

UNITED STATES COURT OF APPEALS FOR THE FOURTH CIRCUIT

Marcus C. Ingram v. Warden Israel Hamilton; Sgt. D. Squier

No. 25-6634 (4th Cir. June 24, 2026) · No. 25-6634 · Decided June 24, 2026

SUMMARY

The Fourth Circuit affirmed the grant of qualified immunity to prison officials sued under 42 U.S.C. § 1983 over a policy requiring visual strip searches of inmates before and after video visitation. The court assumed without deciding that some searches may have violated the Fourth Amendment but held that the right was not clearly established at the time. The court did not reach supervisory liability because it affirmed qualified immunity.

CASE DETAILS

COURT	United States Court of Appeals for the Fourth Circuit
WRITING FOR THE COURT	Judge Thacker; Judge King; Judge Wynn
JURISDICTION	United States Court of Appeals for the Fourth Circuit
DECIDED	June 24, 2026
DOCKET	25-6634
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff appealed the district court's grant of summary judgment to the defendants on qualified-immunity grounds in a 42 U.S.C. § 1983 action challenging repeated strip searches under the Fourth Amendment.
STANDARD OF REVIEW	The court reviewed the summary judgment order de novo, viewing the record and reasonable inferences in the light most favorable to the nonmovant.
PRECEDENTIAL VALUE	Published precedential opinion of the United States Court of Appeals for the Fourth Circuit
PARTIES	Marcus C. Ingram v. Warden Israel Hamilton, Sgt. D. Squier

TOPICS

- qualified immunity
- prisoners rights
- appellate procedure
- standard of review
- civil rights

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the blanket policy requiring visual strip searches before and after each video visitation was unreasonable under the Fourth Amendment.
2. Whether the alleged Fourth Amendment right violated by the policy was clearly established at the time of the searches, defeating qualified immunity.
3. Whether the district court properly granted summary judgment on qualified-immunity grounds.

HOLDINGS

1. The Fourth Circuit applies the *Bell v. Wolfish* balancing test, rather than the *Turner v. Safley* test, to determine whether a sexually invasive inmate search violates the Fourth Amendment.
2. The court assumed without deciding that some of the strip searches, particularly the redundant searches after video visits, were unreasonable and therefore unconstitutional under the Fourth Amendment.
3. The alleged right to be free from the challenged repeated strip-search policy was not clearly established in the Fourth Circuit or by a consensus of persuasive authority; therefore, the defendants were entitled to qualified immunity.

KEY QUOTATIONS

“We assume without deciding that some of the strip searches to which Appellant was subjected lacked reasonable justification and thus ran afoul of the Fourth Amendment. But because the reasonableness of those searches was not beyond debate at the time they took place, we affirm the district court’s award of qualified immunity.” (2)

*“To determine whether a [strip] search was constitutionally unreasonable, we apply the balancing test adopted by the Supreme Court in *Bell*.”* (10-11)

“Because the alleged constitutional violation was not clearly established in this circuit or among the constellation of other circuit opinions, we must affirm the district court’s grant of qualified immunity to Appellees.” (20-21)

FACTUAL BACKGROUND

Keen Mountain Correctional Center experienced 13 near-fatal opioid overdoses during May and June 2023. Based on anonymous and uncorroborated inmate tips that contraband was being circulated through video-visitation rooms, the warden instituted a policy requiring every inmate using those rooms to undergo a visual strip search before and after each visit. Ingram was strip searched 26 times in one month, although the record contained no instance of contraband being found or of an inmate associated with the video-visitation rooms being linked to drug smuggling.

PROCEDURAL HISTORY

Ingram sued the warden and a correctional officer, asserting Fourth and Eighth Amendment claims and supervisory liability. The United States District Court for the Western District of Virginia granted the defendants' motion for summary judgment, concluding that the strip-search policy was reasonable under the Fourth Amendment, that the searches did not violate the Eighth Amendment, and that supervisory liability could not exist without underlying wrongdoing. The Fourth Circuit affirmed the grant of qualified immunity; Ingram did not appeal the dismissal of his Eighth Amendment claim, and the court did not reach supervisory liability.

DISPOSITION

affirmed

CASES CITED

- Thomas v. EOTech, LLC, 169 F.4th 259, 263 (4th Cir. 2026)
- Zorn v. Linton, 146 S. Ct. 926, 930 (2026)
- Rivas Villegas v. Cortesluna, 142 S. Ct. 4, 8 (2021) (per curiam)
- Escondido v. Emmons, 586 U.S. 38, 43 (2019) (per curiam)
- District of Columbia v. Wesby, 583 U.S. 48, 63 (2018)
- deWet v. Rollyson, 157 F.4th 344, 349 (4th Cir. 2025)
- Case v. Beasley, 167 F.4th 651, 662 (4th Cir. 2026)
- Bolick v. Anderson, 169 F.4th 528, 539-40 (4th Cir. 2026)
- Johnson v. Robinette, 105 F.4th 99, 110-16 (4th Cir. 2024)
- King v. Rubenstein, 825 F.3d 206, 215 (4th Cir. 2016)
- Bell v. Wolfish, 441 U.S. 520, 524, 558-59 (1979)
- Turner v. Safley, 482 U.S. 78, 89-91 (1987)
- N.G. v. Connecticut, 382 F.3d 225, 227, 233-36 (2d Cir. 2004)
- Florence v. Bd. of Chosen Freeholders of Cnty. of Burlington, 566 U.S. 318, 323-34 (2012)
- Pearson v. Callahan, 555 U.S. 223, 236 (2009)
- Arruda v. Fair, 710 F.2d 886, 886-88 (1st Cir. 1983)
- Skurstenis v. Jones, 236 F.3d 678, 681-84 (11th Cir. 2000)
- Parkell v. Danberg, 833 F.3d 313, 321, 328 (3d Cir. 2016)
- Bull v. City & County of San Francisco, 595 F.3d 964, 966-75 (9th Cir. 2010)
- Franklin v. Lockhart, 769 F.2d 509, 509-11 (8th Cir. 1985)
- Flores v. Meese, 681 F. Supp. 665, 667 (C.D. Cal. 1988)

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