

Chatrie v. United States

Chatrie v. United States (No. 25-112)^[1] is a United States Supreme Court case holding that a geofence warrant is a search subject to the Fourth Amendment to the United States Constitution.^[2] *Chatrie* reaffirmed and expanded the Court's holding in the landmark 2018 case *Carpenter v. United States*, which held that government entities violate the Fourth Amendment when accessing historical cell site location information (CSLI) records containing the physical locations of cellphones without a search warrant.

Background

A geofence warrant is a law enforcement technique used to identify all cell phones present within a physical area at a particular time and is a form of reverse search. The warrant makes use of technology companies' practice of collecting granular user location information. The law enforcement agency seeking the warrant directs it toward a technology company, and identifies a geofence (a virtual "fence" around a geographic location) along with a specific period of time to be searched.^{[3][4]}

Before the 2018 Supreme Court case *Carpenter v. United States*, third-party data was not protected by the Fourth Amendment's warrant requirement under a legal theory known as the third-party doctrine. *Carpenter* created a narrow exception to the third-party doctrine for cell site location information (CSLI), a particular type of location data collected by wireless carriers when a phone connects to a cell tower.^[5] While CSLI can provide precise location information in places with many cell towers close together, geofence data is generally far more precise. CSLI can show where a cell phone is physically present within a range as small as one-eighth of a mile, whereas geofence data provides a range of twenty meters. Unlike CSLI, geofence data uses GPS pings, as well as Wi-Fi and Bluetooth connections. The warrants at issue in *Chatrie* and *Carpenter* also differed in duration of time. In *Carpenter*, the government sought access to over 12,898 data points spanning 129, whereas the *Chatrie* geofence warrant covered 2 hours worth of location information.^[1]

Lower court history

On May 20, 2019, a bank was robbed in Midlothian, Virginia. Over the coming weeks, the investigation stalled. On June 14, local law enforcement applied for and received a geofence warrant directed at Google. The issued warrant authorized a "geofence" area in the form of a circle targeted the bank with a radius of 150 meters. The area encompassed was large enough to collect information from a nearby church.^[6]

The government worked with Google to create a three-step process for responding to such warrants. First, the warrant requested anonymized information on all user accounts within the geofence between 4:20pm and 5:20pm on the day of the robbery. Second, after reviewing such information, law enforcement would attempt to narrow down their list of possible suspects. They would then return to Google and seek all information on users from the narrowed list, between 3:50pm and 5:50pm (for an additional 30 minutes on each end of the original time period) regardless of whether they were inside or outside of the geofence area. Finally, after reviewing the second batch of information, law enforcement would again narrow the list of persons of interest and return to Google, at which point the remaining accounts would be linked to identifiable users. Police received the name, phone numbers, and email addresses of all users identified in the final step of the warrant procedure.^[6]

Detective Joshua Hylton sent the geofence warrant to Google, which executed the first step of the process. In doing so, it returned anonymized data for 19 users within the geofence. Hylton subsequently narrowed the request to nine users and requested an extra hour of location data, unbounded by the geofence. Lastly, he narrowed the request to three users and requested de-anonymized information on them, which Google supplied. Okello Chatrie was among the three final users.^[6]

Chatrie was indicted in the United States District Court for the Eastern District of Virginia on robbery and firearms charges. He moved to suppress the results of the geofence warrant. After extensive fact-finding, the district court declined to suppress the results of the warrant. Despite finding both that a search occurred and the warrant violated the particularity and probable cause requirements of the Fourth Amendment, the court found that the evidence was nevertheless admissible under the good-faith exception to the exclusionary rule and denied the motion. Chatrie entered a conditional plea of guilty, reserving his right to appeal the denial of his motion to suppress.^[6]

Court of Appeals

A divided panel of the Fourth Circuit affirmed Okello Chatrie's conviction. Dissenting, Judge James Andrew Wynn concluded that the government violated Chatrie's reasonable expectation of privacy. On rehearing *en banc*, the Fourth Circuit affirmed the district court's judgment in a one-sentence per curiam opinion.^[7]

The 15-member court divided 7–7 on whether a Fourth Amendment search had occurred, with Chief Judge Albert Diaz not expressing a view either way.^[8] Seven judges concluded, in an opinion written by Judge Julius N. Richardson, that no Fourth Amendment search occurred because petitioner lacked a "reasonable expectation of privacy in two hours' worth of Location History data voluntarily exposed to Google," with three judges within that group (J. Harvie Wilkinson III, Paul V. Niemeyer, and Robert Bruce King) filing separate concurrences. Seven judges, in an opinion written by Judge Wynn, concluded that a Fourth Amendment search had occurred, reasoning that the government had "invaded [petitioner's] reasonable expectation of privacy" in accessing his data, an expectation that the third-party doctrine was "wholly inadequate" to defeat. Of the seven judges who found a Fourth Amendment search, five concluded that the government's warrant application was not supported by probable cause, with two not opining on the issue. However, only Judge Roger Gregory would have suppressed the evidence, the other six indicating that suppression was unwarranted under the good-faith exception.^{[6][9]}

Supreme Court

On July 28, 2025, Chatrie petitioned the Supreme Court for a writ of certiorari. On January 16, 2026, the court granted review. Oral arguments were heard on April 27, 2026. The case was argued by Adam Unikowsky on behalf of Chatrie and Eric Feigin on behalf of the United States.^[10]

On June 29, 2026, the Supreme Court held that the police conducted a Fourth Amendment search when they obtained Chatrie's location information from Google because individuals have reasonable expectations of privacy in their cell phone location information.^[11] The court did not hold that geofence warrants are unconstitutional, but did hold that a search occurs when law enforcement accesses location data from an individual's cell phone.^[11] Because such access constitutes a search, the Fourth Amendment requires law enforcement to obtain a warrant prior to demanding it from technology companies regardless of the duration of information sought. Justices Sonia Sotomayor and Ketanji Brown Jackson concurred in the judgment, but would have gone further by deeming the geofence warrant at issue invalid because it failed to meet the particularity and probable cause requirements for warrants. The court remanded the case to the Fourth Circuit for determination of the warrant issue.

References

1.

"Chatrie v. United States, 609 U.S. ____ (2026)" (https://supreme.justia.com/cases/federal/us/609/25-112/). *Justia Law*. Retrieved 2026-06-30.

2.

Howe, Amy (June 29, 2026). "Court rules that law enforcement's use of "geofence warrant" was a "search"" (https://www.scotusblog.com/2026/06/court-rules-that-la-w-enforcements-use-of-geofence-warrant-was-a-search/). *www.scotusblog.com*. Retrieved 2026-06-29.

3.

Peter G. Berris; Clay Wild (January 22, 2026). "Geofence Warrants and the Fourth Amendment" (https://www.congress.gov/crs-product/LSB11274). *Congress.gov*. Retrieved April 2, 2026.

4.

Amy Howe (January 16, 2026). "Supreme Court takes up four new cases, including disputes on geofence warrants and Roundup weedkiller" (https://www.scotusblog.com/2026/01/supreme-court-takes-up-four-new-cases-including-dispute-s-on-geofence-warrants-and-roundup-weedkiller/). *SCOTUSBlog*. Retrieved April 2, 2026.

5.

Daniel, Lars. "How Digital Forensics Experts Know Where You've Been—Cell Site Location Information" (https://www.forbes.com/sites/larsdaniel/2024/12/18/how-digital-forensics-experts-know-where-youve-been-cell-site-location-information/). *Forbes*. Retrieved 2026-06-30.

6.

"Petitioner's Opening Brief" (https://www.supremecourt.gov/DocketPDF/25/25-112/397074/20260223160717593_25-112%20-%20Opening%20Brief.pdf) (PDF). *Supreme Court of the United States*. February 23, 2026. Retrieved April 2, 2026.

7.

United States v. Chatrie, 107 F. 4th 319 (4th Cir. 2024).

8.

Cushing, Tim (2025-05-06). "After Further Review, The Fourth Circuit Says Good Faith Applies To Bad Geofence Warrant" (https://www.techdirt.com/2025/05/06/after-further-review-the-fourth-circuit-says-good-faith-applies-to-bad-geofence-warrant/). *Techdirt*. Retrieved 2026-06-30.

9.

United States v. Chatrie, 136 F. 4th 100 (4th Cir. 2025) (en banc).

10.

"Search - Supreme Court of the United States" (https://www.supremecourt.gov/search.aspx?filename=/docket/docketfiles/html/public/25-112.html). *Supreme Court of the United States*. Retrieved 2026-06-29.

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Chatrie v. United States, 609 U.S. ____ (2026)

Chatrie v. United States	
	
 Supreme Court of the United States	
Argued April 27, 2026	
Decided June 29, 2026	
Full case name	<i>Okello T. Chatrie, Petitioner v. United States</i>
Docket no.	25-112 (https://www.supremecourt.gov/docket/docketfiles/html/public/25-112.html)
Citations	609 U.S. ____ (<i>more</i>)
Argument	Oral argument (https://www.supremecourt.gov/oral_arguments/audio/2025/25-112)
Opinion announcement	Opinion announcement (https://www.supremecourt.gov/opinions/25pdf/25-112_0am4.pdf)
Case history	
Prior	- Motion to suppress denied. <i>United States v. Chatrie</i>, 590 F. Supp. 3d 901 (E.D. Va. 2022). - Affirmed. <i>United States v. Chatrie</i>, 107 F. 4th 319 (4th Cir. 2024). - Affirmed on rehearing. <i>United States v. Chatrie</i>, 136 F. 4th 100 (4th Cir. 2025) (en banc). - Cert. granted. 607 U.S. ____ (2026).
Questions presented	
1. Whether the execution of the geofence warrant violated the Fourth Amendment. 2. Whether the exclusionary rule should apply to the evidence derived from the geofence warrant.	
Holding	
Police officers conducted a Fourth Amendment search when they acquired Chatrie's location data from Google because an individual has a reasonable expectation of privacy in his cell-phone location information. Note: The Court remanded on whether the warrant met the particularity and probable cause requirement and, if so, whether the good-faith exception to the exclusionary rule should apply.	
Court membership	
Chief Justice John Roberts Associate Justices Clarence Thomas · Samuel Alito Sonia Sotomayor · Elena Kagan Neil Gorsuch · Brett Kavanaugh Amy Coney Barrett · Ketanji Brown Jackson	
Case opinions	
Majority	Kagan, joined by Roberts, Sotomayor, Kavanaugh, Jackson
Concurrence	Jackson, joined by Sotomayor
Concurrence	Gorsuch (in judgment)
Dissent	Alito, joined by Thomas (as to Part I); Barrett (as to Parts II–B, II–C–1, and II–C–2)
Dissent	Barrett
Laws applied	
U.S. Const. amend. IV	

External links

- Text of *Chatrie v. United States*, 609 U.S. ____ (2026) is available from: Cornell (<https://www.law.cornell.edu/supremecourt/text/25-112>) Justia (<https://supreme.justia.com/cases/federal/us/609/25-112/>) Oyez (oral argument audio) (<https://www.oyez.org/cases/2025/25-112>)

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