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LAW ENFORCEMENT OFFICER TRAINING CASE OF THE MONTH

By Don Hays

Month of March – 2026

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Oneal Johnson v. Ryan Edwards, 164 F.4th 1074, January 27, 2026.

THE CASE: Johnson sued four police officers and alleged that they violated his rights under the U.S. Constitution. All his claims arose from the same incident when the police arrested him for disorderly conduct, and he was injured on the way to the police station. Should the Officers be held liable for the injuries suffered by Johnson?

FACTS: Around 3:00 a.m. on the day in question, Johnson was walking down a Chicago street when he encountered an active crime scene where police personnel were investigating a shooting. Police tape had been placed around the scene by the time Johnson arrived. Several officers' body-worn cameras captured this encounter. The police ordered Johnson to leave the scene—telling him he could not cross into the crime scene—which angered him. And the situation escalated quickly. Johnson yelled at the officers, used racial slurs, and swore repeatedly; some officers yelled and swore in response. Police told Johnson they would arrest him if he did not leave. They ordered him to depart many times. Johnson sent mixed messages on whether he would comply with these orders. At one point he took a few steps away from the crime scene, suggesting he was leaving; at another he pointed toward the crime scene, said “I'm trying to go that way[,]” “you don't tell me sh*t[,]” and “I'm going the other way... But I'm gonna check you b**ches in the door before I go, so I ain't trying to go that way, brother.” It was after this last statement that police arrested Johnson. Johnson was agitated as police put him in the police car and told them repeatedly to stop touching him. After he was in the car, an officer tried to put on his seatbelt. But Johnson refused, saying “I don't need that, get that sh*t off around me.” The Officer then asked if Johnson wanted a seatbelt, to which he said, “[h]*ll no. Get that sh*t off[.]” So the Officer left Johnson's seatbelt unfastened.

Two other Officers transported Johnson to the police station. The car's dashboard camera recorded the drive from the perspective of the hood of the car, showing the hood and the street in front of the car, but nothing inside the car. The camera also recorded audio. During the drive, the officer driving the squad car drove quickly with the police lights on and passed through multiple red lights and stop signs without coming to a full stop. About two and a half minutes into the trip, as the car neared another red-light intersection, Johnson (who had been chattering the whole drive) told the driving officer to slow down. The Officer did so, braking harder than he had at prior stops. The stop was abrupt enough that the hood of the car pitched forward. This hard stop caused Johnson, whose hands were cuffed behind his back, to lurch forward in his seat and hit his head on the divider between him and the officers in the front seats. The driving Officer, presumably because he heard the impact, said “I'm sorry.” Johnson cried out, then fell silent for the rest of the drive.

The car pulled into the police station around two and a half minutes after Johnson hit his head. It was then, after the Officers tried to get Johnson out of the car, that they realized he was unconscious. They tried to rouse him, and a minute later called for an ambulance. Johnson came to and requested to be taken to a hospital. When paramedics arrived they took him to a hospital, where he was diagnosed with and treated for a cut lip. Though Johnson was later charged with disorderly conduct under the Municipal Code of Chicago for failing to obey an order of a peace officer, the charges were later dropped.

Johnson filed a civil rights action in federal court against the police officers asserting claims for false arrest, state-created danger, excessive force, and failure to provide adequate medical care. The District Court granted the officers' motion for summary judgment, and Johnson appealed.

ARGUMENT: On appeal from the District Court's order, Johnson argued that the District Court erred in dismissing his case.

ISSUE #1: Dismissal of the False Arrest Claim. Were the Officers entitled to qualified immunity from liability for Johnson's alleged false arrest?

THE LAW: According to the Court of Appeals, to determine whether qualified immunity attaches, court asks (1) whether plaintiff's allegations make out deprivation of a constitutional right, and (2) whether the right was clearly established at time of defendant's alleged misconduct; if answer under either prong is “no,” immunity attaches and bars claim. A right is “clearly established,” for qualified immunity purposes, when: (1) closely analogous case finds alleged violation unlawful; (2) relevant caselaw shows such clear trend that court can say with fair assurance that recognition of right by controlling precedent was merely question of time; or (3) in rare cases, the defendant's conduct was so egregious and unreasonable that no reasonable

official could have thought he was acting lawfully. In context of qualified immunity, if probable cause for arrest is arguable, plaintiff cannot show that officer violated her clearly established right to be free from arrest; accordingly, reasonable officer who could mistakenly have believed that he had probable cause to make arrest is entitled to qualified immunity. “Arguable probable cause” for arrest exists, thus entitling officer to qualified immunity from liability for false arrest under § 1983, where reasonable officer in same circumstances and possessing same knowledge as officer in question could have reasonably believed that probable cause existed in light of well-established law.

FINDINGS: In this case, the Court of Appeals determined that the police officers had arguable probable cause to arrest suspect for disorderly conduct, and thus were entitled to qualified immunity from liability for false arrest in suspect's § 1983 action. **WHY:** *The Court reasoned that when Johnson encountered the officers, they were investigating a recent shooting in the area and guarding an active crime scene; the officers told Johnson repeatedly he could not enter the active crime scene, but he stayed put and sent mixed messages about whether he would comply with officers' orders. Therefore, the Court determined that the Officers has sufficient probable cause to arrest Johnson and, thus, were entitled to qualified immunity.*

ISSUE #2: State-Created Danger. Did Johnson have a clearly established right to be free from an unbelted car ride.

THE LAW: Due process generally confers no affirmative right to governmental aid, even where such aid may be necessary to secure life, liberty, or property interests. When public official affirmatively places particular individual in position of danger that individual would not otherwise have faced, official may be liable for due process violation if injury results. This is known as the State-Created Danger Rule. To recover for injuries resulting from state-created danger, the plaintiff alleging due process violation must prove that state created or increased danger to them, that its failure to protect them caused their injury, and that its behavior shocked the conscience.

FINDINGS: In this case, the Court of Appeals determined that Johnson did not have clearly established right to be free from unbelted car ride, and thus the police officers were entitled to qualified immunity from liability in Johnson's action alleging that the officers violated the Due Process Clause by exposing him to state-created danger by failing to fasten his seat belt while knowing he was handcuffed and could not brace himself against sudden movements of police car. **WHY:** *The Court reasoned that Johnson was not seat-belted because he refused officers' attempt to secure him, and the officer driving apologized for the single stop that injured him.*

ISSUE #3: Excessive Force. Did the driving officer use excessive force in violation of the Fourth Amendment while transporting Johnson to the police station by subjected him to a “rough ride” by “intentionally” coming “to a sudden stop,” causing him “to lurch forward” and hit his head?

THE LAW: Court determines whether force is excessive in violation of Fourth Amendment by asking whether officer's actions are objectively reasonable in light of facts and circumstances confronting officer. Reasonableness of particular use of force must be judged from perspective of reasonable officer on scene, rather than with 20/20 vision of hindsight. Court must conduct analysis as to reasonableness of officer's use of force without regard for officer's underlying intent or motivation. In assessing whether right is “clearly established” for purposes of qualified immunity, Court of Appeals first looks to controlling Supreme Court precedent and its own circuit decisions on issue; after doing so, Court of Appeals may then look to all relevant caselaw and ask whether there was such clear trend in caselaw that it can say with fair assurance that recognition of right by controlling precedent was merely question of time.

FINDINGS: It was not clearly established at time police officer transported unarmed, restrained misdemeanor arrestee to police station that intentionally coming to sudden stop, causing him to lurch forward and hit his head, violated Fourth Amendment's prohibition against use of excessive force, and thus officer was entitled to qualified immunity from liability on arrestee's § 1983 excessive force claim.

ISSUE #4: Failure to Provide Adequate Medical Care. Did the Officers fail to provide Johnson with reasonable medical care after they merely called paramedics after they arrived at the station?

FINDINGS: It was not clearly established that police officers violated Johnson's Fourth Amendment right to adequate medical care when they delayed for several minutes in seeking medical assistance to arrestee after he hit his head while being transported to police station, and thus officers were entitled to qualified immunity from liability on arrestee's § 1983 claim for failure to provide adequate medical care. **WHY:** The officers called paramedics when they arrived at police station and realized he was hurt. According to the Court, this conduct on the part of the Officers was sufficient.

CONCLUSION: The Court of Appeals affirmed the District Court's Order granting summary judgment to the Officers.

QUIZ QUESTIONS FOR THE MONTH OF MARCH – 2026

Oneal Johnson v. Ryan Edwards, 164 F.4th 1074, January 27, 2026.

1. Oneal Johnson sued the arresting Officers for false arrest. In order for a plaintiff to win on a false-arrest claim, the plaintiff must prove that the Officers arrested him without probable cause.
 - a. True.
 - b. False.

2. Oneal Johnson argued that the Officers in this case lacked probable cause to place him under arrest. Did the appellate court agree with this argument?
 - a. Yes.
 - b. No.

3. If an Officer places a particular individual in a position of danger the individual would not otherwise have faced, can the Officer be held liable if that individual suffers an injury as a result of the conduct of the Officer.
 - a. Yes.
 - b. No.

4. Johnson argued that the Officers in this case used excessive force against him where they subjected him to a “rough ride” by “intentionally” coming “to a sudden stop,” causing him “to lurch forward” and hit his head. The appellate court agreed with Johnson’s argument.
 - a. True.
 - b. False.

**QUIZ ANSWERS AND DISCUSSION FOR THE MONTH OF QUIZ QUESTIONS FOR THE MONTH
OF MARCH – 2026**

Oneal Johnson v. Ryan Edwards, 164 F.4th 1074, January 27, 2026.

1. Oneal Johnson sued the arresting Officers for false arrest. In order for a plaintiff to win on a false-arrest claim, the plaintiff must prove that the Officers arrested him without probable cause.
 - a.** ***True.*** This court held: “To prevail on a Fourth Amendment false-arrest claim, a plaintiff must show that there was no probable cause for his arrest.” *Braun v. Village of Palatine*, 56 F.4th 542, 548 (7th Cir. 2022).

2. Oneal Johnson argued that the Officers in this case lacked probable cause to place him under arrest. Did the appellate court agree with this argument?
 - b.** ***No.*** The Court held that the Officers had arguable probable cause to arrest Johnson for Disorderly Conduct.

3. If an Officer places a particular individual in a position of danger the individual would not otherwise have faced, can the Officer be held liable if that individual suffers an injury as a result of the conduct of the Officer.
 - a.** ***Yes.*** This is the “State-Created Danger” rule. “[W]hen a public official affirmatively places a particular individual in a position of danger the individual would not otherwise have faced, the official may be liable for a due-process violation if injury results.” *Est. of Her v. Hoepfner*, 939 F.3d 872, 876 (7th Cir. 2019).

4. Johnson argued that the Officers in this case used excessive force against him where they subjected him to a “rough ride” by “intentionally” coming “to a sudden stop,” causing him “to lurch forward” and hit his head. The appellate court agreed with Johnson’s argument.
 - b.** ***False.*** The appellate court rejected this argument by finding that Johnson failed to prove that he had a clearly established right to be free from the specific conduct at issue—here, braking too hard at a red light while he was not wearing a seatbelt.