No. 83-712

IN THE
Supreme Court of the United States
October Term, 1983

State of New Jersey,
Petitioners,

v.

T.L.O., a Juvenile,
Respondent.

ON WRIT OF CERTIORARI TO THE
SUPREME COURT OF NEW JERSEY

MOTION FOR LEAVE TO FILE A BRIEF AS *AMICUS CURIAE*

IN SUPPORT OF REVERSAL

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MOTION TO APPEAR AS *AMICUS CURIAE*
IN SUPPORT OF PETITIONER

The New Jersey School Boards Association (NJSBA) moves this Court for leave to appear as *amicus curiae* herein, for the purpose of filing the attached supplementary brief in support of the Petitioner. Counsel for the parties have not consented.

Amicus curiae, NJSBA, is a statutory, nonprofit organization, comprised of approximately 600 Boards of Education in

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the State of New Jersey. N.J.S.A. 18A:6-45. The bylaws of the NJSBA cite as major objectives to encourage and aid all movements for the improvement of educational affairs of the state and the betterment and welfare of the children. The issues before this Court impact dramatically on individual boards of education and their employees and students. Resolution of the issues before this Court will dictate the actions which any board of education and its agents may take in efforts to maintain discipline and safety within the schools of their district.

By order of this Court on January 23, 1984, the NJSBA was permitted leave to file a brief as amicus curiae concerning the applicability of the exclusionary rule to searches conducted by school officials. The NJSBA maintains it is imperative that it be granted leave to participate and file a brief addressing the question of whether the assistant principal's actions violated

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the Fourth Amendment in opening respondent's purse given the facts and circumstances of this case.

The applicability of a reasonable suspicion standard governing searches by school officials to which they must conform in maintaining safety and discipline in the schools is the issue this Court has elected to address. The NJSBA has adopted the following policy with respect to this issue:

> The New Jersey School Boards Association recognizes that public school students have the constitutional right to be free from unreasonable searches and seizures by any person acting in an official capacity on behalf of a local school district. It is believed to be best for all parties concerned if the search of a student by a school official were permissible, only where the official had a reasonable suspicion that a school rule or a state law was being violated. (emphasis supplied)

With this policy position as a base, amicus will urge the Court that given the facts and circumstances of this case the search of respondent's purse by the assistant

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principle was reasonable.

Respectfully submitted,

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ON WRIT OF CERTIORARI TO THE
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AMICUS CURIAE BRIEF OF THE NEW
JERSEY SCHOOL BOARDS ASSOCIATION
IN SUPPORT OF PETITIONER

INTEREST OF THE *AMICUS*

The NJSBA is a statutory organization whose membership consists of 612 local boards of education in New Jersey. The NJSBA is empowered to "investigate such subjects relating to education in its various branches as it may think proper" and to "aid all movements for the improvement of the educational affairs of

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this state." N.J.S.A. 18A:6-45 et seq.; 18A:6-47; See AFL-CIO v. State Federation of District Boards of Education, 93 N.J. Super. 51 (Ch. Div. 1966).

The presence of drugs and the relationship of drugs to crime in the schools presents a serious challenge to boards of education and their agents to maintain discipline and safety within the schools. Resolution of whether the Fourth Amendment was violated in this case will have far reaching affects upon the future actions of school administrators, and will in all likelihood dictate the actions school administrators will take in promoting safety and maintaining discipline.

Amicus is concerned that a finding by this Court that the assistant principal in this matter conducted an unreasonable search, and consequently violated the Fourth Amendment, will unduly restrict a school administrator's authority to enforce valid school regulations.

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ISSUE PRESENTED FOR REVIEW

Whether the assistant principal violated the Fourth Amendment in opening respondent's purse in the facts and circumstances of this case?

ARGUMENT

THE SEARCH OF RESPONDENT'S PURSE WAS REASONABLE AND WAS NOT VIOLATIVE OF THE FOURTH AMENDMENT AS THE ASSISTANT PRINCIPAL HAD A REASONABLE SUSPICION THAT A SCHOOL REGULATION HAD BEEN VIOLATED.

The issue before this Court is a novel one, whether the assistant principal abridged respondent's right to be free from unreasonable searches as guaranteed by the Fourth Amendment to the United States Constitution.

The issue may be framed as follows: To what standard of reasonableness must a school official be held when searching a student? Three questions must be addressed to resolve this issue: (1) Does freedom from unreasonable searches apply to students in a school setting; (2) Is

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the action of a school official state action for the purposes of the Fourth Amendment; and (3) What standard should be applied to assess the reasonableness of a school search.

The United States Supreme Court has extended to children the rights and protections of the United States Constitution. In Re Gault, 387 U.S. 1, (procedural due process); In Re Winship, 397 U.S. 358 (1970) (requiring proof beyond a reasonable doubt). Although these rights have been held to be not necessarily coextensive with those enjoyed by adults, (see Ginsberg v. New York, 390 U.S. 629 (1968)) it is well established that juveniles do not shed those constitutional rights when they enter the confines of the local school house. Tinker v. Des Moines School District, 343 U.S. 503 (1969). Although Tinker dealt specifically with students' First Amendment guarantee of free speech, the Court addressed constitutional

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rights generally and did not limit its reasoning to the facts in that case. As a result, Tinker has been held by a number of jurisdictions to extend Fourth Amendment as well as First Amendment rights to students. Bilbrey v. Brown, 481 F. Supp. 26 (D.C.Ore., 1979); In re W., 29 Cal. App. 3d 777, 105 Cal. Rptr. 775 (D.Ct.App. 1973); In re C., 26 Cal. App. 3d 320, 102 Cal. Rptr. 682 (D.Ct.App. 1972); State v. Baccino, 282 A. 2d 869; (Del. Super, 1971); State v. F.W.E., 360 So. 2d 148 (Fla.D.Ct.App. 1978); People v. Ward, 62 Mich. App. 46, 233 N.W. 2d 180 (App. Ct. 1975); State in the Interest of G.C., 121 N.J. Super. 108 (J.D.R. 1972); State in Interest of T.L.O., 178 N.J. Super. 329, 428 A. 2d 1327 (J.D.R. 1980); Doe v. State, 88 N.M. 347, 540 P. 2d 827 (Sup.Ct. 1975); People v. Singletary, 37 N.Y. 2d 310, 372 N.Y.S. 2d 68, 333 N.E. 2d 369 (Ct.App. 1975); People v. D., 34 N.Y. 2d 483, 358 N.Y.S. 2d 403, 315 N.E. 2d 466 (Ct. App.

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1974); People v. Jackson, 65 Misc. 2d 909, 319 N.Y.S. 2d 731 (App. Div. 1971); State v. McKinnon, 88 Wash. 2d 75, 558 P. 2d 781 (Sup. Ct. 1977); In re L.L., 90 Wis. 2d 585, 280 N.W. 2d 343 (Sup. Ct. 1979).

The Fourth Amendment to the United States Constitution protects "the right of the people to be secure in their persons, houses and effects against unreasonable searches and seizures." U.S.C.A. Const. Amend. 4. This right to be free from unreasonable searches extends to the States through the due process clause of the Fourteenth Amendment. Mapp v. Ohio, 367 U.S. 643, 81 (1961). It is well established that the Fourth Amendment does not apply to searches conducted by private individuals. Burdeau v. McDowell, 256 U.S. 465 (1921).

The status of school officials as either government agents or private citizens has been debated in the courts. New Jersey, however, has been firm in its

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assessment that school officials are government agents for purposes of the Constitution. Durgin v. Brown, 37 N.J. 189 (1962); Kaveny v. Board of Commissioners, Montclair, 69 N.J. Super. 94 (Law Division, 1961), aff'd 71 N.J. Super. 244 (App. Div. 1962); State in the Interest of G.C., supra. This assessment follows those reached in other jurisdictions on both the state and federal levels. West Virginia State Board of Education v. Barnette, 319 U.S. 624 (1943); Tinker v. Des Moines School District, supra; Burnside v. Byars, 363 F. 2d 744 (5 Cir. 1966); Ferrell v. Dallas Independent School District, 392 F. 2d 697 (5 Cir. 1968); State v. Baccino, supra; People v. Jackson, supra.

The New Jersey Legislature too, has recognized that school officials are government agents for purposes of meeting the legislature's obligation to provide a thorough and efficient education to all school age children. N.J. Const., 1947,

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Art. 8, Sec. 4, par. 1. Consequently boards of education have been given broad mandatory powers and duties necessary to meet the state's thorough and efficient education obligation, N.J.S.A. 18A:11-1 *et seq.*; while school administrators have been charged thereunder to maintain discipline, safety and order: authority to prevent disorderly conduct by pupils, N.J.S.A. 18A:25-2; students are required to submit to such authority, N.J.S.A. 18A:37-1.

Given the principles that the protections of the Fourth Amendment extend to students and that school officials are properly considered government officers, the question remains to what standard of reasonableness must school officials be held when searching a student.

As observed from its language, the Fourth Amendment does not prohibit all searches, only unreasonable ones. The United States Supreme Court in applying and interpreting the Fourth Amendment

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determined there can be no ready definition of the term "unreasonable." Instead the Court has fashioned a threshold test, a balancing, wherein the interests of the government in conducting its search are weighed against the intrusion into one's individual right to privacy. Camara v. Municipal Court, 387 U.S. 537 (1967); See v. City of Seattle, 387 U.S. 541 (1968); Marshall v. Barlow, 436 U.S. 307 (1978). The balance has been determined to mean that when law enforcement officers conduct a search they are generally required to secure a warrant issued upon a showing of probable cause. Camara v. Municipal Court, supra.

Warrantless searches are permissible under appropriate circumstances. However, the probable cause requirement is a necessary predicate for such a search. Wong Sun v. United States, 371 U.S. 471 (1963). As is true with many rules, there have been exceptions to this strict

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probable cause requirement. Under certain circumstances the United States Supreme Court has determined a search to be reasonable within the meaning of the Fourth Amendment upon a showing of less than probable cause. Terry v. Ohio, supra (stop and frisk); United States v. Brignoni-Ponce, 422 U.S. 873 (1975) (stopping of vehicles by roving border patrol); United States v. Martinez-Fuerte, 428 U.S. 543 (1976) (routine stops at permanent border checkpoints). Delaware v. Prouse, 440 U.S. 648 (1979) (random stop of automobile prohibited; must have reasonable articulable suspicion of a violation).

While school officials may be government officials subject to the proscriptions of the Fourth Amendment, they are not "law enforcement officers"; they are educators, untrained in and unfamiliar with the detection and the prevention of crime. They are concerned with the orderly operation of a school. The function of

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that school is to educate children, both intellectually and socially, and to preare them to function as independent, resourceful adults in society. This task requires a healthy, secure educational atmosphere. With the large number of students brought together during a school day, a learning environment can only be attained by maintaining order and discipline in the school. A delicate balance is required. Student activities and actions are monitored and controlled, but not suppressed. Certified school personnel are relied upon to implement rules and policies to protect other students' rights to be secure and to be left to pursue their educational goals. However, these rules and policies would be ineffective if school officials lacked the power to enforce them.

The high school assistant principal shares with the principal and other teachers the duty of maintaining an

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orderly, disciplined atmosphere and protecting the rights of individual students. In People v. Overton, 20 N.Y. 2d 360, 229 N.E. 2d 596, 283 N.Y.S. 2d 22, (Ct. App. 1967), the court stated its view of the role assumed by school officials:

> The school authorities have an obligation to maintain discipline over the students. It is recognized that, when large numbers of teenagers are gathered together *** their inexperience and lack of mature judgment can often create hazards to each other. Parents, who surrender their children to this type of environment, in order that they may continue developing both intellectually and socially, have a right to expect certain safeguards. [229 N.E. 2d at 597, 283 N.Y.S. 2d at 24]

In recognition of the responsibility of school officials to maintain school discipline and create a secure healthy learning environment many courts have adopted a reasonable suspicion standard, whether or not the jurisdiction perceives the official as a private person acting in

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place of the parent[1], or as an agent of the government. See, e.g. Bellmier v. Lund, 438 F. Supp. 47 (N.D. N.Y. 1971); M. v. Bd. of Ed., 429 F. Supp. 288 (S.D. Ill., 1977); State v. McKinnon, supra. In Re Ronald B., 61 A.D. 2d 204, 401 N.Y. 2d 544 (N.Y. App. Div. 1978); Nelson v. State, 319 So. 2d 154 (Fla. Dist. Ct. App. 1975); Doe v. State, supra; State in the Interest of G.C., supra. This concept does not dismantle the safeguards afforded students by the Fourth Amendment rather it provides a less onerous standard than probable cause to provide for searches in the school context. It operates to fashion the

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1 Amicus notes with approval the New Jersey Supreme Court's movement away from the doctrine of in loco parentis. State in Interest of T.L.O., 94 N.J. 331, 340 n. 4 (1983)

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standard of reasonableness imposed upon school officials prior to conducting a search. This emerging concept of reasonableness is properly identified as a "standard of reasonable suspicion." A school official given certain articulable facts which result in a reasonable suspicion on his part that a school policy has been violated or a criminal activity is afoot can conduct a search in order to safeguard the rights of other students and protect the safe and orderly operation of the school. _Cf_. _Delaware v. Prouse_, _supra_.

Recently a Wisconsin court analyzed the interests which allow this standard of reasonableness to satisfy the Fourth Amendment. These interests may be summarized as: (1) the State's interest in providing an education in "an orderly atmosphere which is free from danger and disruption"; (2) a student's lessened expectation of privacy because of the restraint exercised over students for

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security and discipline; (3) "the realities of the classroom present few less intrusive alternatives to an immediate search for dangerous or illegal items or substances" In re L.L., 90 Wisc. 2d at 600-601, 280 N.W. 2d at 350-357 (Sup. Ct. 1979).

In Doe v. Renfrow, 475 F.Supp. 1012 (N.D. Ind. 1979), a federal district court considered the absence of any normal or justifiable expectation of privacy on behalf of the students. The court determined that school officials had a reasonable right to conduct searches if necessary to protect students and safeguard the educational process. Concluding that students could not enjoy an absolute expectation of privacy while in the school because of the constant interaction among students, faculty, and school administrators, the court stated:

> There is no question as to the right, and indeed, the duty of school officials to maintain an educationally sound environment

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> within the school. It is the responsibility of the school administrator to insure the proper functioning of the educational process...Maintaining an educationally productive atmosphere within the school rests upon the school administration certain heavy responsibilities. One of these is that of providing an environment free from activities harmful to the educational function and to the individual student. [475 F. Supp. 1012 at 1020] (N.D. Ind. 1979)

A student's right to be free from intrusion is not to be lightly disregarded; however, it must be subordinate to the orderly operation of the school. Support for this proposition comes from the United States Supreme Court as well as from state and federal courts. Tinker, supra. In Tinker, students were suspended for wearing black armbands to express their objection to the Vietnam War. The Supreme Court determined that the wearing of armbands was closely akin to "pure speech" and students could not be suspended for expressing non-disruptive objections to the Vietnam conflict. Protecting this student

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activity, the Court noted that any conduct which materially disrupts classwork or involves substantial disorder or invasion of the rights of others is not immunized by the constitutional guarantee of freedom of speech. Tinker v. Des Moines School District, 343 U.S. at 513. This protection of school room decorum was also affirmatively recognized in Goss v. Lopez, 419 U.S. 565, 95 S. Ct. 729, 42 L.Ed. 2d 725 (1975).

Tinker and Goss did not deal with students' Fourth Amendment rights, but the same recognition of school house decorum is appropriate when dealing with rights delineated under the Fourth Amendment. State in Interest of T.L.O., supra; State v. McKinnon, supra. Maintaining discipline in schools often requires immediate action and cannot await the procurement of a search warrant based on probable cause. A search of a student is reasonable if the school official has a reasonable suspicion

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that there has been a violation of a school policy and the search is a necessary aid to the maintenance of school discipline and order. State in Interest of T.L.O., supra, State v. Baccino, supra; State v. Young, 234 Ga. 488, 216 S.E. 2d 586 (1975); In re State in Interest of G.C., supra; Doe v. State, supra; People v. D., supra; People v. Jackson, supra.

In Bilbrey v. Brown, 481 F. Supp. 26 (D. Or. 1979) a United States District Court held that searches may be conducted when a school official has a reasonable suspicion to believe a student has violated a school policy. It is clear that a school official should not be held to the same probable cause standard as a law enforcement officer. D.R.C. v. Alaska, 646 P. 2d 252 (Alaska Ct. App. 1982). To hold these officials to the limitations regarding searches imposed by the Fourth Amendment would place an unreasonable burden upon them.

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Applying this standard to the facts before the court, it is clear that the search of the purse was reasonable. The assistant principal opened the student's purse upon a reasonable suspicion, if not probable cause, that the juvenile had violated school policy. The student was escorted to the office by a teacher who had observed the student smoking in a non-smoking area. The conduct of the student imposed a threat not only to the safety of the building and its occupants but also to the health of other students and staff. It infringed upon the rights of students to enjoy a safe and orderly environment in which to pursue their education.

Opening the student's purse was a reasonable attempt to obtain additional facts upon which to make an intelligent, fair determination regarding the claims of both parties. It preserved the school's interest in a safe, healthy and orderly

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learning environment. The student's right to privacy was protected when she was provided with an opportunity to explain what had occurred prior to the search of her purse. It was only upon her denial of smoking in the face of the observation by the teacher, thereby creating a conflict requiring further investigative efforts, that the assistant principal found it necessary to open her purse.

School officials have a responsibility to protect the health, safety and welfare of not only the student involved but also the entire school population. This responsibility includes restricting smoking to specifically designated areas, as was done in the case *sub judice*, and the protection of the non-smoking student from the harmful and bothersome effects of cigarette smoke. These two concerns, coupled with the school's overall priority in maintaining discipline, safety and the integrity of the educational system,

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satisfy the threshold required to sustain the reasonableness of the assistant principal's search of the purse. As stated herein, the standard to be applied in searches conducted by school officials is one of reasonable suspicion; that criterion was satisfied in the present case.

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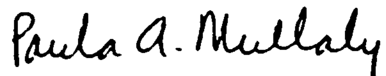
CONCLUSION

For the foregoing reasons, as well as the reasons expressed in amicus' brief previously filed with this Court, the NJSBA urges this Court to rule that the assistant principal did not violate the Fourth Amendment as he had reasonable suspicion to search respondent's purse under the facts and circumstances of this case; and further that the exclusionary rule should not be applied where the assistant principal conducted said search in good faith as discussed in our previous brief.

Respectfully submitted,



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