

### Table 11-3 Exceptions to the Exclusionary Rule

*Mapp v. Ohio* (1961) held that evidence obtained in violation of the Fourth Amendment is inadmissible in court. Over the years the justices have allowed certain exceptions to that rule. Listed below are some examples of those exceptions.

Decision	Exception
<i>United States v. Calandra</i> (1974)	The exclusionary rule does not apply to grand jury investigations. A witness before the grand jury may not refuse to answer questions that are based on illegally obtained evidence.
<i>United States v. Ceccolini</i> (1978)	Evidence improperly obtained may be admitted if the connection between the evidence and the illegal means by which it was gathered is very remote.
<i>Nix v. Williams</i> (1984)	Evidence discovered as the result of an illegal search may still be admissible if it can be shown that police following correct procedures inevitably would have discovered the evidence.
<i>United States v. Leon</i> (1984)	Illegally seized evidence is admissible if law enforcement officers had a reasonable good faith belief that they were acting consistent with appropriate legal authority, such as relying on a search warrant later proven to be defective.
<i>Murray v. United States</i> (1988)	Evidence obtained illegally may be admitted if the evidence was later independently obtained through legal means.
<i>Arizona v. Evans</i> (1995)	Evidence obtained pursuant to a search incident to a valid arrest may be admissible even if police based the arrest on information found in court records later determined to be inaccurate.
<i>Hudson v. Michigan</i> (2006)	Evidence from the search of a residence may be admissible where the police had authorization to search but entered in violation of established knock-and-announce rules.
<i>Herring v. United States</i> (2009)	Evidence gathered in a search incident to a valid arrest may be admissible even if the arrest was based on erroneous law enforcement records that the arresting officers relied on as being accurate.
<i>Utah v. Strieff</i> (2016)	Evidence gathered from a search incident to an arrest may be admissible even if the justification for arrest is the by-product of an unconstitutional investigatory stop.