

Wristlocks, Warnings, and Qualified Immunity: What Zorn v. Linton Means for Officers

Description

The Supreme Court of the United States recently decided *Zorn v. Linton*, holding that, because the U.S. Court of Appeals for the Second Circuit failed to identify a case where an officer using a routine wristlock on a protester after issuing a verbal warning, without more, was held to have violated the Constitution, Sergeant Jacob Zorn was entitled to qualified immunity.

Summary of Facts

On January 8, 2015, Vermont hosted the inauguration for Governor Peter Shumlin in the state Capitol. Approximately 200 protesters attended the event, and some protestors staged a sit-in to demand universal healthcare. Among the 200 protestors included Shela Linton, the Plaintiff in this case, whom planned to refuse to vacate and predicted being forcibly removed, as she later explained, “*That’s the point of the sit-in part of the protest.*” As the Capitol closed for the night, 29 protesters remained in the legislative chamber. As protestors sat on the floor with their arms linked, police officers explained that they would arrest the protesters for trespass if they did not leave. The officers dealt with them one at a time; some stood up and were escorted out of the chamber without force, but others refused to stand and had to be lifted to their feet or dragged out. After removing more than a dozen protesters, Sergeant Zorn crouched down to speak with Linton, but she remained seated and linked her fellow protesters. Linton passively resisted, and Sergeant Zorn unlinked her arm from another protester’s, put it behind her back in a rear wristlock, and twisted her arm. While Linton exclaimed “ow, ow, ow,” Zorn plead her to “please stand up.” Linton responded, “I will not stand up,” and Zorn told her that he would ask “one more time” and then would use more pain compliance. As Linton refused, Zorn placed pressure on her wrist and lifted her up by her underarm. Once on her feet, Linton continued to jerk her arms and fell back to the floor. Zorn asked her to stand up again, and when she did not, three officers picked her up and carried her outside.

In the aftermath, Linton alleged physical and psychological injuries from the interaction. Linton filed suit under Rev. Stat. §1979, 42 U.S.C. §1983, alleging excessive force in violation of the Fourth Amendment. The District Court granted summary judgment in favor of Sergeant Zorn, finding that he was entitled to qualified immunity, because it was not clearly established at the time of the encounter that, in these circumstances, lifting Linton while putting pressure on her wrist violated the Fourth Amendment. The case was appealed to the United States Court of Appeals for the Second Circuit, where the Circuit Court ultimately reversed the finding of qualified immunity, holding that its decision in *Amnesty America v. West Hartford*, 361 F. 3d 113 (2004), clearly established that the “gratuitous” use of a rear wrist-lock on a protester passively resisting arrest constitutes excessive force. 135 F. 4th 19, 35 (2025).

The Supreme Court granted certiorari and reversed the judgment of the Second Circuit, explaining that the Second Circuit contravened the established legal principles and framework in this case. The Court began by reiterating the governing qualified-immunity framework. Government officials are shielded from liability unless they violate a constitutional right that was clearly established at the time of the

conduct. A right is clearly established only when precedent places the constitutional question “beyond debate,” such that every reasonable officer would understand that the conduct is unlawful. This standard requires courts to define the right at issue with a high degree of specificity.

Applying that framework, the Court held that the Second Circuit failed to identify precedent that clearly established the unlawfulness of Zorn’s conduct. The court of appeals relied on *Amnesty America*, but the Supreme Court explained that the decision did not provide the necessary level of factual specificity. That case involved a range of alleged uses of force, including conduct more aggressive than what occurred here, and did not specifically hold that the use of a wristlock in comparable circumstances violated the Fourth Amendment. Instead, *Amnesty America* held that a jury could find excessive force on the facts presented, while also recognizing that a jury could conclude the officers acted reasonably. In the Supreme Court’s view, such a holding does not clearly establish the law. The Court further emphasized that the totality of the circumstances must be considered in evaluating the use of force. Here, Sergeant Zorn issued repeated verbal warnings before escalating his use of force and employed a commonly recognized control technique in response to continued noncompliance during a lawful arrest. The Court concluded that no precedent cited by the Second Circuit would have placed a reasonable officer on notice that using a wristlock under these circumstances, after warnings and in response to passive resistance, was unconstitutional.

The Court also rejected the Second Circuit’s reliance on a broader principle that “gratuitous” use of pain-compliance techniques against passively resisting individuals constitutes excessive force. Even assuming such a principle could be derived from prior case law, the Court held that it was too general to clearly establish the law for qualified-immunity purposes. The term “gratuitous,” the Court explained, does not provide meaningful guidance as to when force becomes unlawful, nor does it define the circumstances under which specific techniques cross the constitutional line. Without that level of precision, officers cannot be expected to anticipate liability. Because the Second Circuit failed to identify precedent involving sufficiently similar facts that would have put the constitutional question beyond debate, the Supreme Court held that Sergeant Zorn was entitled to qualified immunity. The judgment of the Second Circuit was reversed.

Takeaway

Zorn v. Linton reinforces the Supreme Court’s consistent instruction that qualified immunity must be analyzed with careful attention to factual detail. The decision does not categorically approve the use of wristlocks or pain-compliance techniques against passively resisting individuals, nor does it foreclose excessive-force claims in similar situations.

Zorn v. Linton 607 U. S. ____ (2026)

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