

SUMMARY STATEMENT
State v. Pylican, Docket. No. 47308

On October 12, 2017, an Ada County Sheriff's deputy observed defendant Jennie Pylican enter a storage facility after hours. He followed Pylican's vehicle upon its departure and made a traffic stop. During the course of the traffic stop, the deputy questioned Pylican on her presence in the facility after it had closed and a K-9 officer performed a dog sniff around the vehicle. The dog alerted on the driver's door, and a subsequent search found methamphetamine and drug paraphernalia. Pylican later filed a motion to suppress the evidence. The district court granted her motion, concluding that the arresting officer unconstitutionally extended the stop when he questioned Pylican regarding her presence in the storage facility. The Idaho Court of Appeals affirmed and the State filed a petition for review to the Idaho Supreme Court which the Court granted review. The Court reversed and remanded, explaining that (1) the deputy had reasonable suspicion to stop Pylican regarding her presence in the storage facility, and (2) the deputy did not impermissibly extend the duration of the stop by ordering Pylican to exit her vehicle.