

SUPREME COURT OF WASHINGTON

Stalter v. State, 151 Wash. 2d 148

86 P.3d 1159 (2004) · Decided March 18, 2004

SUMMARY

The Washington Supreme Court consolidated cases involving individuals detained in the Pierce County Jail under arrest warrants issued for other persons. The court held that jail personnel have no general duty to investigate every claim of misidentification, but must take steps to promptly release a detainee when they know or should know, based on information presented, that the detainee is not the person named in the warrant. The court remanded Stalter’s negligence and false-imprisonment claims for trial, affirmed dismissal of Brooks’s corresponding claims, and affirmed dismissal of Brooks’s 42 U.S.C. § 1983 claim.

CASE DETAILS

COURT	Supreme Court of Washington
WRITING FOR THE COURT	Alexander, C.J.; Johnson, J.; Madsen, J.; Ireland, J.; Bridge, J.; Owens, J.; Fairhurst, J.
JURISDICTION	Washington
DECIDED	March 18, 2004
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	The Washington Supreme Court granted review of consolidated Court of Appeals decisions reversing summary judgments for Pierce County in negligence and false-imprisonment claims and affirming dismissal of Brooks's 42 U.S.C. § 1983 claim.
STANDARD OF REVIEW	Summary judgment is reviewed de novo. The court views the facts and reasonable inferences in the light most favorable to the nonmoving party and asks whether there is a genuine issue of material fact and whether the moving party is entitled to judgment as a matter of law.
PRECEDENTIAL VALUE	published precedential opinion
PARTIES	Pierce County, Brooks v. Kevin Lee Stalter, Pierce County

TOPICS

- torts
- negligence
- government liability
- section 1983
- summary judgment

PRACTICE AREAS

torts

civil rights

constitutional law

municipal law

civil procedure

QUESTIONS PRESENTED

1. Whether jail personnel have a duty to investigate a detainee's identity whenever they receive notice that the detainee may be the wrong person named in an arrest warrant.
2. Whether jail personnel have a duty to take steps to promptly release a detainee when they know or should know, based on information actually presented to them, that the detainee is not the person named in the warrant.
3. Whether the evidence created a genuine issue of material fact regarding Pierce County's breach of that duty in Stalter's case.
4. Whether Brooks's detention violated the Due Process Clause and supported a claim under 42 U.S.C. § 1983.

HOLDINGS

1. Jail personnel do not have an affirmative duty to investigate every claim of misidentification merely because they are put on notice that they may be holding the wrong person.
2. Jail personnel have a duty to take steps to promptly release a detainee once they know or should know, based on information actually presented to them, that the detainee is not the person named in the arrest warrant.
3. Stalter presented sufficient evidence to create a jury question regarding whether Pierce County knew or should have known that he was not the person named in the warrant and breached its duty to release him.
4. Brooks's negligence and false-imprisonment claims were properly dismissed because his protests, despite his matching the warrant description, did not provide sufficient evidence that jail personnel knew or should have known of the misidentification.
5. Brooks failed to establish a constitutional violation because his three-day prearrestment detention under a facially valid warrant, followed by a hearing at which counsel could raise misidentification, did not violate due process.

KEY QUOTATIONS

“We hold that the Court of Appeals erred when it concluded that mere notice to jail personnel that they may be holding the wrong individual imposes a duty on them to investigate claims of misidentification.” (151)

“We determine, however, that jail personnel do have a duty to take steps to promptly release a detainee once they know or should know, based on information provided to them, that the person they are holding is not the person named in the arrest warrant.” (151)

“We reject the argument that jailers have a duty to investigate claims of misidentification.” (160)

FACTUAL BACKGROUND

Kevin Lee Stalter was arrested and detained under a warrant issued for his brother, Robert John Stalter, despite substantial discrepancies in name, physical characteristics, and birth date and Stalter's repeated assertions of misidentification. David W. Brooks, Jr., was detained under a North Carolina warrant; although he protested misidentification, he matched the warrant description, and Pierce County later obtained fingerprints showing that he was not the wanted person. Stalter was released at his arraignment after a probation officer identified the mistake, while Brooks was released after fingerprint comparison.

PROCEDURAL HISTORY

Stalter and Brooks were detained in the Pierce County Jail pursuant to arrest warrants issued for other persons and sued Pierce County for negligence and false imprisonment; Brooks also asserted a claim under 42 U.S.C. § 1983. The superior court granted Pierce County summary judgment in both cases. The Court of Appeals reversed the judgments on the negligence and false-imprisonment claims and affirmed dismissal of Brooks's § 1983 claim. The Washington Supreme Court affirmed in part, reversed in part, and remanded Stalter's claims for trial.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The court remanded Stalter's negligence and false-imprisonment claims for trial. It affirmed dismissal of Brooks's negligence, false-imprisonment, and 42 U.S.C. § 1983 claims.

CASES CITED

- Stalter v. State, 113 Wn. App. 1, 4, 13, 51 P.3d 837 (2002)
- Berger v. Sonneland, 144 Wn.2d 91, 102-03, 26 P.3d 257 (2001)
- Michak v. Transnation Title Ins. Co., 148 Wn.2d 788, 794, 64 P.3d 22 (2003)
- Keller v. City of Spokane, 146 Wn.2d 237, 242, 44 P.3d 845 (2002)
- Tufte v. City of Tacoma, 71 Wn.2d 866, 870-72, 431 P.2d 183 (1967)
- Keates v. City of Vancouver, 73 Wn. App. 257, 265, 869 P.2d 88 (1994)
- Hartley v. State, 103 Wn.2d 768, 779, 698 P.2d 77 (1985)
- Vashon Island Comm. for Self-Gov't v. Wash. State Boundary Review Bd., 127 Wn.2d 759, 771, 903 P.2d 953 (1995)
- Baker v. McCollan, 443 U.S. 137, 140, 146-47, 99 S. Ct. 2689, 61 L. Ed. 2d 433 (1979)
- Kennell v. Gates, 215 F.3d 825, 828 (8th Cir. 2000)
- Hernandez v. City of Chicago, 2001 U.S. Dist. LEXIS 1217, 2001 WL 128246 (N.D. Ill. Feb. 9, 2001)
- Stalter v. State, 149 Wn.2d 1016, 72 P.3d 763 (2003)

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