

SUPREME COURT OF THE STATE OF IDAHO

State v. Campbell

Campbell · No. 49269 · Decided March 26, 2026

SUMMARY

The Idaho Supreme Court’s substitute opinion addresses whether police unlawfully converted an investigative detention into a de facto arrest by handcuffing Benny Dean Campbell during an investigation of a stolen motorcycle. The court affirms the district court’s conclusion that the handcuffing was unjustified, but holds that the attenuation doctrine did not apply because of the close temporal connection and lack of a meaningful intervening circumstance. The court nevertheless affirms the denial of Campbell’s suppression motion on the basis of the inevitable discovery doctrine.

CASE DETAILS

COURT	Supreme Court of the State of Idaho
WRITING FOR THE COURT	Moeller, Justice; Bevan, Chief Justice; Brody, Justice; Meyer, Justice; Zahn, Justice
JURISDICTION	Supreme Court of the State of Idaho
DECIDED	March 26, 2026
DOCKET	49269
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from the denial of a motion to suppress evidence, followed by a conditional guilty plea preserving the suppression issue for appellate review. The Idaho Supreme Court issued a substitute opinion on rehearing and affirmed the denial of suppression and the resulting judgment of conviction.
STANDARD OF REVIEW	The court applies a bifurcated standard when reviewing denial of a suppression motion: factual findings are accepted unless clearly erroneous, while the application of constitutional principles to those facts is freely reviewed. Findings supported by substantial and competent evidence are not clearly erroneous.
PRECEDENTIAL VALUE	Published precedential opinion
PARTIES	Benny Dean Campbell v. State of Idaho

TOPICS

suppression of evidence

fourth amendment

search and seizure

criminal procedure

appellate procedure

PRACTICE AREAS

criminal procedure

constitutional law

evidence

appellate procedure

QUESTIONS PRESENTED

1. Whether the trooper's use of handcuffs converted Campbell's investigative detention into an unlawful de facto arrest.
2. Whether the attenuation doctrine purged the taint of the unlawful de facto arrest.
3. Whether the inevitable-discovery issue was preserved for appellate review despite the State's failure to raise it below.
4. Whether inevitable discovery requires a separate, independent investigation already underway.
5. Whether the evidence in Campbell's backpack would inevitably have been discovered by lawful means independent of the unlawful handcuffing.

HOLDINGS

1. The State failed to establish that handcuffing Campbell was a reasonable precaution for officer safety. Under the circumstances, ordering Campbell to lie down and placing him in handcuffs converted the investigative detention into an unlawful de facto arrest.
2. The attenuation doctrine did not make the evidence admissible because only ten to fifteen minutes elapsed between the unlawful de facto arrest and the search, and the discovery of Campbell's probation status occurred while he remained unlawfully detained and did not meaningfully interrupt the causal chain.
3. The inevitable-discovery issue was preserved because the district court expressly ruled that the doctrine did not apply, and that ruling became adverse to the State once the attenuation rationale was rejected.
4. A lawful separate or independent investigation already underway is not a per se requirement for application of the inevitable-discovery doctrine. The State may instead establish inevitability through other compelling historical facts independent of the constitutional violation.
5. Suppression was not required because the State established that the evidence would inevitably have been discovered through lawful investigative steps independent of the unlawful handcuffing.

KEY QUOTATIONS

"For these reasons, we hold that a finding that there was a lawful separate or independent investigation underway is not a per se requirement in every case for the inevitable discovery doctrine to apply." (18)

"Thus, it is not a matter of mere speculation but of reasoned judgment, based on the historic facts in the record, for us to conclude that law enforcement would have discovered the same evidence in Campbell's backpack under either path branching from the moment the trooper walked into the convenience store." (22)

FACTUAL BACKGROUND

An Idaho State Police trooper investigating a stolen motorcycle encountered Campbell and another person at a convenience store. The trooper ordered them to the ground and handcuffed them, but the State presented no specific evidence that Campbell posed a safety or flight threat. After learning that Campbell was on felony probation and had signed a Fourth Amendment waiver, the trooper contacted Campbell's probation officer, who authorized a search of Campbell's backpack. The search revealed methamphetamine, heroin, fentanyl, drug paraphernalia, and related items.

PROCEDURAL HISTORY

Campbell moved to suppress drugs found in his backpack after an Idaho State Police trooper handcuffed him during an investigative detention concerning a stolen motorcycle. The district court found that the handcuffing constituted an unlawful de facto arrest but denied suppression under the attenuation doctrine. Campbell entered a conditional guilty plea to trafficking in heroin, and the remaining charges were dismissed. After an initial appellate decision relying on inevitable discovery, the Idaho Supreme Court granted rehearing, withdrew the prior opinion, and issued this substitute opinion affirming on the inevitable-discovery theory.

DISPOSITION

affirmed

CASES CITED

- State v. Marsh, 171 Idaho 627, 524 P.3d 906
- State v. Bishop, 146 Idaho 804, 203 P.3d 1203
- State v. Reagan, 169 Idaho 689, 502 P.3d 1027
- State v. Johns, 112 Idaho 873, 736 P.2d 1327
- Utah v. Strieff, 579 U.S. 232
- State v. Cohagan, 162 Idaho 717, 404 P.3d 659
- State v. Miramontes, 170 Idaho 920, 517 P.3d 849
- Nix v. Williams, 467 U.S. 431
- Murray v. United States, 487 U.S. 533
- State v. Maxim, 165 Idaho 901, 454 P.3d 543
- State v. Downing, 163 Idaho 26, 407 P.3d 1285
- State v. Hoskins, 165 Idaho 217, 443 P.3d 231
- Andre v. Morrow, 106 Idaho 455, 680 P.2d 1355
- State v. Fenton, 163 Idaho 318, 413 P.3d 419
- State v. Plata, 171 Idaho 833, 526 P.3d 1003
- United States v. Boatwright, 822 F.2d 862
- United States v. Silvestri, 787 F.2d 736
- Taylor v. Alabama, 457 U.S. 687

