

SUMMARY STATEMENT
State of Idaho v. April Dawn Ramos
Docket No. 48473

April Dawn Ramos appeals the denial of her motion to suppress evidence following an inventory search of her vehicle. Deputy Katseanes approached the vehicle in the parking lot of a boat ramp to determine if the driver needed assistance; relayed the license plate to dispatch; and learned the vehicle's owner was Ramos, who had an active felony warrant. Deputy Katseanes was unable to locate the driver, but the vehicle's trunk remained open; its front windows were rolled down; and it was unlocked. After unsuccessfully searching for Ramos with a canine tracker, the canine conducted an exterior drug sniff of Ramos' vehicle but did not alert, contrary to the officers' comments that they expected the canine to alert. Thereafter, Deputy Katseanes and another officer both stated the vehicle was in a handicap parking space. The officers impounded Ramos' vehicle, conducted an inventory search, and found methamphetamine and drug paraphernalia.

Ramos filed a suppression motion challenging the constitutionality of the officer's decision to impound her vehicle. The district court denied the motion concluding Deputy Katseanes' decision to impound Ramos' vehicle was objectively reasonable under the circumstances. On appeal, Ramos challenges this denial, arguing that the officers impounded and searched her vehicle as pretext for a criminal investigation and that they had no justification for impounding her vehicle. The Idaho Court of Appeals affirmed the district court's denial of Ramos' suppression motion. It concluded impounding the vehicle was reasonable under all the circumstances known to the officers when they decided to impound the vehicle, including that the vehicle was illegally parked in a handicap parking space and was unsecured in an area known for car burglaries. Additionally, the Court concluded Deputy Katseanes' expectation of discovering drugs in Ramos' vehicle based on his prior experience with Ramos did not invalidate the officer's reasonable justification for impounding the vehicle.

This summary constitutes no part of the opinion of the Court but has been prepared by court staff for the convenience of the public.