

SUMMARY STATEMENT

State v. Lancaster

Docket No. 48633

After defendant Clarence Lancaster was charged with felony burglary and grand theft for taking multiple ATMs, he moved to suppress evidence on the grounds that the arresting officers failed to inform him of the basis for his arrest. He argued the officers' violation of Idaho Code section 19-608 rose to the level of an unconstitutional seizure under Article 1, Section 17 of the Idaho Constitution. The district court denied Lancaster's motion and he appealed to the Idaho Supreme Court

The Idaho Supreme Court affirmed the district court's ruling. It explained that an officer's failure to comply with a prong of section 19-608 did not amount to a violation of a defendant's constitutional rights, consistent with its recent ruling in *State v. Sutterfield*, 168 Idaho 558, 484 P.3d 839 (2021). Neither Idaho case law nor its common law history indicated the Framers' intent to incorporate the arrest notice requirements into Article 1, Section 17 of the Idaho Constitution. Consequently, the Court concluded that suppression of the evidence was not the appropriate remedy for the statutory violation. The Court also concluded that there was no abuse of discretion by the district court in failing to strike an attachment to Lancaster's PSI.

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