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TRAINING BULLETIN

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SCOTUS OPINION: Caniglia v. Strom 2021 U.S. LEXIS 2582 “There’s No Place Like Home”

On May 17, 2021, the United States Supreme Court (SCOTUS), in *Caniglia v. Strom*, examined whether the “community caretaking” exception to the Fourth Amendment’s warrant requirement extends to the home as it does in the motor vehicle context. SCOTUS unanimously held that it did not.

Facts

During an argument with his wife at their home, Edward Caniglia retrieved a handgun from the bedroom, put it on the dining room table, and asked his wife to “shoot [him] now and get it over with.” She declined and, instead, left to spend the night at a hotel. The next morning, Caniglia’s wife discovered that she could not reach him by telephone, and she called the police to request a welfare check.

Officers met Caniglia’s wife and went to the residence, where they encountered Caniglia on the porch. Caniglia confirmed his wife’s account of the argument but denied that he was suicidal. The officers disagreed, believing that Caniglia posed a risk to himself or others. Consequently, the officers called an ambulance and Caniglia agreed to go to the hospital for a psychiatric evaluation, but only after the officers promised not to confiscate his firearms. However, after Caniglia was gone, the officers decided to seize his firearms. The officers entered Caniglia’s home, guided by his wife, whom they allegedly misinformed about his wishes, and seized two handguns.

Caniglia sued the officers under 42 U.S.C. § 1983ⁱ, claiming that the officers violated the Fourth Amendment when they entered his home and seized him and his firearms without a warrant. The district court disagreed and dismissed the lawsuit. On appeal, the First Circuit Court of Appeals affirmed the district court, solely on the ground that the officers' decision to remove Caniglia and his firearms from the residence fell within a "community caretaking exception" to the warrant requirement. Accordingly, the First Circuit did not consider: 1) whether anyone had consented to the officers' actions; 2) whether these actions were justified by "exigent circumstances"; or, 3) whether any state law permitted this kind of mental-health intervention. Caniglia appealed to SCOTUS.

SCOTUS Opinion

In a unanimous decision, SCOTUS held that the "community caretaking" exception to the Fourth Amendment warrant requirement does not extend to the home. In delivering the decision of the Court, Justice Thomas recognized that in *Cady v. Dombrowski*ⁱⁱ, the Court held that a warrantless search of an impounded vehicle for an unsecured firearm did not violate the Fourth Amendment. In reaching this conclusion, the Court found that police officers who patrol the "public highways" are often called to discharge noncriminal "community caretaking functions," such as responding to disabled vehicles or investigating accidents.

However, Justice Thomas added that the First Circuit's "community caretaking" rule in this case went beyond anything the Supreme Court has recognized, stating that "neither the holding nor logic of *Cady* [justified warrantless searches and seizures in the home]." In *Cady*, the location of the warrantless search was an impounded vehicle, not a home, a "constitutional difference" that was repeatedly stressed in the Court's opinion. In addition, the Court in *Cady* made an "unmistakable distinction between vehicles and homes" and placed "into proper context its reference to 'community caretaking.'" Finally, the Court has recognized what is reasonable under the Fourth Amendment for vehicles is different from what is reasonable for homes. The Court acknowledged this fact in *Cady*, and, in subsequent opinions, the Court has repeatedly "declined to expand the scope of . . . exceptions to the warrant requirement to permit warrantless entry into the home." As a result, the Court held that its holding in *Cady* did not create a stand-alone "community caretaking" exception that justified warrantless searches and seizures in the home.

Takeaways

SCOTUS made clear that there is truly "no place like home." The key takeaway here is absent consent of the homeowner or exigent circumstances, officers will need a warrant to enter the home as the "community caretaker" exception to the warrant requirement does not extend to the home as it does a motor vehicle.

Source: DLG Learning Center