

SUMMARY STATEMENT

State v. Plata Iniguez

Docket No. 48920

This appeal addressed the exclusionary rule in the context of a warrantless arrest for a misdemeanor completed outside the presence of an officer—where the arrest occurred prior to the release of *State v. Clarke*, 165 Idaho 393, 446 P.3d 451 (2019) (holding that warrantless arrests for completed misdemeanors violate Article I, section 17 of the Idaho Constitution). Officers arrested Eduardo Plata Iniguez (“Plata”) outside his home for misdemeanor DUI without a warrant, and without witnessing the alleged crime. Upon his arrest, Plata was transported to the Ada County Jail (“the Jail”), where evidentiary breath testing was administered. At the Jail, Plata failed to provide an adequate breath sample. Thereafter, officers procured a warrant from an on-call magistrate judge for a search of Plata’s blood, performed a blood draw at the Jail, and obtained an evidentiary sample of his blood. The State charged Plata with misdemeanor DUI, and Plata later moved to suppress the blood draw evidence as a product of his unlawful arrest under *Clarke*. The magistrate court denied his motion, and the district court later affirmed in its appellate capacity.

Plata timely appealed to the Idaho Supreme Court, and argued there was a causal nexus between his illegal arrest and the State’s acquisition of the blood draw evidence, thus, the evidence must be suppressed as fruit of the poisonous tree. The State responded that there was no causal nexus, and even if there was, the Court should adopt a reasonable “mistake of law” exception to Idaho’s exclusionary rule where the illegal arrest of Plata occurred prior to the release of *Clarke*. The Idaho Supreme Court concluded that Plata made an initial showing of a causal nexus; Idaho’s exclusionary rule does not include a reasonable “mistake of law” exception; and that the State did not argue any established exception to the exclusionary rule (e.g., inevitable discovery or attenuation). Thus, the Court reversed the decision of the district court because the blood draw evidence was derivative fruit of Plata’s illegal arrest that must be suppressed.

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