

expectation of privacy in his luggage or other baggage, the Court held that, once police have arrested and immobilized a suspect, validly seized bags are not subject to search without a warrant.²⁴⁸

Police may, however, in the course of jailing an arrested suspect, conduct an inventory search of the individual's personal effects, including the contents of a shoulder bag, since "the scope of a station-house search may in some circumstances be even greater than those supporting a search immediately following arrest."²⁴⁹ *Chimel* has also been qualified by another consideration. Not only may officers search areas within the arrestee's immediate control in order to alleviate any threat posed by the arrestee, but they may extend that search if there may be a threat posed by "unseen third parties in the house." A "protective sweep" of the entire premises (including an arrestee's home) may be undertaken on less than probable cause if officers have a "reasonable belief," based on "articulable facts," that the area to be swept may harbor an individual posing a danger to those on the arrest scene.²⁵⁰

For a time, vehicular searches incident to arrest appeared subject to more flexible limits. Stating that it was "in no way alter[ing] the fundamental principles established in the *Chimel* case," the Court in *New York v. Belton*²⁵¹ nevertheless held that police officers who had made a valid arrest of the occupant of a vehicle could make a contemporaneous search of the entire passenger compartment of the automobile, including containers found therein. Believing that a fairly simple rule understandable to authorities in the field was desirable, the Court ruled "that articles inside the relatively narrow compass of the passenger compartment of an automo-

²⁴⁸ If, on the other hand, a sealed shipping container had already been opened and resealed during a valid customs inspection, and officers had maintained surveillance through a "controlled delivery" to the suspect, there is no reasonable expectation of privacy in the contents of the container and officers may search it, upon the arrest of the suspect, without having obtained a warrant. *Illinois v. Andreas*, 463 U.S. 765 (1983).

²⁴⁹ *Illinois v. LaFayette*, 462 U.S. 640, 645 (1983) (inventory search) (following *South Dakota v. Opperman*, 428 U.S. 364 (1976)). Similarly, an inventory search of an impounded vehicle may include the contents of a closed container. *Colorado v. Bertine*, 479 U.S. 367 (1987). Inventory searches of closed containers must, however, be guided by a police policy containing standardized criteria for exercise of discretion. *Florida v. Wells*, 495 U.S. 1 (1990).

²⁵⁰ *Maryland v. Buie*, 494 U.S. 325, 334 (1990). This "sweep" is not to be a full-blown, "top-to-bottom" search, but only "a cursory inspection of those spaces where a person may be found." *Id.* at 335–36.

²⁵¹ 453 U.S. 454, 460 n.3 (1981).