

est in the premises that the search invaded.⁴⁹⁰ The same illegal search might, therefore, invade the rights of one person and not of another.⁴⁹¹ Again, the effect of the application of the privacy rationale has been to narrow considerably the number of people who can complain of an unconstitutional search.

⁴⁹⁰ *Rakas v. Illinois*, 439 U.S. 128 (1978) (passengers in automobile had no privacy interest in interior of the car; could not object to illegal search). *United States v. Padilla*, 508 U.S. 77 (1993) (only persons whose privacy or property interests are violated may object to a search on Fourth Amendment grounds; exerting control and oversight over property by virtue of participation in a criminal conspiracy does not alone establish such interests). *Jones v. United States*, 362 U.S. 257 (1960), had established the rule that anyone legitimately on the premises could object; the rationale was discarded but the result in *Jones* was maintained because he was there with permission, he had his own key, his luggage was there, he had the right to exclude and therefore a legitimate expectation of privacy. Similarly maintained were the results in *United States v. Jeffers*, 342 U.S. 48 (1951) (hotel room rented by defendant's aunts to which he had a key and permission to store things); *Mancusi v. DeForte*, 392 U.S. 364 (1968) (defendant shared office with several others; though he had no reasonable expectation of absolute privacy, he could reasonably expect to be intruded on only by other occupants and not by police).

⁴⁹¹ *E.g.*, *Rawlings v. Kentucky*, 448 U.S. 98 (1980) (fearing imminent police search, defendant deposited drugs in companion's purse where they were discovered in course of illegal search; defendant had no legitimate expectation of privacy in her purse, so that *his* Fourth Amendment rights were not violated, although hers were).