

Adkins v. State

Police received information from an informant concerning a drug transaction. Officers obtained a search warrant and stopped the suspect in his vehicle. A search of the car revealed weapons, cash, and a large quantity of narcotics. The warrant was later determined to be invalid because the supporting affidavit was deficient. The court proceeded to find that the search was valid due to exigent circumstances. The dissenting opinion criticized the majority in a lengthy discussion of the “four corners” rule, which requires that sufficiency of the evidence for a search warrant is limited solely to the information provided in the supporting affidavit. By going beyond the affidavit and finding additional facts, the dissent argued that the majority was effectively overruling 60 years’ worth of precedent in permitting the introduction of additional facts not presented in the affidavit.