

SUPREME COURT OF MINNESOTA

Daniel Garcia-Mendoza v. 2003 Chevy Tahoe, VIN
#1GNEC13V23R143453, Plate #235JBM, et al.

852 N.W.2d 659 (Minn. 2014) · No. A13-0445 · Decided August 20, 2014

SUMMARY

The Minnesota Supreme Court held that Daniel Garcia-Mendoza had standing to challenge the civil forfeiture of a vehicle and cash because he had a colorable interest in the seized property. The court further held that the Fourth Amendment exclusionary rule applies to civil forfeiture actions under Minn. Stat. §§ 609.531-.5319. The court reversed the court of appeals and remanded for further proceedings.

CASE DETAILS

COURT	Supreme Court of Minnesota
WRITING FOR THE COURT	Dietzen, Justice
JURISDICTION	Minnesota
DECIDED	August 20, 2014
DOCKET	A13-0445
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Appeal from the court of appeals' affirmance of summary judgment for the County in a state civil forfeiture action.
STANDARD OF REVIEW	Standing and the applicability of the Fourth Amendment exclusionary rule are legal questions reviewed de novo. Because the case arose from summary judgment, the appellant had to show a genuine issue of material fact concerning standing.
PRECEDENTIAL VALUE	Published precedential opinion of the Supreme Court of Minnesota.
PARTIES	Daniel Garcia-Mendoza v. 2003 Chevy Tahoe, VIN #1GNEC13V23R143453, Plate #235JBM, et al., Hennepin County

TOPICS

- search and seizure
- fourth amendment
- standing
- summary judgment
- appellate procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Garcia-Mendoza had standing as an aggrieved party to challenge the civil forfeiture of the vehicle and cash.
2. Whether the Fourth Amendment exclusionary rule applies to civil forfeiture actions brought under Minn. Stat. §§ 609.531-.5319.
3. Whether the Supreme Court should reach the County's collateral-estoppel, plea-agreement, exclusive-remedy, and challenge to the district court's dictum arguments when those issues were outside the scope of the granted review.

HOLDINGS

1. A party has standing to challenge a civil forfeiture under Minn. Stat. §§ 609.531-.5319 when the party has a colorable interest in the seized property. Garcia-Mendoza had such an interest because he was the registered owner of the vehicle and possessed the vehicle and cash when they were seized.
2. The Fourth Amendment exclusionary rule applies to civil forfeiture actions brought under Minn. Stat. §§ 609.531-.5319.

KEY QUOTATIONS

“We conclude that a party is aggrieved and can challenge a civil forfeiture under Minn. Stat. §§ 609.531-.5319 when the party has a colorable interest in the seized property.” (at 668)

“We conclude that the Fourth Amendment exclusionary rule applies to civil forfeiture actions brought under Minn. Stat. §§ 609.531-.5319.” (at 676)

“If a precedent of this Court has direct application in a case, yet appears to rest on reasons rejected in some other line of decisions, [courts] should follow the case which directly controls, leaving to this Court the prerogative of overruling its own decisions.” (at 675)

FACTUAL BACKGROUND

Police stopped Garcia-Mendoza while he was driving a Chevrolet Tahoe after determining that neither occupant appeared to have a valid driver's license. During an inventory search conducted before the vehicle was towed, officers discovered approximately 225.9 grams of methamphetamine, and officers found \$611 in cash on Garcia-Mendoza. The vehicle and cash were seized, and the County pursued civil forfeiture under Minnesota's controlled-substance forfeiture statutes.

PROCEDURAL HISTORY

After police seized the vehicle and \$611 in cash following a traffic stop and inventory search, Garcia-Mendoza filed a civil forfeiture complaint seeking a judicial determination. The district court granted the County summary judgment, and the court of appeals affirmed on the ground that the Fourth Amendment exclusionary rule did not apply to civil forfeiture proceedings. The Minnesota Supreme Court granted review on standing and the

applicability of the exclusionary rule, reversed, and remanded to the court of appeals for further proceedings on the County's remaining arguments.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remanded to the Minnesota Court of Appeals for further proceedings consistent with the opinion, including consideration of the County's remaining arguments. The Supreme Court expressed no opinion on the merits or preservation of those arguments and directed the court of appeals to determine whether to address each issue.

CASES CITED

- Marine Credit Union v. Detlefson-Delano, 830 N.W.2d 859, 864 n.3 (Minn. 2013)
- In re Custody of D.T.R., 796 N.W.2d 509, 512-13 (Minn. 2011)
- Sierra Club v. Morton, 405 U.S. 727, 731-32 (1972)
- McCaughtry v. City of Red Wing, 808 N.W.2d 331, 338 (Minn. 2011)
- State v. McBride, 666 N.W.2d 351, 360 (Minn. 2003)
- Leamington Co. v. Nonprofits' Insurance Association, 615 N.W.2d 349, 354 (Minn. 2000)
- Lexmark International, Inc. v. Static Control Components, Inc., 134 S. Ct. 1377, 1386 (2014)
- United States v. \$304,980 in U.S. Currency, 732 F.3d 812, 818 (7th Cir. 2013)
- United States v. \$557,933.89, More or Less, in U.S. Funds, 287 F.3d 66, 78 (2d Cir. 2002)
- United States v. 500 Delaware Street, 868 F. Supp. 513, 518 n.2 (W.D.N.Y. 1994), aff'd, 113 F.3d 310 (2d Cir. 1997)
- United States v. Bailey, 419 F.3d 1208, 1213 (11th Cir. 2005)
- United States v. 92 Buena Vista Avenue, 507 U.S. 111, 131-32 (1993) (Scalia, J., concurring)
- Counihan v. Allstate Insurance Co., 25 F.3d 109, 112 (2d Cir. 1994)
- State v. Brist, 812 N.W.2d 51, 54, 57 (Minn. 2012)
- One 1958 Plymouth Sedan v. Pennsylvania, 380 U.S. 693, 694-702 (1965)
- Davis v. United States, 131 S. Ct. 2419, 2426 (2011)
- Herring v. United States, 555 U.S. 135, 139 (2009)
- State v. Askerooth, 681 N.W.2d 353, 370 (Minn. 2004)
- United States v. James Daniel Good Real Property, 510 U.S. 43, 49 (1993)
- United States v. Ursery, 518 U.S. 267, 292 (1996)
- Rodriguez de Quijas v. Shearson/American Express, Inc., 490 U.S. 477, 484 (1989)
- State v. Jackson, 742 N.W.2d 163, 180 (Minn. 2007)
- State v. Borg, 806 N.W.2d 535, 537 n.1 (Minn. 2011)
- Anderly v. City of Minneapolis, 552 N.W.2d 236, 239-40 (Minn. 1996)

- Hoyt Properties, Inc. v. Production Resource Group, 736 N.W.2d 313, 317 n.1 (Minn. 2007)
- Eagan Economic Development Authority v. U-Haul Co. of Minnesota, 787 N.W.2d 523, 539 (Minn. 2010)
- Baker v. Baker, 753 N.W.2d 644, 653 (Minn. 2008)

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