A Civics in Real Life Series

THE DOCKET

Chatrie v. U.S.

Civics is all around us. The United States Supreme Court is the highest court in the land. Through its power of judicial review, its decisions have a lasting impact on "We the People". So what is the Court hearing this session and how might the justices rule? Let's help each other expand our civic literacy.

The Case of Digital Dragnet

The Facts of *Chatrie v. United States*:

The Supreme Court does not just interpret old words on faded parchment; it decides how constitutional rights apply to modern life. In Chatrie v. United States, the justices are confronting a central question of the digital age: How much privacy do Americans have when their everyday movements are tracked by technology?

This case asks whether the government can use a geofence warrant, which collects location data on everyone near a crime scene, to identify criminal suspects without violating 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." Fourth Amendment to the U.S. Constitution

In 2019, an armed robbery took place at a federal credit union outside Richmond, Virginia. The suspect escaped with nearly $200,000 in cash, and the investigation stalled. To generate leads, law enforcement sought a geofence warrant from Google. The warrant required Google to identify devices located within a defined area around the bank during the robbery. Google complied through a multi-step process:
1. It first provided anonymized data for devices near the bank.
2. Investigators narrowed that list and requested additional location details.
3. Finally, Google revealed account information for a few individuals, including Okello Chatrie.

Based on that location data, police obtained additional warrants to search places associated with Chatrie. They found cash, a firearm, and demand notes. Chatrie was charged with bank robbery.

A federal district court ruled the warrant was too broad but allowed the evidence under the good-faith exception. The U.S. Court of Appeals for the Fourth Circuit upheld that ruling in a deeply divided decision. Chatrie then appealed to the Supreme Court.

Chatrie argues that location data is highly personal and revealing, even when it covers only a short period, and that individuals do not meaningfully consent to government access simply by using Google's services. He contends that the geofence warrant in his case failed the Fourth Amendment's requirement of particularity because it swept in the location data of many innocent people who had no connection to the crime. According to Chatrie, allowing law enforcement to use such broad warrants grants police excessive discretion and creates a serious risk of mass digital surveillance, making the geofence warrant the modern equivalent of searching everyone in an entire neighborhood just to find a single suspect.

The federal government responds that the location data obtained through the geofence warrant reflected Chatrie's movements in public spaces, not activities inside private locations. It emphasizes that Chatrie voluntarily enabled location services on his phone, thereby allowing Google to collect and store that information. According to the government, geofence warrants are important investigative tools that help solve serious crimes and generate leads when other methods fail, and placing strict limits on them would undermine public safety and law enforcement effectiveness. The government also maintains that location data should be treated differently from the contents of private communications, such as emails or personal documents, because it reveals only where someone was in public, not what they were thinking or communicating.

At the center of the case is the Fourth Amendment, which protects people against unreasonable searches and seizures. The Court is considering:
1. Does collecting location data through a geofence warrant count as a "search"?
2. Do people have a reasonable expectation of privacy in their cellphone location history?
3. Does voluntarily sharing data with a company like Google reduce constitutional protections?

Supreme Court Precedents Used in this Case:

- *Carpenter v. United States (2018)* - The Court said that the government generally must obtain a warrant to access a person's historical cell-site location information, holding that warrantless collection of such data violates the Fourth Amendment.

A ruling in favor of the government could significantly expand the use of geofence and other data-driven warrants, potentially reducing privacy protections in the digital age. By contrast, a ruling in favor of Chatrie could impose stricter limits on searches based on digital data and strengthen Fourth Amendment safeguards against modern forms of surveillance. Either outcome will play a critical role in shaping how constitutional rights apply to smartphones, apps, and technologies that track everyday life.

To Think and To Do: The Constitution is not frozen in the past. Its meaning is tested every time technology changes how we live, move, and connect. Predict how you think the Supreme Court will rule in Chatrie v United States. Explain which constitutional argument you find more persuasive and why.

To Learn More: Brief for the Petitioner, Okello Chatrie.; Brief for the Respondent, United States; and Oral Arguments