Steagald v. United States

5. Steagald v. United States, 451 U.S. 204 (1981), involved a twist on Payton. In Steagald, officers had an arrest warrant for one Ricky Lyons; an informant's tip had reported that Lyons could be found at Steagald's house. Officers went to Steagald's house and searched it; they did not find Lyons but did find a substantial quantity of cocaine. The question was whether an arrest warrant justified the search of the home of someone other than the arrestee. The Court held that it did not:

\[ \ldots \text{Whether the arrest warrant issued in this case adequately safeguarded the} \]
\[ \text{interests protected by the Fourth Amendment depends upon what the warrant authorized} \]
\[ \text{the agents to do. To be sure, the warrant embodied a judicial finding that there was} \]
\[ \text{probable cause to believe that Ricky Lyons had committed a felony, and the warrant} \]
\[ \text{therefore authorized the officers to seize Lyons. However, the agents sought to do} \]
\[ \text{more than use the warrant to arrest Lyons in a public place or in his home; instead,} \]
\[ \text{they relied on the warrant as legal authority to enter the home of a third person based} \]
\[ \text{on their belief that Ricky Lyons might be a guest there. Regardless of how reasonable} \]
\[ \text{this belief might have been, it was never subjected to the detached scrutiny of a judicial} \]
\[ \text{officer. Thus, while the warrant in this case may have protected Lyons from an unreasonable seizure, it did absolutely nothing to protect petitioner's privacy interest in being free from an unreasonable invasion and search of his home.} \ldots \]

In sum, two distinct interests were implicated by the search at issue here—Ricky Lyons' interest in being free from an unreasonable seizure and petitioner's interest in being free from an unreasonable search of his home. Because the arrest warrant for Lyons addressed only the former interest, the search of petitioner's home was no more reasonable from petitioner's perspective than it would have been if conducted in the absence of any warrant. Since warrantless searches of a home are impermissible absent consent or exigent circumstances, we conclude that the instant search violated the Fourth Amendment. \ldots

\[ \ldots \text{Thus, in order to render the instant search reasonable under the Fourth Amendment, a search warrant was required.} \]

Id. at 213-214, 216, 222.

Both Payton and Steagald contained long discussions of common-law history. In both cases, the Court concluded that the history was inconclusive. In both cases, dissenting opinions argued forcefully, and persuasively, that the weight of the historical evidence counseled against requiring a warrant, that warrantless felony arrests in the felon's home were both common and generally permissible at common law. See Steagald, 451 U.S. at 227-230 (Rehnquist, J., dissenting); Payton, 445 U.S. at 604-613 (White, J., dissenting). Was the Court's discussion of history in Watson a smokescreen? Or should the Court have stuck to its historical guns and permitted warrantless arrests in homes in Payton and Steagald? Only in Payton?