

SUMMARY STATEMENT

State of Idaho v. Ricky Allen Lewis

Docket No. 48878

In this case arising out of Twin Falls County, the Idaho Court of Appeals affirmed Ricky Allen Lewis's judgment of conviction for trafficking in marijuana. While executing a search warrant for controlled substances on the residence in which Lewis lived, officers discovered a locked, fifth-wheel trailer registered to Lewis behind the residence. After a drug dog alerted to the presence of controlled substances in the trailer, officers entered the trailer and discovered controlled substances and drug paraphernalia. The State charged Lewis with trafficking in marijuana, possession of methamphetamine, possession of drug paraphernalia, and a persistent violator sentencing enhancement. The district court denied Lewis's motion to suppress the evidence obtained in the trailer, concluding the trailer fell within the scope of the search warrant. Lewis subsequently pled guilty, reserving the right to appeal the denial of his motion to suppress. Lewis appealed.

On appeal to the Court of Appeals, Lewis argued that the district court erred by denying his motion to suppress. Specifically, Lewis argued that the district court erred by concluding the search warrant authorized the search of the trailer because it was not described as a place to be searched and that the automobile exception did not justify the search. The Court of Appeals held that Lewis failed to show the district court erred by concluding the trailer fell within the scope of the search warrant; as such, the Court of Appeals declined to address whether the automobile exception justified the search. The Court of Appeals affirmed Lewis's judgment of conviction for trafficking in marijuana.