

In the Supreme Court of the United States

JANICE HUGHES BARNES, INDIVIDUALLY AND AS REPRESENTATIVE
OF THE ESTATE OF ASHTIAN BARNES,
PETITIONER

v.

ROBERTO FELIX JR., ET AL.,
RESPONDENTS

*On Writ of Certiorari to the
United States Court of Appeals for the Fifth Circuit*

**BRIEF OF *AMICUS CURIAE*
SOUTHERN BORDER COMMUNITIES COALITION
IN SUPPORT OF PETITIONER**

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Interest of Amicus Curiae¹

Southern Borders Communities Coalition (SBCC) is a program of Alliance San Diego (ASD), a non-profit organization whose mission is to build collective power to create an inclusive democracy where everyone can participate fully with dignity. While SBCC and ASD have complementary missions, SBCC is focused on the southern border region, border enforcement, and border communities. SBCC has its own budget, dedicated funding and staff, and full autonomy in decision-making regarding its strategy direction and actions.

Formed in March 2011, SBCC brings together over 60 member organizations spanning the length of the U.S.-Mexico borderlands from California, Arizona, New Mexico, and Texas. Our coalition members are as diverse as our geographies and include environmental, immigrant rights, human rights, faith, direct service, and labor groups. We are united to amplify the voices of our border communities. SBCC's mission is to 1) advocate for federal policy reform, 2) advocate for border enforcement policies and practices that are fair, respect human dignity and human rights, and 3) prevent the loss of life in the border region. Further, SBCC promotes policies and solutions that improve the quality of life in border communities, advances a positive image of the border region, and supports rational and humane immigration reform policies affecting the border region.

As part of its work, SBCC monitors and documents Customs and Border Protection (CBP) activities

¹ All parties received notice 10 days in advance of the filing of this brief. No counsel for any party authored this brief in whole or in part, and no person or entity other than amicus or his counsel made a monetary contribution intended to fund the brief's preparation or submission.

at the border and files complaints with federal agencies and international bodies based on abuses and mistreatment of migrants and border residents. CBP's inadequate use of force policy stems directly from interpretations of the Fourth Amendment applicable to all law enforcement. The agency's faulty policies and extreme lack of accountability have led to a culture of violence and impunity that has devastated border communities for decades. SBCC files this amicus to urge respect for international use of force standards to address rampant abuse by law enforcement including CBP, the nation's largest law enforcement agency.

Introduction and Summary of Argument

In 2023, U.S. police killed more people than any year on record.² Lower courts in the majority of circuits play an important role in determining *why* this is by following this Court's direction to consider the totality of the circumstances surrounding a police officer's decision to use deadly force. Reasoned decision-making in individual civil rights lawsuits is one piece of evidence that policymakers can use when determining how best to balance safeguards against wrongful killings with the realities of on-the-ground policing. But a minority of federal circuits reduce the inquiry into police use of deadly force only to the "moment of the threat." These circuits forbid lower courts to consider facts and contexts at the heart of an accurate determination of whether use of deadly force was reasonable.

² Hayden Godfrey et al., *Police Shootings Database 2015-2024*, Wash. Post, <https://www.washingtonpost.com/graphics/investigations/police-shootings-database/> (updated Nov. 6, 2024).

Not only do the majority of federal circuits reject the moment of the threat doctrine as impermissibly narrow; the rest of the world does too. International human rights law, codified in treaties the United States has ratified, requires that a police officer's use of deadly force be both necessary and proportionate to the threat at hand. With good reason: in addition to their role in upholding the sanctity of human life, the principles of necessity and proportionality—and the example the United States sets in adhering to them—encourage the flourishing of democratic governance around the globe by constraining state violence against civilians and reinforcing the rule of law. The moment of the threat doctrine undermines these stabilizing influences and the United States' strategic interests in promoting human rights in a historical moment of increasing autocratic regimes.

The international human rights principles of necessity and proportionality are incompatible with a cramped focus on the moment of the threat alone. Consistent with international human rights law, this Court should therefore resolve the circuit split before it by rejecting the moment of the threat doctrine.

Argument

I. Deadly Force Must Be Both Necessary and Proportionate under International Human Rights Law

“The protection of fundamental human rights was a foundation stone in the establishment of the United States over 200 years ago” and remains a

guiding principle in its law today.³ Among the human rights enumerated both in the Declaration of Independence and in international human rights treaties is the right to life.⁴ International human rights law explicitly protects the right to be free from arbitrary deprivation of life by requiring that police use of deadly force be “necessary” and “proportionate.”

a. The United States recognizes the right to life

The right to life under international human rights law is “the supreme human right, since without effective guarantee of this right, all other rights of the human being would be devoid of meaning.”⁵ This Court has long recognized that “international law is part of our law,” acknowledging legal obligations under international customary law and *jus cogens*.⁶ It is *jus cogens* or

³ U.S. Dep’t of State, *Human Rights and Democracy*, <https://www.state.gov/policy-issues/human-rights-and-democracy/>.

⁴ The Declaration of Independence para. 2 (U.S. 1776); G.A. Res. 217 (III) A, Universal Declaration of Human Rights (Dec. 10, 1948) [hereinafter Universal Declaration]; International Covenant on Civil and Political Rights art. 6, Dec. 16, 1966, 999 U.N.T.S. 171 [hereinafter ICCPR].

⁵ William J. Aceves, *When Death Becomes Murder: A Primer on Extrajudicial Killing*, 50 Colum. Hum. Rts. L. Rev. 116, 126 (2018) (quoting Manfred Nowak, U.N. Covenant on Civil and Political Rights: ICCPR Commentary 121 (2d Ed. 2005)).

⁶ *The Paquete Habana*, 175 U.S. 677, 700 (1900); see also Restatement (Third) of Foreign Relations Law § 111 (Am. L. Inst. 1987) (stating that customary international law constitutes federal law and is binding on both state and federal courts). For more than two centuries, this Court has recognized that federal statutes must be read in light of the United States’ binding obligations under international treaties. *Murray v. The Schooner Charming Betsy*, 6 U.S. 64, 118 (1804) (establishing the “maxim of statutory construction” that “an act of Congress ought never to be construed to violate the

a peremptory norm, a universally accepted rule from which no derogation is permitted, that all nations have a duty to protect against the arbitrary deprivation of life.⁷ The right to life is also enshrined in customary international law, rules arising from consistent and widespread state practice, given written expression in international human rights declarations that the United States played a key role in drafting, including the Universal Declaration of Human Rights and the American Declaration on the Rights and Duties of Man.⁸ International human rights treaties that the United States has ratified, including the International Covenant on Civil and Political Rights (ICCPR), also protect “the inherent right to life” and require that “[n]o one shall be arbitrarily deprived of his life.”⁹

law of nations, if any other possible construction remains”). This principle “has for so long been applied by this Court that it is beyond debate.” *Edward J. DeBartolo Corp. v. Fla. Gulf Coast Bldg. and Const. Trades*, 485 U.S. 568, 575 (1988) (internal citations omitted).

⁷ By definition, a *jus cogens* norm cannot be derogated from by treaty. But the fact that every major human rights treaty in the world protects the right to life is evidence of the universal obligation to protect against arbitrary deprivation of life. *See e.g.*, ICCPR at art. 6; Organization of American States, American Declaration of the Rights and Duties of Man art. 1, May 2, 1948, O.A.S. Res. XXX [hereinafter American Declaration]; African Charter on Human and Peoples’ Rights art. 4, June 27, 1981, 1520 U.N.T.S. 217; Organization of American States, American Convention on Human Rights art. 4, Nov. 22, 1969, O.A.S.T.S. No. 36, 1144 U.N.T.S. 123; European Convention for the Protection of Human Rights and Fundamental Freedoms art. 2, November 4, 1950, 213 U.N.T.S. 222.

⁸ Universal Declaration; American Declaration.

⁹ ICCPR, art. 6; *see also* American Declaration; Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, Dec. 10, 1984, 1465 U.N.T.S. 85; International Convention on the Elimination of All Forms of Racial Discrimination, Dec. 21, 1965, 660 U.N.T.S. 195.

The United States’ commitment to protecting human rights domestically is not merely formalistic. “U.S. law declares the promotion and protection of democracy, human rights, and fundamental freedoms to be ‘principal’ and ‘fundamental’ goals of U.S. foreign policy.”¹⁰ By the same token, the promotion and implementation of human rights *within* the United States serves important strategic goals of the executive branch. By leading through example of domestic implementation of international human rights norms, the United States “helps create a more secure, stable, and prosperous global arena” in an era of increasing challenge to the rule of law around the globe.¹¹ In short, both as a matter of law and policy, the United States is committed to protecting against the arbitrary deprivation of life by police use of deadly force.

b. Police use of deadly force must be both necessary and proportionate

International sources of law explain how the general obligation to protect against arbitrary deprivation of life applies to the specific, on-the-ground context of police use of deadly force. Interpretive instruments and human rights courts in the international arena require police use of deadly force to be both necessary and proportionate to the threat at hand.¹² These two core

¹⁰ Michael A. Weber, Cong. Rsch. Serv., R47890, *Democracy and Human Rights in U.S. Foreign Policy: Tools and Considerations for Congress* (2024) (citing Foreign Assistance Act of 1961, Section 502B(a)(1) (22 U.S.C. §2304(a)(1)); Advance Democratic Values, Address Nondemocratic Countries, and Enhance [ADVANCE] Democracy Act of 2007, Section 2103 (22 U.S.C. §8202)).

¹¹ U.S. Dep’t of State, *supra* note 3.

¹² *Basic Principles on the Use of Force and Firearms by Law Enforcement Officials*, Eighth U.N. Cong. on the Prevention of Crime

principles—necessity and proportionality—protect the right to life of both police officers and the public they serve by setting clear, administrable limits on the use of deadly force, reducing the probability of violent encounters that can lead to fatalities of police and civilians.

The principles of necessity and proportionality are discussed in detail in the Code of Conduct for Law Enforcement Officials¹³ and the Basic Principles on the Use of Force and Firearms by Law Enforcement Officials,¹⁴ interpretive instruments of international human rights law that were “developed through intensive dialogue between law enforcement experts and human rights experts” of a large number of states, providing “an indication of the near universal consensus on their content.”¹⁵ In turn, international human rights courts have applied the principles derived from these interpretive tools in robustly reasoned cases arising under binding

and the Treatment of Offenders, Principle 4 (Sept. 7, 1990) [hereinafter *Basic Principles on the Use of Force*] (“Law enforcement officials, in carrying out their duty, shall, as far as possible, apply non-violent means before resorting to the use of force and firearms. They may use force and firearms only if other means remain ineffective or without any promise of achieving the intended result.”); see also *Salas Galindo v. United States*, Case 10.573, Inter-Am. Comm’n H.R., Report No. 121/18, OEA/Ser.L/V/II.169, Doc. 138, ¶ 338 (2018); Inter-Am. Comm’n H.R., *Police Violence Against Afro-Descendants in the United States*, ¶ 208, OEA/Ser.L/V/II, Doc. 156 (Nov. 26, 2018) [hereinafter *IACHR Report on Police Violence in the United States*]; Inter-Am. Comm’n H.R., *Report on Citizen Security and Human Rights*, ¶ 118, OEA/Ser.L/V/II, Doc. 57 (Dec. 31, 2009) [hereinafter *IACHR Report on Citizen Security and Human Rights*].
¹³ G.A. Res. 34/169, Code of Conduct for Law Enforcement Officials (Dec. 17, 1979).

¹⁴ *Basic Principles on the Use of Force*.

¹⁵ Philip Alston (Special Rapporteur, on Extrajudicial, Summary or Arbitrary Executions), *Rep. of the Special Rapporteur on Extrajudicial, Summary or Arbitrary Executions*, ¶ 41, U.N. Doc. A/61/311 (Sept. 5, 2006).

treaties that address the right to protection from arbitrary use of deadly police force.¹⁶

Necessity dictates that force only be used as a last resort to achieve a legitimate law enforcement objective. It requires law enforcement officers to exhaust viable non-violent measures before resorting to force, permits force only as a last result and where “other means remain ineffective”¹⁷ and limits the use of force to the minimum amount required to accomplish a specific and legitimate objective. Necessity also imposes a duty on police to first use persuasion and de-escalation tactics before resorting to force.¹⁸ In the case of *Landaeta Mejías Brothers v. Venezuela*, the Inter-American Court of Human Rights found that Venezuelan police who had shot and killed a teenager as he begged for his life violated the right to life, regardless of whether or not

¹⁶ See *IACHR Police Violence Against Afro-Descendants in the United States* (defining lethal force); *IACHR Report on Citizen Security and Human Rights; Dorzema v. Dominican Republic*, Merits, Reparations, and Cost, Judgment, Inter-Am. Ct. H.R. (ser. C) No. 251, ¶ 85 (Oct. 24, 2012); *Barrios Family v. Venezuela*, Merits, Reparations, and Costs, Judgment, Inter-Am. Ct. H.R. (ser. C) No. 237, ¶ 49 (Nov. 24, 2011); see also Christof Heyns (Special Rapporteur on Extrajudicial, Summary or Arbitrary Executions), *Rep. of the Special Rapporteur on Extrajudicial, Summary or Arbitrary Executions*, Christof Heyns, ¶ 59, U.N. Doc. A/HRC/26, at 26/36 (Apr. 1, 2014) [hereinafter *2014 Rep. of Special Rapporteur Christof Heyns*].

¹⁷ *Basic Principles on the Use of Force*, Principle 4 (“Law enforcement officials, in carrying out their duty, shall, as far as possible, apply non-violent means before resorting to the use of force and firearms. They may use force and firearms only if other means remain ineffective or without any promise of achieving the intended result.”).

¹⁸ See *Landaeta Mejías Brothers v. Venezuela*, Preliminary Objections, Merits, Reparations, and Costs, Judgment, Inter-Am. Ct. H.R. (ser. C) No. 281, ¶ 135 (Aug. 27, 2014); *2014 Rep. of Special Rapporteur Christof Heyns*.

the teenager had been armed.¹⁹ The Court underscored the state duty to use the “least harmful means” available and provide clear warning of the intent to use force.²⁰

Proportionality mandates that the degree of force used by police officers correspond to the level of resistance encountered, the gravity of threat, and the law enforcement objective at stake. The force employed should escalate only to the extent necessary to counter the resistance or threat, ensuring that the response remains balanced and appropriate to the situation. Proportionality and necessity are distinct, but complementary. “While the proportionality requirement imposes an absolute ceiling on the permissible level of force based on the threat posed by the suspect to others, the necessity requirement imposes an obligation to minimize the level of force applied regardless of the level of force that would be proportionate.”²¹

Recognizing the life-saving benefits and on-the-ground workability of the principles of proportionality and necessity, U.S. law enforcement agencies have incorporated them into their use-of-force policies. For example, Washington State mandates that force be proportional to both the law enforcement objective and the level and type of threat posed,²² a standard adopted by other jurisdictions.²³ Similarly, acknowledging that the

¹⁹ See *Landaeta Mejías Brothers*, No. 281 at ¶¶ 139, 142.

²⁰ *Id.* at ¶¶ 132, 135.

²¹ Alston, *Rep. on Extrajudicial, Summary or Arbitrary Executions* at ¶ 41.

²² See Washington State Off. of the Att’y Gen., Model Use of Force Policy, 7 (July 1, 2022), https://agportal-s3bucket.s3.amazonaws.com/uploadedfiles/Another/UOF%20Model%20Policies_070122_FINAL_0.pdf.

²³ See State of New Jersey Off. of the Att’y Gen., Use of Force Policy, vi (Apr. 2022), <https://www.nj.gov/oag/force/docs/UOF-2022-0429-Use-of-Force-Policy.pdf>; Office of the Chief of Police, 556.10 Policy

principle of necessity and its duty to de-escalate benefit both law enforcement and the general public by protecting both officer and civilian, U.S. law enforcement agencies have also implemented requirements for officers to attempt de-escalation by issuing clear, understandable warnings and giving subjects a chance to comply voluntarily before force is used.²⁴

II. The Moment of the Threat Doctrine Is Irreconcilable with International Human Rights Law

The moment of the threat doctrine makes no room for principles of necessity and proportionality, the twin pillars regulating use of deadly force under international human rights law. The doctrine excludes consideration of actions a police officer took that may have unnecessarily heightened an avoidable threat, including the failure to use alternative, less-lethal means to avoid deadly force. Nor does the moment of the threat doctrine permit examining circumstances like whether the reason for the seizure merited so extreme a response as the loss of human life. Moreover, by refusing to consider the totality of the circumstances that may have made an officer's actions unreasonable, the moment of

on the Use of Force – Revised, Los Angeles Police Dep't, 1 (November 17, 2021), <https://lapdonlinestrgeacc.blob.core.usgovcloudapi.net/lapdonlinemedia/2021/12/Policy-Use-of-Force-Revised.pdf>; Seattle Police Dep't, Seattle Police Dep't Policy Manual, 8.200 – Using Force, 1 (Sept. 9, 2024), <https://public.powersdms.com/Sea4550/documents/2042944>; *see also* Am. L. Institute, Principles of the Law, Policing (Combined Revised Tentative Drafts), § 7.05 (Jan. 2023), https://www.policingprinciples.org/wp-content/uploads/2023/01/Policing-Tentative-Draft_1-31-23.pdf.

²⁴ Washington State Off. of the Att'y Gen., *supra* note 22, at 8; New Jersey Off. of the Att'y Gen., *supra* note 23, at 3.

the threat doctrine decreases the likelihood that the state will be held accountable for arbitrarily depriving a person of the right to life.

a. **The moment of the threat doctrine is incompatible with the core tenets of necessity and proportionality**

By their nature, necessity and proportionality require fact-intensive inquiries that consider a wide variety of factors beyond the moment of the threat. International human rights courts sitting in interpretation of treaty duties to protect against arbitrary loss of life discuss some of these factors. For example, the Inter-American Court's analysis in excessive force cases²⁵ examines (1) the level of intensity and danger of the threat; (2) the attitude of the individual injured or killed; (3) the conditions of the surrounding area; and (4) the means available to law enforcement to deal with the situation.²⁶

The present case illustrates that the moment of the threat doctrine is incompatible with an analysis of necessity and proportionality. By focusing solely on the two seconds before Officer Felix fired his first shot, the Fifth Circuit completely ignored factors central to proportionality, including "Felix's decision to jump on to a moving vehicle, or the minor nature of the toll violation,

²⁵ The Inter-American Commission has stated that Inter-American legal precedent on the right to life is applicable in all cases before it that involve the use of force. *See Ruiz Fuentes v. Guatemala*, Case 12.650, Inter-Am. Comm'n. H.R., Report No. XX/17, OEA/Ser.L/V/II.163, Doc. XX, ¶ 189 (2017). When the failure by state agents to follow principles of necessity and proportionality results in death, those agents have arbitrarily deprived the subject of life in violation of the American Declaration. *See id.* at ¶ 190.

²⁶ *Landaeta Mejías Brothers*, No. 281 at ¶ 136.

when analyzing the reasonableness of Felix’s actions.”²⁷ Nor did the Fifth Circuit leave any room to account for necessity, including whether “warnings [or] other de-escalatory actions” were taken that might have reduced the likelihood of unnecessary loss of life.²⁸ In fact, the Fifth Circuit’s decision disincentivizes de-escalation and peaceful conflict resolution, telling officers that their conduct prior to using deadly force won’t be considered. As Professor Barbara E. Armacost notes, “As long as the focus is on whether the circumstances justified the use of force at the moment it was applied, officers have no legal incentive to step back and ask themselves whether they could have avoided the entire situation without a violent confrontation.”²⁹

b. The moment of the threat doctrine erodes accountability for use of lethal force

International human rights law also highlights the benefits of law enforcement transparency and accountability, including access to effective remedies, in-depth investigations into the use of force, and adequate safeguards against law enforcement abuse of force. The moment of the threat doctrine impedes these accountability efforts by disregarding an officer’s actions that unnecessarily lead to deadly force, effectively denying victims a remedy for the harm.

Under Article 2 of the ICCPR, victims of excessive force by law enforcement officials must have access

²⁷ Pet. for a Writ of Cert., *Barnes v. Felix*, No. 23-1239, 9 (2024).

²⁸ *Id.* at 29.

²⁹ Barbara E. Armacost, *Organizational Culture and Police Misconduct*, 72 *Geo. Wash. L. Rev.* 453, 471 (2004).

to an effective remedy.³⁰ A failure to investigate allegations of violations could in and of itself give rise to a separate breach of Articles 2(3) and 6 of the ICCPR.³¹ The UN Human Rights Committee has interpreted the ICCPR to require that State Parties “investigate . . . incidents involving allegations of excessive use of force with lethal consequences.”³² Although the Committee has urged the U.S. to ensure that killings by law enforcement are “effectively investigated,”³³ impunity for killings by U.S. law enforcement is still all too common.

The Inter-American Commission and Court have also instructed states to investigate, identify, and punish those responsible for human rights violations as a remedy in the majority of its cases.³⁴ The Inter-American Commission, for example, instructed the United States in *Jessica Lenahan (Gonzales) v. United States* to “[c]onduct a serious, impartial and exhaustive investigation into systemic failures” that led to the violations of the victim’s rights, “including performing an inquiry

³⁰ U.N. Hum. Rts. Comm., *General Comment No. 31 [80]: The Nature of the General Legal Obligation Imposed on States Parties to the Covenant*, U.N. Doc. CCPR/C/21/Rev.1/Add.13, ¶ 15 (May 26, 2004) (noting that Article 2(3) of the ICCPR obliges States parties to “ensure that individuals . . . have accessible and effective remedies to vindicate [their] rights”).

³¹ U.N. Hum. Rts. Comm., *General Comment No. 36 on Article 6: Right to Life*, U.N. Doc. CCPR/C/GC/36, ¶ 27 (Sept. 3, 2019). *See also* U.N. Hum. Rts. Comm., *Olimzhon Eshonov v. Uzbekistan*, Communication No. 1225/2003, U.N. Doc. CCPR/C/99/D/1225/2003, ¶ 9.2. (2010).

³² U.N. Hum. Rts. Comm., *General Comment No. 36*, ¶ 15.

³³ Concluding Observations on the Fourth Periodic Report of the United States of America, U.N. Doc. CCPR/C/USA/CO/4, ¶ 11 (Apr. 23, 2014).

³⁴ Alexandra Huneeus, *Courts Resisting Courts: Lessons from the Inter-American Court’s Struggle to Enforce Human Rights*, 44 *Cornell Int’l L.J.* 493 (2011).

to determine the responsibilities of public officials for violating state and/or federal laws, and holding those responsible accountable.”³⁵

The European Court of Human Rights has likewise mandated that a “[c]ourt must, in making its assessment, subject deprivations of life to the most careful scrutiny, particularly where deliberate lethal force is used.”³⁶ In *Makaratzis v. Greece*, the Court stated that “as well as being authorised under national law, policing operations must be sufficiently regulated by it, within the framework of a system of adequate and effective safeguards against arbitrariness and abuse of force and even against avoidable accident.”³⁷

The moment of the threat doctrine undermines accountability efforts by immunizing law enforcement officers from responsibility for their actions prior to using deadly force, allowing them to provoke situations that lead to the use of force without facing consequences. At a moment where killings by police have reached a record high in the U.S., the Court’s endorsement of the moment of the threat doctrine could sanction reckless and arbitrary use of deadly force by officers.

³⁵ *Lenahan (Gonzales) v. U.S.*, Case 12.626, Inter-Am. Comm’n H.R., Report No. 80/11, OEA/Ser.L/VII.142, Doc. 11, ¶ 201(2) (2011). See also *Romero v. El Salvador*, Case 11.481, Inter-Am. Comm. H.R., Report 37/00, ¶¶ 87-122, 159 (1999) (finding that El Salvador had not “undertake[n] an effective investigation” and instructing the State to “expeditiously” conduct a “complete, impartial, and effective judicial investigation,” with the aim to try and punish all the “direct perpetrators and planners of the [established human rights] violations”).

³⁶ *McCann and Others v. U.K.*, App. No. 18984/91, ¶ 150 (Sept. 17, 1995), <https://hudoc.echr.coe.int/eng?i=001-57943>.

³⁷ *Makaratzis v. Greece*, App. No. 50385/99, ¶ 58 (Dec. 20, 2004), <https://hudoc.echr.coe.int/eng?i=001-67820>.

Accountability is critical to addressing past harms and preventing future abuse. The moment of the threat doctrine weakens this principle, preventing the United States from fulfilling its commitment to human rights.

Conclusion

The United States has long recognized the right to life and is committed to protecting civilians from the arbitrary deprivation of life. The international human rights principles of necessity and proportionality that guide police use of deadly force are fundamentally incompatible with the “moment of the threat” doctrine. We therefore respectfully request that this Court reject the “moment of the threat” doctrine and reverse the judgment below.

Respectfully submitted,

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