

Illinois v. Gates

Acting on a detailed anonymous tip, the police department of Bloomingdale, Illinois investigated the facts given, obtained a search warrant, and discovered marijuana and other contraband in the Gateses' car trunk and home.

The Court abandoned the rigid "two-pronged test" under *Aguilar* and *Spinelli* for determining whether an informant's tip establishes probable cause for issuance of a warrant and adopted the "totality of the circumstances" approach. The task of the issuing magistrate is simply to make a practical, common-sense decision whether, given all the circumstances set forth in the affidavit before him, there is a fair probability that contraband or evidence of a crime will be found in a particular place.

Under the "totality of the circumstances" analysis, corroboration of details of an informant's tip by independent police work is of significant value. Here, even standing alone, the facts obtained through the independent investigation of the Bloomingdale police officer and the DEA at least suggested that respondents were involved in drug trafficking. In addition, the judge could rely on the anonymous letter, which had been corroborated in major part by the police officer's efforts.