IN THE SUPREME COURT OF OHIO

IN RE: L.G.

Case No. 2017-0877

On Appeal From The Montgomery County Court Of Appeals, Second Appellate District

Court of Appeals Case No. 27296

REPLY BRIEF OF THE STATE OF OHIO, APPELLANT

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A. Clarifications.

As an initial matter, Appellee makes several assertions in his brief that necessitate some clarification, particularly with regard to what appears in the record of the suppression hearing.

a. Mr. Bullens is not a Peace Officer.

In the *Merit Brief of L.G., Appellee* ("*Brief of Appellee*"), considerable focus is given to the suggestion that Mr. Bullens is a peace officer. *Brief of Appellee*, p.5, 7, 8. While this term was loosely used in testimony, statutorily it is clear that Bullens is not a peace officer. R.C. 2935.01(B) defines "peace officer," and while it includes a wide range of actors, Mr. Bullens' position as Executive Director of Safety and Security for Dayton Public Schools does not fall under this definition.[1] Additionally, there is no evidence in the record that Mr. Bullens carries a badge of any type, is armed, or has the power to arrest. Upon questioning by counsel for L.G., Bullens testified that he has no ongoing training requirements for his position because he is "non-sworn," and that his employment is as an administrator. (Tr. 26) Counsel for L.G. specifically asked if Bullens maintained his status as a peace officer, and Bullens' answer was unequivocal:

> Q: Okay. And so you maintain your status as a - - you, yourself, maintain your status as a police officer or a peace officer, correct, in the State of Ohio; is that - -
> A: No.
> Q: No you don't?
> A: No.
> Q: So your additional training is in - - is that peace officer training?
> A: No, my additional training is administrative.

(Tr. 26-27)

[1] A copy of R.C. 2935.01 is included in the Appendix.

Nor did either of the lower courts find that Bullens was a peace officer himself, but rather, found that his cooperation and interaction with law enforcement rendered him their agent. *See Decision and Judgment Concerning the Objections to the Decision of the Magistrate* (*"Decision"*), p.5; *In re L.G.*, 2d Dist. Montgomery No. 27296, 2017-Ohio-2781, 82 N.E.3d 52 (*"Opinion"*), ¶ 23. The question before this Court, therefore, is not whether Bullens is a peace officer, but whether he was directed or controlled by law enforcement to the extent that he was acting on their behalf, so that the requirements of *Miranda v. Arizona*, 384 U.S. 436, 86 S.Ct. 1602, 16 L.Ed.2d 694 (1966), must apply. *See State v. Bolan*, 27 Ohio St.2d 15, 18, 271 N.E.2d 839 (1971). The State submits that he was not.

b. There is no evidence that school policy required Bullens to turn over all information to police.

Appellee makes several assertions throughout his brief that are not borne out by the record. Appellee states that Mr. Bullens was required *by school policy* to turn over any information he obtained to the police. "Bullens was explicitly required by school policy to report any and all information he gathered to the Dayton Police (Tr. 28)." *Brief of Appellee*, p.3. This does not appear on page 28 of the transcript. Instead, what Bullens does say is that he is directed by policy "to work closely with the police department" whenever a crime is committed on school grounds, and that they "have a good relationship." (Tr. 28) This is not the same as a school policy requiring Bullens "to report any and all information he gathered to the Dayton Police." *Brief of Appellee*, p.3. However, even if such an explicit policy directive existed, this Court recently held in *State v. Jackson*, Slip Opinion No. 2018-Ohio-2169, that a "statutory duty to cooperate and share information with law enforcement * * * does not render the [interviewer] an agent of law enforcement for purposes of the Fifth and Sixth Amendments to the United States

Constitution * * * unless other evidence demonstrates that the [interviewer] acted at the direction or under the control of law enforcement." *Id.* at ¶ 22.

c. Alternative school and subjective characteristics of L.G.

The *Brief of Appellee* places significant emphasis on the fact that L.G. was a student at Longfellow, an alternative school. *See Brief of Appellee*, p.1, 4, 11, 12. The *Merit Brief of* Amicus Curiae *Ohio Association of Criminal Defense Lawyers in Support of Appellee L.G.* (*Ohio Association of Criminal Defense Lawyers Amicus Brief*), relies even more heavily on this fact, going so far as to place it in the their proposition of law. *Id.* at p.1.

There are, however, several problems with Appellee's and the Amici's reliance on this factor. First, it appears nowhere in the record that Longfellow is a "school for children with academic or psychological difficulties," as Amici alleges in its brief. Counsel for L.G. asked Mr. Bullens if he was aware "that the vast majority of students at Longfellow Academy have disabilities of one sort or another," and Bullens replied that "I don't know that that would be a fair statement." (Tr. 41)

Counsel for L.G. also called L.G.'s mother to the stand, who testified that L.G. suffered from post-traumatic stress disorder. (Tr. 57) Appellee uses this factor to argue that L.G. was in custody at the time of his questioning by Mr. Bullens. However, whether or not a person is in custody is an objective question. "As we have repeatedly emphasized, whether a suspect is 'in custody' is an objective inquiry. * * * The test, in other words, involves no consideration of the 'actual mindset' of the particular suspect subjected to police questioning." *J.D.B. v. North Carolina*, 564 U.S. 261, 270-71, 131 S.Ct. 2394, 180 L.Ed.2d 310 (2011).

The totality of the circumstances, including L.G.'s age, are relevant in determining if a "reasonable person" in his position would feel free to terminate the interview. However, any

other unique characteristics of L.G.'s - including any academic or psychological issues he may have had - would not be relevant to this inquiry, especially given that Mr. Bullens was not aware of them at the time of the interview. (Tr. 40)

d. Bullens testified he told L.G. he was not required to answer his questions.

In his brief, Appellee asserts that although Bullens "first testified that he told L.G. he did not have to answer his questions, Mr. Bullens later testified after reviewing his own report, that 'no, I did not' inform L.G. that he could refuse to answer questions. (T. 38; 54)." *Brief of Appellee*, p.4. This is not accurate. Mr. Bullens testified on cross-examination:

> Q: And when [L.G.] was brought in, were you - - did you tell him he could answer your questions or not answer your questions?
> A: Yes.
> Q: You did make that statement to him?
> A: Yeah, absolutely.
> Q: You told him that he didn't have to answer any of your questions?
> A: Yes, sir.
> Q: Now, that is not in your report anywhere, is it, Mr. Bullens?
> A: I would have to review - -
> Q: Do you have the report in front of you?
> A: I may have a copy. No, just generically that Mr. Ivy had brought [L.G.] to the cafeteria where I introduced myself. In our conversation, [L.G.] confessed to making the bomb threat with someone else's cell phone. So no, I did not.

(Tr. 37-38)

Appellee asserts that the record reads that Bullens testified " 'no, I did not' inform L.G. that he could refuse to answer questions." *Brief of Appellee*, p.4. This is not what the transcript states, and is not a fair recitation of Bullens' testimony. The State submits that the more accurate reading of this testimony is that Bullens' statement "no, I did not," refers to him not including in his report that he told L.G. he was not required to answer his questions. Bullens is describing the contents of his report ("no, just generically...") when he makes that statement. Also persuasive is that just prior to that Bullens stated three separate times, unequivocally, that he *did* tell L.G. he

did not have to answer his questions. The State therefore asserts that Mr. Bullens testified he did tell L.G. he was not required to answer his questions.[2]

B. Distinguishing *J.D.B. v. North Carolina.*

Appellee and the Amici also cite *J.D.B.*, 564 U.S. 261, repeatedly for the perils of interviewing students at school. *Brief of Appellee*, p.11; *Brief of Amici Curiae, Juvenile Law Center, Office of the Ohio Publix Defender, Children's Law Center, Inc., Educational Law Center-PA, Juvenile Justice Coalition, National Juvenile Defender Center, and Schubert Center for Children's Studies, In Support of Appellant, L.G. ("Brief of Amici Curiae")*, p.7, 8, 9, 16, 18. The Amici write that "the Court has made clear that the school setting may heighten the coercion, noting that the 'effect of the schoolhouse setting cannot be disentangled from the identity of the person questioned.' " *Amici*, p.7, citing *J.D.B.*, supra. However, the Court's primary concern in *J.D.B.* was not interviews at schools, but was the importance of considering the suspect's age in the custody analysis:

> Reviewing the question *de novo* today, we hold that so long as the child's age was known to the officer at the time of police questioning, or would have been objectively apparent to a reasonable officer, its inclusion in the custody analysis is consistent with the objective nature of that test. This is not to say that a child's age will be a determinative, or even a significant, factor in every case. It is, however, a reality that courts cannot simply ignore.

(Internal citations omitted.) *J.D.B.*, 564 U.S. at 277.

The State is not suggesting that L.G.'s age is not a factor to be considered in the custody analysis. Only that, in this case, it is not dispositive.

Numerous appellate courts have held that schools are inherently less coercive settings for interviews than police stations. *See State v. Spahr*, 2d Dist. Miami No. 2008 CA 21, 2009-Ohio-

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[2] L.G., of course, disputes this in his testimony. (Tr. 54) The juvenile court did not make a factual determination as to whose testimony was more credible on this issue; it merely repeated what both parties had testified to. (*Decision*, p.3)

4609, ¶ 15 ("Although Spahr would have us believe that this was a coercive atmosphere, courts have previously rejected the argument that a school is necessarily a coercive setting for a juvenile to be questioned by police."); *In Matter of Johnson*, 5th Dist. Morgan No. CA-95-13, 1996 WL 363811, *1 (June 20, 1996) ("Further, the circumstances demonstrate that the setting was not custodial in nature. Appellant was questioned in the school library, a setting that is not intimidating."). Even questioning by law enforcement at school is not inherently custodial. *See In re Haubeil*, 4th Dist. Ross No. 01CA2631, 2002-Ohio-4095, ¶ 16 ("Ohio courts generally have found that the act of law enforcement officers questioning minors while they are at school does not amount to custodial interrogation where there is no evidence that the student was under arrest or told he was not free to leave."). *See* also *In re McDonald*, 11th Dist. Lake No. 2006-L-027, 2007-Ohio-782, ¶ 22, fn.1; *In re Bucy*, 9th Dist. No. 96CA0019 Ohio App. LEXIS 4842, at *4-*5 (Nov. 6, 1996).

The State however, does agree with the Amici that *J.D.B.* is instructive in analyzing the interview in the instant case. *Brief of Amici*, p.18. The situation in *J.D.B.* differs in several significant ways from the instant case. Most notably, J.D.B. was interviewed by police, not by a school administrator as L.G. was. *J.D.B.*, 564 U.S. at 265. J.D.B. was removed from his classroom by a uniformed police officer, not a school employee. *Id.* Additionally, J.D.B.'s interview lasted for "30 to 45 minutes." *J.D.B.*, 564 U.S. at 266. L.G.'s lasted for ten to twenty minutes at most. (Tr. 15, 22) J.D.B.'s interview also was more intense: the juvenile initially denied any wrongdoing, but after being pressured to "do the right thing," warned that "the truth always comes out," and threatened by police with being placed in juvenile detention prior to going to court, made admissions. *Id.* at 267. By contrast, L.G.'s interview was not intense. Mr. Bullens testified:

> I identified myself and provided him with the information that was provided to me by the two individuals that had come forward. And at which time he admitted that he had called it in, okay, but he didn't have a cell phone on him . . . [W]e were trying to establish, you know, once he admitted that he did it why he did it. And try to get the others involved in it. And he refused to provide the names of anybody else that was involved in it.

(Tr. 20-21).

In his dissenting opinion below, Judge Hall noted the lack of coercive elements in L.G.'s interview:

> However, L.G.'s own testimony failed to indicate any arrest, threats of arrest, constraint, compulsion, or coercion. Other than the fact that L.G. was a school student, who would not have been permitted to leave the premises because he was in school (not because he was in police custody), there is simply no support in the record to conclude that the child was in 'custody.'

Opinion, ¶ 29 (Hall, J., dissenting).

L.G. was not in custody at the time of his interview with Mr. Bullens and, therefore, was not subject to the custodial interrogation that requires *Miranda* warnings.

C. Private citizens become state actors only when they are directed or controlled by law enforcement.

In their amicus brief, the Ohio Association for Criminal Lawyers states: "If Bullens' involvement with the police and his pursuit of their objectives in compliance with their cooperation and direction, does not make him a state actor, it is difficult to imagine what would." *Ohio Association of Criminal Defense Lawyers Amicus Brief*, p.5. This is a question easily answered, and one which has already been answered by this Court and lower courts. If a police officer had told Mr. Bullens to question L.G., if a police officer had told Mr. Bullens what questions to ask L.G., or if a police officer had given Mr. Bullens any advice on how best to question L.G., then Director Bullens would be rendered a state actor. However, that did not occur here.

"[T]he duty of giving '*Miranda* warnings' is limited to employees of governmental agencies whose function is to enforce law, or to those acting for such law enforcement agencies by direction of the agencies; that it does not include private *citizens not directed or controlled by a law enforcement agency, even though their efforts might aid in law enforcement.*" (Emphasis added.) *Bolan*, 27 Ohio St.2d at 18, 271 N.E.2d 839. "Although defendant was in custody, the statement in question was not the result of 'questioning initiated by law enforcement officers.' " *State v. Watson*, 28 Ohio St.2d 15, 26–27, 275 N.E.2d 153 (1971).

Most recently, this Court emphasized that:

> [A] social worker's statutory duty to cooperate and share information with law enforcement with respect to a child abuse investigation does not render the social worker an agent of law enforcement for purposes of the Fifth and Sixth Amendments to the United States Constitution when the social worker interviews an alleged perpetrator *unless other evidence demonstrates that the social worker acted at the direction or under the control of law enforcement. * * * There is no evidence that law enforcement asked Mack to interview Jackson before or after the detective's failed attempt to interview him or that law enforcement influenced Mack's interview of Jackson in any way.*

(Emphasis added.) *State v. Jackson*, Slip Opinion No. 2018-Ohio-2169, ¶¶ 22-23.

Director Bullens need not have been "a private citizen who stumbled upon a crime scene and decided to get involved," *Brief of Appellee*, p.8, for *Miranda* not to apply. This Court made it clear in *Bolan*, 27 Ohio St.2d 15, that individuals whose goals and job functions are parallel to police are not transformed into law enforcement simply by the nature of their jobs. *See Id.* at 18-19 (A store security officer detaining a shoplifting suspect was not an agent of law enforcement). *See also State v. Chung*, 2d Dist. Montgomery No. 17154, 1999 WL 76945, *3 (Feb. 19, 1999) ("In such circumstances it makes no difference that the private employer's objectives in keeping the business operation free of criminal activity coincides with the government interest in law enforcement.").

This Court and Ohio appellate courts have made clear that the critical question is whether the private citizen's interview was controlled or directed by law enforcement. That is, whether law enforcement arranged the interview, instructed the citizen to conduct the interview, instructed them on what questions to ask or information to seek, gave advice on how best to obtain that information, or participated in the interview.

For example, the Eleventh District Court of Appeals rejected the argument that the interviewer, the school principal, was an agent of law enforcement because, among other reasons, "[t]he police did not ask [the principal] to question appellant or to take any statements from him. * * * The fact that [the principal] decided on his own to take statements from appellant does not make him an agent of the police." *In re G.J.D.*, 11th Dist. Geauga No. 2009-G-2913, 2010-Ohio-2677, ¶ 26.

In *In re Harris*, 5th Dist. Tuscarawas No. 1999AP030013, 2000 WL 748087 (June 7, 2000), although the Fifth District Court of Appeals found that the appellant's statements elicited in response to police questioning must be suppressed, the Court found that statements made in response to questioning by appellant's mother would not be suppressed, since she was not law enforcement or its agent. *Id.* at *16. The Court held that if police had asked the mother to help them question the appellant, she would have been an agent of law enforcement and the Court "would have reached a different conclusion." *Id.*[3]

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[3] In response to Appellee's apparent confusion at the State's citation of *Harris* (*see Brief of Appellee*, p.9, 10), the State would reiterate that it is clearly citing this case for the issue of who qualifies as a state actor – not whether the police in *Harris* acted appropriately in their questioning. As to the issue of who is a state actor, *Harris* is instructive; Harris's mother was not a state actor because police did not ask her to help them interview her son. In the instant case, police did not ask Bullens to interview L.G.

As to the clearly inappropriate questioning *by the police* in *Harris*, on that point *Harris* is factually distinguishable from the instant case. No police officer questioned L.G., while police questioned Harris extensively; L.G.'s interview occurred at school while Harris' occurred at a

Contrary to Appellee and the Amici's assertion, it is not true that "[t]here were no actions taken by Director Bullens that were not taken with the permission of, or as required by, or under the direct supervision of, law enforcement." *Brief of Appellee*, p.5. In fact, all of the decisions concerning L.G. and his interview were made by Bullens alone.

In this case police did not arrange the interview, Mr. Bullens did. He interviewed the two students who gave information, and determined that L.G. was a suspect. (Tr. 20) Bullens instructed one of his employees to bring L.G. to him in the cafeteria. (Tr. 20) Police did not instruct Mr. Bullens to interview L.G., Bullens did that on his own. (Tr. 2) Police did not tell Bullens what questions to ask L.G., or what information to seek. (Tr. 8, 22-23) In fact, after L.G. was identified as a suspect, there was no conversation between the police and Bullens until after the interview was concluded. (Tr. 22-23) The police did not participate in Bullens' interview of L.G.; instead, they remained silent throughout. (Tr. 7-8, 23, 44-45, 50-51). Mr. Bullens was not directed or controlled by law enforcement when he questioned L.G., and was therefore not their agent. *Bolan*, 27 Ohio St.2d at 18, 271 N.E.2d 839. The requirements of *Miranda* do not apply.

CONCLUSION

The lower courts erred in expanding the requirements of *Miranda* to an interview by a private citizen who was not operating under the direction and control of law enforcement, and further erred in finding that L.G. was in custody at the time of his interview. The State respectfully requests that this Court reverse the decision of the Second District Court of Appeals, and remand the case to the juvenile court.

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police station; and L.G.'s interview appears to have been short and not intense, as opposed to the intense, hour-long interview described in *Harris. In re Harris*, 5th Dist. Tuscarawas No. 1999AP030013, 2000 WL 748087, *4.

Respectfully submitted,

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I hereby certify that a copy of this Reply Brief of Appellant was sent by regular U.S. mail this 2nd day of July, 2018 to the following:

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Baldwin's Ohio Revised Code Annotated
Title XXIX. Crimes--Procedure (Refs & Annos)
Chapter 2935. Arrest, Citation, and Disposition Alternatives (Refs & Annos)
Definitions

R.C. § 2935.01

2935.01 Definitions

Effective: September 14, 2016
Currentness

As used in this chapter:

(A) "Magistrate" has the same meaning as in section 2931.01 of the Revised Code.

(B) "Peace officer" includes, except as provided in section 2935.081 of the Revised Code, a sheriff; deputy sheriff; marshal; deputy marshal; member of the organized police department of any municipal corporation, including a member of the organized police department of a municipal corporation in an adjoining state serving in Ohio under a contract pursuant to section 737.04 of the Revised Code; member of a police force employed by a metropolitan housing authority under division (D) of section 3735.31 of the Revised Code; member of a police force employed by a regional transit authority under division (Y) of section 306.05 of the Revised Code; state university law enforcement officer appointed under section 3345.04 of the Revised Code; enforcement agent of the department of public safety designated under section 5502.14 of the Revised Code; employee of the department of taxation to whom investigation powers have been delegated under section 5743.45 of the Revised Code; employee of the department of natural resources who is a natural resources law enforcement staff officer designated pursuant to section 1501.013 of the Revised Code, a forest-fire investigator appointed pursuant to section 1503.09 of the Revised Code, a natural resources officer appointed pursuant to section 1501.24 of the Revised Code, or a wildlife officer designated pursuant to section 1531.13 of the Revised Code; individual designated to perform law enforcement duties under section 511.232, 1545.13, or 6101.75 of the Revised Code; veterans' home police officer appointed under section 5907.02 of the Revised Code; special police officer employed by a port authority under section 4582.04 or 4582.28 of the Revised Code; police constable of any township; police officer of a township or joint police district; a special police officer employed by a municipal corporation at a municipal airport, or other municipal air navigation facility, that has scheduled operations, as defined in section 119.3 of Title 14 of the Code of Federal Regulations, 14 C.F.R. 119.3, as amended, and that is required to be under a security program and is governed by aviation security rules of the transportation security administration of the United States department of transportation as provided in Parts 1542. and 1544. of Title 49 of the Code of Federal Regulations, as amended; the house of representatives sergeant at arms if the house of representatives sergeant at arms has arrest authority pursuant to division (E)(1) of section 101.311 of the Revised Code; an assistant house of representatives sergeant at arms; the senate sergeant at arms; an assistant senate sergeant at arms; officer or employee of the bureau of criminal identification and investigation established pursuant to section 109.51 of the Revised Code who has been awarded a certificate by the executive director of the Ohio peace officer training commission attesting to the officer's or employee's satisfactory completion of an approved state, county, municipal, or department of natural resources peace officer basic training program and who is providing assistance upon request to a law enforcement officer or emergency assistance to a peace officer pursuant to section 109.54 or 109.541 of the Revised Code; a state fire marshal law enforcement officer described in division (A)(23) of section 109.71 of the Revised Code; and, for the purpose of arrests within those areas, for the purposes of Chapter 5503. of the Revised Code, and the filing of and service of process relating to those offenses witnessed or investigated by them, the superintendent and troopers of the state highway patrol.

(C) "Prosecutor" includes the county prosecuting attorney and any assistant prosecutor designated to assist the county prosecuting attorney, and, in the case of courts inferior to courts of common pleas, includes the village solicitor, city director of law, or similar chief legal officer of a municipal corporation, any such officer's assistants, or any attorney designated by the prosecuting attorney of the county to appear for the prosecution of a given case.

(D) "Offense," except where the context specifically indicates otherwise, includes felonies, misdemeanors, and violations of ordinances of municipal corporations and other public bodies authorized by law to adopt penal regulations.

CREDIT(S)

(2016 S 293, eff. 9-14-16; 2012 H 487, eff. 9-10-12; 2011 H 153, eff. 9-29-11; 2008 H 562, eff. 9-23-08; 2002 H 675, eff. 3-14-03; 2002 H 545, eff. 3-19-03; 2002 H 427, eff. 8-29-02; 2002 S 200, eff. 9-6-02; 2000 S 317, eff. 3-22-01; 2000 S 137, eff. 5-17-00; 1999 H 163, eff. 6-30-99; 1998 S 187, eff. 3-18-99; 1996 H 72, eff. 3-18-97; 1995 S 162, eff. 10-29-95; 1995 S 2, eff. 7-1-96; 1991 S 144, eff. 8-8-91; 1991 H 77; 1988 H 708, § 1)

Notes of Decisions (30)

R.C. § 2935.01, OH ST § 2935.01
Current through File 66 of the 132nd General Assembly (2017-2018), 2017 State Issue 1, and 2018 State Issue 1.

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