**US Supreme Court Case Updates 2025**

**Barnes v. Felix, 605 U.S. \_\_\_ (2025)**

**Docket No. 23-1239, Lower Court: Fifth Circuit**

**Facts of the Case**

On April 28, 2016, Officer Roberto Felix Jr. fatally shot Ashtian Barnes during a traffic stop on the Harris County Tollway. Felix initiated the stop after identifying Barnes’s Toyota Corolla as flagged for toll violations. Barnes pulled over to the median, but when asked for documentation, could not provide it and began searching the vehicle. Officer Felix claimed to smell marijuana and questioned Barnes, who then suggested checking for paperwork in the trunk. Dash cam footage revealed that after Barnes exited the vehicle and opened the trunk at Felix’s request, the car’s blinker activated and the vehicle began to move. Felix, with his gun drawn, climbed onto the moving car and pressed his weapon to Barnes’s head. While holding onto the car and unable to see inside, Felix fired twice, killing Barnes. Barnes’s car stopped shortly thereafter, and he was pronounced dead at 2:57 p.m. Subsequent investigations by local law enforcement resulted in a grand jury declining to indict Felix.

The district court granted summary judgment for Felix and the defendants, focusing exclusively on the immediate moments before the shooting when Felix was physically on the moving vehicle. The court held that Felix’s fear for his own safety in that instance justified deadly force, regardless of preceding events, such as his decision to jump onto the vehicle. The Fifth Circuit Court of Appeals affirmed this ruling.

**Question Presented**

Should courts evaluate excessive force claims under the Fourth Amendment only at the “moment of the threat,” or consider the broader context?

**Supreme Court Conclusion**

The Supreme Court ruled that, for Fourth Amendment excessive force claims, courts must assess the totality of the circumstances—looking beyond just the instant when an officer perceives a threat. Writing for a unanimous Court, Justice Elena Kagan vacated and remanded the Fifth Circuit’s decision, which had limited its analysis to the seconds when Felix was hanging onto the car. The Court stated that the Fourth Amendment requires an objective and contextual review of all events leading up to an officer’s use of force. While the critical moment when force is used is important, prior events—including both the officer’s and suspect’s actions—can clarify whether a threat was reasonably perceived. Focusing only on the “moment of threat” is inconsistent with established Fourth Amendment standards. The Fifth Circuit’s narrow rule improperly excluded significant context. The Supreme Court held that a “totality of the circumstances” approach is required, and questions about whether an officer contributed to creating the danger must be addressed by lower courts on remand.

**Impact**

This ruling has significant implications for how law enforcement will operate and train going forward. This could lead to more scrutiny on law enforcement actions and a greater emphasis on de-escalation.

The case still emphasizes the "objectively reasonable" standard, meaning that the force used must be what a reasonable officer would have used under the same circumstances.

The ruling clarified that the "reasonable officer" standard is not a static one, but rather one that is viewed through the lens of the totality of the circumstances.

This case refines the legal framework for assessing police use of force, requiring a more comprehensive review of the situation leading up to an incident rather than solely focusing on the immediate moment a threat is perceived.

**Bondi v. VanDerStok, 604 US \_\_\_\_(2025)**

**Docket No. 23-852, lower court: Fifth Circuit**

**Facts of the Case**

The ATF (Bureau of Alcohol, Tobacco, Firearms and Explosives) was set up in 1972 to enforce gun laws, including those from the Gun Control Act of 1968. This Act requires gun sellers to do background checks, keep records, and put serial numbers on guns. The law defines a gun by parts like the “frame or receiver.” But because newer guns—like AR-15s and Glocks—are made differently, the old ATF definition didn’t work well anymore. Also, "ghost guns" (homemade guns without serial numbers) were hard for police to track. To fix this, the ATF updated its rules in 2022 to better define what counts as a frame, receiver, or gun, so these parts and ghost guns would be regulated. The new rule started on August 24, 2022.

Some people sued, saying the ATF had no authority to update the rule. Lower courts agreed and struck down the rule. The case was appealed.

**Question**

Did ATF go beyond its legal power by making this new rule about ghost guns?

**Conclusion**

The Supreme Court decided the ATF did have the power to regulate gun kits and unfinished parts that can quickly be turned into working guns.

* If a kit has all the parts to build a gun and it’s easy to make, it counts as a weapon under the law.
* Even if the parts aren’t finished, if they just need a little work to become a gun, they should still be regulated.
* The law’s requirement for serial numbers on unfinished frames and receivers supports this.
* Past practice and even the challengers agree that some unfinished parts count as guns.
* Not every kit or part will be regulated—only those that can quickly become guns.
* The ruling said the ATF rules fit within the law.

Justices Sotomayor, Kavanaugh, and Jackson agreed with the main ruling and wrote their own opinions, while Justices Thomas and Alito disagreed.

**Impact**

Law enforcement groups and public safety advocates support the rule, saying it’s a commonsense step that helps keep communities safer by making it harder for criminals to get untraceable weapons, aids in solving crimes, and closes some loopholes allowing people to get guns without background checks.

**Delligatti v. United States, 604 US \_\_\_\_\_ (2025)**

**Docket No. 23-825, Lower Court: Second Circuit**

**Facts of the Case**Salvatore Delligatti was connected to the Genovese Crime Family. He was convicted of trying to murder someone as part of a gang activity and for having a gun while committing a violent crime. Delligatti set up a plan to kill Joseph Bonelli, who was causing trouble in the neighborhood and suspected of helping the police. Delligatti gave a gun and a car to others to carry out the plan. The murder attempts failed because there were too many witnesses around, and police arrested the people Delligatti sent.  
On appeal, Delligatti argued that his gun conviction should be thrown out because trying to commit murder isn’t always considered a "crime of violence" under the law. However, the appeals court said that attempted murder in this context does count as a crime of violence since it involves trying to use physical force. The court upheld Delligatti’s gun conviction.

**Question**If a crime causes injury or death (even if by not doing something), does that count as using or trying to use physical force under the law?

**Conclusion**The Supreme Court decided that causing injury or death—whether by doing something or by purposely not doing something—still counts as using physical force under the law.

* A key example: If someone lets something bad happen (like not feeding a child, leading to death), they are still “using” force.
* The Court said it doesn’t matter if the harm happens by action or by inaction; both ways count as using force for the purpose of the law.
* Therefore, “crimes of violence” include both direct actions and cases where harm is caused by doing nothing on purpose.

Justices Gorsuch and Jackson disagreed with this conclusion**.**

**Impact**

Law enforcement now has a wider scope to investigate, charge, and convict people for violent federal crimes, even when those crimes are committed by failing to act instead of taking direct action.

**Martin v. United States, 605 US\_\_\_(2025)**

**Docket No. 24-362, Lower Court: Eleventh Circuit**

**Facts of the Case**In October 2017, FBI agents accidentally raided the wrong house in Atlanta, Georgia. They were looking for a gang member but entered Curtrina Martin’s home by mistake because the houses looked similar and it was hard to find the right address. The SWAT team, wearing full gear, scared the family. When agents realized the error, they left, apologized, and said the FBI would fix any damage.  
Martin’s family sued the government and the FBI agents, saying their rights were violated and they wanted money for damages. The lower courts ruled against the family, saying the agents were protected from being sued, and the law didn’t allow the government to be held responsible in this case.

**Questions**

1. Does the law stop people from suing the U.S. government for mistakes made by federal employees if those mistakes happened while doing their jobs?
2. Can the government always avoid lawsuits about officers’ actions by using a rule that protects them for certain decisions (the “discretionary-function exception”), even in cases where the officers did something wrong on purpose?

**Conclusion**

* The Supreme Court said people can sue the U.S. government under the Federal Tort Claims Act (FTCA) when federal agents make mistakes on the job, unless a specific legal exception applies.
* The special law allowing lawsuits for certain intentional actions by law enforcement (like assault or wrongful entry) only overrides one specific exception—it doesn’t cancel out other exceptions, like the one protecting “discretionary” decisions made by employees.
* The Supremacy Clause, which says federal law is the highest law, doesn’t stop these lawsuits because the FTCA already says the government can be sued under state law, just like a private person. There was no conflict between federal and state law for the Supremacy Clause to solve.
* One Justice added that the lower court used the wrong test when deciding which government actions count as discretionary, and that the rule might not protect careless actions like those in this mistaken raid.

**Impact**

The case mainly deals with federal law and federal agents. It does not directly change rules for Texas state or local police, who are covered by the Texas Tort Claims Act and other state laws. But it could serve as a guide for how Texas courts handle similar situations involving immunity and lawsuits for police mistakes or misconduct.

**Williams v. Reed, 604 US \_ (2025)**

**Docket No. 23-191, Lower Court: Supreme Court of Alabama**

**Facts of the Case**

Twenty-six people were unhappy with how the Alabama Department of Labor handled their unemployment benefit applications. They sued the head of the department, saying his policies broke federal law and the U.S. Constitution by causing long delays and poor communication. They asked the court to order quicker processing and clearer communication, plus attorney fees.

The department tried to get the case dismissed, arguing the court didn’t have the power to decide it, and that the claims didn’t have legal merit. The court dismissed the case but didn’t explain why. The workers asked the court to change its decision, but the court refused, so they appealed. The Alabama Supreme Court said the case had to be dismissed because the workers hadn’t finished all the steps in the department’s own appeal process before suing.

**Question**

Do people have to finish all state administrative steps (like department appeals) before they can bring a federal lawsuit in state court under Section 1983?

**Conclusion**

The Supreme Court said no:

* Alabama cannot force people to complete every step of the state process before they are allowed to file a federal civil rights lawsuit (a §1983 suit) about delays in unemployment benefits.
* If a state’s rules make it nearly impossible to sue state officials under federal law for these delays, those rules are not allowed.
* Federal law lets people go directly to court if their constitutional rights are violated, even if they haven’t finished the state’s own by-the-book complaint process.
* The Supreme Court reversed Alabama’s decision and said people can move forward with their lawsuit.

Justice Clarence Thomas wrote a dissenting opinion disagreeing with the majority.

**Impact**

The Supreme Court’s decision means that people who claim their constitutional rights have been violated by law enforcement—or any state officials—do not have to finish all state agency appeals before suing under federal civil rights law (Section 1983). This has a few effects on law enforcement:

* **Faster Lawsuits:** People can file federal civil rights lawsuits against police, jails, or other officials in state court without first completing the entire local investigation or complaint process. This can speed up how quickly law enforcement agencies—or their leaders—face court challenges for alleged rights violations.
* **More Accountability:** Law enforcement officers and agencies can be brought to court more easily when accused of violating rights, since victims no longer need to wait for slow or stalled administrative processes to finish before seeking court remedies. Courts are open right away to review their actions.
* **Fewer “Catch-22” Dismissals:** Agencies can’t use state rules to block lawsuits simply by saying a person hasn’t finished an internal review—especially when those reviews are delayed or unlikely to produce results. This means law enforcement loss of immunity from immediate court review in some civil rights cases.
* **No Change to Criminal Proceedings:** The decision only applies to civil (lawsuits for money or orders to change practices), not to criminal law or criminal cases against officers.

Overall, law enforcement may see more Section 1983 lawsuits reach court without the delays of state-run administrative appeals, making it harder for agencies or officials to avoid being sued for alleged civil rights violations.

**New Federal Legislation**

**LEOSA Reform Act of 2025**

The LEOSA Reform Act of 2025 makes several major updates to the Law Enforcement Officers Safety Act (LEOSA):

* **Expanded Carry Rights:** Qualified active and retired law enforcement officers can now carry concealed firearms and ammunition (including magazines) in more places—including school zones, national parks, on public and private property open to the public, and in certain federal buildings that are open to the public (such as post offices and Social Security offices).
* **Magazine Capacity:** The law exempts qualified officers from state and local restrictions on magazine capacity, allowing them to carry standard magazines regardless of stricter state laws.
* **Certification Timeline:** States may now let retired officers requalify as seldom as every 36 months (instead of every 12 months), making it easier and less costly to maintain their qualification.
* **Who Can Qualify Retirees:** The Reform Act clarifies who can administer firearms qualification for retired officers, simplifying and broadening these options.
* **Removes Regulatory Barriers:** The Act addresses confusion and legal gray areas, making it clear that trained officers can carry under LEOSA anywhere civilians with a state-issued permit can—even in places previously prohibited or unclear under old law.

The overall effect is to give active and retired law enforcement greater nationwide consistency and protection in their concealed carry rights, especially while traveling or visiting places with strict gun laws.