In a later case, the Court held that an officer may seize an object if, in the course of a weapons frisk, "plain touch" reveals the presence of the object, and the officer has probable cause to believe it is contraband.[206] The Court viewed the situation as analogous to that covered by the "plain view" doctrine: obvious contraband may be seized, but a search may not be expanded to determine whether an object is contraband.[207] Also impermissible is physical manipulation, without reasonable suspicion, of a bus passenger's carry-on luggage stored in an overhead compartment.[208]

Terry did not rule on a host of problems, including the grounds that could permissibly lead an officer to momentarily stop a person on the street or elsewhere in order to ask questions rather than frisk for weapons, the right of the stopped individual to refuse to cooperate, and the permissible response of the police to that refusal. The Court provided a partial answer in 2004, when it upheld a state law that required a suspect to disclose his name in the course of a valid *Terry* stop.[209] Questions about a suspect's identity "are a routine and accepted part of many *Terry* stops," the Court explained.[210]

After *Terry*, the standard for stops for investigative purposes evolved into one of "reasonable suspicion of criminal activity."[211] That test permits some stops and questioning without probable cause in order to allow police officers to explore the foundations of their suspicions.[212] Although it did not elaborate a set of rules to govern the application of the test, the Court was initially restrictive in recog-

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[206] Minnesota v. Dickerson, 508 U.S. 366 (1993).

[207] 508 U.S. at 375, 378–79. In *Dickerson* the Court held that seizure of a small plastic container that the officer felt in the suspect's pocket was not justified; the officer should not have continued the search, manipulating the container with his fingers, after determining that no weapon was present.

[208] Bond v. United States, 529 U.S. 334 (2000) (bus passenger has reasonable expectation that, although other passengers might handle his bag in order to make room for their own, they will not "feel the bag in an exploratory manner").

[209] Hiibel v. Sixth Judicial Dist. Ct., 542 U.S. 177 (2004).

[210] 542 U.S. at 186.

[211] In United States v. Cortez, 449 U.S. 411 (1981), a unanimous Court attempted to capture the "elusive concept" of the basis for permitting a stop. Officers must have "articulable reasons" or "founded suspicions," derived from the totality of the circumstances. "Based upon that whole picture the detaining officer must have a particularized and objective basis for suspecting the particular person stopped of criminal activity." Id. at 417–18. The inquiry is thus quite fact-specific. In the anonymous tip context, the same basic approach requiring some corroboration applies regardless of whether the standard is probable cause or reasonable suspicion; the difference is that less information, or less reliable information, can satisfy the lower standard. Alabama v. White, 496 U.S. 325 (1990).

[212] The extent and intrusiveness of a stop must be consistent with its investigatory purpose, and extensive detention needs to be justified by something more that reasonable suspicion. Davis v. Mississippi, 394 U.S. 721 (1969); Dunaway v. New York, 442 U.S. 200 (1979)