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STATE OF NEW JERSEY, vs. CONSTANCE DAYS-CHAPMAN, Defendant.	SUPERIOR COURT OF NEW JERSEY LAW DIVISION: CRIMINAL PART ATLANTIC COUNTY INDICTMENT NO. 24-09-02900 **NOTICE OF MOTION TO QUASH THE MARCH 20, 2024 SEARCH WARRANTS AND TO SUPPRESS EVIDENCE**

TO: Kathleen E. Robinson, Esq.
Chief Assistant Prosecutor
Atlantic County Prosecutor's Office
4997 Unami Blvd.
Mays Landing, NJ 08330

PLEASE TAKE NOTICE that the undersigned attorney for Defendant Constance Days-Chapman hereby moves before the Superior Court of New Jersey, Law Division: Criminal Part in Atlantic County, New Jersey, on a date and time to be set by the Court, for an Order quashing the March 20, 2024 search warrants and suppressing evidence and for other relief as the Court deems just and proper.

PLEASE TAKE FURTHER NOTICE that, in support of the within Motion, Defendant shall rely upon the enclosed brief and Certification of Lee Vartan, Esq. with exhibits.

PLEASE TAKE FURTHER NOTICE that a proposed Order is submitted herewith.

PLEASE TAKE FURTHER NOTICE that Defendant requests oral argument if timely opposition to this Motion is filed.

By: *s/ Lee Vartan*

Dated: November 8, 2024

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STATE OF NEW JERSEY, vs. CONSTANCE DAYS-CHAPMAN, Defendant.	SUPERIOR COURT OF NEW JERSEY LAW DIVISION: CRIMINAL PART ATLANTIC COUNTY INDICTMENT NO. 24-09-02900

BRIEF OF DEFENDANT CONSTANCE DAYS-CHAPMAN IN SUPPORT OF HER MOTION TO QUASH THE MARCH 20, 2024 SEARCH WARRANTS AND TO SUPPRESS EVIDENCE

On the brief:

Lee Vartan, Esq. (041252006)
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PRELIMINARY STATEMENT

The State secured three search warrants for three of Defendant Constance Days-Chapman's electronic devices, two cellular phones and an Apple Watch. The State's contention was that the devices contained evidence of official misconduct and conspiracy to commit official misconduct, among other crimes. Each warrant was unconstitutional, and the evidence obtained by the State must be suppressed.

First, and most basically, even if the State had probable cause that evidence of crimes was on some electronic device, the State did not have probable cause to believe that evidence of crimes was on the devices it seized and searched. In the certification of probable cause, there was no mention of an Apple Watch. Nor was there any mention of whether an Apple Watch could even store communications (or anything). Likewise, in a single paragraph, the certification discussed toll records between Days-Chapman and her alleged co-conspirators. But those communications happened on one of the phones, not both. One of the phones, like the Apple Watch, is nowhere mentioned in the certification of probable cause. So, for the Apple Watch and one of the phones, the State alleged no probable cause to search either because neither was even mentioned in the certification.

Second, all three warrants are overbroad on their face in violation of State v. Missak. Reading the certification of probable cause in the light most favorable to the State, it alleged a conspiracy to conceal parental abuse from December 2023 through January 2024. But the warrants authorized law enforcement officers to search and seize everything on Days-Chapman's three devices, with no limitation as to time or subject matter. Very plainly, the warrants authorized officers to seize all "stored electronic information on the device[s]." That violates Missak.

Third, the probable cause alleged in the certification for the one phone (whichever phone that was) was deficient. The State alleged: (*i*) over 100 toll records between Days-Chapman's

phone and the Smalls' phones; (*ii*) an outgoing call from Days-Chapman to Mrs. Small the day [redacted] disclosed the alleged abuse; and (*iii*) toll records between Mr. Small and Days-Chapman after the alleged abuse had been disclosed to State authorities. That's it. The certification omitted that Days-Chapman is the Smalls' close friend, including Mr. Small's campaign manager and the chairperson of the Atlantic City Democratic Committee. It likewise omitted that, as the principal of Atlantic City High School, Days-Chapman reported to Mrs. Small, the superintendent. Of course, there would be regular telephone and text communications among the three. The State also omitted that the only "suspect" call, from the day [redacted] disclosed the alleged abuse to her counselor, lasted just 1 minute. There was no time for Days-Chapman to communicate anything of substance to Mrs. Small; it's not even clear the two spoke.

The State did not have probable cause to search Days-Chapman's phone. Probable cause to believe that a crime was committed does not automatically and without more provide probable cause to search a suspect's phone. There must be independent probable cause that evidence of that crime would be on the phone, and here there was none.

The State's warrants were unconstitutional, and all evidence must be suppressed.

FACTUAL BACKGROUND

The essential facts of the State's investigation are straightforward. The State alleges that the Smalls' [redacted] was abused by [redacted]; [redacted]. first disclosed the alleged abuse to Days-Chapman in December 2023; Days-Chapman failed to report the alleged abuse to the Division of Child Protection and Permanency ("DCP&P") as required by school district policy; [redacted] disclosed the alleged abuse a second time in January 2024 to a high school counselor, who, in turn, disclosed the alleged abuse to Days-Chapman; Days-Chapman again failed to report the alleged abuse to DCP&P; and Days-Chapman failed to report the alleged abuse to protect the Smalls. That was the "official misconduct."

On March 20, 2024, the State applied for and obtained three warrants to search Days-Chapman's two cellular phones and Apple Watch. (Certification of Lee Vartan, Esq. Exs. A1 (iPhone), A2 (Samsung), A3 (Watch).) The warrants relied upon a single certification of probable cause from Detective Daniel Choe dated the same day. The certification did not mention the Apple Watch at all. The certification did mention one phone, but not two phones.

With respect to the one phone mentioned, the probable cause was limited to just one paragraph. (Vartan Certification, Ex. B at ¶ 3(tt).) And that paragraph was misleading by omission. It implied there was something suspect in the number of toll records between Days-Chapman and the Smalls when the State knew better. Days-Chapman is the Smalls' close friend, the principal of Atlantic City High School, the mayor's campaign manager, and the chairperson of the Atlantic City Democratic Committee. Of course the three would be in regular communication. The certification also highlighted a call between Days-Chapman and Mrs. Small from the day [redacted] disclosed the alleged abuse to a counselor. But again, the State misled by omission. That call lasted just 1 minute; nothing of substance could have been communicated—it is not even clear the two actually spoke at that time, rather than being a missed call.

In short, the State offered no probable cause that evidence of any crime would be found on Days-Chapman's one phone. Rather, the State's theory seems to have been that when the State has probable cause to believe a crime was committed, it has carte blanche to search a suspect's phone. According to the State, if there is probable cause that a crime was committed, then there is also probable cause to search the suspect's phone—without more. That is not what the Fourth Amendment says. The State must have probable cause to believe that evidence of a crime will be found at the place to be searched. The State did not have probable cause that evidence of any crime would be found on Days-Chapman's phone.

The Fourth Amendment also requires particularity, and the certification and three warrants had none. The warrants allowed officers to search through all "stored electronic information" on each of the devices. (Vartan Certification, Exs. A1 at 2, A2 at 2, A3 at 2.) The certification made it explicit that officers were to search for "[a]ny and all stored electronic information." (Vartan Certification, Ex. B at ¶ 1(i);¶ 6(a).) Executing officers could equally seize Days-Chapman's communications with her doctor as they could her communications with the Smalls about the alleged abuse. The warrants had no time or subject matter limitations; they authorized officers to take everything in violation of State v. Missak.

These three unconstitutional search warrants must be quashed, and all evidence obtained from them must be suppressed.

ARGUMENT

THIS COURT MUST QUASH THE SEARCH WARRANTS AND SUPPRESS THE EVIDENCE OBTAINED.

A. The search warrants for the electronic devices were overly broad in violation of State v. Missak.

The State seized three electronic devices based on facially invalid search warrants. All evidence taken from the Apple iPhone, Samsung Phone, and Apple Watch[1] must be suppressed.

Search warrants are presumptively valid. State v. Bivins, 226 N.J. 1, 11 (2016). But warrants are not infallible once issued. The Appellate Division recently emphasized the constitutional standards that a search warrant for electronic devices must satisfy. The failure to

[1] Independently, the warrant for the watch is facially invalid. First, the application provides no statement that an Apple Watch is even capable of storing electronic data. Second, the warrant itself refers to the watch as "a cellular telephone" and "wireless phone." (Vartan Certification, Ex. A3 at 1-2.)

abide by these requirements renders a search warrant facially invalid under the Fourth Amendment and Article 1, paragraph 7 of the New Jersey Constitution.

In State v. Missak, the Appellate Division reviewed a warrant application to search the defendant's phone. 476 N.J. Super. 302 (App. Div. 2023). The defendant argued the warrant was unconstitutional because the warrant—without any limitation—authorized a search "for the entirety of the phone's contents." Id. at 318. Ultimately, the court concluded that the certification in support of the application did not provide sufficient facts demonstrating probable cause for such an "expansive search warrant for all the data and information on the seized cellular phone." Id. at 322 (emphasis added). The specific "constitutional infirmity" in the warrant was "grounded" in this authorization to search all information and data without adequate probable cause showing that evidence of criminal conduct would be found in all information and data. Id. at 322-23.

In reaching its decision, the Missak court emphasized the constitutional issues inherent in broad searches of electronic data. The panel stressed that "issues related to electronic data stored on personal devices" raise "important and challenging issues for law enforcement, the citizenry, and the courts during criminal investigations and prosecutions, especially in the application of the state and federal constitutional protections against unreasonable searches and seizures." Id. at 318.

The Appellate Division relied on a Connecticut Supreme Court decision in justifying its holding. Id. at 320. In that case, the Connecticut Supreme Court found unconstitutional "a search warrant for all the data on a cellular phone in part because the warrant 'included no time parameters to cabin the scope of the search but, rather, allowed for the entire contents of the phone to be searched for all time.'" Id. (quoting State v. Smith, 278 A.3d 481, 497 (Conn. 2022)). The court found the Missak warrant suffered from the same constitutional infirmities.

The warrant application in Missak did not temporally limit the search and seizure of the defendant's data; according to the warrant, the officers could search through all data without regards to when that data was created or accessed. Id. at 319-20. The State alleged the crime occurred on December 8, 2021; the warrant application contained no facts supporting probable cause to search the phone for any data pre-dating that time. Id. The Appellate Division found that the lack of temporal limitation invalidated the warrant. Id.

The warrant application also did not limit the search and seizure to any particular type of "information and data" either. Id. Instead, the warrant allowed seizure, without restriction, of texts, calls, GPS data, and other information. Id. The court found that the warrant was invalid because the warrant application did not "establish[] a reason to believe all the phone's various contents, information, and data may include evidence of the crimes for which the warrant was sought and [defendant] is charged." Id. at 318 (emphasis added).

The Appellate Division concluded by providing advice to law enforcement officials on what to include in future applications: "[F]uture search warrant application[s] should address such issues to allow the court to determine the locations within the data and information on the cellular phone there is probable cause to believe relevant information concerning the crimes charged may be found." Id. at 323.

Unfortunately, the State did not heed the Appellate Division's advice when submitting the applications to search Days-Chapman's three electronic devices. The applications here failed to provide "the locations within the data and information on the cellular phone" wherein there was probable cause to believe there would be evidence of criminal conduct. See id. at 323. Instead, the applications for these warrants suffered from the same "constitutional infirmity" as Missak's—the State sought an "expansive search warrant for all the data and information on the seized cellular

phone." Id. at 322-23 (emphasis added). Indeed, the supporting certification here explicitly asked to do so, specifically seeking authorization to search "[a]ny and all stored electronic information." (Vartan Certification, Ex. B at ¶ 1(i);¶ 6(a).)

The State alleged that criminal activity occurred from December 2023 through January 2024. Yet the warrants allowed officers to seize data that may have existed years before the alleged crimes occurred.

Likewise, there was no limitation as to the type of data seizable. As in Missak, the broad warrants permitted seizure of "emails, all stored contact numbers, stored incoming and outgoing calls, stored incoming and outgoing text/image messaging, stored chats, stored images/videos, internet website visitation/search history and any additional stored digital evidence [sic] the above mentioned crimes." (Vartan Certification, Exs. A1 at 2, A2 at 2, A3 at 2.)

Nor did the warrants provide any guidance to the executing officers for them to know what they could seize and what was off limits. The crimes identified, official misconduct and conspiracy to commit official misconduct, are broad crimes without defined parameters. The warrants failed to provide search terms or subject matter restrictions such that the officers would know what was, and what was not, within their authority to seize. "Specificity is required in the warrant so that the discretion of the executing officer may be limited." State v. Muldowney, 60 N.J. 594 (1972). The broad search warrants here gave too much discretion to the executing officers to decide what electronic items to seize as relevant. See Missak, 476 N.J. Super. at 315 (noting that the Fourth Amendment and Article 1, paragraph 7 protect against warrants that "vest[] the executing officer with unfettered discretion" (quotation omitted).) This lack of specificity and direction for the executing officers is further fatal to the warrants.

As the Court in Missak noted, it's possible that more narrowly constructed warrants with appropriate limitations may have been constitutional. See 476 N.J. Super. at 321-22. In fact, it seems the State is aware of its Missak obligations and implemented them in a different warrant in this investigation. The State applied for, and was granted, a Communications Information Order from Verizon Wireless for toll records for Days-Chapman's phone. (See Vartan Certification, Ex. B at ¶ 3(pp);¶ 3(tt).) Pursuant to Missak, that application was temporally limited to December, January, and February. (Id. at ¶ 3(pp).) The State was well aware of how to implement the appropriate Missak limitations. For whatever reason though, the State chose not to do so for these warrant applications. And that is fatal to the warrants.

Without the appropriate limitations, as required by Missak, these three search warrants for Days-Chapman's electronic devices are facially invalid. Each warrant must be quashed, and all evidence obtained by the State must be suppressed.

B. The warrant applications failed to provide any nexus between the alleged criminal conduct and the electronic devices.

Compounding the Missak problem, and providing separate grounds for suppression, the certification fails to provide any justification for the detective's belief that any of the three devices would contain evidence of criminal conduct.

"The application for a warrant must satisfy the issuing authority that there is probable cause to believe that a crime has been committed, or is being committed, at a specific location or that evidence of a crime is at the place sought to be searched." State v. Boone, 232 N.J. 417, 4267 (2017) (emphasis in original) (quotation omitted). It is not enough for an application to establish probable cause that a crime occurred; rather, probable cause requires a "fair probability" that evidence of that crime will be found in a particular place. State v. Chippero, 201 N.J. 14, 28 (2009). See, e.g., State v. Boone, 232 N.J. 417, 430 (2017) ("[A]lthough police may arguably have

demonstrated in the application that they had probable cause to believe [defendant] had committed a crime, nothing on the face of the warrant application gave rise to probable cause to believe that evidence of any of [defendant's] wrongdoing might be specifically found in [the place identified in the search warrant].").

Assuming the facts in the certification establish probable cause that a crime was committed, there is no probable cause that evidence of that crime would be found on any of Days-Chapman's electronic devices. The certification just does not factually connect the supposed crimes to Days-Chapman's electronic devices, whether her phones or her watch. Indeed, the State's entire theory was that Days-Chapman failed to report an incident to the Division of Child Protection and Permanency. The certification does not identify what kind of evidence an electronic device would have for the crime of failing to act.

As the Supreme Court "emphasize[d]," "judges issuing search warrants must scrutinize the warrant application and tie specific evidence to the persons, property, or items the State seeks to search. Without that specificity and connection to the facts, the application must fail." Boone, 232 N.J. at 431.

But the certification here contains just one bare reference that: "Based upon my training, experience, and the investigation to date, I have probable cause to believe that items of evidentiary value, in particular electronic devices to support evidence of crimes of aggravated assault, endangering the welfare of a child, and official misconduct [sic]." (Vartan Certification, Ex. B at ¶ 4.) But this just amounts to securing a warrant for a suspect in the hopes that their phone contains evidence of the crime. Vague statements such as this one cannot support a finding of probable cause that evidence would be found in a particular location. See, e.g., State v. Halgas, No. A-2851-23, 2024 WL 4563241, at *8 (App. Div. Oct. 24, 2024) (granting defendant's leave to appeal,

reversing denial of suppression motion, and noting there is no need to reach "scope of search issue addressed in Missak" where "warrant application does not set forth any factual basis to find a nexus between the alleged crimes and information that might be located on cell phones").

Courts in other jurisdictions have rejected similarly broad language, recognizing the problem that if generalized averments about information likely to be found on cell phones were sufficient, then "it would be a rare case where probable cause to charge someone with a crime would not open the person's cellular telephone to seizure and subsequent search." Commonwealth v. White, 59 N.E.3d 369, 377 (Mass. 2016). See also State v. Baldwin, No. PD-0027-21, 2022 WL 1499508, at *1 (Tex. Crim. App. May 11, 2022) ("[B]oilerplate language may be used in an affidavit for the search of a cell phone, but to support probable cause, the language must be coupled with other facts and reasonable inferences that establish a nexus between the device and the offense."); Buckham v. State, 185 A.3d 1, 17 (Del. 2018) (holding that "generalized suspicions" that defendant may have used his phone to communicate about crimes and make social media posts relating to criminal activity were inadequate to support a probable cause finding).

Reading the certification in the light most favorable to the State, it appears that the detective believed the phone would contain evidence of a conspiracy to commit official misconduct. Setting aside the problems with such generalized statements connecting a phone to criminal conduct, this is insufficient for other reasons too. The certification does not spell out the scope of the conspiracy. Nor does the certification specify who the co-conspirators were. The certification simply lacks any nexus between the phone and the alleged criminal conduct.

Indeed, the certification indicates the State's theory was that the conspiracy occurred in person—and not on the phone. The certification spends considerable effort identifying who entered and exited Days-Chapman's car on January 22, 2024 and at what times. (See Vartan

Certification, Ex. B at ¶ 3(mm); ¶ 3(qq).) To the extent the certification establishes probable cause for a conspiracy, the conspiracy transpired in person in that car on January 22, and not over the phone.

At most, the certification establishes that one of the seized phones was used to make the communications identified with Mr. and Mrs. Small. (See id. at ¶¶ 3(tt)(b) and (c).) But the certification does not specify with particularity which one of the seized phones was used to make these communications. And, as discussed supra, there is no connection between the Apple Watch and any supposed criminal activity.

The fact that these communications existed is not sufficient to establish probable cause that the phone would contain evidence of criminal conduct. The certification identifies over 100 communications, (id.), as if that is suspicious activity supporting a probable cause finding. But Days-Chapman was friends with the Smalls. Moreover, she was the campaign manager for Mr. Small. And Mrs. Small is the superintendent of the Atlantic City Public Schools, who Days-Chapman, as principal, reported to. There was an existing, ongoing relationship. Yet the certification omitted this material information to make the communications appear nefarious or worse. At a minimum, the failure to include this material information about the pre-existing relationships and the closeness between Days-Chapman and the Smalls requires a Franks hearing to determine whether this omitted information impacted the finding of probable cause. See Franks v. Delaware, 438 U.S. 154 (1978).

Focusing on the specific communications identified in the certification further demonstrates how they do not support a finding of probable cause. The State identifies two suspicious communications. The first, on January 22, was an outgoing call from Days-Chapman to Mrs. Small. (See Vartan Certification, Ex. B at ¶ 3(tt)(b).) The State failed to disclose that this

outgoing call at 4:07 p.m. was a short one, lasting just one minute. Indeed, there is no indication that Mrs. Small even answered the call or that the two spoke at that time. See Franks, 438 U.S. 154. Nor is there any indication that the call was criminal in any way, and not simply a call from a principal to her superintendent in the normal course. A call of such a limited nature cannot be used to support a finding of probable cause. The second suspicious communication was a series of communications between Mr. Small and Days-Chapman on January 31. But they also do not support a finding of probable cause. (See Vartan Certification, Ex. B at ¶ 3(tt)(c).) As discussed, Days-Chapman was Mr. Small's campaign manager. And, more importantly, January 31 was after any alleged conspiracy was over and thus cannot be evidence of the crime. By January 31, the allegations were known, and DCP&P had started conducting interviews. To the extent the State's theory of criminality is that Days-Chapman failed to report conduct to DCP&P, or conspired to do so, her failure to report was already completed and no longer ongoing on January 31.

The detective's unsubstantiated statement that he believed there would be evidence on Days-Chapman's electronic devices is not sufficient to establish probable cause that any of those devices would in fact contain evidence of criminal conduct. For this independent reason, all evidence obtained from the search warrants must be suppressed.

CONCLUSION

For the foregoing reasons, the three search warrants must be quashed, and the evidence obtained must be suppressed.

CHIESA SHAHINIAN & GIANTOMASI PC

By: *s/ Lee Vartan*

Dated: November 8, 2024

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STATE OF NEW JERSEY, vs. CONSTANCE DAYS-CHAPMAN, Defendant.	SUPERIOR COURT OF NEW JERSEY LAW DIVISION: CRIMINAL PART ATLANTIC COUNTY INDICTMENT NO. 24-09-02900 **ORDER**

WHEREAS this matter comes before the Court on motion by Chiesa Shahinian & Giantomasi PC, attorneys for Constance Days-Chapman ("Defendant"), seeking a motion to quash the March 20, 2024 search warrants and to suppress evidence and for such other relief as the Court deems just and proper; and the Court having considered the submissions of the parties; and for good cause shown;

It is on this ___ day of _____ 2024,

ORDERED that Defendant's Motion to Quash the March 20, 2024 Search Warrants and to Suppress Evidence is hereby granted;

AND IT IS FURTHER ORDERED that Chiesa Shahinian & Giantomasi PC shall forward a copy of this Order as executed by the Court to all other counsel who have appeared within seven (7) days of its receipt.

_____

HON. BERNARD E. DELURY, P.J.

Motion Unopposed _____

Motion Opposed _____

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STATE OF NEW JERSEY, vs. CONSTANCE DAYS-CHAPMAN, Defendant.	SUPERIOR COURT OF NEW JERSEY LAW DIVISION: CRIMINAL PART ATLANTIC COUNTY INDICTMENT NO. 24-09-02900 **CERTIFICATION OF LEE VARTAN, ESQ. IN SUPPORT OF MOTION TO QUASH SEARCH WARRANTS AND TO SUPPRESS EVIDENCE**

I, LEE VARTAN, of full age, certify as follows:

1. I am an attorney-at-law of the State of New Jersey and a member of Chiesa Shahinian & Giantomasi PC. I am counsel for Defendant Constance Days-Chapman in the above-captioned matter. I have personal knowledge of the facts set forth herein and submit this certification in support of Ms. Days-Chapman's Motion to Suppress.

2. Attached hereto as **Exhibit A** are true and correct copies of the three Search Warrants dated March 20, 2024.

   a. **Exhibit A1** is the Search Warrant for the Apple iPhone 15 Pro Max.

   b. **Exhibit A2** is the Search Warrant for the Samsung cellphone.

   c. **Exhibit A3** is the Search Warrant for the Apple Watch.

3. Attached hereto as **Exhibit B** is a true and correct copy of the Certification of Search Warrant dated March 20, 2024.

I hereby certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

By: *s/ Lee Vartan*
LEE VARTAN

Dated: November 8, 2024