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Patrol Essentials

Stop, Search & Detention

A POCKET-REFERENCE GUIDE FOR PATROL OFFICERS

This free preview contains the complete introduction and full Section 1 (Terry Stops) from the 38-page manual.

First Edition — 2025

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What's Inside This Preview

This free sample gives you the complete introduction and the full Section 1 (Terry Stops) from **Patrol Essentials: Stop, Search & Detention** — our pocket-reference field manual for patrol officers. The full 36-page manual covers four core sections plus three appendices with quick-reference case tables, articulation templates, and state-law considerations.

We're giving you Section 1 in its entirety — not a watered-down excerpt — because we believe the quality speaks for itself. Read it, use it on your next shift, and if it makes you a sharper, more confident officer, the full manual is available at the link on the final page.

Stay safe out there.

— **Patrol Reference Press**

Foreword

Every patrol officer remembers the moment. You're standing on a street corner at 2 a.m., backup is minutes out, and the subject in front of you just shoved something into his waistband. Your academy training covered *Terry*. You know the words *reasonable suspicion*. But in that moment, under that streetlight, the gap between what you learned in a classroom and what you need to know right now feels like a canyon.

That gap is why Patrol Reference Press exists.

This project grew from a recurring problem familiar to field training officers across the country — different departments, different regions, but the same pattern. Newly sworn officers who passed their academies with solid scores can recite *Terry v. Ohio* and the *Graham* factors from memory, but they can freeze at their first non-consensual encounter. They hesitate. They second-guess their articulations. They know the doctrine but struggle to know when it applies — and what to do with it once it does.

This is not a shortcoming of the academy. Academy training covers an immense volume of material in a compressed timeline and necessarily focuses on foundational knowledge. But foundational knowledge and field-ready knowledge are not the same thing. One gives you the framework. The other gives you the answer when you've got fifteen seconds to figure out whether you can lawfully pat down a nervous passenger on a traffic stop.

The same problem repeats itself in every generation of rookies: officers learn the most in their first three years on the road — often the hard way — and much of what they absorb is institutional wisdom that could have been documented and shared years earlier. The best knowledge accumulates slowly, through

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hallway conversations, roll-call debriefs, and FTO critiques. We believe that knowledge should be accessible on day one.

Patrol Essentials: Stop, Search & Detention is our attempt to bridge that gap. It is not a law school treatise, and it is not a substitute for department policy or legal counsel. It is a field reference — a concise, organized, searchable summary of the law, procedure, and practical judgment that governs the most common and consequential patrol encounter: the stop.

We wrote this manual for the officer who needs to look something up in thirty seconds before stepping out of the cruiser. We wrote it for the trainee who wants to review the difference between a frisk and a search before the next shift. We wrote it for the veteran who wants an articulation template they can adapt to tonight's report.

This is the first in a series. Every manual we publish will follow the same principle: give patrol officers the knowledge they need, in the format they can actually use, when it counts.

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How to Use This Manual

This manual is designed for the working patrol officer — not the law student, not the legal scholar. It is structured so you can find what you need in seconds, whether you're reviewing a topic during roll call or refreshing your memory on scene.

Each section opens with a Quick-Reference card — a one-page summary you can scan in thirty seconds. The detailed breakdown follows, with case citations, practical scenarios, and officer notes woven throughout. If you only have time for the quick-reference, you'll still walk away knowing the rule and the bottom-line guidance.

Icons and callouts used throughout:

- ⚖️ **CASE LAW** — Key Supreme Court or circuit decision you should know by name. Useful background and justification support; cite in your report only if your agency's practice does so.
- 🛑 **RED LINE** — A genuinely settled, bright-line rule. Violation can jeopardize admissibility, expose the investigation to suppression challenges, and create civil or administrative consequences. Reserved for firmly established propositions.
- 🚨 **HIGH-RISK PRACTICE** — Conduct presenting substantial suppression or civil-liability risk depending on the circumstances and controlling jurisdiction. Reassess and articulate justification carefully.
- 💡 **OFFICER NOTE** — Practical field guidance, common-sense reminders, and lessons learned from real-world policing.

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- ⚠️ **PITFALL** — A common mistake that gets good cases tossed. Read these carefully.

Disclaimer: This manual is a training and reference aid. It does not constitute legal advice, nor does it replace department policy, POST-mandated training, or guidance from your agency's legal advisor. When in doubt, consult a supervisor or your department's legal office. Provisional. Verify before you rely — agency policy and your legal advisor govern.

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Here's everything covered in the complete 36-page manual — this preview includes all of Section 1.

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Appendix A: Quick-Reference Case Table

Complete case law reference covering all major decisions from Terry through Rodriguez, organized for fast lookup by topic and holding.

Appendix B: Articulation Templates

Model report language for common scenarios — Terry stops, frisks, vehicle searches under the automobile exception, Gant searches, consent searches, and detention-vs.-arrest justifications.

Appendix C: State Law Considerations

Guidance on state constitutional protections, stop-and-identify statutes, and jurisdiction-specific rules that may impose standards above the federal floor.

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Section 1: Terry Stops (Investigative Detentions)

Quick-Reference: Terry Stop

ELEMENT	STANDARD
Legal Threshold	Reasonable suspicion (less than probable cause, more than a hunch)
Basis	Specific, articulable facts + rational inferences
Scope	Brief, limited to confirming or dispelling suspicion
Frisk Allowed?	Only if reasonable suspicion subject is armed AND dangerous
Frisk Scope	Limited protective pat-down for weapons. If the officer reasonably believes an object felt during the frisk may be a weapon, the officer may take reasonably necessary steps to inspect/remove it. The frisk may not become a general evidentiary search
Plain Feel Doctrine	If contraband is *immediately apparent* to touch, may seize
Duration	As long as reasonably necessary; no fixed time limit
Miranda Required?	Ordinarily no — a typical Terry stop is not Miranda custody, but sufficiently coercive or arrest-like circumstances may be. If custodial, warnings are required before interrogation
Key Cases	Terry v. Ohio (1968), Minnesota v. Dickerson (1993), Illinois v. Wardlow (2000), Berkemer v. McCarty (1984)

1.1 The Legal Standard: Reasonable Suspicion

A **Terry stop** is a limited investigative detention of a person based on reasonable suspicion that criminal activity is afoot. It is named for the landmark Supreme Court case **Terry v. Ohio, 392 U.S. 1 (1968)**.

What Is Reasonable Suspicion?

Reasonable suspicion is a lower standard than probable cause but requires more than an "inchoate and unparticularized suspicion or hunch." The officer must be able to point to **specific and articulable facts** that, taken together with rational inferences from those facts, reasonably warrant the intrusion.

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Courts evaluate reasonable suspicion based on the **totality of the circumstances**, viewed through the lens of a trained officer's experience. What matters is what you knew *at the moment of the stop* — not what you discovered afterward.

> ⚖️ **CASE LAW**
>
> District of Columbia v. R.W., 608 U.S. 22 (2026): Reasonable suspicion must be evaluated from the totality of the circumstances — the 'whole picture' — rather than by isolating individual facts and dismissing each as independently innocent. Innocent explanations for individual facts do not necessarily defeat reasonable suspicion when the circumstances collectively support a commonsense inference of criminal activity. Reasonable suspicion need not rule out innocent conduct.

Sources of Reasonable Suspicion

Courts recognize several categories of information that can support reasonable suspicion:

Personal Observation. You see conduct that, based on your training and experience, is consistent with criminal activity. Examples: a person casing a building, a hand-to-hand exchange in an area known for drug activity, a vehicle circling a block repeatedly at odd hours.

Information from Others. Tips from informants, witnesses, or victims. The weight given to a tip depends on the informant's **reliability** and **basis of knowledge**.

- **Identified citizen witnesses** are generally presumed reliable. *A store clerk who reports a shoplifter you stop two blocks away — strong reasonable suspicion.*
- **Anonymous tips** are not automatically reliable or unreliable — the weight of the tip depends on its indicia of reliability and basis of knowledge. An anonymous tip alone, without sufficient indicia of reliability, is not enough for a stop and frisk. **Florida v. J.L., 529 U.S. 266 (2000)** — an anonymous tip that a person is carrying a gun, without more, does not justify a stop and frisk. **Compare Navarette v. California, 572 U.S. 393 (2014)** — an ostensibly anonymous 911 report describing a specific, dangerous situation (an erratic drunk driver), relayed promptly and containing a firsthand basis of knowledge and enough internal detail to be tested by police, can carry sufficient indicia of reliability to support reasonable suspicion. Anonymous tips are not automatically unreliable; some must be independently corroborated, while others may stand on their own indicia of reliability.
- **Known informants** fall in between. Courts look at the informant's track record and whether the information is against their penal interest.

Police Bulletins and Flyers. You may rely on information from other officers, including BOLOs and wanted-person bulletins, so long as the originating officer had reasonable suspicion. **United States v. Hensley, 469 U.S. 221 (1985)** — officers may rely on a flyer or wanted-person bulletin issued on adequate suspicion by another department, even if they lack firsthand knowledge of the facts supporting it.

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Flight from Police. Unprovoked flight upon noticing police presence in a high-crime area is a relevant factor in the reasonable-suspicion calculus. **Illinois v. Wardlow, 528 U.S. 119 (2000).** However, mere presence in a high-crime area plus *refusal to cooperate* — without flight — is not enough. Refusal to answer questions or walking away is not, by itself, reasonable suspicion.

Time and Place. The character of the area (high-crime), time of day, and officer experience are relevant factors. But none of these alone is sufficient; they must be combined with particularized facts about the individual.

> ⚖️ **CASE LAW**
>
> Terry v. Ohio, 392 U.S. 1 (1968): An experienced officer observed two men repeatedly walking past a store, pausing to look in the window, and conferring with a third man. The officer, suspecting a casing for armed robbery, stopped and frisked them, finding weapons. The Supreme Court held the stop and frisk were reasonable under the Fourth Amendment, creating the reasonable-suspicion framework.

> ⚠️ **PITFALL**
>
> The "High-Crime Area" Trap: Courts scrutinize stops where "high-crime area" is the primary or sole justification. Always articulate *what the individual did*, not just *where they were*. "I stopped him because he was in a high-drug area and looked nervous" is a losing articulation. "I stopped him because he was in a high-drug area, observed him exchange a small object for cash with a known narcotics user, and he immediately changed direction upon seeing my patrol vehicle" is a winning one.

1.2 The Stop: Scope and Limits

What You Can Do During a Terry Stop

A Terry stop is a **limited seizure**. The scope must be "reasonably related in scope to the circumstances which justified the interference in the first place." You may:

- **Stop and briefly detain** the person for investigation
- **Ask questions** related to the suspected criminal activity
- **Request identification** (check state law — some states criminalize refusal)
- **Conduct a pat-down frisk** if you have reasonable suspicion the person is armed and dangerous
- **Run a warrants check** incidental to the stop
- **Order the person to remain** during the investigatory period

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What You Cannot Do

🛑 **RED LINE**

No Automatic Frisks. A Terry stop does not automatically authorize a frisk. You must have independent reasonable suspicion that the subject is armed *and* dangerous. The purpose of the frisk is officer safety, not evidence gathering.

🛑 **RED LINE**

Custodial Interrogation Requires Miranda Warnings. If a person is in Miranda custody, warnings are required before interrogation. A typical Terry stop is ordinarily non-custodial, but sufficiently coercive or arrest-like circumstances may amount to custody even before a formal arrest (see Section 4). If the encounter becomes custodial, stop and give warnings before questioning.

⚖️ **CASE LAW**

Berkemer v. McCarty, 468 U.S. 420 (1984): A routine traffic stop ordinarily does not constitute Miranda custody. The Court held that the temporary, brief, and comparatively noncoercive nature of a roadside detention generally means a person is not "in custody" for Miranda purposes — but custody is judged objectively by the person's freedom of action and the surrounding circumstances, so a sufficiently coercive or arrest-like encounter can become custodial even short of a formal arrest.

🛑 **RED LINE**

No Prolonged Detention for a Drug Dog. You cannot extend a completed traffic stop to conduct a dog sniff without independent reasonable suspicion. **Rodriguez v. United States, 575 U.S. 348 (2015).** The dog sniff must occur within the time reasonably required to complete the mission of the stop — i.e., issuing the citation or warning.

💡 **OFFICER NOTE:** Rodriguez does not prohibit dog sniffs during otherwise lawful traffic stops. A dog sniff may occur so long as it does not add time beyond that reasonably required to complete the traffic mission and officers are diligently pursuing the traffic-related tasks. Without independent reasonable suspicion, officers may not slow, pause, or extend the traffic mission to facilitate the sniff. Merely being "still writing the citation" is not, by itself, a constitutional safe harbor.

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1.3 The Pat-Down Frisk

Legal Standard

A frisk is a limited search for weapons. To conduct a frisk, you must have reasonable suspicion that the subject is **armed and presently dangerous.** The frisk is justified by the need to protect officer safety during the investigatory stop.

Scope of the Frisk

The frisk is limited to a **pat-down of the outer clothing**. You may not manipulate objects, reach into pockets, or squeeze items unless what you feel makes it "immediately apparent" that the object is contraband — the **plain feel doctrine**. If an object encountered during the pat-down reasonably could be a weapon, Terry permits the limited intrusion necessary to determine that fact and neutralize the threat — the officer may take reasonably necessary steps to inspect or remove it. The frisk may not become a general evidentiary search.

> ⚖️ **CASE LAW**
>
> Minnesota v. Dickerson, 508 U.S. 366 (1993): During a lawful Terry frisk, an officer felt a small lump in the subject's pocket. The officer manipulated the object with his fingers, determined it was crack cocaine, and seized it. The Supreme Court held this exceeded the scope of a Terry frisk. The officer's manipulation went beyond what was necessary to determine whether the object was a weapon. The plain feel doctrine requires that the incriminating character of the object be *immediately apparent* — without manipulation.

Plain Feel Doctrine: The Rule

If, during a lawful pat-down for weapons, you feel an object whose contraband nature is **immediately apparent** to touch, you may seize it. "Immediately apparent" means the lawful tactile observation, considered with the surrounding circumstances and the officer's training and experience, gives probable cause to believe the object is contraband without squeezing, sliding, manipulating, or otherwise expanding the frisk. It does not require absolute tactile identification or certainty.

Examples:

- ✅ During a pat-down, you feel an object whose contour and characteristics, together with the surrounding circumstances and your training, give you probable cause to believe it is contraband without further manipulation. Seizure is lawful under the plain feel doctrine.
- ❌ You feel a lump. You squeeze and manipulate it until you can tell it's drugs. Seizure is unlawful under Dickerson.

💡 **OFFICER NOTE:** If you conduct a frisk and the subject is wearing heavy or bulky clothing, articulate why you could not determine whether they were armed from the pat-down alone. If a more thorough search is necessary, ensure you have a valid legal basis — consent, search incident to arrest, or probable

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cause.

Frisk of Belongings

When specific and articulable facts create reasonable suspicion that a container accessible to the detainee may contain a weapon posing a danger during the encounter, officers may conduct a protective examination limited to what is reasonably necessary to locate weapons, subject to controlling jurisdictional law. This is not a general search — you are looking for weapons that could be accessed during the encounter. Articulate accessibility and the officer-safety necessity; container plus suspicion alone is not automatically enough.

1.4 Duration of the Stop

There is no bright-line time limit for Terry stops. The standard is whether the officer "diligently pursued a means of investigation that was likely to confirm or dispel their suspicions quickly."

> ⚖️ **CASE LAW**
>
> United States v. Sharpe, 470 U.S. 675 (1985): A 20-minute detention while officers investigated a suspected drug-smuggling operation was reasonable. The Court declined to set a rigid time limit, emphasizing the diligence of the investigation and cautioning courts against unrealistic second-guessing simply because another, less-intrusive alternative could be imagined.

Factors courts consider:

- Was the officer actively pursuing the investigation?
- Did delays result from the subject's own actions?
- Were the investigative methods reasonably related to promptly confirming or dispelling the suspicion?
- Did officers diligently pursue the investigation without unnecessary delay or unreasonable intrusion? (The question is not merely whether some other less-intrusive alternative existed, but whether officers acted unreasonably in failing to recognize or pursue it — United States v. Sharpe.)

💡 **OFFICER NOTE:** If a stop runs long, document *why*. Articulate what you were doing during the detention and why it took the time it did. A 30-minute detention where you were waiting for a K-9 with no explanation reads very differently from a 30-minute detention where you documented that you were verifying the subject's identity, running a warrants check, and awaiting a K-9 that was already en route.

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1.5 Pretextual Stops

A pretextual stop occurs when an officer uses a minor traffic violation or other objective justification as a reason to stop a vehicle when the officer's real motivation is to investigate other, unsubstantiated suspicions.

> ⚖️ **CASE LAW**
>
> Whren v. United States, 517 U.S. 806 (1996): The Supreme Court held that the constitutional reasonableness of a traffic stop does not depend on the officer's subjective motivations. So long as there was probable cause to believe a traffic violation occurred — even a minor one — the stop is lawful under the Fourth Amendment, regardless of any ulterior motive.

⚠️ **PITFALL:** While Whren makes pretextual stops constitutionally permissible, many state constitutions and some department policies impose stricter limits. Know your state law and agency policy. Also, even under Whren, you still need *independent* justification for any detention or search beyond the traffic stop itself.

1.6 Stops of Vehicles and Passengers

A traffic stop is a seizure of both the driver *and* the passengers. **Brendlin v. California, 551 U.S. 249 (2007).** Both are detained and may challenge the stop's legality.

Ordering occupants out: During a lawful traffic stop, you may order the driver *and* any passengers out of the vehicle as a matter of course — no additional justification required.

- **Driver: Pennsylvania v. Mimms, 434 U.S. 106 (1977)** — officer safety justifies ordering the driver out.
- **Passengers: Maryland v. Wilson, 519 U.S. 408 (1997)** — the same rule applies to passengers.

> 💡 **OFFICER NOTE**
>
> Passengers and Frisks: Ordering occupants out is not a frisk. It is a lawful control measure. If you then want to frisk any occupant, you need independent reasonable suspicion that they are armed and dangerous. **Arizona v. Johnson, 555 U.S. 323 (2009)**, confirms that during a lawful traffic stop an occupant is already lawfully detained; however, a frisk of that occupant requires separate reasonable suspicion that the particular person is armed and dangerous.

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Get the Full 36-Page Manual

You just read Section 1 in its entirety. The full **Patrol Essentials: Stop, Search & Detention** manual includes three more core sections and three appendices — everything you need for confident, defensible field decisions:

- **Section 2: Vehicle Searches** — The automobile exception, Gant search-incident-to-arrest rules, inventory searches, protective vehicle searches under Michigan v. Long, and a complete vehicle case law summary table.
- **Section 3: Consent Searches** — Voluntariness analysis, who can consent (including apparent authority and third-party consent), the Randolph co-occupant objection rule, scope of consent, revocation, and documentation best practices.
- **Section 4: Detention vs. Arrest** — The critical legal line every patrol officer must understand. Handcuffing, moving subjects, duration, use of force, the multi-factor test courts apply, and three detailed practical scenarios with analysis.
- **Appendix A: Quick-Reference Case Table** — Every key case from Terry through Rodriguez, organized by topic and holding for instant lookup.
- **Appendix B: Articulation Templates** — Ready-to-adapt report language for Terry stops, frisks, vehicle searches, consent searches, and detention justifications.
- **Appendix C: State Law Considerations** — What you need to know about state constitutions, stop-and-identify statutes, and jurisdiction-specific rules above the federal floor.

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