UNPUBLISHED

UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT

No. 25-4244

UNITED STATES OF AMERICA,

Plaintiff - Appellee,

v.

ALONZO MARKELL JENKINS,

Defendant - Appellant.

Appeal from the United States District Court for the District of South Carolina, at Charleston. Bruce H. Hendricks, District Judge. (2:22-cr-00032-BHH-1)

Submitted: August 20, 2026 Decided: August 24, 2026

Before AGEE and RUSHING, Circuit Judges, and TRAXLER, Senior Circuit Judge.

Affirmed by unpublished per curiam opinion.

ON BRIEF: Joshua Snow Kendrick, KENDRICK & LEONARD, P.C., Greenville, South Carolina, for Appellant. Bryan P. Stirling, United States Attorney, Andrea G. Hoffman, Assistant United States Attorney, OFFICE OF THE UNITED STATES ATTORNEY, Charleston, South Carolina, for Appellee.

Unpublished opinions are not binding precedent in this circuit.

PER CURIAM:

A jury convicted Alonzo Markell Jenkins of possession of a firearm by a felon, in violation of 18 U.S.C. § 922(g)(1) and § 924(a)(2). On appeal, Jenkins argues that the district court erred in denying his motion to suppress evidence of his possession of firearms obtained during a traffic stop. Finding no reversible error, we affirm.

When considering a district court's denial of a suppression motion, we "review legal conclusions de novo and factual findings for clear error [and] . . . consider the evidence in light most favorable to the Government." *United States v. Pulley*, 987 F.3d 370, 376 (4th Cir. 2021) (citation and internal quotation marks omitted). "When reviewing factual findings for clear error, we particularly defer to a district court's credibility determinations, for it is the role of the district court to observe witnesses and weight their credibility during a pre-trial motion to suppress." *Id.* (internal quotation marks omitted).

Jenkins argues that the district court erred in finding that the police officer who stopped his vehicle had reasonable suspicion for the stop based on a traffic violation, or alternatively, because the officer had reasonable suspicion that Jenkins was engaged in criminal activity. The temporary detention of a person during a routine traffic stop, "even if only for a brief period and for a limited purpose," constitutes a seizure of a person within the meaning of the Fourth Amendment. *Whren v. United States*, 517 U.S. 806, 809 (1996); *United States v. Branch*, 537 F.3d 328, 335 (4th Cir. 2008). Thus, an automobile stop must not be unreasonable under the circumstances. *Whren*, 517 U.S. at 810. Observation of any traffic violation, no matter how minor, gives an officer probable cause to stop a vehicle. *United States v. Hassan El*, 5 F.3d 726, 730 (4th Cir. 1993).

The district court found credible the police officer's testimony that he stopped Jenkins for failing to have his headlights on while driving in the dark, in violation of S.C. Code Ann. § 56-5-4450. Though Jenkins argued that he was in compliance with state law because his running lights were illuminated and he was traveling less than 20 miles per hour, *see* S.C. Code Ann. § 56-5-4810, the court credited the officer's testimony that the running lights were not on and found that it was consistent with video evidence. Moreover, the court stated that it was not persuaded by Jenkins's testimony. We have reviewed the record and conclude that the district court's credibility findings are not clearly erroneous.[*] Therefore, the officer had reasonable suspicion for the stop based on the traffic violation he witnessed.

Jenkins also argues that the court erred in finding that the search of the vehicle following Jenkins's detention behind the vehicle was reasonable. However, the officer testified that upon approaching the vehicle, he saw a duffle bag containing several firearms in the back seat. Under South Carolina law at the time of the stop, handguns carried in a vehicle had to be secured in a closed glove compartment, closed console, closed truck, or closed container secured by a fastener. S.C. Code Ann. § 16-23-20(9) (2022). Therefore, the officer had reasonable suspicion of criminal activity to justify the search of the vehicle after Jenkins was secured.

[*] Because we conclude that the district court did not err in finding that the officer had probable cause to stop Jenkins based on a traffic violation, we need not address Jenkins's challenge to the district court's determination that the stop was also justified based on the officer's reasonable suspicion that Jenkins was engaged in criminal activity.

Accordingly, we affirm the district court's judgment. We dispense with oral argument because the facts and legal contentions are adequately presented in the materials before this court and argument would not aid the decisional process.

AFFIRMED