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LAW ENFORCEMENT OFFICER TRAINING CASE OF THE MONTH

By Don Hays

Month of July – 2026

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Jacob P. Zorn v. Shela M. Linton, 146 S. Ct. 926, March 23, 2026

THE CASE USE OF FORCE: Protesters conducted a "sit-in" in the Vermont State capital. Officer Zorn used a reverse wrist lock to force a protester to stand. Was the Officer entitled to qualified immunity from liability for his alleged use of excessive force?

FACTS: On January 8, 2015, Vermont hosted the inauguration for its Governor in the Vermont capitol. About 200 protesters attended, and some of them staged a sit-in to demand universal healthcare. Linton joined them. She planned to refuse to leave and anticipated being forcibly removed. "That's the point of the sit-in part of the protest," she later explained. When the capitol closed to the public for the night, 29 protesters remained in the legislative chamber, sitting on the floor with their arms linked. At that point, police officers explained that they would arrest the protesters for trespass if they did not leave. The officers dealt with them one at a time; some stood up and were escorted out of the chamber without force, but others refused to stand and had to be lifted to their feet or dragged out.

After removing more than a dozen protesters, the officers turned to Linton. Sergeant Jacob Zorn crouched down to speak with her, but she remained seated with her arms interlocked with those of her fellow protesters. As Linton passively resisted, Zorn unlinked her arm from another protester's, put it behind her back in a rear wristlock, and twisted her arm. Linton exclaimed " ' ow, ow, ow,' " while Zorn repeatedly implored her to " 'please stand up.' " After Linton responded, " 'I will not stand up,' " Zorn told her that he would ask " 'one more time' " and then would use more pain compliance. Linton refused, so Zorn placed pressure on her wrist and lifted her up by her underarm. Linton yelled as she stood up. Once on her feet, Linton continued to jerk her arms and fell back to the floor. Zorn asked her to stand up again, and when she did not, three officers picked her up by her arms and legs and carried her outside. Linton alleged resulting physical and psychological injuries that included post-traumatic stress disorder.

Linton sued Zorn, claiming that Zorn violated her Fourth Amendment right against the excessive use of force. The District Court granted summary judgment for Zorn after concluding that he was entitled to qualified immunity. The District Court reasoned that it was not clearly established at the time of the encounter that, under these circumstances, lifting Linton while putting pressure on her wrist violated the Fourth Amendment. The Second Circuit reversed. It held that its decision in *Amnesty America v. West Hartford*, 361 F.3d 113 (2004), clearly established that the "gratuitous" use of a rear wristlock on a protester passively resisting arrest constitutes excessive force. It remanded the case for a jury trial against Zorn. Zorn then brought this appeal before the United States Supreme Court.

USE OF FORCE RULES LISTED BY THE SUPREME COURT IN THIS CASE:

A. Government officials enjoy qualified immunity from suit under § 1983 unless their conduct violates clearly established law.

B. "A right is clearly established when it is 'sufficiently clear that every reasonable official would have understood that what he is doing violates that right.' "

C. A right is not clearly established if existing precedent does not place the constitutional question " 'beyond debate.' "

D. To find that a right is clearly established, courts generally "need to identify a case where an officer acting under similar circumstances ... was held to have violated" the Constitution.

E. The relevant precedent must define the right with a "high degree of specificity," so that "every reasonable official would interpret it to establish the particular rule the plaintiff seeks to apply."

F. Principles stated generally, such as that "an officer may not use unreasonable and excessive force," do not suffice.

G. In short, officers receive qualified immunity unless they could have "read" the relevant precedent beforehand and "know[n]" that it proscribed their specific conduct.

ISSUE: Did the Second District Court of Appeals properly determine that their case of *Amnesty America v. West Hartford*, 361 F.3d 113 (2004), clearly establish that the "gratuitous" use of a rear wristlock on a protester passively resisting arrest constitutes excessive force**? (No).**

FINDINGS: According to the United States Supreme Court, the Second Circuit contravened the Use of Force principles cited above. The Supreme Court held that *Amnesty America* did not clearly establish that Zorn's specific conduct violated the Fourth Amendment with respect to the circumstances of this case. The Court noted that whether any particular use of force violates the Fourth Amendment depends on "the facts and circumstances of each particular case," including whether the officer gave "warnings" before using force. In *Amnesty America*, the district court considered a wide range of allegations of excessive force. The officers in that case rammed a protester's head into a wall, dragged another protester across the ground, and used rear wristlocks on two more protesters to lift them up before throwing one of them to the ground. The Supreme Court noted that nothing indicated that the officers in *Amnesty America* gave the protesters any warning that they would use such force.

According to the Supreme Court, *Amnesty America* did not hold that any of the Officer's actions violated the Fourth Amendment, let alone all of them. Instead, it remanded for a jury trial because a "reasonable jury could ... find that the officers gratuitously inflicted pain." However, the Court in that case also concluded that it was also "entirely possible that a reasonable jury would find ... that the police officers' use of force was objectively reasonable given the circumstances." Relevant here, *Amnesty America* even relied on a decision approving the practice of warning protesters and then using wristlocks to move them. (citing Forrester v. San Diego, 25 F.3d 804, 807–808 (CA9 1994)).

The Supreme Court concluded that reasonable officials would not "interpret [Amnesty America] to establish" that using a routine wristlock to move a resistant protester after warning her, without more, violates the Constitution. In this case, Zorn repeatedly warned Linton that he would have to use more force if she did not stand up, and when she did not do so, he used a wristlock to bring Linton to her feet. The Supreme Court noted that *Amnesty America* never "held" that such conduct alone "violated" the Fourth Amendment. The Court determined that, if anything, it implied the opposite. See Amnesty America, 361 F.3d at 124 (citing Forrester, 25 F.3d at 807–808). And its statement that officers who had engaged in a wide range of aggressive conduct may have used excessive force did not "put [Zorn] on notice that his specific conduct was unlawful."

The Supreme Court noted that the Second Circuit concluded otherwise by reading *Amnesty America* to establish the general principle "that the gratuitous use of pain compliance techniques—such as a rear-wristlock—on a protestor who is passively resisting arrest constitutes excessive force." However, the Supreme Court held that that principle, even assuming Amnesty America established it, lacked the "high degree of specificity" needed to make it "clear" to officers which actions violate the law. It did not "obviously resolve" whether using a rear wristlock to move a noncompliant protester after repeated warnings violates the Fourth Amendment, as it failed to specify which circumstances make the use of force "gratuitous." Because the Second Circuit failed to identify a case where an officer taking actions in similar circumstances "was held to have violated" the Constitution, Zorn was entitled to qualified immunity.

CONCLUSION: The judgment of the Court of Appeals was vacated, and this case was remanded for further consideration. **DISSENT:** Three Justices disagreed with the Majority in this case.

QUIZ QUESTIONS FOR THE MONTH OF JULY – 2026

Jacob P. Zorn v. Shela M. Linton, 146 S. Ct. 926, March 23, 2026

1. As a general rule, government officials have qualified immunity from liability for their actions unless those actions violate clearly established law.

   a. True.

   b. False.

2. A right is "clearly established", for purposes of immunity from liability, if a case can be identified wherein an Officer, acting under similar circumstances, was held to have violated the constitution.

   a. True.

   b. False.

3. In this case, the Officer repeatedly warned the Protester that he would use force if she continued to refuse to obey his orders. In cases involving the alleged excessive use of force, do these warnings matter?

   a. Yes.

   b. No.

4. The Protester argued that *Amnesty America* declared "that the gratuitous use of pain compliance techniques—such as a rear-wristlock—on a protestor who is passively resisting arrest constitutes excessive force." Therefore, they argued that the force used by the Officer in this case violated clearly established law. Did the United States Supreme Court agree with this argument?

   a. Yes.

   b. No.

QUIZ ANSWERS AND DISCUSSION FOR THE MONTH OF JULY – 2026

Jacob P. Zorn v. Shela M. Linton, 146 S. Ct. 926, March 23, 2026

1. As a general rule, government officials have qualified immunity from liability for their actions unless those actions violate clearly established law.

   a. True. Government officials enjoy qualified immunity from suit under § 1983 unless their conduct violates clearly established law. Rivas-Villegas v. Cortesluna, 595 U.S. 1, (2021).

2. A right is "clearly established", for purposes of immunity from liability, if a case can be identified wherein an Officer, acting under similar circumstances, was held to have violated the constitution.

   a. True. This Court held: "To find that a right is clearly established, courts generally "need to identify a case where an officer acting under similar circumstances ... was held to have violated" the Constitution. Escondido v. Emmons, 586 U.S. 38, (2019)

3. In this case, the Officer repeatedly warned the Protester that he would use force if she continued to refuse to obey his orders. In cases involving the alleged excessive use of force, do these warnings matter?

   a. Yes. The Court held, "Whether any particular use of force violates the Fourth Amendment depends on "the facts and circumstances of each particular case," *Graham v. Connor*, 490 U.S. 386, 396, 109 S. Ct. 1865, (1989), including whether the officer gave "warnings" before using force, *Barnes v. Felix*, 605 U.S. 73, (2025).

4. The Protester argued that *Amnesty America* declared "that the gratuitous use of pain compliance techniques—such as a rear-wristlock—on a protestor who is passively resisting arrest constitutes excessive force." Therefore, they argued that the force used by the Officer in this case violated clearly established law. Did the United States Supreme Court agree with this argument?

   b. No. The Court disagreed by declaring: "that principle, even assuming *Amnesty America* established it, lacks the "high degree of specificity" needed to make it "clear" to officers which actions violate the law. *District of Columbia v. Wesby*, 583 U.S. 48, (2018).