



Search And Seizure

©2009 eNotes.com, Inc. or its Licensors. Please see [copyright information](#) at the end of this document.

- [Background](#)
- [The Text of the Fourth Amendment and Case Law Interpreting It](#)
- [State Court Decisions Interpreting State Constitutional Provisions Governing Search and Seizure](#)
- [Additional Resources](#)
- [Organizations](#)

Background

SEARCH AND SEIZURE refers to the methods used by law enforcement to investigate crimes, track down [EVIDENCE](#), question witnesses, and arrest suspects. It also refers to the legal rules governing these methods. At the federal level these rules are set forth in the Fourth Amendment to the U. S. Constitution, the Federal Rules of CRIMINAL PROCEDURE, and Title 18 of the United States Code, sections 2231 et seq. The rules and statutes reference each other, and both are designed to provide greater detail for areas left silent by the Constitution. In addition, each state has its own set of applicable statutes, rules of procedure, and constitutional provisions. But the starting point in understanding any of these rules is the Fourth Amendment, since it sets forth the minimum amount of protection that both the state and federal government must provide against searches and seizures. Under the Due Process and EQUAL PROTECTION Clauses of the Fourteenth Amendment, the U. S. Supreme Court has ruled that states may provide their citizens with more protection against searches and seizures but not less.

The American Revolution was fought in part to create a system of government that would operate within the rule of law. The rule of law is represented by the idea that the United States is a nation of laws and not of men and women. Under the rule of law, the actions of government officials are limited by the legal principles, rules, and other norms that make up the U. S. legal system and not by the arbitrary or capricious whim of an individual official. Violating these legal norms in the course of official conduct can transform a law enforcer into a law breaker.

The Framers drafted the Fourth Amendment in response to their colonial experience with British officials whose discretion in collecting revenues for the Crown often went unchecked. Local magistrates were allowed to issue general search warrants to British tax collectors upon mere suspicion that a colonist was not fully complying with the tax code. Magistrates were not authorized to question the source or strength of a tax collector's suspicion, and, once issued, general warrants permitted blanket, door-to-door searches of entire neighborhoods without regard to person, place, or time.

The [WRIT](#) of assistance was a particularly loathsome form of general [WARRANT](#). This writ derived its name from the power of British authorities to compel local peace officers and colonial residents to "assist" in executing a particular search. A writ of assistance lasted for the life of the king or queen under whom it was issued and could be enforced by any British law enforcement officer, including customs officials who often relied on them as long-term hunting licenses against suspected smugglers.

Colonial opposition to general warrants was pervasive. In Paxton's case, 1 Quincy 51 (Mass. 1761), James Otis appeared on behalf of the colonists who opposed issuance of another writ, arguing that before a warrant

is valid it must be "directed to special officers and to search certain houses" for particular goods and may only be granted "upon oath made" by a government official "that he suspects such goods to be concealed in those very places he desires to search" (quoted in *Illinois v. Krull*, 480 U.S. 340, 107 S.Ct. 1160, 94 L.Ed.2d 364 [1987]). John Adams cited Otis' argument against the writs "as the commencement of the controversy between Great Britain and America" (see WEAL, vol. 5, p. 80).

Ratified by the states in 1791, the Fourth Amendment put an end to writs of assistance by creating a constitutional buffer between U. S. citizens and the often intimidating power of law enforcement. It has three components: first, the Fourth Amendment establishes a privacy interest by recognizing the right of every citizen to be "secure in their persons, houses, papers, and effects"; second, it protects this privacy interest by prohibiting searches and seizures that are not authorized by a warrant based on "probable cause" or that are otherwise "unreasonable"; and third, for searches requiring a warrant the Fourth Amendment states that the warrant must describe with particularity "the place to be searched, and the persons or things to be seized" and be supported by "oath or affirmation" of the officer requesting its issuance.

The Text of the Fourth Amendment and Case Law Interpreting It

Although [RATIFICATION](#) of the Fourth Amendment answered any lingering doubts about the validity of the writs of assistance in the United States, the text of the Fourth Amendment raised questions of its own about the meaning of the terms "unreasonable," "search or seizure," "warrant," "particularity," "oath or affirmation," and "probable cause," not to mention other questions about the scope of such terms as "houses, papers, and effects." The U. S. Supreme Court, lower federal courts, and state courts have spent more than 200 years grappling with these questions and continue to do so as new cases come before them.

The Text of the Fourth Amendment

The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no Warrants shall issue, but upon [PROBABLE CAUSE](#), supported by Oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized.

When the Fourth Amendment Applies

Like the rest of the **BILL OF RIGHTS**, the Fourth Amendment originally only applied in federal court. However, in *Wolf v. Colorado*, 338 U.S. 25, 69 S.Ct. 1359, 93 L.Ed. 1782 (1949), the U. S. Supreme Court ruled that the rights guaranteed by the text of the Fourth Amendment (sans the [EXCLUSIONARY RULE](#) to be discussed below) apply equally in state courts via the Fourteenth Amendment, which guarantees to the citizen of every state the right to due process and equal protection of the laws. The process by which the Supreme Court has made certain fundamental liberties protected by the Bill of Rights applicable to the states is known as the doctrine of incorporation.

Not every search and seizure that is scrutinized in state and federal court raises a Fourth Amendment issue. The Fourth Amendment only protects against searches and seizures conducted by the government or pursuant to governmental direction. Surveillance and investigatory actions taken by strictly private persons, such as private investigators, suspicious spouses, or nosy neighbors, are not governed by the Fourth Amendment. However, Fourth Amendment concerns do arise when those same actions are taken by a law enforcement official or a private person working in conjunction with law enforcement.

The Fourth Amendment will not apply even against governmental action unless defendants first establish that

they had a reasonable expectation of privacy in the place to be searched or the thing to be seized. The Supreme Court has explained that what "a person knowingly exposes to the public, even in his own home or office, is not a subject of Fourth Amendment protection . . ." But what he seeks to preserve as private, even in an area accessible to the public, may be constitutionally protected (see *Katz v. U.S.*, 389 U.S. 347, 88 S.Ct. 507, 19 L.Ed.2d 576 [1967]).

Applying this principle, the Supreme Court has ruled that individuals generally maintain a reasonable expectation of privacy in their bodies, clothing, and personal belongings. Homeowners possess a privacy interest that extends inside their homes and in the curtilage immediately surrounding the outside of their homes, but not in the "open fields" and "wooded areas" extending beyond the curtilage (see *Hester v. U.S.*, 265 U.S. 57, 44 S.Ct. 445, 68 L.Ed. 898 [1924]). A business owner's expectation of privacy in commercial property is less than privacy interest afforded to a private homeowner, and is particularly attenuated in commercial property used in "closely regulated" industries (i.e., airports, railroads, restaurants, and liquor establishments), where business premises may be subject to regular administrative searches by state or federal agencies for the purpose of determining compliance with health, safety, or security regulations. Automobile owners have a reasonable expectation of privacy in the cars they own and drive, but the expectation of privacy is less than a homeowner's privacy interest in their homes but greater than a business owner's privacy interest in their closely regulated business premises.

No expectation of privacy is maintained for property and personal effects held open to the public. Things visible in "plain view" for a person of ordinary and unenhanced vision are entitled to no expectation of privacy and thus no Fourth Amendment protection. Items lying in someone's backseat, growing in someone's outdoor garden, or discarded in someone's curb-side garbage all fall within this category. However, items seen only through enhanced surveillance, such as through high-powered or telescopic lenses, may be subject to the strictures of the Fourth Amendment. Public records, published phone numbers, and other matters readily accessible to the general public enjoy no expectation of privacy. Similarly, the Supreme Court has said that individuals do not possess an expectation of privacy in their personal characteristics (see *U. S. v. Dionisio*, 410 U.S. 1, 93 S.Ct. 764, 35 L.Ed.2d 67 [1973]). Thus, the police may require individuals to give handwriting and voice exemplars, as well as hair, blood, DNA, and fingerprint samples without complying with the Fourth Amendment's requirements.

Finally, to raise a Fourth Amendment objection to a particular search or seizure, a person must have "standing" to do so. Standing in this context means that the rights guaranteed by the Fourth Amendment are personal and may not be asserted on behalf of others. Thus, a passenger may not generally object to a police search of the owner's car and a house-guest may not generally object to a search of the homeowner's premises. These rules can become murky, however, as when a houseguest is actually living with the homeowner or owns things stored on the owner's premises.

How the Fourth Amendment Applies: The Warrant Requirement

Once the Fourth Amendment applies to a particular search or seizure, the next question is under what circumstances is a warrant required. The Supreme Court has ruled that the Constitution expresses a preference for searches, seizures, and arrests conducted pursuant to a lawfully executed warrant (see *Mincey v. Arizona*, 437 U.S. 385, 98 S.Ct. 2408, 57 L.Ed.2d 290 [1978]). A warrant is a written order signed by a court authorizing a law-enforcement officer to conduct a search, seizure, or arrest. Searches, seizures, and arrests performed without a valid warrant are deemed presumptively invalid, and any evidence seized without a warrant will be suppressed unless a court finds that the search was reasonable under the circumstances.

An application for a warrant must be supported by a sworn, detailed statement made by a law enforcement officer appearing before a neutral judge or [MAGISTRATE](#). The Supreme Court has said that probable cause exists when the facts and circumstances within the police officer's knowledge provide a reasonably

Encyclopedia of Everyday Law: Search And Seizure

trustworthy basis for a man of reasonable caution to believe that a criminal offense has been committed or is about to take place (see *Carroll v. U. S.*, 267 U. S. 132, 45 S.Ct. 280, 69 L.Ed. 543 [1925]). Probable cause can be established by out-of-court statements made by reliable police informants, even though those statements cannot be tested by the magistrate. However, probable cause will not lie where the only evidence of criminal activity is an officer's affirmation of suspicion or belief (see *Aguilar v. Texas*, 378 U.S. 108, 84 S.Ct. 1509, 12 L.Ed.2d 723 [1964]).

Nor will probable cause lie unless the facts supporting the warrant are sworn by the officer as true to the best of his or her knowledge. The officer's oath can be written or oral, but the officer must typically swear that no knowing or intentionally false statement has been submitted in support of the warrant and that no statement has been made in reckless disregard of the truth. Inaccuracies due to an officer's [NEGLIGENCE](#) or innocent omission do not jeopardize a warrant's validity.

The Fourth Amendment requires not only that warrants be supported by probable cause offered by a sworn police officer, but it also requires that a warrant "particularly" describe the person or place to be searched or seized. Warrants must provide enough detail so that an officer with the warrant can ascertain with reasonable effort the persons and places identified in the warrant. For most residences a street address usually satisfies the particularity requirement, unless the warrant designates an apartment complex, hotel, or other multiple-unit building, in which case the warrant must describe the specific sub-unit to be searched. Warrants must describe individuals with sufficient particularity so that a person of average intelligence can distinguish them from others in the general population.

The magistrate before whom an officer applies for a warrant must be neutral and detached. This qualification means that the magistrate must be [IMPARTIAL](#) and not a member of the "competitive enterprise" of law enforcement (see *California v. Acevedo*, 500 U. S. 565, 111 S.Ct. 1982, 114 L.Ed.2d 619 [1991]). Thus, police officers, prosecutors, and attorney generals are disqualified from becoming a magistrate. States vary as to the requirements that candidates must possess before they will be considered qualified for the job of magistrate. Some states require that magistrates have an attorney's license, while others require only that their magistrates be literate.

How the Fourth Amendment Applies: The Reasonableness Requirement

Not every search, seizure, or arrest must be made pursuant to a lawfully executed warrant. The Supreme Court has ruled that warrantless police conduct may comply with the Fourth Amendment so long as it is reasonable under the circumstances. The exceptions made to the Fourth Amendment's warrant requirement reflect the Court's reluctance to unduly impede the job of law enforcement officials. The Court has attempted to strike a balance between the practical realities of daily police work and the privacy and freedom interests of the public. Always requiring police officers to take the time to complete a warrant application and locate and appear before a judge could result in the destruction of evidence, the disappearance of suspects and witnesses, or both. The circumstances under which a warrantless search, seizure, or arrest is deemed reasonable generally fall within seven categories.

First, no warrant is required for a [FELONY](#) arrest in a public place, even if the arresting officer had ample time to procure a warrant, so long as the officer possessed probable cause that the suspect committed the crime. Felony arrests in places not open to the public generally do require a warrant, unless the officer is in "hot pursuit" of a fleeing [FELON](#) (see *Warden v. Hayden*, 387 U.S. 294, 87 S.Ct. 1642, 18 L.Ed.2d 782 [1967]). The Fourth Amendment also allows warrantless arrests for misdemeanors committed in an officer's presence.

Second, no warrant is required for searches incident to lawful arrest. If a police officer has made a lawful arrest, with or without a warrant, the Fourth Amendment permits the officer to conduct a search of the

Encyclopedia of Everyday Law: Search And Seizure

suspect's person, clothing, and all of the areas within the suspect's immediate reach. This kind of warrantless search is justified on grounds that it allows police officers to protect themselves from hidden weapons that might suddenly be wielded against them. Accordingly, officers are only permitted to seize items from the area in the immediate control of the arrestee.

Third, automobiles may be stopped if an officer possesses a reasonable and articulable suspicion that the motorist has violated a traffic law. Once the vehicle has pulled to the side of the road, the Fourth Amendment permits the officer to search the vehicle's interior, including the glove compartment. However, the trunk of a vehicle cannot be searched unless the officer has probable cause to believe that it contains [CONTRABAND](#) or the instrumentalities of criminal activity. But similar to a search incident to arrest, once a vehicle has been lawfully impounded, its contents may be inventoried without a warrant, including the contents of the trunk.

Fourth, an officer who reasonably believes that criminal activity may be afoot in a public place is authorized to stop any person who is suspected of participating in that criminal activity and conduct a carefully limited search of the suspect's outer clothing for weapons that may be used against the officer (see *Terry v. Ohio*, 392 U.S. 1, 88 S. Ct. 1868, 21 L. Ed. 889 [1968]). The officer may also ask for identification, but the suspect is under no obligation to produce it. However, a suspect's refusal to identify himself together with surrounding events may create probable cause to arrest (see *People v. Loudermilk*, 195 Cal.App.3d 996, 241 Cal.Rptr. 208 (Cal.App. 1 Dist. [1987])). This kind of warrantless search, called a Terry stop or a Terry [FRISK](#), is designed to protect officers from hidden weapons. Accordingly, items that do not feel like weapons, such as a baggie of soft, granular substance tucked inside a jacket pocket, cannot be seized during a Terry frisk, even if it turns out that the item is contraband.

Fifth, warrantless searches, seizures, and arrests may be justified by "exigent" circumstances. To determine whether exigent circumstances justified police conduct, a court must review the totality of the circumstances, including the gravity of the underlying offense and whether the suspect was fleeing or trying to escape. However, the surrounding circumstances must be tantamount to an emergency. Shots fired, screams heard, or fire emanating from inside a building have all been considered sufficiently exigent to dispense with the Fourth Amendment's warrant requirement.

Sixth, the Supreme Court has upheld brief, warrantless seizures at fixed roadside checkpoints aimed at intercepting illegal [ALIENS](#) (see *United States v. Martinez-Fuerte*, 96 S.Ct. 3074, 428 U.S. 543, 49 L.Ed.2d 1116 [1976]) and drunk drivers (see *Michigan v. Sitz*, 110 S.Ct. 2481, 496 U.S. 444, 110 L.Ed.2d 412 [1990]). Both checkpoint programs passed constitutional muster because they were tailored to remedying specific problems that law enforcement could not effectively address through more traditional means, namely problems relating to policing the nation's border and ensuring roadway safety. However, when the primary purpose of a checkpoint is simply to detect ordinary criminal activity, the Supreme Court has declared it violative of the Fourth Amendment (see *Indianapolis v. Edmond*, 531 U.S. 32, 121 S.Ct. 447, 148 L.Ed.2d 333 [2000]).

Seventh, searches, seizures, and arrests made pursuant to a defective warrant may be justified if the officer was proceeding in "good faith." The Supreme Court has said that a search made pursuant to a warrant that is later declared invalid (i.e., it fails to meet the requirements for a valid warrant enumerated above) will still be considered reasonable under the Fourth Amendment so long as the warrant was issued by a magistrate and the defect was not the result of willful police deception (see *U. S. v. Leon*, 468 U.S. 897, 104 S.Ct. 3405, 82 L.Ed.2d 677 [1984]). This exception to the warrant requirement was created so as not to punish honest police officers who have done nothing wrong while acting in accordance with an ostensibly valid warrant.

How the Fourth Amendment Applies: The Exclusionary Rule

For the more than 100 years after its ratification, the Fourth Amendment was of little value to criminal defendants because evidence seized by law enforcement in violation of the warrant or reasonableness requirements was still [ADMISSIBLE](#) during the defendant's prosecution. The Supreme Court dramatically changed Fourth Amendment [JURISPRUDENCE](#) when it handed down its decision in *Weeks v. United States*, 232 U. S. 383, 34 S. Ct. 341, 58 L. Ed. 652 (1914). *Weeks* involved the appeal of a [DEFENDANT](#) who had been convicted based on evidence that had been seized by a federal agent without a warrant or other constitutional justification. The Supreme Court reversed the defendant's [CONVICTION](#), thereby creating what is known as the "exclusionary rule." In *Mapp v. Ohio*, 367 U. S. 643, 81 S. Ct. 1684, 6 L.Ed.2d 1081(1961), the Supreme Court made the exclusionary rule applicable to the states.

Designed to deter police misconduct, the exclusionary rule enables courts to exclude incriminating evidence from introduction at trial upon proof that the evidence was procured in contravention of a constitutional provision. The rule allows defendants to challenge the admissibility of evidence by bringing a pre-trial motion to suppress the evidence. If the court allows the evidence to be introduced at trial and the jury votes to convict, the defendant can challenge the propriety of the trial court's decision denying the motion to suppress on appeal. If the defendant succeeds on appeal, however, the Supreme Court has ruled that [DOUBLE JEOPARDY](#) principles do not bar retrial of the defendant because the trial court's error did not go to the question of guilt or innocence (see *Lockhart v. Nelson*, 488 U. S. 33, 109 S.Ct. 285, 102 L.Ed.2d 265 (1988)). Nonetheless, obtaining a conviction in the second trial would be significantly more difficult if the evidence suppressed by the exclusionary rule is important to the prosecution.

A companion to the exclusionary rule is the "fruit of the poisonous tree" doctrine. Under this doctrine, a court may exclude from trial not only evidence that itself was seized in violation of the Constitution but also any other evidence that is derived from an illegal search. For example, suppose a defendant is arrested for [KIDNAPPING](#) and later confesses to the crime. If a court subsequently declares that the arrest was unconstitutional, the [CONFESSION](#) will also be deemed tainted and ruled [INADMISSIBLE](#) at any prosecution of the defendant on the kidnapping charge.

State Court Decisions Interpreting State Constitutional Provisions Governing Search and Seizure

The federal Constitution and the Supreme Court cases interpreting it establish the minimum amount of protection that a state court must provide when it is interpreting a section of the Bill of Rights that has been made applicable to the states via the doctrine of incorporation, including instances when a state court is required to interpret and apply the Fourth Amendment. A state court interpreting the search-and-seizure provisions of its own constitution may provide more protection than is afforded by the federal Constitution but not less. Below is a sampling of cases decided in part based on a state court's interpretation of its own state constitutional provision governing search and seizure.

FLORIDA: Florida courts are constitutionally required to interpret search and seizure issues in conformity with the Fourth Amendment of the United States Constitution as interpreted by the United States Supreme Court (see *State v. Hernandez*, 718 So.2d 833 (Fla.App. 1998); U.S.C.A. Const.Amend. 4; West's F.S.A. Const. Art. 1, § 12).

GEORGIA: A driver's proceeding through a poorly lit intersection without her headlights on created reasonable suspicion to justify a traffic stop of driver under the state constitution (see *State v. Hammang*, 249 Ga.App. 811, 549 S.E.2d 440 (Ga.App. 2001) U.S.C.A. Const.Amend. 4; GA CONST Art. 1, § 1, P XIII).

Encyclopedia of Everyday Law: Search And Seizure

IDAHO: The term "exigent circumstances" refers to a catalogue of exceptional or compelling circumstances that allow police to enter, search, seize, and arrest without complying with the warrant requirements of the federal or state constitutions, including unannounced entries to search made pursuant to the state and federal "knock and announce" statutes (see *State v. Rauch*, 99 Idaho 586, 586 P.2d 671 (Idaho 1978); Idaho Code §§ 19-611, 19-4409; U.S.C.A.Const. Amends. 4, 14).

LOUISIANA: Warrantless searches and seizures are unreasonable [PER SE](#) unless justified by one of the specific exceptions to warrant requirement of the federal and state constitutions (see *State v. Manson*, 791 So.2d 749 (La.App. 2001); U.S.C.A. Const.Amend. 4; LSA-Const. Art. 1, § 50.)

MICHIGAN: Enhanced search and seizure protection under Michigan's Constitution is available only if the search or seizure occurs inside the curtilage of the house (see M.C.L.A. Const. Art. 1, § 11).

MINNESOTA: The purpose of the exclusionary rule based upon the search and seizure provision of the state constitution is to deter police misconduct, and thus there is no compelling reason to apply a more stringent standard when applying the state exclusionary rule than when applying the federal exclusionary rule (see *State v. Martin*, 595 N.W.2d 214 (Minn.App., 1999); U.S.C.A. Const.Amend. 4; M.S.A. Const. Art. 1, § 10).

NEW JERSEY: Racial profiling involves a claim of unlawful search and seizure in violation of the state's constitution (see *State v. Velez*, 335 N.J.Super. 552, 763 A.2d 290 (N.J.Super.A.D., 2000); N.J.S.A. Const. Art. 1, par. 7.)

NEW MEXICO: The state constitution allows a warrantless arrest only upon a showing of exigent circumstances (see *American Civil Liberties Union of New Mexico v. City of Albuquerque*, 128 N.M. 315, 992 P.2d 866 (N.M. 1999); NM Const. Art. 2, § 10).

NEW YORK: Liquor retailer had no legitimate expectation of privacy in retail customer sales records maintained by liquor wholesalers with whom the retailer had business dealings, and thus, the retailer lacked standing to challenge, as an unreasonable search and seizure in violation of the New York Constitution, the Department of TAXATION and Finance's use of wholesalers' sales records to investigate suspected underreporting of [SALES TAX](#) by liquor retailers (see *Roebing Liquors Inc. v. Commissioner of Taxation and Finance*, 284 A.D.2d 669, 728 N.Y.S.2d 509 (N.Y.A.D. 3 Dept., 2001); U.S.C.A. Const.Amend. 4; McKinney's Const. Art. 1, § 12).

NORTH CAROLINA: Where the government is aware that certain business records relating to crime exist but cannot get their precise titles or quantity, the Fourth Amendment does not require that the warrant enumerate each individual paper, and the state constitution does not require more particularity than does the Fourth Amendment of the federal Constitution (see *State v. Kornegay*, 313 N.C. 1, 326 S.E.2d 881 (N.C. 1985); U.S.C.A. Const.Amends. 4, 14; NC Const. Art. 1, § 20).

OHIO: An inventory search of a compartment of a lawfully impounded vehicle does not contravene the federal or state constitutions, where the search is administered in [GOOD FAITH](#) and in accordance with reasonable police procedures or established routine (see *State v. Mesa*, 87 Ohio St.3d 105, 717 N.E.2d 329 (Ohio 1999); U.S.C.A. Const.Amend. 4; Const. Art. 1, § 14).

WASHINGTON: Without judicial participation, a municipal court clerk may not order the issuance of an [ARREST WARRANT](#) in the absence of an authorizing [STATUTE](#), court rule, or [ORDINANCE](#) (see *State v. Walker*, 101 Wash.App. 1, 999 P.2d 1296 (Wash.App. 2000); U.S.C.A. Const.Amend. 4; West's RCWA Const. Art. 1, § 7).

Encyclopedia of Everyday Law: Search And Seizure

WISCONSIN: Where police officers act in objectively reasonable reliance upon a facially valid [SEARCH WARRANT](#) that has been issued by a detached and neutral magistrate, a good-faith exception to the exclusionary rule applies under the state constitution, provided that the state shows the process used in obtaining the warrant included a significant investigation and review by either a police officer trained and knowledgeable in the requirements of probable cause and reasonable suspicion or a knowledgeable government attorney (see *State v. Eason*, 245 Wis.2d 206, 629 N.W.2d 625 (Wis. 2001); W.S.A. Const. Art. 1, § 11).

Additional Resources

American Jurisprudence. Lawyers Co-operative Publishing Company, 2001.

Criminal Procedure. Wayne R. LaFave, Jerold H. Israel, and Nancy J. King, West Group, 2001.

http://www.nolo.com/encyclopedia/articles/crim/search_seizu... . Understanding Search and Seizure Law, 2001.

Oxford Companion to the Supreme Court. Kermit Hall, ed., Oxford University Press, 1992.

West's Encyclopedia of American Law. West Group, 1998.

Organizations

American Civil Liberties Union (ACLU)

1400 20th St., NW, Suite 119

Washington, DC 20036 USA

Phone: (202) 457-0800

E-Mail: info@aclu.org

URL: <http://www.aclu.org/>

Primary Contact: Anthony D. Romero, Executive Director

Association of Federal Defense Attorneys

8530 Wilshire Blvd, Suite 404

Beverly Hills, CA 90211 USA

Phone: (714) 836-6031

Fax: (310) 397-1001

E-Mail: AFDA2@AOL.com

URL: <http://www.afda.org>

Primary Contact: Gregory Nicolaysen, Director

Center for Human Rights and Constitutional Law

256 S. Occidental Blvd.

Los Angeles, CA 90057 USA

Phone: (213) 388-8693

Encyclopedia of Everyday Law: Search And Seizure

Fax: (213) 386-9484

E-Mail: mail@centerforhumanrights.org

URL: <http://www.centerforhumanrights.org>

Primary Contact: Peter A. Schey, Executive Director

National District Attorneys Association (NDAA)

99 Canal Center Plaza

Alexandria, VA 22314 USA

Phone: (703) 549-9222

Fax: (703) 836-3195

URL: <http://www.ndaa.org>

Primary Contact: Thomas J. Charron, Director

Copyright Notice

©2009 eNotes.com, Inc.

ALL RIGHTS RESERVED.

No part of this work covered by the copyright hereon may be reproduced or used in any form or by any means graphic, electronic, or mechanical, including photocopying, recording, taping, Web distribution or information storage retrieval systems without the written permission of the publisher.

For complete copyright information, please see the online version of this work:

<http://www.enotes.com/everyday-law-encyclopedia>