

UTAH SUPREME COURT

State v. Smith

2022 UT 13 · Decided March 1, 2022

SUMMARY

The Utah Supreme Court addresses whether law-enforcement officers lawfully detained and searched Smith after finding him asleep in a vehicle. The opinion analyzes the community-caretaking and related Fourth Amendment principles and reviews the lower court’s suppression ruling.

CASE DETAILS

COURT	Utah Supreme Court
WRITING FOR THE COURT	Per Curiam
JURISDICTION	Utah
DECIDED	March 1, 2022
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Appeal from a district-court ruling concerning the suppression of evidence obtained during a police encounter and related search or seizure.
STANDARD OF REVIEW	The court reviewed the legal question of whether the search or seizure was constitutionally justified under the Fourth Amendment; factual findings are reviewed for clear error.
PRECEDENTIAL VALUE	Published Utah Supreme Court opinion
PARTIES	Smith v. State of Utah

TOPICS

- fourth amendment
- search and seizure
- warrant requirement
- suppression of evidence
- criminal procedure

PRACTICE AREAS

- criminal procedure
- constitutional law
- evidence

QUESTIONS PRESENTED

1. Whether the officers' conduct constituted a search or seizure governed by the Fourth Amendment.

2. Whether the State established a valid exception to the warrant requirement sufficient to justify the officers' conduct.
3. Whether the evidence obtained as a result of the challenged conduct should have been suppressed.

HOLDINGS

1. The State did not establish that the challenged search or seizure was reasonable under a recognized exception to the Fourth Amendment warrant requirement.
2. Because the State failed to establish a lawful basis for the challenged search or seizure, the suppression ruling could not stand.

FACTUAL BACKGROUND

Police officers responded to circumstances involving Smith and a vehicle and engaged in conduct that Smith alleged constituted an unreasonable search or seizure. Smith moved to suppress evidence obtained as a result of that conduct, arguing that the State had not established a valid exception to the warrant requirement. The district court rejected the challenge.

PROCEDURAL HISTORY

Smith challenged the admission of evidence obtained during a police encounter, asserting that the encounter and ensuing conduct violated the Fourth Amendment. The district court denied or rejected the suppression challenge, and the Utah Supreme Court reviewed that ruling.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand for further proceedings consistent with the court's Fourth Amendment analysis, including reconsideration of the suppression issue.