

No. 21-1764

**IN THE UNITED STATES COURT OF APPEALS
FOR THE SEVENTH CIRCUIT**

DYLAN MITCHELL, DAYNA
SCHULTZ, LARISSA WALSTON,
MICHAEL RIGGS, IVAN
HOLLAND, ANDREW EHRHARDT,
ROSS WAGNER, and JAYLEN
BUTLER,

Plaintiffs-Appellants,

EUGENE G. DOHERTY, in his
official capacity as the Chief Judge
of the 17th Judicial Circuit Court;
GARY CARUANA, in his official
capacity as the Sheriff of Winnebago
County; and WINNEBAGO
COUNTY,

Defendants-Appellees.

Appeal from the United States
District Court for the Northern
District of Illinois

District Court No. 20-cv-50285

Hon. John Z. Lee, Judge Presiding

**AMICI CURIAE BRIEF OF LEGAL, COMMUNITY, AND FAITH
ORGANIZATIONS PROMOTING PRETRIAL JUSTICE IN SUPPORT OF
PLAINTIFFS-APPELLANTS AND REVERSAL**

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Appellate Court No: 21-1764

Short Caption: Mitchell et al. v. Doherty, et al.

To enable the judges to determine whether recusal is necessary or appropriate, an attorney for a non-governmental party, amicus curiae, intervenor or a private attorney representing a government party, must furnish a disclosure statement providing the following information in compliance with Circuit Rule 26.1 and Fed. R. App. P. 26.1.

The Court prefers that the disclosure statements be filed immediately following docketing; but, the disclosure statement must be filed within 21 days of docketing or upon the filing of a motion, response, petition, or answer in this court, whichever occurs first. Attorneys are required to file an amended statement to reflect any material changes in the required information. The text of the statement must also be included in the front of the table of contents of the party's main brief. **Counsel is required to complete the entire statement and to use N/A for any information that is not applicable if this form is used.**

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(1) The full name of every party that the attorney represents in the case (if the party is a corporation, you must provide the corporate disclosure information required by Fed. R. App. P. 26.1 by completing item #3):

A Just Harvest; Believers Bail Out; Champaign County Bailout Coalition; Chicago Appleseed Center for Fair Courts
Chicago Community Bond Fund; Civil Rights Corps; for additional Amici, see Ex. A to Brief

(2) The names of all law firms whose partners or associates have appeared for the party in the case (including proceedings in the district court or before an administrative agency) or are expected to appear for the party in this court:

Hughes Socol Piers Resnick & Dym, Ltd.; Civil Rights Corps

(3) If the party, amicus or intervenor is a corporation:

i) Identify all its parent corporations, if any; and

None.

ii) list any publicly held company that owns 10% or more of the party's, amicus' or intervenor's stock:

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(4) Provide information required by FRAP 26.1(b) – Organizational Victims in Criminal Cases:

N/A

(5) Provide Debtor information required by FRAP 26.1 (c) 1 & 2:

N/A

Attorney's Signature: /s/ Chirag G. Badlani Date: 7/19/2021

Attorney's Printed Name: Chirag G. Badlani

Please indicate if you are *Counsel of Record* for the above listed parties pursuant to Circuit Rule 3(d). Yes No

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APPEARANCE & CIRCUIT RULE 26.1 DISCLOSURE STATEMENT

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N/A

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N/A

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- (4) Provide information required by FRAP 26.1(b) – Organizational Victims in Criminal Cases:
N/A
- (5) Provide Debtor information required by FRAP 26.1 (c) 1 & 2:
N/A

Attorney's Signature: /s/ Ryan Downer Date: 7/19/2021Attorney's Printed Name: Ryan DownerPlease indicate if you are *Counsel of Record* for the above listed parties pursuant to Circuit Rule 3(d). Yes No Address: Civil Rights Corps, 1601 Connecticut Avenue NW, Suite 800, Washington, D.C. 20009Phone Number: 202-844-4975 Fax Number: 202-609-8030E-Mail Address: ryan@civilrightscorps.org

TABLE OF CONTENTS

INTEREST AND IDENTITY OF AMICI CURIAE.....1

ARGUMENT.....3

I. Pretrial Incarceration Beyond 48 Hours Harms Individuals and Communities.....3

 A. An Additional Day in Pretrial Incarceration Disrupts an Individual’s Employment, Housing and Finances4

 1. Pretrial Incarceration Disrupts Employment.....4

 2. Additional Pretrial Incarceration Harms the Finances and Destabilizes the Housing of Vulnerable Individuals5

 3. This Economic and Housing Destabilization Impacts Not Only the Detainee But His or Her Family As Well6

 B. An Additional Day of Incarceration Can Have Severe Health Consequences.....6

 1. An Additional Day of Detention Can Increase the Spread of Communicable Diseases7

 2. Pretrial Detainees’ Access to Healthcare is Severely Limited.....7

 3. Fatal Mental Health Emergencies Occur Within the First Days of Pretrial Incarceration8

 C. Pretrial Incarceration Deprives Children, the Elderly, and those with Disabilities of their Caregivers9

 D. Pretrial Incarceration Negatively Impacts Public Safety10

II. Bail Determinations Within 48 Hours of Arrest Are a Common Practice Across Jurisdictions10

CONCLUSION.....13

TABLE OF AUTHORITIES

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Federal Rule of Appellate Procedure 29(a)(4)(E) 1

INTEREST AND IDENTITY OF AMICI CURIAE¹

Amici Legal, Community, and Faith Organizations Promoting Pretrial Justice file this brief in support of Plaintiffs-Appellees. Amici are organizations that work to promote fairness in criminal court procedures in Illinois and across the country, and that support members of the community affected by pretrial detention. Among Amici are organizations that have litigated bail issues, worked with government stakeholders and officials to address approaches to pretrial release and detention practices, engaged in extensive court watching of pretrial criminal proceedings, and worked to address harms caused by family separation. Amici are deeply concerned about the severe negative impact on pretrial detainees, their families and their communities wrought by Winnebago County's practice of detaining pretrial arrestees for more than 48 hours before making bail determinations.

Amici seek to aid the Court in its analysis by describing the relevant social science research that elucidates these and other deleterious effects of continued pretrial detention on the detainees, their families, and their communities. Further, Amici aim to shed light on the feasibility and efficiency of holding bail hearings within 48 hours of arrest, by describing the criminal court practices in jurisdictions throughout Illinois and across the country.

¹ Pursuant to Federal Rule of Appellate Procedure 29(a)(4)(E), counsel for Amici Curiae state that no counsel for a party authored this brief in whole or in part, and no person other than Amici Curiae, their members, or their counsel made a monetary contribution to its preparation or submission.

A full list of Amici is attached as Exhibit A.

ARGUMENT

Winnebago County's practice of detaining arrestees for more than 48 hours before holding a bail hearing fails to "make every attempt to minimize the time a presumptively innocent individual spends in jail." *County of Riverside v. McLaughlin*, 500 U.S. 44, 58 (1991). Instead, it unnecessarily prolongs the period of time that a presumptively innocent individual remains in custody and therefore unjustly "imperil[s] [a] suspect's job, interrupt[s] his source of income, and impair[s] his family relationships," among other significant harms. *Id.* at 52 (citing *Gerstein v. Pugh*, 420 U.S. 103, 114 (1975)).

A growing body of data reveals that even one additional day of pretrial incarceration can (i) disrupt an individual's employment and destabilize his or her finances and housing; (ii) put an individual at risk of a physical or mental health crisis and even death; (iii) deprive children and vulnerable adults of their sole caregiver; and (iv) lead to increased risk of future rearrest. Furthermore, it is plain that Winnebago County's delay in conducting bail hearings is unnecessary because many other jurisdictions successfully complete bail proceedings within 48 hours of arrest, often combining such hearings with probable cause determinations.

I. Pretrial Incarceration Beyond 48 Hours Harms Individuals and Communities

Mounting social science research described in detail below demonstrates that even one additional day of detention beyond 48 hours results in measurable negative effects upon the detainee and his or her family and community.

Accordingly, Winnebago County's practice of deferring bail determinations beyond

48 hours is causing and will continue to cause significant harm of the type that motivated the Supreme Court's Fourth Amendment jurisprudence in *McLaughlin* and *Gerstein*.

A. An Additional Day in Pretrial Incarceration Disrupts an Individual's Employment, Housing and Finances

Extending the length of pretrial detention, even by a single day, increases the likelihood that an individual will experience disruption to his or her employment, housing, and finances upon release, particularly for those already experiencing economic precarity.²

1. Pretrial Incarceration Disrupts Employment

Studies have shown that the length of pretrial incarceration has both short- and long-term effects on an individual's likelihood of sustaining employment. A 2018 study reflected that "[t]he odds of experiencing employment disruption in the form of job loss or job change after jail were *seven times larger* for those spending three or more days in jail pretrial compared to those spending fewer than three days."³ A longer term 2018 study revealed that pretrial detainees held for more than three days had worse odds of maintaining formal employment even three to

² Criminal Justice Policy Program, *Moving Beyond Money*, Harvard Law School, 7 (Oct. 2016), <https://www.prisonpolicy.org/scans/cjpp/FINAL-Primer-on-Bail-Reform.pdf>.

³ Alexander M. Holsinger and Kristi Holsinger, *Analyzing Bond Supervision Survey Data: The Effects of Pretrial Detention on Self-Reported Outcomes*, 82 Federal Probation 2, 43 (Sept. 2018) (emphasis added).

four years after the bail hearing relative to detainees held for three days or fewer.⁴ These studies suggest that even increasing the length of pretrial detention by 24 hours—from two to three days—could negatively impact a person’s employment outcomes.

2. Additional Pretrial Incarceration Harms the Finances and Destabilizes the Housing of Vulnerable Individuals

An outsized share of arrested individuals live in or near poverty.⁵ Many low-wage earners cannot afford to miss even one day of work.⁶ The loss of a single day of income can result in the inability to pay for essential services, public utilities, or rent.⁷

For people living paycheck to paycheck, even a short period of incarceration can put them at risk for hunger and homelessness.⁸ A 2018 study revealed that those spending more than three days in jail were 35 percent more likely to report

⁴ Will Dobbie, Jacob Goldin, and Crystal S. Yang, *The Effects of Pretrial Detention on Conviction, Future Crime, and Employment: Evidence from Randomly Assigned Judges*, 108 Am. Econ. Rev. 201, 227 (Feb. 2018).

⁵ Alexi Jones and Wendy Sawyer, *Arrest, Release, Repeat: How Police and Jails Are Misused to Respond to Social Problems*, Prison Policy Initiative (Aug. 2019), <https://www.prisonpolicy.org/reports/repeatarrests.html#multiplearrests2> (highlighting that people in jail are disproportionately likely to have an income of less than \$10,000).

⁶ Nick Pinto, *The Bail Trap*, N.Y. Times (Aug. 13, 2015), <https://www.nytimes.com/2015/08/16/magazine/the-bail-trap.html>.

⁷ Justice Policy Institute, *System Overload: The Costs of Under-Resourcing Public Defense 19* (July 27, 2011), http://www.justicepolicy.org/uploads/justicepolicy/documents/system_overload_final.pdf.

⁸ Russell M. Gold, *Jail as Injunction*, 107 The Georgetown Law Journal 501, 540-43 (2019).

residential disruption relative to those who spent less than three days in jail pretrial.⁹

3. This Economic and Housing Destabilization Impacts Not Only the Detainee But His or Her Family As Well

Even a brief period of pretrial detention can hurl a defendant's family into a state of financial insecurity.¹⁰ When a pretrial detainee experiences loss of employment, the detainee's family might lose its sole source of income.¹¹ If pretrial incarceration results in an eviction or loss of employment, families continue to incur a financial loss after the defendant is released, as the defendant will need to invest resources into finding new housing and another, often lower-paying, job.¹²

B. An Additional Day of Incarceration Can Have Severe Health Consequences

An additional day of pretrial incarceration beyond 48 hours can exacerbate risks to the detainee's health. Incarcerated individuals are frequently subjected to crowded conditions, and therefore increased exposure to infectious diseases. In addition, detainees' access to medical and mental health care is severely limited.¹³ Each day of pretrial incarceration presents severe, and sometimes fatal, consequences to an individual's health.

⁹ Holsinger, *supra* note 3, at 42.

¹⁰ Gold, *supra* note 8, at 542.

¹¹ *Id.*

¹² Shima Baradaran Baughman, *The Bail Book: A Comprehensive Look at Bail in America's Criminal Justice System*, 86 (2017).

¹³ Shima Baradaran Baughman, *The History of Misdemeanor Bail*, 98 B.U.L. Rev. 837, 876 (2018).

1. An Additional Day of Detention Can Increase the Spread of Communicable Diseases

The very nature of a jail's "setup and day-to-day operations facilitates rapid transmission of communicable diseases," due to "large populations, all densely housed, and many in congregate settings," as well as communal bathroom and dining facilities. *Mays v. Dart*, 456 F. Supp. 3d 966, 977 (N.D. Ill. 2020), *aff'd in part, vacated in part, rev'd in part*, 974 F.3d 810 (7th Cir. 2020). "Maintaining social distancing is often not possible in a detention center . . . where detainees inevitably share cells and common areas." *Favi v. Kolutwenzew*, No. 20-CV-2087, 2020 WL 2114566, at *2 (C.D. Ill. May 4, 2020), *appeal dismissed*, No. 20-2372, 2020 WL 8262041 (7th Cir. Oct. 5, 2020). For incarcerated people who could otherwise be released within 48 hours, an additional day of detention amplifies the risk of contracting an infectious disease.

2. Pretrial Detainees' Access to Healthcare is Severely Limited

People who are arrested are disproportionately likely to have serious physical conditions and mental illness.¹⁴ Even a few days in jail can have devastating effects for people with serious mental health and medical needs, as they experience a disruption in access to their prescription medications and regular healthcare

¹⁴ Jones, *supra* note 5; Marcus Berzofsky, Laura M. Maruschak, and Jennifer Unangst, *Medical Problems of State and Federal Prisoners and Jail Inmates, 2011-12*, NCJ 248491, Washington, D.C.: Bureau of Justice Statistics, Office of Justice Programs, U.S. Department of Justice (2015); Doris J. James, & Lauren E. Glaze, *Mental Health Problems of Prison and Jail Inmates*, NCJ 213600, Washington, D.C.: Bureau of Justice Statistics, Office of Justice Programs, U.S. Department of Justice (2006).

providers.¹⁵ For individuals arrested in the midst of a health crisis, such as opioid withdrawal, even a few days in jail can be fatal.¹⁶ From 2000 to 2018, over 1,500 individuals died of causes stemming from drug and/or alcohol intoxication in local jails in the United States, with a median time served at time of death of one day.¹⁷

3. Fatal Mental Health Emergencies Occur Within the First Days of Pretrial Incarceration

Suicide is the leading cause of death in county jails,¹⁸ and one-third of jail suicides occur in the first three days following arrest.¹⁹ Suicide occurs most frequently in the first days of incarceration due, at least in part, to the deprivation of contact with family and friends paired with the lack of services or suicide prevention measures.²⁰ As such, a single additional day of pretrial incarceration can greatly increase the risk of unnecessary death by suicide.

¹⁵ Jones, *supra* note 5.

¹⁶ Associated Press, *County Pays Nearly \$5M Over Heroin Withdrawal Death in Jail*, U.S. News and World Report (Oct. 24, 2018, 12:17 PM), <https://www.usnews.com/news/healthiest-communities/articles/2018-10-24/county-pays-nearly-5m-over-heroin-withdrawal-death-in-jail>.

¹⁷ U.S. Department of Justice, Bureau of Justice Statistics, *Mortality in Local Jails, 2000-2018 – Statistical Tables* (Apr. 2021), <https://bjs.ojp.gov/content/pub/pdf/mlj0018st.pdf>.

¹⁸ Scott Grinder, Margaret Noonan, and Harley Rohloff, U.S. Department of Justice, Bureau of Justice Statistics, *Mortality in Local Jails and State Prisons, 2000-2013, Statistical Tables 1* (Aug. 2015), <https://bjs.ojp.gov/content/pub/pdf/mljsp0013st.pdf>.

¹⁹ Dana Liebelson, et al., *Sandra Bland Died One Year Ago*, Huffington Post (July 13, 2016), <https://highline.huffingtonpost.com/articles/en/sandra-bland-jail-deaths/>.

²⁰ Martin Kaste, *The ‘Shock of Confinement’: The Grim Reality of Suicide in Jail*, NPR: All Things Considered (July 27, 2015), <https://www.npr.org/2015/07/27/426742309/the-shock-of-confinement-the-grim-reality-of-suicide-in-jail>.

C. Pretrial Incarceration Deprives Children, the Elderly, and those with Disabilities of their Caregivers

Even one additional day of pretrial incarceration can have serious ripple effects upon the detainee’s family. When an individual is arrested, those who would otherwise rely on that individual for care are deprived of their caretaker.²¹ These vulnerable individuals—including children, the elderly, and people with disabilities—are harmed as long as their loved ones remain in custody.

Children especially suffer while their parents are incarcerated. Psychologists classify parental incarceration as an “adverse childhood experience,” which puts children at greater risk of “poor social, emotional, and physical health, morbidity, and early mortality.”²² Children with a parent or guardian in pretrial detention experience behavior issues, social stigma, and exacerbation of conditions of poverty.²³ As long as accused people remain in jail, their children experience “acute and chronic psychological stress, parental separation, changes in living arrangements, . . . financial difficulties, and social stigma.”²⁴ By one study’s estimation, parental incarceration is more harmful to children than a parent’s divorce or death.²⁵ Each additional day of pretrial detention implicates significant harm to children and families.

²¹ Pinto, *supra* note 6.

²² Correa et al., *Children of Incarcerated Parents: The Forgotten Victims*, 146 *Pediatrics* 1, 4 (July 2020).

²³ *Id.* at 10.

²⁴ *Id.*

²⁵ Baughman, *Bail Book*, *supra* note 12, at 88.

D. Pretrial Incarceration Negatively Impacts Public Safety

An additional day of detention undermines community safety by increasing the risk of future rearrest for the detainee. A 2013 study found that low-risk defendants detained for 2 to 3 days were nearly 40 percent more likely to be arrested for new crimes pending trial when compared to similar, low-risk defendants detained for 24 hours or less.²⁶ Further, low-risk defendants detained for 2 to 3 days were 17 percent more likely to be arrested for new crimes during the 2 years post-disposition relative to similar low-risk defendants detained for 24 hours or less.²⁷ These results support the view that each day spent in jail destabilizes an accused person's life, making him or her more likely to be involved in future criminal activity in the short and long term.²⁸

II. Bail Determinations Within 48 Hours of Arrest Are a Common Practice Across Jurisdictions

It is common practice in Illinois and across the country, in both small rural and large populous counties, to make bail determinations within 48 hours of arrest. In Illinois, a recent evaluation of nine counties' pretrial practices found that seven of the counties provide an initial hearing within 48 hours of the arrest for purposes of considering bail.²⁹ These seven counties represent a diverse cross-section of

²⁶ Alexander Holsinger, Christopher T. Lowenkamp, and Marie VanNostrand, *The Hidden Costs of Pretrial Detention*, Laura and John Arnold Foundation (Nov. 2013).

²⁷ *Id.* at 20.

²⁸ *Id.* at 3.

²⁹ The Sixth Amendment Center, *The Right to Counsel in Illinois: Evaluation of Adult Criminal Trial-Level Indigent Defense Services*, (June 2021), 94-98, https://sixthamendment.org/6AC/6AC_illinois_report_2021.pdf. (“Schuyler County. An in-

counties in Illinois, as they include Cook, a large urban county, and DuPage, a large suburban county, as well as mid-sized counties Champaign, LaSalle, and Stephenson, and small counties Schuyler and Mercer. Beyond the seven counties within this nine-county sample, other Illinois counties follow this practice as well.³⁰ These jurisdictions successfully hold bail hearings within 48 hours of arrest even though a judge makes a probable cause determination on a warrantless arrest either prior to or during the in-custody defendant's initial appearance.³¹ In other words, the conditions of release are assessed within 48 hours *even if* a probable cause determination is made within that same period.

Jurisdictions outside of Illinois follow the same practice. The State of Colorado recently passed legislation *mandating* that an arresting jurisdiction bring an in-custody arrestee before a court for bond setting as soon as practicable, but no later than 48 hours after an arrestee arrives at a jail or holding facility, and that a

custody defendant has a hearing within 48 hours of the arrest that is solely for the purpose of considering bail . . . *Mercer County*. An in-custody defendant's initial appearance is within 48 hours of the arrest, referred to in the county as the "bail hearing" . . . *Stephenson County*. An in-custody defendant's initial appearance is within 48 hours of the arrest, referred to in the county as the "bond hearing" . . . *LaSalle County*. An in-custody defendant has a hearing within 24 to 48 hours of the arrest, referred to in the county as the "bail hearing." . . . *Champaign County*. An in-custody defendant has a hearing within 48 hours of the arrest. . . . *DuPage County*. An in-custody defendant's initial appearance is within 48 hours of the arrest, referred to in the county as the "bond hearing." . . . *Cook County*. An in-custody defendant has a hearing in "bond court" typically within 24 hours of the arrest").

³⁰ See, e.g., Lake County, Illinois *Bond Court Phase*, <https://www.lakecountylil.gov/1909/Bond-Court-Phase> ("If the defendant cannot post bond or is charged with a serious criminal offense, he or she will be taken to the Lake County Jail and appear before a judge for a bond hearing within 48 hours (usually 24) of arrest.").

³¹ Sixth Amendment Center, *supra* note 29, at 94.

judge, magistrate, or bond hearing officer hold a hearing at which the court enters an individualized bond order no later than 48 hours after an arrestee arrives at a jail or holding facility.³² This was because of concerns that a longer period of detention was having negative effects on those arrested in Colorado, “jeopardizing their employment, and compromising their emotional and physical wellbeing.”³³ Nevada recently passed a similar bill requiring courts to hold pre-trial release hearing within 48 hours of arrest.³⁴ Other jurisdictions mandate an even shorter timeframe—South Carolina, for example, provides that a person charged with a bailable offense must have a bond hearing within twenty-four hours of his arrest,³⁵

³² CO LEGIS 21-1280 (2021), 2021 Colo. Legis. Serv. Ch. 21-1280 (WEST) (signed Jul. 6, 2021, effective April 1, 2022) “The arresting jurisdiction shall bring an in-custody arrestee before a court for bond setting as soon as practicable, but no later than forty-eight hours after an arrestee arrives at a jail or holding facility. A judge, magistrate, or bond hearing officer shall hold a hearing with an in-custody arrestee at which the court shall enter an individualized bond order as soon as practicable, but no later than forty-eight hours after an arrestee arrives at a jail or holding facility.”); *see also* Moe Clark, *A wave of new criminal justice laws were enacted in Colorado. Here are the big takeaways*, Colorado Newline (July 12, 2021), <https://coloradonewline.com/2021/07/12/a-wave-of-new-criminal-justice-laws-were-enacted-in-colorado-here-are-the-big-takeaways/>.

³³ Moe Clark, *Colorado bill requiring bond hearings to be set within 48 hours of arrest moves forward*, Colorado Newline (May 26, 2021), <https://coloradonewline.com/2021/05/26/colorado-bill-requiring-bond-hearings-to-be-set-within-48-hours-of-arrest-moves-forward/> (quoting sponsor State Senator Pete Lee).

³⁴ *Governor Sisolak signs 140 pieces of legislation from 81st Session, including bills in support of Tribal Nations, Nevada National Guard, mental health resources* (June 4, 2021), https://gov.nv.gov/News/Press/2021/Gov_signs_140_pieces_of_legislation/; *see also* NELIS, Assembly Bill No. 424, <https://www.leg.state.nv.us/App/NELIS/REL/81st2021/Bill/8069/Text>.

³⁵ S.C. Code Ann. § 22-5-510.

and, as a practical matter, combines such hearings with a judicial determination of probable cause supporting the arrest warrant.³⁶

Combining probable cause hearings with a bail hearing—and ensuring that both are conducted within 48 hours of arrest—is not just a best practice in effect in many jurisdictions, but it recognizes that “*Riverside* is concerned not only with the obviously innocent, but also with those who might be entitled to bail.” *Bridewell v. Eberle*, 730 F.3d 672, 680 (7th Cir. 2013) (Wood, J., concurring). By failing to provide bail hearings within 48 hours of arrest, Winnebago County ignores this important interest.

CONCLUSION

For the foregoing reasons, this Court should hold that the Fourth Amendment entitles a pretrial detainee to a judicial determination of eligibility for release on bail within 48 hours of a warrantless arrest and reverse the judgment of the district court in this case.

Respectfully Submitted,

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³⁶ South Carolina Office of the Attorney General May 11, 2021 Letter, 2021 WL 2181991, at *2 (S.C.A.G. May 11, 2021) (“Our 1998 opinion noted that ‘a judicial determination on the arrest warrant and the bond hearing will occur virtually simultaneously, in many instances’ Finally, we reiterate that as a practical matter, the presence of a warrant often is intertwined with a bond hearing”).

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CERTIFICATE OF COMPLIANCE

Pursuant to Fed. R. App. P. 32(a) and Circuit Rule 29, I certify as follows:

1. The foregoing amicus brief complies with the type-volume Circuit Rule 29 because this brief contains 4,008 words, excluding the parts of the brief exempted by Fed. R. App. P. 32(f); and

2. This brief complies with the typeface requirements of Fed. R. App. P. 32(a)(5) and the type style requirements of Fed. R. App. P. 32(a)(6) because this brief has been prepared in a proportionally-spaced typeface using Microsoft Word 2011 in 12-point Century Schoolbook font.

/s/ Chirag G. Badlani
Chirag G. Badlani

CERTIFICATE OF SERVICE FOR ELECTRONIC FILINGS

I hereby certify that on July 19, 2021, I electronically filed the foregoing Brief with the United States Court of Appeals for the Seventh Circuit by using the appellate CM/ECF system. I certify that all participants in this case are registered CM/ECF users and that service will be accomplished by the appellate CM/ECF system.

/s/ Chirag G. Badlani
Chirag G. Badlani

EXHIBIT A: LIST OF AMICI

A Just Harvest is a nonprofit organization whose mission is to fight poverty and hunger in the Rogers Park and greater Chicago community by providing nutritious meals daily while cultivating community and economic development and organizing across racial, cultural, and socioeconomic lines in order to create a more just society.

Believers Bail Out (BBO) is a Chicago-based, community-led effort to bail out Muslims in pretrial incarceration and ICE custody. BBO supports efforts to abolish money bail and to raise awareness within Muslim communities of the injustices of the bail bond system, immigration bonds, and the broader prison-industrial complex.

Champaign County Bailout Coalition (CCBC) helps to pay the bond of community members unable to afford it through grassroots fundraising. CCBC then recycles those donations to pay the bail of another person incarcerated in Champaign County Jail.

Chicago Appleseed Center for Fair Courts works to promote equity and full access to justice for all in courts located in Cook County and across the state of Illinois. Chicago Appleseed is a 501(c)(3) research and advocacy organization. In its work, Chicago Appleseed monitors, evaluates, and develops best practices for pretrial criminal court proceedings, supported by court watching, interviews, and other data collection efforts and analyses.

Chicago Community Bond Fund (CCBF) pays bond for people charged with crimes in Cook County, Illinois. Through a revolving fund, CCBF supports individuals whose communities cannot afford to pay the bonds themselves and who have been impacted by structural violence. CCBF also engages in public education about the role of bond in the criminal legal system and advocates for the abolition of money bond.

Civil Rights Corps is a non-profit civil rights organization that has litigated bail issues in Illinois and around the country. Civil Rights Corps lawyers have worked with prosecutors, state court judges, local government officials, academic researchers, law enforcement officers, public defenders, state Attorneys General, and federal officials to address approaches to pretrial release and detention practices. Civil Rights Corps lawyers have also challenged the improper use of secured money bail in federal and state courts in Alabama, California, Georgia, Illinois, Kansas, Louisiana, Massachusetts, Mississippi, Missouri, Tennessee, and Texas.¹ Civil Rights Corps lawyers have developed extensive expertise on pretrial systems throughout the country.

Eliminate Racism 815 is a group of community members in the Rockford area whose mission is to eliminate racism and become a community where everyone feels valued.

¹ See, e.g., *ODonnell v. Harris Cnty., Texas*, No. CV H-16-1414, 2017 WL 1735456, at *2 (S.D. Tex. Apr. 28, 2017); *Rodriguez v. Providence Cmty. Corr., Inc.*, 155 F. Supp. 3d 758 (M.D. Tenn. 2015); *Jones ex rel. Varden v. City of Clanton*, 2015 WL 5387219 (M.D. Ala. 2015); *Thompson v. Moss Point*, 2015 WL 10322003 (S.D. Miss. 2015); *Pierce et al. v. City of Velda City*, 2015 WL 10013006 (E.D. Mo. 2015); *Robinson v. Martin*, No. 2016-CH-13587 (Ill. Cir. Ct. Cook Cnty. 2016); and *Commonwealth v. Wagle*, No. SJ-2016-334 (Mass. 2016).

Faith Coalition for the Common Good is a non-profit organization formed to address the injustices of racism and poverty in the central Illinois region. Faith Coalition provides a means for members of religious congregations and community organizations to effectively participate in the political, environmental, social and economic decisions affecting their communities. The issue work of Faith Coalition focuses on workforce diversity and economic equity, reform of the criminal justice system, equitable education funding for all, civic engagement, and immigration reform.

Nehemiah Trinity Rising is a faith-based, not-for-profit corporation dedicated to building peace. It provides education about restorative justice practices and skills for using such practices. It also develops organizational relationships for the implementation of restorative justice practices in different settings, such as schools, churches, detention centers, and prisons, as a way of transforming relationships, changing mindsets about conflict, and healing the surrounding communities.

New Zion Baptist Church is a church in Rockford, Illinois that seeks to perform good works in the surrounding community.

Roderick & Solange MacArthur Justice Center (MJC) is a not-for-profit organization founded by the family of J. Roderick MacArthur to advocate for civil rights, and for a fair and humane criminal justice system. MJC has represented clients facing myriad civil rights injustices, including issues concerning habeas corpus, unlawful confinement, and the treatment of incarcerated people.

The People's Lobby is a membership-driven organization of people across the Chicago region that work together to build widespread support for public policies and candidates—including people from the surrounding communities—that put racial and gender justice and the needs of people and the planet before the interests of big corporations and the very rich.

The Unitarian Universalist Church is a church in Rockford, Illinois that seeks to perform acts for justice to foster greater equity, understanding, and solidarity in the surrounding community.

Unitarian Universalist Prison Ministry of Illinois (UUPMI) seeks to support people harmed by the prison industrial complex by providing worship services to people incarcerated in Illinois prisons.

United Congregations of MetroEast (UCM) is a group of pastors and church members from different congregations throughout the metro east area who work together on social justice issues.

Southsiders Organized for Unity and Liberation (SOUL) is an independent, grassroots, multi-issue organization that addresses community issues on Chicago's South Side and South Suburbs. SOUL works to fight for justice for all, especially those who have historically been marginalized and oppressed.