struck Snukis six times on the head?

FINDINGS: The Court noted that when the officer punched Snukis, Snukis was struggling beneath the officers, refusing their commands, grabbing at the officer's genitals and holster, and actively gripping the officer's inner thigh. Further, prior attempts at pain compliance had not deterred Snukis and he continued to actively resist even after the officers had used a stun gun twice and pinned him to the ground, and officer did not continue striking Snukis after he released his grip on the officer's inner thigh. The Court held that the Officer did not use greater force than was reasonably necessary to subdue Snukis when he struck Snukis on the head six times while he was on the ground. Therefore, the Officer's act of striking Snukis did not constitute the excessive use of force.

QUESTION #7: Are Officers required to act immediately upon discovering that a suspect as a medical problem?

FINDINGS: The Fourth Amendment requires a reasonable response to a suspect's medical needs, not an immediate one, and the reasonableness inquiry takes into account the sufficiency of the steps the police officers did take.

QUESTION #8: Were the Officers' response to Snukis's medical needs was objectively reasonable.

FINDINGS: The Court noted that when the officers noticed that Snukis appeared to be unconscious seconds after he was secured in handcuffs, they immediately turned him over, applied sternum rubs, and called for medical assistance. Further, as the Officers waited for help, they continued to monitor Snukis's pulse and breathing, and when he no longer had a pulse, they took handcuffs off and applied chest compressions until paramedics arrived. The Court declared the Officer's response to be objectively reasonable.

QUESTION #9: The Estate complained that the Officers delayed in providing medical aid to Snukis. Was it objectively reasonable for the Officers to delay their response to Snukis's medical needs until they had him handcuffed?

FINDINGS: The Court held that it was not objectively unreasonable under the Fourth Amendment for the officers to delay their response to suspect's medical needs until they had him handcuffed even if the guttural and snoring sounds suspect began making while officers were trying to handcuff him were sufficient to put a reasonable officer on notice of suspect's medical needs. Here, Snukis was fighting with the officers even after he had been pinned to the ground and it was reasonable for the officers to first ensure that he would not present continuing threat before they administered first aid, and the officers began attending to Snukis within one minute.

QUESTION #10: Was the Officers four-minute delay in performing chest compressions on Snukis objectively reasonable?

FINDINGS: The Court concluded that the officers' four-minute delay in performing chest compressions was not an objectively unreasonable response where the officers repeatedly checked Snukis's vital signs, began CPR within one minute of losing his pulse, and called for an ambulance as soon as they learned of Snukis's medical emergency.

CONCLUSION: The Court of Appeals declared that under the facts of this case, the District Court correctly granted the Officer's motions for summary judgment.

QUIZ QUESTIONS FOR THE MONTH OF SEPTEMBER – 2025

Estate of Snukis v. Matthew O. Taylor, et al., No. 24-1946, 2025 WL 2104182, July 28, 2025.

1. In this case, Officer One grabbed Snukis' arm and ordered him to turn around. This single act of touching Snukis' arm constituted a seizure of Snukis even though Snukis refused to cooperate with the Officers.
 - a. True.
 - b. False.

2. Officer Two twice tased Snukis. Was the Officer's act of tasing Snukis a second time unreasonable under the facts of this case?
 - a. Yes.
 - b. No.

3. Office Two repeatedly struck Snukis prior to subduing him. Did the Officer's repeated acts of striking Snukis with his fist constitute the excessive use of force?
 - a. Yes.
 - b. No.

4. The Officers waited until after they had succeeded in handcuffing Snukis before they began providing medical assistance. This delay was found to have been unreasonable by the Court of Appeals.
 - a. True.
 - b. False.

QUIZ ANSWERS AND DISCUSSION FOR THE MONTH OF SEPTEMBER – 2025

Estate of Snukis v. Matthew O. Taylor, et al., No. 24-1946, 2025 WL 2104182, July 28, 2025.

1. In this case, Officer One grabbed Snukis' arm and ordered him to turn around. This single act of touching Snukis' arm constituted a seizure of Snukis even though Snukis refused to cooperate with the Officers.

a. **True.** The Court of Appeals declared that Snukis was first seized when the Officer grabbed his arm. Specifically, the court held, “(w)hen an officer uses physical force to restrain an individual, he effects a seizure within the meaning of the Fourth Amendment. Torres v. Madrid, 592 U.S. 306, (2021). Therefore, the Officer's act of touching Snukis' arm constituted a seizure of Snukis.
2. Officer Two twice tased Snukis. Was the Officer's act of tasing Snukis a second time unreasonable under the facts of this case?

b. **No.** The Court held that, “While it may be unreasonable to use a taser against suspects that are passively noncompliant or uncooperative but subdued, courts have generally held that it can be appropriate to use tasers against suspects who are actively resisting officers.” Abbott v. Sangamon County, 705 F.3d 706, (7th Cir. 2013). In this case, Snukis continued to actively resist the efforts of the Officers to subdue him after being initially tased. Therefore, the Officer did not act unreasonably in tasing Snukis a second time.
3. Office Two repeatedly struck Snukis prior to subduing him. Did the Officer's repeated acts of striking Snukis with his fist constitute the excessive use of force?

b. **No.** The Court held that “For (the Officer's) strikes to be excessive, he must have used greater force than was reasonably necessary to subdue Snukis. The Court concluded that, “Given the threat posed by Snukis, (the Officer's) use of force was a reasonable means of gaining control.
4. The Officers waited until after they had succeeded in handcuffing Snukis before they began providing medical assistance. This delay was found to have been unreasonable by the Court of Appeals.

b. **False.** According to this Court, the Fourth Amendment requires a reasonable response medical emergency situations, not an immediate one, and the reasonableness inquiry “takes into account the sufficiency of the steps the officers did take,” Florek v. Village of Mundelein, 649 F.3d 594, (7th Cir. 2011). Here the Court found that the Officers' response to Snukis's medical emergency was prompt and appropriate.