



Supreme Court of the United States

Joseph Lee Byron v. The United States of America

Case Precedent Update

By Joseph Resnek

Weeks v. United States (1914)

BACKGROUND

Fremont Weeks was suspected of using the mail system to distribute chances in a lottery, which was considered gambling and was illegal in Missouri. State agents entered Weeks' house, searched his room, and obtained papers belonging to him. Later, the State agents returned to the house with a US Marshal in order to collect more evidence and took letters and envelopes from Weeks' drawers. In both instances, the police did not have a search warrant.

OPINION OF THE COURT

In the landmark case of *Weeks v. United States (1914)*, the Court ruled for the first time (and did so unanimously) that the Fourth Amendment provides protection against the submission of evidence that was the product of "unreasonable searches and seizures."

United States v. Leon (1984)

BACKGROUND

Acting on the basis of information from a confidential informant, officers of the Burbank Police Department in California initiated a drug-trafficking investigation involving surveillance of respondents' activities. Based on an affidavit

summarizing the police officers' observations, Officer Rombach prepared an application for a warrant to search three residences and respondents' automobiles for an extensive list of items. The application was reviewed by several Deputy District Attorneys, and a facially valid search warrant was issued by a state court judge. Ensuing searches produced large quantities of drugs and other evidence. Respondents were indicted for federal drug offenses, and filed motions to suppress the evidence seized pursuant to the warrant.

The Government's petition for certiorari presented only the question whether a "good faith exception" to the exclusionary rule should be recognized.

OPINION OF THE COURT

The Fourth Amendment exclusionary rule should not be applied so as to bar the use in the prosecution's case in chief of evidence obtained by officers acting in reasonable reliance on a search warrant issued by a detached and neutral magistrate but ultimately found to be invalid.

DISSENTING OPINION

In his dissent, Justice Brennan argues that the Majority is misguided, because the admission of evidence after an illegal search is in itself an act in violation of the Fourth Amendment. He contends that the exclusionary rule is based not on a "judicially fashioned remedial purpose" but upon a "direct constitutional command," to which arguments of deterrent effects are irrelevant.

"Indeed, no other explanation suffices to account for the Court's holding in *Mapp*, [but that] the exclusionary rule was 'part and parcel of the Fourth Amendment's limitation upon encroachment of individual property.'"

***Arizona v. Evans* (1995)**

BACKGROUND

For several weeks, the police had had a warrant for suspected criminal Isaac Evans. A police officer finally found him

driving down a one-way street. The officer stopped him, searched his car, and found a bag of marijuana. Evans was charged with possession of marijuana.

Though the officer did have a warrant for Evans' arrest, it turned out the arrest warrant had been revoked some 17 days before the arrest in this case; the court in which the warrant had been quashed did not notify the police of that fact. Evans therefore argued that the arrest was illegal and the marijuana was the fruit of an unlawful search and had to be suppressed.

OPINION OF THE COURT

In *United States v. Leon*, (1984), the Court had ruled that the exclusionary rule did not require the suppression of evidence seized pursuant to a search warrant that was later determined to be invalid. In *Leon*, the police's reliance on the validity of the search warrant was objectively reasonable; thus, excluding the evidence seized in that case would not have deterred any future illegal conduct on the part of the police. The exclusionary rule does not serve to deter illegal conduct on the part of judges, after all. For a similar reason, the Court in *Evans* ruled that the exclusionary rule should not require suppression of the evidence seized in this case. Ultimately, there was no evidence that the officer acted unreasonably on the basis of the information he had at hand.

DISSENTING OPINION

Justice Stevens took issue with the notion that the exclusionary rule served to deter only police misconduct. Because the Fourth Amendment constrains the power of the sovereign, the exclusionary rule – the remedy for violating the Fourth Amendment – should "[impose] costs on that sovereign, motivating it to train all of its personnel to avoid future violations." Nor did Justice Stevens think that the exclusionary rule was an extreme sanction, for there is nothing extreme about allowing the sovereign to profit from its "negligent misconduct."