

Wrong Door, Right Call: When Police Entry Still Passes the Fourth Amendment

Miller v. City of Philadelphia
No. 24-3191 (3d Cir. Dec. 15, 2025)"

In *Miller v. City of Philadelphia*, officers were investigating a fatal drive-by shooting and obtained an arrest warrant for a particular suspect. Using multiple law enforcement databases, officers determined the suspect lived at a particular address. Early one morning, a SWAT team executed the arrest warrant and forced entry into the home. But they had the wrong house.

Upon entering the home, the officers learned that the suspect no longer lived there. Instead, the home belonged to the Plaintiffs, who were detained at gunpoint while officers conducted a full search. The suspect was not found and was later cleared of wrongdoing.

The Plaintiffs sued the officers and the City claiming the entry into their home violated the Fourth Amendment. The Plaintiffs also alleged that the City failed to properly train its officers.

What the Court Decided:

The appellate court sided with the officers and the City.

The Court held there was no constitutional violation because the officers had probable cause to believe (1) the suspect lived at that address, and (2) the suspect would be present at the time of entry.

Importantly, the officers didn't rely on a single source—they cross-checked multiple databases. That layered approach made their belief reasonable, even though it ultimately turned out to be wrong.

The court also rejected the claim against the City for failure to train. The court found that there was no evidence of a pattern of similar constitutional violations or an obvious failure to train. Without that, municipal liability simply doesn't attach.

KEY TAKEAWAY

Being wrong isn't the same as being unconstitutional. Even if officers are mistaken in entering a home they believe is the suspect's residence, no Fourth Amendment violation occurs so long as they had probable cause to believe the suspect lived there and was likely inside at the time. The key isn't perfection, its reasonableness backed by objective facts.

Stay Safe!