

SCOTUS Affirms Standard for Emergency-Aid Entry into the Home in Case v. Montana

Description

The Fourth Amendment draws its sharpest line at the front door of a home, but that line is often blurred as modern policing increasingly intersects with mental health crisis response and the need to render emergency aid.

On January 14, 2026, the Supreme Court of the United States addressed this intersection in *Case v. Montana*, 607 U. S. ____ (2026), where the high Court considered “whether law enforcement may enter a home without a search warrant based on *less than probable cause* that an emergency is occurring, or, whether the emergency-aid exception requires that officers have *probable cause for such intrusion*, as they typically would when investigating a crime.”

The unanimous opinion leaves no space for uncertainty, as the Court reinforced a long-standing principle that it has held before: “Officers may enter if, but only if, they have an ‘objectively reasonable basis for believing’ that an occupant faces serious danger.” *Brigham City*, 547 U. S., at 400.

Summary of Facts

In September 2021, William Case’s ex-girlfriend, J.H., called police after a troubling phone conversation between the couple. During that call, Case threatened suicide, and J.H. believed he was intoxicated because of his erratic behavior. She became even more alarmed when he mentioned getting “a note or something like that” before committing suicide. J.H. warned Case that she would call and report this information to police, to which Case responded by threatening to harm any officers who came to his home. According to J.H., the phone call ended with a “pop” followed by silence, which J.H. believed resembled the sound of a gunshot. Unable to get Case to verbally respond to her, J.H. contacted the police and drove to his residence.

When law enforcement officers arrived, they attempted to contact Case by knocking and announcing their presence and by calling his name through an open window but received no response. Through the windows of the residence, officers observed empty beer cans, an empty handgun holster, and a notepad that they believed contained a suicide note. Prior to responding to this call, officers had notice of Case’s history of alcohol abuse, mental health issues, and previous suicide threats, including a prior suicide-by-cop attempt. Despite the urgency of the situation, officers did not immediately force entry, and instead, remained on scene for approximately forty minutes before entering the home.

At the time officers made warrantless entry into Case’s residence, they advanced with weapons drawn due to J.H.’s report that Case had threatened to harm any officers who came to his home. While clearing the residence, a Sergeant discovered Case in an upstairs bedroom closet. When Case suddenly opened the closet curtain, the Sergeant saw what he believed to be a dark object positioned

at Case's waist, prompting the sergeant to discharge a single shot into Case's abdomen. A handgun was later recovered in a laundry hamper next to where Case fell.

Procedural Posture

In the aftermath of the incident, Case was charged with Assault on a Peace Officer. When the case reached the district court, Case filed a motion to suppress the evidence obtained from the warrantless entry, arguing that the warrantless entry violated the Fourth Amendment. The court denied the suppression motion, and a jury convicted him. Case appealed the district court's denial of the suppression motion to the Montana Supreme Court, which ultimately affirmed his conviction, holding that the warrantless entry into the residence was proper under the Fourth Amendment. The court concluded that the entry in this case was justified under the Community Caretaker Doctrine, which necessitates that police officers need only have "objective, specific, and articulable facts" to suspect that a citizen needs help. This language is consistent with the "reasonable suspicion" standard, and, in the Montana Supreme Court's view, requires only reasonable suspicion that an emergency exists. Case sought review in the Supreme Court of the United States, and the Court granted certiorari to resolve the split amongst the lower courts on the appropriate standard to apply under the Emergency Aid exception to the Fourth Amendment's warrant requirement.

Supreme Court of the United States

The Court began its analysis by outlining the foundational precedents that, together, support its conclusion that the probable cause standard, "borrowed from the criminal context, is inapt" when applied to the Emergency Aid exception.

First, in *Brigham City v. Stuart*, 547 U. S. 398, 400 (2006), the Supreme Court held that police officers may enter a home without a warrant if they have an "objectively reasonable basis for believing" that someone inside needs emergency assistance. The Supreme Court cited the *Brigham* standard to clarify that this language does not require nor imply probable cause, because "the probable-cause requirement is rooted in, and derives its meaning from, the criminal context," and the Court therefore explained that it "declin[e] to transplant it to this different one." In the Court's words: "*Brigham City's* reasonableness standard means just what it says, with no further gloss. And here it was satisfied because the police had 'an objectively reasonable basis for believing' that a homeowner intended to take his own life and, indeed, may already have shot himself."

Second, the Court relied on *Michigan v. Fisher*, 558 U.S. 45, 47 (2009) (per curiam), which relied on the same Emergency Aid standard from *Brigham City*. In *Fisher*, officers responding to a neighbor's call encountered broken windows, blood on the scene, and observed a man inside "screaming and throwing things." In that case, the Court held that officers' entry was reasonable because officers had an objectively reasonable basis for believing someone inside the home required immediate emergency aid.

Lastly, the Court pointed to *Caniglia v. Strom*, 593 U. S. 194, 198 (2021), to clarify what does not justify a home entry. In *Caniglia*, the Court rejected the "community caretaking" justification for warrantless home entries, and reaffirmed that under *Brigham*, officers may enter a home to "render emergency assistance to an injured occupant or to protect an occupant from imminent injury." However, it emphasized that emergency conditions were indeed necessary, refusing to permit an "open-ended license" for warrantless entry under the care-taking function alone.

The Court rejected Case's argument that officers' entry created the "likely danger" by triggering a potential "suicide-by-cop," and that if the officers had left it alone, nothing would have occurred. Importantly, the Court reiterated that "the objective reasonableness of an officer's conduct under *Brigham City*, as in other Fourth Amendment contexts, is evaluated by looking at the 'totality of the circumstances.'" E.g., *Barnes v. Felix*, 605 U. S. 73, 80 (2025); *Ohio v. Robinette*, 519 U. S. 33, 39 (1996). Recognizing Case's point regarding the potential provocation that would lead to confrontation, the Court acknowledged that this danger was undoubtedly one of the many considerations factored into this analysis. However, the Court recited the overwhelming circumstances that justified officers' entry, being that Case may already have shot himself or would do so absent intervention. The Supreme Court concluded that the officers' decision to enter his home to prevent that result, despite serious danger to the officers themselves, was "at least reasonable." "The Fourth Amendment did not require them, as Case argued, to leave him to his fate."

The 9-0 opinion concluded with the following note: "We repeat today what we have held before: An officer may enter a home without a warrant if he has 'an objectively reasonable basis for believing that an occupant is seriously injured or imminently threatened with such injury.' *Brigham City*, 547 U. S., at 400. The officers' entry satisfied that test. Accordingly, we affirm the judgment (even though not all the reasoning) of the Montana Supreme Court."

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