nizing permissible bases for reasonable suspicion.[213] For example, the Court held that an uncorroborated, anonymous tip is an insufficient basis for a *Terry* stop.[214] Other cases have been more receptive to reasonable suspicion claims, especially when authorities proffer more details of the circumstances that contributed to their beliefs.[215] "Reasonable suspicion" is a fact-intensive test that has now been applied, and met, in a wide range of interactions.[216]

It took the Court some time to settle on a test for when a "seizure" has occurred, and the Court has modified its approach. The issue is of some importance, since it is at this point that Fourth Amendment protections take hold. The *Terry* Court recognized in dictum that "not all personal intercourse between policemen and citizens involves 'seizures' of persons," and suggested that "[o]nly when the officer, by means of physical force or show of authority, has in some way restrained the liberty of a citizen may we conclude that a 'seizure' has occurred."[217] Years later Justice Stewart proposed a similar standard—that a person has been seized "only if, in view of all of the circumstances surrounding the incident, a reasonable person would have believed that he was not free to leave."[218] A majority of the Justices subsequently endorsed this rea-

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[213] *E.g.*, Brown v. Texas, 443 U.S. 47 (1979) (individual's presence in high crime area gave officer no articulable basis to suspect him of crime); Delaware v. Prouse, 440 U.S. 648 (1979) (reasonable suspicion of a license or registration violation is necessary to authorize automobile stop; random stops impermissible); United States v. Brignoni-Ponce, 422 U.S. 873 (1975) (officers could not justify random automobile stop solely on basis of Mexican appearance of occupants); Reid v. Georgia, 448 U.S. 438 (1980) (no reasonable suspicion for airport stop based on appearance that suspect and another passenger were trying to conceal the fact that they were traveling together). *But cf.* United States v. Martinez-Fuerte, 428 U.S. 543 (1976) (halting vehicles at fixed checkpoints to question occupants as to citizenship and immigration status permissible, even if officers should act on basis of appearance of occupants).

[214] Florida v. J.L., 529 U.S. 266 (2000) (no loosening of the reasonable suspicion standards when tip involves possession of firearms).

[215] *Compare*, *e.g.*, Florida v. J.L., 529 U.S. 266 (2000) (anonymous tip that a man wearing a plaid shirt and standing at a named spot is armed found insufficient to justify stop and frisk) *with* Prado Navarette v. California, 572 U.S. ___, No. 12–9490, slip op. (2014) (anonymous 911 call reporting an erratic swerve by a particular truck traveling in a particular direction barely held to be sufficient to justify stop) *and* Alabama v. White, 496 U.S. 325 (1990) (anonymous tip describing in detail that a particular person would be driving a particular car to deliver cocaine to a particular destination held to be sufficiently reliable to justify reasonable suspicion of criminal activity).

[216] *See,e.g.*, United States v. Hensley, 469 U.S. 221 (1985) (reasonable suspicion to stop a motorist may be based on a "wanted flyer" as long as issuance of the flyer has been based on reasonable suspicion); United States v. Sokolow, 490 U.S. 1, 9 (1989) (airport stop based on drug courier profile may rely on a combination of factors that individually may be "quite consistent with innocent travel"); Illinois v. Wardlow, 528 U.S. 119 (2000) (unprovoked flight from high crime area upon sight of police produces "reasonable suspicion").

[217] 392 U.S. at 19, n.16.

[218] United States v. Mendenhall, 446 U.S. 544, 554 (1980).