

NONPRECEDENTIAL DISPOSITION

To be cited only in accordance with FED. R. APP. P. 32.1

United States Court of Appeals

For the Seventh Circuit

Chicago, Illinois 60604

Submitted February 2, 2026*

Decided February 2, 2026

Before

MICHAEL B. BRENNAN, *Chief Judge*

DAVID F. HAMILTON, *Circuit Judge*

THOMAS L. KIRSCH II, *Circuit Judge*

No. 24-3138

JOSHUA WALKER,
Plaintiff-Appellant,

v.

V.N. GATSIOS and K.J. BUNGE,
Defendants-Appellees.

Appeal from the United States District
Court for the Northern District of
Illinois, Eastern Division.

No. 19 C 6072

Jeffrey I. Cummings,
Judge.

ORDER

Joshua Walker brought this lawsuit against Chicago police officers, alleging constitutional violations arising out of his arrest for vehicular hijacking. *See* 42 U.S.C. § 1983. The district court granted the officers' motion to dismiss. We affirm.

* We have agreed to decide the case without oral argument because the briefs and record adequately present the facts and legal arguments, and oral argument would not significantly aid the court. FED. R. APP. P. 34(a)(2)(C).

Walker attached to his complaint police reports detailing that in August 2016, police responded to a report of vehicular hijacking in a parking lot. A man demanded the victim's car keys at gunpoint, got in the car, and sped off. The victim viewed a photo lineup and identified Walker as the perpetrator. Walker's fingerprints were found on a box in the back seat of the car after it was recovered.

In March 2018, Chicago Police Officers V.N. Gatsios and K.J. Bunge were informed by detectives that Walker was positively identified as the suspect of the August 2016 carjacking. The officers went to the Salvation Army where Walker was residing, handcuffed him, and brought him to the police station. Walker was charged with aggravated vehicular hijacking. *See* 720 ILCS 5/18-4. He pleaded guilty to the lesser-included offense of vehicular hijacking. *See* 720 ILCS 5/18-3.

Walker sued the City of Chicago, Officers Gatsios and Bunge, and several other police officers for violating his constitutional rights. *See* 42 U.S.C. § 1983. He alleged that his arrest was unlawful because the officers lacked probable cause and did not have a warrant for his arrest, that they used excessive force in handcuffing him, and that he was illegally searched.

At screening, the district court permitted Walker to proceed with only a claim for false arrest against Gatsios and Bunge based on their warrantless arrest of Walker. In the screening order, the court explained that the police reports attached to Walker's complaint established that there was probable cause for his arrest, so the only question remaining was whether the officers needed a warrant to arrest him at the Salvation Army.

Gatsios and Bunge moved to dismiss Walker's complaint, arguing that they did not need a warrant because the arrest occurred in a conference room of the Salvation Army where Walker had no reasonable expectation of privacy. They attached body camera footage from the arrest that confirmed they arrested Walker in a conference room. Walker did not respond to the motion.

The district court granted the officers' motion to dismiss. It first determined that it could consider the attached video footage because it provided a complete picture of the arrest, which was detailed in the police reports Walker attached to his complaint, and Walker did not object to consideration of the video. *See Esco v. City of Chicago*, 107 F.4th 673, 678–79 (7th Cir. 2024). The video footage, the court explained, clearly showed that the arrest took place in a conference room located in a common area rather

than in Walker's private living quarters. Thus, a warrant was not necessary because Walker did not have a reasonable expectation of privacy in the conference room.

Walker appeals, first arguing that the district court wrongly concluded that the officers had probable cause for his arrest. In Walker's view, the officers could not make that determination without authorization from a judge. But officers may independently determine that probable cause exists and arrest a suspect in a public place without first obtaining a warrant. *See, e.g., United States v. Watson*, 423 U.S. 411, 423–24 (1976); *Giddeon v. Flynn*, 830 F.3d 719, 720 (7th Cir. 2016). And probable cause existed here: As the district court noted in its screening order, the police report attached to Walker's complaint explains that the victim of the carjacking positively identified Walker in a lineup, and Walker's fingerprints were found on a box in the backseat of the stolen car. *See McDaniel v. Polley*, 847 F.3d 887, 895 (7th Cir. 2017) ("A single, credible eyewitness identification can create probable cause.").

Next, Walker contends that the warrantless arrest was unlawful because it occurred at his residence. Because he lived at the Salvation Army, Walker argues, any arrest on its premises required a warrant. But, as the district court concluded, the Salvation Army is more akin to an apartment building where multiple residents reside than a single-family home. And there is "generally no reasonable expectation of privacy in shared and common areas in multiple-dwelling residential buildings." *United States v. Sweeney*, 821 F.3d 893, 902–03 (7th Cir. 2016). After the officers entered the building, a man escorted them to a small conference room directly adjacent to the Salvation Army entrance and lobby. Because the conference room was a shared space, accessible to others residing in or working at the Salvation Army, Walker did not have a reasonable expectation of privacy in it. *See id.*

Walker also argues that his arrest violated the Fourth Amendment because it was based on an investigative alert—a function of Illinois policing where detectives send a computer notification informing officers in the field that they have probable cause for an individual's arrest. *See People v. Clark*, 266 N.E.3d 1047, 1049–50 (Ill. 2024). Walker points to Illinois caselaw saying that an arrest pursuant to an investigative alert violates the Illinois Constitution because the "mere word" of another officer is not enough to support a lawful arrest. *See People v. Bass*, 144 N.E.3d 542, 557–58 (Ill. App. Ct. 2019), *as modified on denial of reh'g* (Sept. 30, 2019). But that caselaw has been overruled. *See Clark*, 266 N.E.3d at 1066–67. In any event, the holding in *Bass* was based on a feature of the Illinois Constitution, not present in the Fourth Amendment, which requires probable cause to be supported by an affidavit. *Bass*, 144 N.E.3d at 547–48.

Under the Fourth Amendment, officers are permitted to draw upon the knowledge of other officers to assess whether probable cause exists. *See Taylor v. Hughes*, 26 F.4th 419, 436 (7th Cir. 2022) (“[O]ne officer’s determination of probable cause may be imputed to other officers in the department, who may arrest on the basis of the first officer’s finding.”); *United States v. Howard*, 883 F.3d 703, 707 (7th Cir. 2018).

We have considered Walker’s remaining arguments, and none has merit.

AFFIRMED