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A Digital Trail to the Door: Emergency Aid & Warrantless Entry in *United States v. Rowell*

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The United States Court of Appeals for the First Circuit recently issued a decision in *United States v. Rowell*, holding that a missing minor's recent digital footprint, combined with evidence that the child may be endangered, may justify warrantless entry under the emergency-aid doctrine.

Summary of the Facts

On January 18, 2021, a father reported to the Belmont Police Department that his teenage daughter was missing and endangered. On January 21, the investigating officers gathered digital evidence that provided a lead to her possible location. They discovered that her Snapchat account had been accessed recently from an IP address linked to a specific apartment. Officers promptly responded to the apartment complex. An occupant of the apartment spoke with the officers from a window and denied entry. However, a tenant from another unit granted the officers access to the building's common area. The officers approached the unit associated with the IP address and opened the unlocked door. Before asking the occupants for consent to search for the missing minor, one officer entered approximately five feet into the apartment, while another barely crossed the threshold. The occupants refused consent to search. During this interaction, Keion Rowell walked out of a bedroom holding a cell phone, which was captured on one of the officers' body-worn cameras.

In the district court, Rowell moved to suppress evidence based on the officers' warrantless entry. The district court denied the motion, finding that exigent circumstances existed under the emergency-aid doctrine. At trial, a jury convicted Rowell of sex trafficking a minor. Rowell appealed to the First Circuit Court of Appeals, challenging the denial of the motion to suppress.

United States Court of Appeals for the First Circuit

When the case reached the First Circuit, the court considered whether the officers' warrantless entry violated the Fourth Amendment. The court ultimately affirmed Rowell's conviction, concluding that the entry was justified under the emergency-aid doctrine. On appeal, Rowell argued that the district court should have suppressed the body-worn camera video and audio recordings, along with the officers' observations and any evidence obtained during the ensuing search, because they resulted from the warrantless entry. The court emphasized that the emergency aid doctrine is recognized as an exception to the Fourth Amendment's warrant requirement. As recently reaffirmed in the Supreme

Court's decision in *Case v. Montana*, the emergency aid doctrine allows law enforcement to enter a home without a warrant when officers have an objectively reasonable basis to believe that someone inside needs immediate assistance to protect against serious injury or death. The Case holding further outlined the objective reasonableness standard by rejecting a probable cause threshold for emergencies unrelated to crime-solving. Rowell argued that the warrantless entry was based solely on the IP association with the minor's Snapchat account, which "alone did not create an objectively reasonable basis for the officers to believe the minor was inside the apartment."

In this case, a missing person report was filed to the Belmont Police Department on January 18, and the minor's father described her as "endangered." The designation of the minor as endangered heightened the urgency, as it signaled potential vulnerability to harm, exploitation, or trafficking, based on standard protocols for missing juveniles. Further, the Snapchat records confirmed her location at the apartment shortly before the officers arrived. Therefore, the court found that the officers were not acting on a vague tip but rather had information that linked the missing minor's whereabouts to the apartment. Additionally, the sweep only lasted moments, with the officers focused solely on finding the girl, and ended upon her discovery. There was no additional rummaging or evidence collection beyond plain-view items like her cellphone. Therefore, the court concluded that there was an objectively reasonable basis for the officers to conclude that an emergency existed and that the apartment was reasonably linked to the perceived emergency. Therefore, the First Circuit ultimately upheld and affirmed the district court's denial of Rowell's motion to suppress.

Key Takeaways

Rowell emphasizes that warrantless entries under the emergency aid doctrine hinge on an objectively reasonable basis built from specific, articulable facts rather than intuition or pretextual crime investigation. Any intrusion must stay limited to the emergency at hand. It is important to remember that the emergency aid doctrine does not allow a full search and only permits what is necessary to address the crisis. Additionally, the emergency aid doctrine requires specific, concrete facts and not mere speculation. It is not sufficient to have a vague belief that someone may be in danger. Law enforcement officers must be able to articulate how combined elements, such as a multi-day disappearance of an endangered minor and recent digital evidence, create a credible, location-specific belief that someone inside needs immediate aid to avoid serious harm or death.

***United States v. Rowell*, No. 24-1136 (1st Cir. 2026)**