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Kevin demonstrates differing approaches previously taken by the courts when one occupant consents to the warrantless search of a premises and the other occupant objects. In the process, he takes exception to the manner in which the Supreme Court recently resolved this issue, thereby ruling that the objecting occupant can block the search. As Kevin argues, greater emphasis on the Court's prior privacy jurisprudence could have led to a more practical result.

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Is a Man's Home Really His Castle? The True Meaning of 'Consent'

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INTRODUCTION

"The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated …."[1] With its strong language, the Fourth Amendment to the United States Constitution enshrined the adage that a man's home is his castle. Now, hundreds of years later, a notion that was once seemingly straightforward has caused confusion and dispute within the American judicial system.

The United States Supreme Court has addressed governmental searches of private property several times throughout our nation's history. The Fourth Amendment allows a government agent to search a person's home if a warrant is obtained. However, there are certain situations in which the government may need to search a home without obtaining a warrant. One such situation occurs when the government obtains voluntary consent to perform a warrantless search. In *United States v. Matlock*, the Supreme Court further ruled that a third party may consent to a warrantless search, given the third party actor has the authority to do so. However, it was not until the recent case of *Georgia v. Randolph* that the Court had to determine whether an individual's Fourth Amendment rights were violated by a warrantless search of a home, consented to by one occupant, despite the simultaneous refusal of another co-occupant.

This article will begin by examining voluntary consent as an exception to the Fourth Amendment's prohibition of warrantless searches. Several rulings concerning this concept set the stage for analysis of the *Randolph* ruling, by illustrating how this exception has been applied in the past.

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[1] U.S. Const. amend. IV.

In and of themselves, the background cases presented here show that the consent exception has not been easily applied by the courts. The Supreme Court first addressed third party consent to a warrantless search in the case *United States v. Matlock.* The subsequent cases of *State v. Leach* and *United States v. Morning* implemented the *Matlock* ruling in the lower courts, resulting in different outcomes. The Court then heard the case of *Georgia v. Randolph,* which presented an opportunity to resolve any inconsistencies regarding the exception of consent to warrantless searches, when both occupants are present yet happen to disagree**.** Unfortunately, as this article will demonstrate, the Supreme Court in *Georgia v. Randolph* did not properly apply the *Matlock* standard, and by doing so, has created protection from warrantless searches on a random and happenstance basis.

THE LEGAL LANDSCAPE BEFORE *RANDOLPH*

The Fourth Amendment provides the ultimate source of citizens' protection against unreasonable searches of their homes. The Amendment states:

> The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no warrants shall issue, but upon probable cause, supported by oath or affirmation, and particularly describing the place to be searched, and the persons or things to be seized.[2]

Over time, the Supreme Court has crafted some "carefully delineated" exceptions to the warrant requirement.[3] One of these exceptions, which will be the focus of this article**,** is voluntary consent to perform a warrantless search.[4] Consent establishes the validity of a search despite the lack of a warrant, but only if the person giving consent has the authority to do so.[5]

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[2] U.S. Const. amend. IV.

[3] *State v. Leach*, 113 Wn.2d 735, 738 (Wash. 1989) (quoting *Arkansas v. Sanders*, 442 U.S. 753, 760 (1979)).

[4] *Id.* (quoting *State v. Vidor*, 75 Wn.2d 607 (Wash. 1969)).

[5] *Id*. (quoting *State v. Mathe*, 102 Wn.2d 537, 541 (Wash. 1984)).

United States v. Matlock

In *Matlock*, third party consent to the warrantless search of a home was directly at issue. On November 12, 1970, in the town of Pardeeville, Wisconsin, William Matlock, who was suspected of bank robbery, was arrested in the front yard of his home and placed in a squad car. The police officer already knew where Matlock lived, but did not ask him which room he occupied or if he would consent to a search of the room. The officer then approached Matlock's home, encountering Gayle Graff, whose parents owned the property. Graff claimed that she had been sharing a room with Matlock and that they were sleeping together.[6]

After determining that Graff was an occupant of the premises, the police asked for permission to search the home. Graff consented to the search and directed them to the room where she and Matlock resided. During the search of Matlock's room, the police found stolen money, so he was charged with bank robbery. A week later, Matlock filed a motion to suppress the evidence seized by officers from his home. The case made its way to the U.S. Supreme Court.[7]

The Court applied the standards of a warrantless search to the *Matlock* case. First, it was decided that Graff voluntarily consented to the warrantless search. The second question was whether Graff had the *authority* to consent to a warrantless search of Matlock's room. The Court acknowledged that the relevant basis for 'common authority' does not adhere to the law of property ownership, but rather upon shared *use* of the property. Those who share access or control over an area *assume the risk* that any co-occupant has the power to permit a search of the shared area.[8]

The Court found that Graff's statements regarding her relationship to the premises – specifically that she and Matlock shared a room and a dresser – demonstrated her authority to consent to a search of that room. The Court concluded that "the consent of one who possesses common authority over premises or effects is valid against the *absent, non-consenting* person with whom that authority is shared."[9] In reaching this conclusion**,** the Court stated

[6] *United States v. Matlock*, 415 U.S. 164, 166 (1974).
[7] *Id.*
[8] *Id.* at 172.
[9] *Id.* at 170 (emphasis added).

that Matlock had assumed the risk that Graff could permit a warrantless search of their room when he chose to share a common area with Graff. Thus, the Court held that Matlock's Fourth Amendment rights were not violated.

Although *Matlock* determined that consent may be given by a third party, the case did not address situations involving *physically present* co-occupants, with one consenting to a search and the other refusing. The Supreme Court of Washington was forced to address this altered set of facts in *State v. Leach*.

State v. Leach

The issue of third party consent where *both* occupants are present was specifically examined in *State v. Leach.* In Renton, Washington, Duncan Leach opened a small business called "Why Not Travel" within a commercial business complex.[10] A month after Leach's business opened, several businesses in the complex were burglarized and miscellaneous office supplies and equipment were stolen. A few days later, Leach's business was also burglarized, and an inteletype machine and money were stolen.[11]

Soon after, Cynthia Armstrong, Leach's girlfriend, called the police and requested a meeting with one of the officers. At this time, Armstrong informed the officer that Leach was responsible for the burglaries. Armstrong provided the officer with incriminating evidence that supported this statement, such as a notary stamp which had been stolen from one of the other businesses.[12]

The following day, Armstrong gave consent to a warrantless search of Leach's business. She unlocked the door to the office with a key that Leach had previously given her. Although Leach was present when the police arrived, he was immediately arrested and placed in a chair while the officer proceeded with the search.[13] There was nothing to suggest that Leach was asked for his consent to search his office or that he objected to the search.[14]

[10] *Leach*, 113 Wn.2d at 737.
[11] *Id.*
[12] *Id.*
[13] *Id.*
[14] *Id.* at 737-38.

During the search, the officer recovered several items that had been reported stolen from the other businesses.[15] As a result, Leach was brought to the police station and charged with burglary. Shortly thereafter, Leach filed a motion to suppress the evidence seized as a result of the search. During the hearing on this motion, Armstrong asserted that she had the authority to consent to the search because Leach had given her a key to the office, she periodically worked in the office, and her name appeared on both the lease and the business cards.[16]

The Supreme Court of Washington relied on the reasoning found in *Matlock* with regard to warrantless searches. Specifically, the court reasoned that "the law recognizes that the individual has *assumed the risk* that a co-occupant may permit a search of a commonly shared area in the individual's absence."[17] As a result, an individual has a lower *expectation of privacy* when sharing authority over a property, because the other co-occupant(s) may permit entry in their own right.[18] To assess the issue of common authority, the *Leach* Court used a two-pronged analysis:

- First, a consenting party must be able to permit the search in his or her own right.[19]
- Second, it must be reasonable to find that the defendant has assumed the risk that a co-occupant might permit a search.[20]

If a warrantless search does not meet these two prongs, then according to *Leach* (and its interpretation of *Matlock*), a court is unlikely to allow the use of evidence obtained as a result of the search.

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[15] *Id.* at 737.

[16] *Id.* at 738.

[17] *Id.* (emphasis added).

[18] *Id.* at 739.

[19] *Id.* (quoting *Mathe*, 102 Wn.2d at 543-44). In the case of *Illinois v. Rodriguez* the Supreme Court ruled that in conducting warrantless searches, police officers must reasonably believe that the party has the authority to consent to a warrantless search, even if it is later determined that the party giving consent did not actually have the authority to give that consent. *Georgia v. Randolph*, 126 S. Ct. 1515, 1520 (2006) (quoting *Illinois v. Rodriguez*, 497 U.S. 186 (1990)).

[20] *Leach*, 113 Wn.2d at 739 (quoting *Mathe*, 102 Wn.2d at 543-44).

In addressing the first prong, the *Leach* Court had to determine whether Ms. Armstrong had the authority to permit the search. Under the *Matlock* reasoning, Armstrong would be required to show "mutual use of the property [demonstrating] joint access or control for most purposes."[21] The court decided that the appearance of Armstrong's name on the lease and business cards proved her authority to consent to a warrantless search. Therefore, Armstrong's consent satisfied this first part of the two-pronged analysis.

In evaluating the second prong of the common authority rule, the *Leach* Court again referred to the *Matlock* rationale. Specifically, the court had to determine whether Leach had assumed the risk that Armstrong could consent to a warrantless search of the business, even while he was present to refuse. The *Matlock* Court had stated that it is reasonable for police officers to presume an individual has assumed the risk that a co-occupant will permit others to enter during his absence. However, the *Leach* Court concluded that *Matlock* did not apply when a co-occupant was *present* and *able* to refuse consent to a warrantless search.[22]

The court thus ruled that Leach, who was physically present, did *not* assume the risk that a co-occupant could consent to a warrantless search over his objection; therefore, the search violated his Fourth Amendment rights. The court found that in situations where two occupants are present and able to object, the consent of both must be obtained.[23] While it is reasonable for the law to presume an individual has assumed the risk that a co-occupant will permit others' entrance during his absence, the *Leach* Court held that an occupant does not have the right to permit a search over the co-occupant's refusal when both are present.[24]

United States v. Morning

The case of *United States v. Morning* also presented a dispute in which a warrantless search was conducted while two co-occupants were physically present. The facts in *Morning* are similar to those in *Leach*; however, the Ninth Circuit Court of Appeals applied the *Matlock* precedent differently.

[21] *Id.* at 739.
[22] *Id.* at 743.
[23] *Id.* at 744.
[24] *Id.* at 743.

In June of 1993, federal agents received information that narcotics could be found on Laura Morning's property. Agents from the Border Patrol and Drug Enforcement Agency (DEA) arrived at the residence, where Morning received them at the front door. The agents informed Morning of the tip and asked for consent to perform a warrantless search of the property. Morning told the agents they could not conduct a search without a warrant.[25]

After being asked if anybody else lived on the property, Morning responded that she lived with Francisco Leon-Yanez. Moments later, Morning returned to the door with Leon-Yanez. The agents informed Leon-Yanez that they were performing a narcotics investigation, but before being asked a single question, he stated, "It's in the back there, but it's not mine."[26] Leon-Yanez then gave written and oral consent to a warrantless search of the residence. The agents then searched the residence, recovered incriminating evidence and arrested Morning and Leon-Yanez for conspiracy and possession with intent to distribute marijuana.[27] Both occupants subsequently moved to suppress evidence of the search conducted in violation of their Fourth Amendment rights.

The United States Court of Appeals for the Ninth Circuit applied the standard found in *Matlock* to determine whether the search had been a Fourth Amendment violation. The court found that consent to a warrantless search was voluntarily given by Leon-Yanez. The court also found that Leon-Yanez had the authority to consent to a search because he was recognized as an equal co-occupant of the property.[28]

In determining whether the assumption of risk under *Matlock* applied in cases where both occupants were physically present, the court looked to the rationale behind *Matlock*. According to the Ninth Circuit's interpretation, *Matlock* reinforces the notion that a joint occupant necessarily assumes the risk that a co-occupant could expose their common areas to a search at any time. Despite Morning's own refusal to consent to officers' entry, her expectation of privacy was diminished, even during her presence, because she had assumed

[25] *United States v. Morning*, 64 F.3d 531, 532 (9th Cir. 1995).

[26] *Id.*

[27] *Id.*

[28] *Id.* at 534. The court assumed that since Morning did not object to Leon-Yanez's consent, she likely viewed him as having "superior authority" to the property.

the risk that Leon-Yanez could separately allow someone to enter.[29] According to the Ninth Circuit's interpretation, there is no "reasonable expectation of privacy to be protected under such circumstances."[30] Therefore, Morning's Fourth Amendment rights were not violated because Leon-Yanez consented to the warrantless search, even though Morning had refused.

The preceding cases demonstrate somewhat conflicting judicial views as to the rationale behind co-occupancy and consent to warrantless searches. *United States v. Matlock* first established a general rule regarding warrantless searches in the 1970's, then *Leach* and *Morning* later applied the legal standard found in *Matlock*. However, ambiguity regarding the *Matlock* ruling emerged since *Leach* and *Morning* both dealt with physically present co-occupants who refused consent to a warrantless search, whereas *Matlock* focused on a third party who happened to be home alone. In addressing this ambiguity, the courts in *Leach* and *Morning* applied *Matlock* differently. While *Leach* invalidated consent given by a third party in the presence of a refusing co-occupant, *Morning* reached the opposite conclusion. This in turn created inconsistencies for determining when a warrantless search is valid. The Supreme Court had the opportunity to resolve this conflict in *Georgia v. Randolph*.

APPLICATION OF THE LEGAL STANDARD IN *RANDOLPH*

Case Background

Scott Randolph and his wife, Janet Randolph, separated in May of 2001. Mrs. Randolph took their child to her parent's home in Canada and returned in July; it is unknown whether she was returning to reconcile the relationship or merely to retrieve her remaining possessions.[31]

Soon after her return, Mrs. Randolph called the police following a domestic dispute and claimed that Mr. Randolph had taken their son. When the police arrived, Mrs. Randolph informed the officers that she had only recently returned home after several weeks away and had found that Mr. Randolph was

[29] *Id.* The only way that a defendant can expect complete authority is if the defendant lives alone, or has a private area within a joint residence that is restricted to his exclusive access.

[30] *Id*. at 534.

[31] *Randolph*, 126 S. Ct. at 1519.

using cocaine. A few moments later, Mr. Randolph arrived at the door and denied the allegations, claiming that his wife was the actual substance abuser. He further informed one of the officers that their son was at a neighbor's house because he feared that his wife would take him away again. Mr. Randolph then led the officer to his son and returned to the residence.[32]

At that time, Mrs. Randolph claimed that there were items indicative of drug use in the house. The officer asked Mr. Randolph for consent to perform a warrantless search of the home, which Mr. Randolph "unequivocally refused."[33] The officer then asked Mrs. Randolph for permission to search the home. She consented and led officers to Mr. Randolph's bedroom, where incriminating drug evidence such as a straw with a white powdery substance was found.[34]

While returning to his patrol car to obtain an evidence bag, an officer called the District Attorney who ordered that the search cease until a warrant could be obtained. The evidence, along with Mr. and Mrs. Randolph, were then transported to the police station. Additional evidence was subsequently collected in a warranted search of the premises.[35] As a result, Mr. Randolph was charged with possession of cocaine; he later objected to the original search of his home as well as the evidence that was acquired later with a warrant. [36] This case eventually progressed to the United States Supreme Court.

The Majority Opinion

The Supreme Court first referenced *Matlock*, which held that consent to a warrantless search by a co-occupant with proper authority is valid in the absence of another occupant. However, the Court recognized that *Matlock* did not address a situation such as the one found in *Randolph*, in which *both* occupants were present, with one occupant objecting and the other consenting to the search. Therefore, the Court did not apply the *Matlock* reasoning.

[32] *Id.*

[33] *Id.*

[34] *Id.* Mrs. Randolph did not claim that the two shared a room, but rather referred to the room as belonging to Mr. Randolph.

[35] *Id.*

[36] *Id.* at 1519-20.

Instead of *Matlock*, the Court relied on the case of *Minnesota v. Olson*.[37] In *Olson*, the Supreme Court found that an overnight house guest has a legitimate expectation of privacy in his or her temporary quarters. This is because, in the *Olson* Court's view, it is unlikely that a host would admit someone over the objection of the guest.[38] The *Olson* Court had further determined that if a person wanted to enter the property and was given consent from one occupant, but rejected by another, then that person would not 'sensibly' enter since he or she could risk personal injury by doing so.[39] Building upon these principles, the *Randolph* Court reasoned that an actual co-occupant must have *at least* this much, if not an even stronger, claim to prevent people from entering the home.[40]

The *Randolph* Court stated that it would be wrong to believe that one occupant's consent is powerful enough to prevail over another occupant's objection.[41] The Court held that a warrantless search of a shared dwelling, over the *express refusal* of consent given by a *physically present* resident, could not be justified on the basis of consent given by another occupant.[42] Therefore, since both occupants were physically present at the door, where Mrs. Randolph consented and Mr. Randolph objected, the warrantless search violated Mr. Randolph's Fourth Amendment rights.[43]

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[37] *Minnesota v. Olson*, 495 U.S. 91 (1990). This case dealt with the Fourth Amendment rights of a social guest who was arrested on the premises where he was temporarily staying; police had no warrant or the benefit of any other exception to the warrant requirement.

[38] *Randolph*, 126 S. Ct. at 1522.

[39] *Id.* at 1522-23.

[40] *Id.* at 1522.

[41] *Id.* at 1527.

[42] *Id.* at 1526. The Supreme Court acknowledged that a co-occupant must be at the door to object to a search. If the co-occupant is merely nearby, she will not have the opportunity to object. The co-occupant would also be unable to object if she is arrested outside of her house or if the co-occupant is sleeping on a couch in the other room. The police would not be expected to find all potential co-occupants to determine if any of them object to a warrantless search. According to the Court, doing so would be unreasonable and a waste of time.

[43] Justice Souter wrote the Court's majority opinion, joined by Justices Stevens, Kennedy, Ginsburg and Breyer. Justices Stevens and Breyer each wrote separate concurring opinions as well.

Justice Roberts' Dissent

In his dissenting opinion, Chief Justice Roberts argued that the Court should have applied the standard established by *Matlock*. Roberts maintained that if an individual shares information, papers, or places with another, then the *risk is assumed* that the other person could, in turn, share this access with a third party, including the government.[44] Thus, if both parties are physically present and one party decides to provide information to the police, the other individual cannot prevent this from occurring simply by objecting.

Roberts believed that *Matlock* was relevant to the *Randolph* case because each of the Randolphs had assumed the risk that the other, with common authority over the shared home, might permit a common area to be searched.[45] The law allows the government to show that permission to search was obtained from a third party who possessed common authority to the premises.[46] Therefore, Roberts would have ruled that Mr. Randolph's Fourth Amendment rights were not violated by the warrantless search of his home. Even though Mr. Randolph refused to consent to the search, he had assumed the risk that Mrs. Randolph could give consent when he moved in with her, thereby making the search valid under *Matlock*.[47]

Difficulties with the Majority Approach

By taking the *Matlock* precedent and assumption of risk theory into account, Chief Justice Roberts offered a more logical view of the case. In *Matlock,* the Supreme Court determined that consent is given through the assumption of risk. The Court stated that it is reasonable to recognize that any of the co-occupants had the right to permit an inspection. Furthermore, if one co-occupant is absent, the other occupant could consent to a warrantless search because the absent individual has assumed the risk that the other might permit

[44] *Id.* at 1531 (Roberts, C.J., dissenting).

[45] *Id.*

[46] *Id.*

[47] Justice Scalia joined Justice Roberts' dissent and filed a separate dissenting opinion as well. Justice Thomas also filed a separate dissenting opinion, and Justice Alito (new to the Court at the time) did not participate in deciding this case.

the common areas to be searched. The co-occupants have *assumed this risk* by giving each other shared access to their premises and effects.[48]

The *Randolph* Majority's interpretation of the assumption of risk was different from that established in *Matlock*. In *Matlock,* the Court's decision rested on the fact that the assumption of risk was viewed as a 'risk of consent to a search.' To establish whether consent to a *warrantless* search was given through the assumption of risk, the Court should have determined whether the co-occupants had an expectation of privacy that their common areas would not be searched under such conditions.

As a general principle of Fourth Amendment jurisprudence, in order to claim an invasion of privacy, an individual must have an actual subjective expectation of privacy, which society must also recognize as being objectively reasonable.[49] Since every co-occupant of a premises has access to the common areas, as well as the right to permit a search of the premises, there should be no expectation that the common areas cannot be searched. Given that the co-occupants have already assumed this risk, they have also assumed the risk that their co-occupants could permit a search (even a warrantless one) over their objection. The assumption of risk should not be lessened by the happenstance presence of a co-occupant who refuses to consent at one particular moment.

Applying that same rationale to *Georgia v. Randolph*, the Court should have determined that Randolph's Fourth Amendment rights were not violated by the warrantless search of the premises. This is because Randolph had already consented to the search through the assumption of risk that comes with living with someone. Even though Randolph and his wife were not currently living together, they were still married, had equal ownership over the property, and had shared access to that property. If Randolph wanted an expectation of privacy over the premises, and did not want to assume the risk that his wife could consent to a warrantless search of his home, then he could have taken specific action such as changing the locks or filing for divorce. Hence, Randolph assumed the risk that his wife could consent to a search of their property and, therefore, his refusal to consent to a search should not override Mrs. Randolph's permission.

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[48] *Matlock*, 415 U.S. at 171.

[49] *Investigation and Police Practices*, 35 Geo. L.J. Ann. Rev. Crim. Proc. 3 (2006) (citing *Katz v. United States*, 389 U.S. 347, 361 (1967) (Harlan, J., concurring)).

Referencing the standards found in *Matlock,* it can be inferred that once the co-occupants assumed the risk that either of them could permit a warrantless search of the premises, then the issue of physical presence would become irrelevant. Rather than referring to this "assumption of risk" in the abstract, the Court should have clearly tied the concept to a voluntary waiver of the right to privacy. When a citizen voluntarily shares his "castle," he *subjectively*, and *objectively*, gives up some of his privacy and assumes the risk that his co-occupant may allow the police to search the common areas. The merger of privacy standards with the assumption of risk theory could have brought about a better resolution to the gap left by the *Matlock* standard when it comes to warrantless searches.

CONCLUSION:
IMPLICATIONS OF THE *RANDOLPH* RULING

This article centered on examination of the Fourth Amendment and the consent exception to the warrantless search rule. Relevant cases at the state and federal court levels have been addressed to illustrate their application of the consent exception. In *Matlock*, the Court ruled that a warrantless search may be valid if voluntary consent is given by one occupant in the absence of the other occupant, as long as each individual has the authority to do so. The standard from *Matlock* was then applied to *Leach* and *Morning* differently. However, when the Supreme Court heard the *Randolph* case, the *Matlock* reasoning was disregarded. Instead, the Court referred to *Minnesota v. Olson* and determined that Randolph's Fourth Amendment rights were violated, despite his co-occupant's consent to a warrantless search of the property, since Randolph was present and refused to give consent.

By not applying the legal standard regarding assumption of risk found in *Matlock,* the *Randolph* Court created protection from warrantless searches on a "random and happenstance basis."[50] Contrary to the *Matlock* ruling, *Randolph* held that if two occupants answer the door to the home, then both must consent to the search. Chief Justice Roberts acknowledged the ironies in this view:

[50] *Id.* at 1537 (Roberts, C.J., dissenting).

> A man's home is his castle… [but] it is not his castle if he happens to be absent, asleep in the keep, or otherwise engaged when the constable arrives at the gate. Then it is his co-owner's castle. And, of course, it is not his castle if he wants to consent to entry, but his co-owner objects.[51]

In other words, the applicability of the consent exception turns upon who happens to be available to answer the door when police ask for that consent. As a result, this rule creates a policy that unintentionally provides protection from warrantless searches on a "random and happenstance basis," because an occupant who makes it to the door (like Randolph) can block a search over his co-occupant's wishes, but an occupant who can't make it to the door (like Matlock) has no such power.[52]

The Supreme Court should have applied the assumption of risk analysis presented in *Matlock* to the *Randolph* case. If the Court had relied on *Matlock* to determine whether an individual has assumed the risk that a co-occupant may consent to a search, even when *both* occupants are present, then the same Fourth Amendment treatment would apply consistently to all individuals who choose to share their premises with others. Instead, due to the ruling in *Randolph*, if an individual is concerned that a co-occupant could consent to a warrantless search of the premises, then that individual must make it a point to get to the door every time someone approaches, even if his or her co-occupant has already answered it. In other words, a man can still treat his home as his castle, but only if he lives alone or ever-vigilantly guards his door.

[51] *Id.* at 1539.
[52] *Id.* at 1537.