UNPUBLISHED

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

No. 24-4503

UNITED STATES OF AMERICA,

Plaintiff - Appellee,

v.

JOHN ROBERT WILLIAMS, III,

Defendant - Appellant.

Appeal from the United States District Court for the District of Maryland, at Greenbelt. Theodore D. Chuang, District Judge. (8:22-cr-00453-TDC-1)

Submitted: April 29, 2026 Decided: August 21, 2026

Before THACKER, RICHARDSON, and QUATTLEBAUM, Circuit Judges.

Affirmed by unpublished per curiam opinion.

ON BRIEF: Marc G. Hall, LAW OFFICE OF MARC G. HALL, P.C., Greenbelt, Maryland, for Appellant. Kelly O. Hayes, United States Attorney, David C. Bornstein, Assistant United States Attorney, OFFICE OF THE UNITED STATES ATTORNEY, Baltimore, Maryland, for Appellee.

Unpublished opinions are not binding precedent in this circuit.

PER CURIAM:

John Robert Williams, III appeals from his conviction of one count of possession of a firearm and ammunition by a felon in violation of 18 U.S.C. § 922(g)(1). On appeal, he argues that § 922(g)(1) violates the Second Amendment as applied to him and that the district court erred in denying his motions to suppress and to dismiss the indictment. We affirm.

Williams' Second Amendment challenge is foreclosed by our decision in *United States v. Hunt*, 123 F.4th 697 (4th Cir. 2024), *cert. denied*, 145 S. Ct. 2756 (2025). And his arguments concerning the denial of his motion to suppress fare no better.[*] First, as to whether the police had reasonable suspicion to instigate the investigative stop, the police officer who stopped Williams saw him at night and in a high crime area known for drug dealing, standing in the door frame of a car matching the description of one recently suspected of involvement in drug dealing. When Williams spotted the officer, the officer observed him turning and tossing a blue bag into the vehicle, causing the officer to believe Williams was engaged in an aborted drug transaction. Under these circumstances, we find no error in the district court's conclusion that the officer had reasonable suspicion Williams had committed a crime. *Cf. United States v. Johnson*, 599 F.3d 339, 340 (4th Cir. 2010) (finding reasonable suspicion when "[p]olice witnessed [defendant] making what appeared

[*] We review the district court's reasonable suspicion and probable cause determinations—which are legal conclusions—de novo, but we review the factual findings underlying these determinations for clear error, construing the facts in the light most favorable to the government. *United States v. Hawkins*, 161 F.4th 242, 245 (4th Cir. 2025).

to be a series of hand-to-hand exchanges with multiple people in a known open-air drug market").

Next, as to whether the officer violated the Fourth Amendment when searching Williams' vehicle, officers "may seize evidence in plain view, provided that they have not violated the Fourth Amendment in arriving at the spot from which the observation of the evidence is made." *Kentucky v. King*, 563 U.S. 452, 463 (2011). And law enforcement doesn't transgress the Fourth Amendment when "shining [a] flashlight to illuminate the interior of [a suspect]'s car." *Texas v. Brown*, 460 U.S. 730, 739–40 (1983) (plurality opinion); *see also United States v. Finch*, 679 F.2d 1083, 1085 (4th Cir. 1982) (finding shining of flashlight into vehicle to discover contraband permissible). In addition, law enforcement may conduct a warrantless search of an automobile if they have probable cause to believe it contains evidence of criminal activity. *United States v. Patiutka*, 804 F.3d 684, 690 (4th Cir. 2015). Here, we find no error in the district court's conclusion that law enforcement had probable cause to search the vehicle. Because the officer had reasonable suspicion to instigate the stop and discovered a firearm in the course of that stop, the officer didn't violate the Fourth Amendment in arriving to the spot where he shined the flashlight into the car. Then, because the officer saw suspected narcotics and the scale in the car in plain view, he was justified in searching the vehicle.

Finally, as to whether the district court erred in denying Williams' motion to dismiss the indictment, under the Speedy Trial Act, "[a]ny information or indictment charging an individual with the commission of an offense shall be filed within thirty days from the date on which such individual was arrested or served with a summons in connection with such

charges." 18 U.S.C. § 3161(b). Failure to comply with the 30-day requirement results in the dismissal or dropping of charges. *Id.* § 3162(a)(1).

Typically, "at least while a state has valid charges currently pending against an individual," an "individual being held by state authorities is [not] ever under 'federal arrest' or in 'federal custody,'" so the Speedy Trial Act doesn't apply. *United States v. Woolfolk*, 399 F.3d 590, 595–96 (4th Cir. 2005). But an exception exists to this rule—the clock starts running when the federal government "knew or should have known that the defendant was restrained solely to answer federal charges." *Id.* at 596.

Here, the district court found Williams wasn't in state custody only to answer federal charges because the state case was still pending when Williams' federal indictment was filed in December 2022. The court reasoned that the state court had set a hearing for February 2023 and a trial for March 2023. Indeed, it noted the federal government represented "the state prosecutors never expressed any intent to just dismiss th[e] [state] case outright in the absence of federal charges." J.A. 164. So, the Speedy Trial Act clock didn't start running when Williams was arrested on state charges, and no dismissal was warranted.

We review the district court's factual findings for clear error. *United States v. Burgess*, 684 F.3d 445, 450 (4th Cir. 2012). And having reviewed the record, we find no error. *Cf. United States v. Brown*, No. 24-4182, 2026 WL 2086101, at *1 (4th Cir. July 20, 2026) (rejecting similar argument because "[t]he district court found, as a factual matter, that [the defendant] was arrested on a state charge and was being prosecuted in state court").

For these reasons, we affirm. We dispense with oral argument because the facts and legal contentions are adequately presented in the materials before us and argument would not aid the decisional process.

AFFIRMED