

SUPREME COURT OF UTAH

State v. Anderson

2015 UT 90 (2015) · No. 20130511 · Decided October 28, 2015

SUMMARY

The Utah Supreme Court considers whether sheriff’s deputies seized Cameron Anderson when they stopped behind his parked vehicle with flashing emergency lights. The court holds that the vehicle stop was a seizure but was reasonable under the community caretaking doctrine, adopting a balancing standard and abandoning the prior requirement of an imminent danger to life or limb. The court affirms Anderson’s convictions and the denial of his motion to suppress marijuana and drug paraphernalia evidence.

CASE DETAILS

COURT	Supreme Court of Utah
WRITING FOR THE COURT	Justice Durham; Chief Justice Durrant; Associate Chief Justice Lee; Justice Himonas
JURISDICTION	Utah
DECIDED	October 28, 2015
DOCKET	20130511
DISPOSITION	affirmed
PROCEDURAL POSTURE	Cameron Anderson appealed his convictions for possession of less than an ounce of marijuana and possession of drug paraphernalia, challenging the denial of his motion to suppress evidence obtained from his vehicle. The Utah Court of Appeals certified the case to the Utah Supreme Court.
STANDARD OF REVIEW	De novo review of the district court's Fourth Amendment ruling.
PRECEDENTIAL VALUE	Published Utah Supreme Court opinion; precedential.
PARTIES	Cameron Anderson v. State of Utah

TOPICS

- fourth amendment
- search and seizure
- criminal procedure
- suppression of evidence
- appellate procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether deputies seized Anderson within the meaning of the Fourth Amendment when they pulled behind his parked vehicle with their red and blue overhead lights activated.
2. Whether the seizure was justified under the community caretaking doctrine.
3. What standard governs whether a vehicle seizure for community caretaking purposes is reasonable under the Fourth Amendment.

HOLDINGS

1. Under the circumstances, a reasonable person parked on the side of a highway would not have felt free to leave when a police vehicle pulled directly behind the vehicle with its red and blue overhead lights activated; therefore, the deputies seized Anderson.
2. The court abandoned the Warden 'life or limb' standard because subsequent United States Supreme Court emergency-aid decisions fatally undermined it.
3. A community-caretaking seizure is reasonable under the Fourth Amendment when the degree of the government's legitimate public-safety interest and the exigency of the situation justify the degree of intrusion on the individual's freedom of movement and privacy.

KEY QUOTATIONS

“Thus it is a hypothetical reasonable person’s interpretation of an officer’s actions—not the officer’s intent—that determines whether an individual has been seized by an officer through a show of authority.” (¶ 10)

“We therefore conclude that the “life or limb” standard this court effectively endorsed in 1994 is out of step with subsequent Supreme Court precedent closely related to the community caretaking doctrine.” (¶ 24)

“If the level of the State’s interest in investigating whether a motorist needs aid justifies the degree to which an officer interferes with the motorist’s freedoms in order to perform this investigation, the seizure is not “unreasonable” under the Fourth Amendment.” (¶ 26)

FACTUAL BACKGROUND

Around 10:00 p.m. on a cold late-December evening, Anderson parked on the side of a rural highway with his hazard lights flashing. Deputies stopped behind him with their red and blue lights activated to check on the welfare of the vehicle's occupants. After approaching Anderson, they observed bloodshot eyes and uncertainty about his direction of travel; later, pursuant to a warrant, they searched his vehicle and found marijuana and drug paraphernalia.

PROCEDURAL HISTORY

Sheriff's deputies stopped behind Anderson's parked vehicle with their red and blue lights activated while checking on his welfare. After further investigation, officers obtained a warrant to arrest Anderson, obtain blood or urine, and search his vehicle; the vehicle search produced marijuana and drug paraphernalia. The district court

found that Anderson had been seized but denied suppression under the community caretaking doctrine. A jury convicted Anderson, and the Utah Supreme Court affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Brake, 2004 UT 95, ¶ 15, 103 P.3d 699
- Salt Lake City Corp. v. Labor Comm'n, 2007 UT 4, ¶ 15 n.1, 153 P.3d 179
- Davis v. United States, 131 S. Ct. 2419, 2426-28 (2011)
- Mapp v. Ohio, 367 U.S. 643, 655 (1961)
- State v. Strieff, 2015 UT 2, ¶¶ 15-19, 357 P.3d 532
- United States v. Drayton, 536 U.S. 194, 200-01 (2002)
- Brendlin v. California, 551 U.S. 249, 254-55 (2007)
- State v. Hanson, 504 N.W.2d 219, 219-20 (Minn. 1993)
- State v. Morris, 72 P.3d 570, 577-78 (Kan. 2003)
- People v. Cash, 922 N.E.2d 1103, 1114 (Ill. App. Ct. 2009)
- State v. Davis, 821 P.2d 9, 12 (Utah Ct. App. 1991)
- Lawson v. State, 707 A.2d 947, 951 (Md. Ct. Spec. App. 1998)
- Cady v. Dombrowski, 413 U.S. 433, 441, 447-48 (1973)
- Rowe v. State, 769 A.2d 879, 890 (Md. 2001)
- State v. Smathers, 753 S.E.2d 380, 384 (N.C. Ct. App. 2014)
- Provo City v. Warden, 844 P.2d 360, 363-64 (Utah Ct. App. 1992)
- Provo City v. Warden, 875 P.2d 557, 557 (Utah 1994)
- Brigham City v. Stuart, 547 U.S. 398, 401, 403 (2006)
- Mincey v. Arizona, 437 U.S. 385, 392 (1978)
- Michigan v. Fisher, 558 U.S. 45, 46, 48-49 (2009) (per curiam)
- Cardwell v. Lewis, 417 U.S. 583, 589-90 (1974)
- State v. Applegate, 2008 UT 63, ¶ 9, 194 P.3d 925
- Johnson v. United States, 333 U.S. 10, 13-14 (1948)
- United States v. Arvizu, 534 U.S. 266, 273-74 (2002)
- Pennsylvania v. Mimms, 434 U.S. 106, 108-09 (1977)
- Hiibel v. Sixth Judicial District Court, 542 U.S. 177, 187-88 (2004)
- Terry v. Ohio, 392 U.S. 1, 21, 24-27 (1968)