

Case Summary: *Chatrie v. United States*, No. 25-112 (U.S. June 29, 2026)

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On May 20, 2019, Okello T. Chatrie robbed the Call Federal Credit Union in Midlothian, Virginia at gunpoint and stole almost \$200,000.¹ Initial investigations began when the Chesterfield County Police Department obtained security footage of Chatrie approaching the credit union while using his cellphone. Investigators were unable to identify him with the footage.² Detective Joshua Hylton sought a geofence warrant against Google, which required the company to provide the location history of devices within a 150-meter radius of the credit union thirty-minutes before and after the crime.³ Google supplied a list of several accounts, as well as sensitive information, including names and cellphone numbers.⁴ The police then narrowed the group down to three suspects, one of which was Chatrie. His location data showed that he entered the geofence about ten minutes before the robbery commenced and then traveled toward a residential area after leaving the scene. Police then carried out a search warrant on two residences linked to Chatrie, where

¹ *Chatrie v. United States*, 146 S. Ct. 2193, 2202 (2026); Press Release, U.S. Att’y’s Off. for the E. Dist. of Va., *Man Sentenced for Armed Robbery of Credit Union* (Aug. 12, 2022), <https://perma.cc/LSQ5-LD72>.

² *Chatrie*, 146 S. Ct. at 2202.

³ *Id.*; Brief for the United States in Opposition at 2–3, *Chatrie v. United States*, No. 25-112 (U.S. Nov. 24, 2025).

⁴ *Chatrie*, 146 S. Ct. at 2203.

they discovered close to \$100,000 of stolen cash, a 9mm G2C Taurus semiautomatic pistol, and several “practice” demand notes. As a result, Chatrie was charged with armed robbery and brandishing a firearm.⁵

In the U.S. District Court for the Eastern District of Virginia, Chatrie moved to suppress the evidence found through the geofence warrant, arguing that the government had conducted an unconstitutional search by failing to establish individual probable cause, as required under the Fourth Amendment, before they engaged in a wide-spread data sweep.⁶ The district court concluded the geofence warrant had violated the Fourth Amendment, but denied the motion to suppress under the good-faith exception.⁷ Chatrie pleaded guilty, but preserved his ability to challenge.⁸ The U.S. Court of Appeals for the Fourth Circuit affirmed, reasoning that Chatrie had no reasonable expectation of privacy for his location history data, given that he voluntarily agreed to share it with Google.⁹ However, the panel was evenly divided over the issue of whether a Fourth Amendment search had occurred.¹⁰ Chatrie petitioned the United States Supreme Court for review. It granted certiorari, and on April 27, 2026, oral arguments were held.¹¹

The United States argued that the third-party doctrine applied because

⁵ *Id.*; U.S. Att’y’s Off. for the E. Dist. of Va., *supra* note 1.

⁶ *Chatrie*, 146 S. Ct. at 2203.

⁷ *Id.* (citing *United States v. Chatrie*, 590 F. Supp. 3d 901, 905, 937–38 (E.D. Va. 2022)).

⁸ U.S. Att’y’s Off. for the E. Dist. of Va., *supra* note 1; Brief for the United States in Opposition, *supra* note 3, at 7.

⁹ *Chatrie*, 146 S. Ct. at 2203 (citing *United States v. Chatrie*, 107 F.4th 319, 325 (4th Cir. 2024)).

¹⁰ *Id.* (citing *United States v. Chatrie*, 136 F.4th 100, 101 (4th Cir. 2025) (en banc) (per curiam)); see also *Chatrie v. United States*, SCOTUSBLOG, <https://perma.cc/W45W-44TZ>.

¹¹ *Chatrie*, 146 S. Ct. at 2203–04; see also Oral Argument, *Chatrie v. United States*, No. 25-112 (U.S. Apr. 27, 2026), <https://perma.cc/ED5H-V44Y>.

Chatrie enabled Google's Location History feature.¹² In response, the defense countered that modern device use makes enabling location an automated feature, rather than a consensual handover of private movement tracking. They again argued the broad use of the location data acquired in pursuance of the warrant was unconstitutional because the government had engaged in a massive data sweep before establishing individual probable cause.¹³ The Supreme Court vacated the Fourth Circuit's decision and remanded.¹⁴ In a 6-3 decision, Justice Elena Kagan, writing for the majority, held that law enforcement had conducted a search under the Fourth Amendment when obtaining Chatrie's location history from Google.¹⁵ However, the Court did not determine whether the geofence warrant used satisfied the Fourth Amendment's requirements of probable cause and particularity.¹⁶

Justice Ketanji Brown Jackson, joined by Justice Sonia Sotomayor, concurred but argued that the geofence warrant issued was invalid. They argued it failed the Fourth Amendment's particularity and probable-cause requirements and led to the disclosure of several Google account holders' sensitive information.¹⁷ Justice Neil Gorsuch also concurred, emphasizing that digital data is protected directly under the Fourth Amendment based on traditional property rights.¹⁸

Justice Amy Coney Barrett dissented, arguing that Chatrie lacked a

¹² *Chatrie*, 146 S. Ct. at 2212–13.

¹³ *See id.* at 2213–14.

¹⁴ *Id.* at 2217.

¹⁵ *Id.* at 2204.

¹⁶ *Id.* at 2204, 2216.

¹⁷ *Id.* at 2217–18 (Jackson, J., concurring).

¹⁸ *Id.* at 2220–22 (Gorsuch, J., concurring in the judgment).

reasonable expectation of privacy in his data because he had voluntarily enabled the location history feature with his Google account.¹⁹ Justice Samuel Alito—joined by Justice Clarence Thomas—also dissented and criticized the majority ruling of the Court, claiming that it would destabilize the Fourth Amendment's jurisprudence and impede law enforcement's ability to investigate crimes using digital data.²⁰

Chatrue v. United States is meaningful as it established limits to the application of the third-party doctrine to location data. The Court determined that users do not automatically surrender their expectation of privacy when opting into location services or choosing to store data in the cloud.²¹ Furthermore, warrants are now mandatory for geofence requests, and law enforcement can no longer assume that data mining bypasses the Fourth Amendment's requirements. The logic that protects location history could also restrict other digital “dragnet” methods, including reverse-keyword searches and broad requests for information held by technology companies, AI platforms, and cloud storage providers.²² Ultimately, this decision brings light to the growing challenge of balancing law enforcement's investigative capabilities with individuals' constitutional privacy rights in an increasingly digital society. Although technological advancements can make the process of identifying suspects and gathering evidence more efficient, these investigative techniques also create opportunities for government surveillance to

¹⁹ *Id.* at 2234 (Barrett, J., dissenting).

²⁰ *Id.* at 2222–23, 2233–34 (Alito, J., dissenting).

²¹ *Chatrue*, 146 S. Ct. at 2201, 2212–14.

²² See Int'l Ass'n of Priv. Pros., *Chatrue v. United States: A Privacy Victory Before the Supreme Court*, <https://perma.cc/3G8J-RA6V>; Elec. Priv. Info. Ctr., *Chatrue v. United States*, <https://perma.cc/KHJ9-RVT4>.

extend beyond individuals suspected of criminal activity.