

SUPREME COURT OF THE STATE OF IDAHO

State v. Warren

Warren · No. 48008 · Decided September 23, 2021

SUMMARY

The Idaho Supreme Court reversed an order suppressing evidence obtained after officers stopped a vehicle for registration violations and investigated whether the driver was violating a criminal no-contact order involving the passenger. The majority held that officers could continue detaining the passenger while controlling the scene and investigating the driver's suspected criminal conduct. A concurrence agreed that the passenger's detention was lawful but stated that a search of the passenger and her belongings would require individualized reasonable suspicion, an issue not preserved on appeal.

CASE DETAILS

COURT	Supreme Court of the State of Idaho
WRITING FOR THE COURT	Justice Moeller; Chief Justice Bevan; Justice Brody; Justice Burdick; Justice Stegner
JURISDICTION	Idaho
DECIDED	September 23, 2021
DOCKET	48008
DISPOSITION	reversed
PROCEDURAL POSTURE	The State appealed the district court's order granting Jennifer Warren's motion to suppress evidence obtained during and after a traffic stop.
STANDARD OF REVIEW	The court defers to the trial court's factual findings unless clearly erroneous but independently reviews whether, based on those findings, the evidence should have been suppressed. Because the State accepted the district court's factual findings and challenged only the constitutionality of the detention, the issue was reviewed as a matter of law.
PRECEDENTIAL VALUE	Published Idaho Supreme Court opinion; precedential.
PARTIES	State of Idaho v. Jennifer Anne Warren

TOPICS

fourth amendment

search and seizure

criminal procedure

suppression of evidence

appellate procedure

PRACTICE AREAS

criminal procedure

constitutional law

search and seizure

appellate procedure

QUESTIONS PRESENTED

1. Whether officers may continue detaining a passenger during a traffic stop when the investigation shifts to a potentially more serious crime by the driver and officers have reasonable suspicion that the driver is violating a protection or no-contact order.
2. Whether the district court erred in suppressing evidence obtained after officers abandoned the original traffic-stop purpose.

HOLDINGS

1. When a lawful traffic stop gives rise to reasonable suspicion that the driver is committing another, potentially more serious crime, officers may continue controlling the scene and detaining the vehicle's passengers while investigating that crime; the passenger's detention does not become unlawful merely because officers abandoned the original traffic-related purpose.

KEY QUOTATIONS

“The temporary seizure of driver and passengers ordinarily continues, and remains reasonable, for the duration of the stop.” (4)

“Therefore, we hold that the district court erred in granting the motion to suppress.” (8)

“A traffic stop is not a license for the police to subject a passenger to interrogation and search that is unrelated to the basis for the original stop.” (12)

FACTUAL BACKGROUND

Boise police stopped a GMC Yukon driven by Steven Warren for a canceled and expired registration, with Jennifer Warren in the passenger seat. During the stop, officers learned of a civil protection order and criminal no-contact order prohibiting Steven from contacting Jennifer and temporarily detained Jennifer while dispatch confirmed the orders' status. Officers searched the vehicle after a drug-detection dog alerted and later arrested Jennifer, finding drug paraphernalia and methamphetamine on her person and controlled substances in the vehicle and her purse.

PROCEDURAL HISTORY

Boise police stopped a vehicle driven by Steven Warren for a canceled and expired registration and then investigated whether he was violating civil and criminal no-contact orders involving Jennifer Warren, the passenger. The district court granted Jennifer's suppression motion, concluding that officers lacked reasonable suspicion to continue detaining her after abandoning the original traffic-stop purpose. The Idaho Supreme Court reversed that order.

DISPOSITION

reversed

CASES CITED

- State v. Lira-Lara, 132 Idaho 465, 466, 974 P.2d 1094, 1095 (1999)
- Delaware v. Prouse, 440 U.S. 648, 653 (1979)
- Rodriguez v. United States, 575 U.S. 348 (2015)
- Brendlin v. California, 551 U.S. 249, 255 (2007)
- Arizona v. Johnson, 555 U.S. 323 (2009)
- Illinois v. Caballes, 543 U.S. 405, 407 (2005)
- State v. Linze, 161 Idaho 605, 389 P.3d 150 (2016)
- Maryland v. Wilson, 519 U.S. 408, 412 (1997)
- Pennsylvania v. Mimms, 434 U.S. 106, 110 (1977)
- State v. Phipps, 166 Idaho 1, 8, 454 P.3d 1084, 1091 (2019), cert. denied, 141 S. Ct. 242 (2020)
- United States v. Landeros, United States v. Landeros, 913 F.3d 862, 864 (9th Cir. 2019)