FOURTH CIRCUIT FINDS DETENTION OFFICERS HAVE QUALIFIED IMMUNITY IN OVERDOSE DEATH

***Crystal Rice v. Scott Adams*, U.S. Court of Appeals for the Fourth Circuit, Case No. 24-02026 (opinion filed April 14, 2026).** The Fourth Circuit has ruled that a group of detention officers cannot be held liable for the death of a woman who suffered a fatal opioid withdrawal while in custody. In August 2020, police booked Cynthia Rice into the Cecil County Detention Center in Elkton, Maryland, where she informed unidentified officers of her heroin addiction and that she was suffering from opioid withdrawal symptoms. About four hours later, medical staff conducted an intake screening of Rice and identified her as a "high priority detox check." According to the complaint, the next morning, medical staff took Rice's vital signs multiple times and prescribed her blood pressure medication. At unspecified times during that same morning, Rice was allegedly screaming in pain and "custody staff" told her to "shut up" rather than offer her aid. Around 12:30pm, an unidentified officer approached Rice's cell and asked if she was okay, to which she responded that she was not. Later that afternoon, when staff entered Rice's cell, they found her unresponsive. Emergency medical services responded and pronounced Rice dead. Her estate filed a lawsuit against the detention officers in federal district court, asserting that they had violated the Fourteenth Amendment of the U.S. Constitution by displaying deliberate indifference to Rice's acute medical needs. The complaint never identified what any officer did or did not know but rather alleged that each defendant was "made aware of" Rice's condition in three ways: (1) by observing it themselves; (2) by being informed of her condition by other detainees in the facility; and (3) by being informed by other staff. The defendants moved to dismiss on qualified immunity grounds, but the district court denied the motion, finding that Rice's estate had plausibly alleged a constitutional violation. The defendants appealed to the Fourth Circuit. On April 14, 2026, the circuit court reversed the district court's decision, holding that the complaint was fundamentally flawed because it grouped the officers together as an "undifferentiated collective" rather than making defendant-specific allegations. The complaint failed to identify whether any specific officer had actually interacted with Rice or had knowledge of her distress. The court further held that because the defendants were nonmedical staff, they were legally justified in relying on the detention center's medical personnel, who had monitored and examined Rice on multiple occasions during her brief time in custody. The case was remanded to the district court for further proceedings. (Return to In This Issue)

WRONGFUL DEATH LAWSUIT ASSERTS CHATGPT CAUSED OVERDOSE DEATH

***Leila Turner-Scott, et al. v. OpenAI Foundation, et al.*, California Superior Court (San Francisco County), Case No. CGC26636801 (suit filed May 12, 2026).** The family of a 19-year-old college student who died from an overdose has filed a wrongful death lawsuit against OpenAI Foundation and its chief executive officer, Sam Altman, over allegations that the artificial intelligence (AI) chatbot, ChatGPT, caused their son's overdose by providing him with medical advice about mixing substances. According to the complaint, Samuel Nelson began using ChatGPT in 2023 as a productivity tool to help him troubleshoot computer problems and get help with homework. Eventually, Nelson began asking ChatGPT questions about substance use. Initially, ChatGPT refused to answer Nelson's questions, stating that it could not advise him on how to engage in illegal or dangerous behaviors. In 2024, the defendants released an updated ChatGPT chatbot model, which began to engage and advise Nelson on drug use, including providing him with specific dosage information and how to acquire illicit substances. On the day of Nelson's death, ChatGPT allegedly advised him to take Xanax (alprazolam) to help combat nausea caused by him taking kratom but failed to advise him that the combination could be lethal. The plaintiffs argue that the defendants deployed a defective AI product without reasonable safety guardrails, robust safety testing, or transparency to the public, despite knowing that individuals may use it as a medical triage system. The suit brings forth claims of strict product liability for defective design and failure to warn, negligence, and wrongful death. Additionally, the suit asserts