

Summary Statement

State of Idaho v. Douglas James Simanton

Docket No. 49019

In this case, the Idaho Court of Appeals reversed the district court's order granting Douglas James Simanton's motion to suppress and remanded for further proceedings. An Idaho State Police Trooper observed a male driver in a truck with what appeared to be a silver beer can. Dispatch informed the trooper that the registered owner of the vehicle, Simanton, had an outstanding misdemeanor arrest warrant. The trooper initiated a traffic stop and made contact with the driver, who was in fact Simanton. The can in question was an Arizona Iced Tea. After dispatch informed the trooper that the jail would not accept arrestees due to COVID-19 restrictions, the trooper had Simanton step out of his vehicle. The trooper asked Simanton if a drug dog would alert on his vehicle, to which Simanton confirmed that it would. Next the trooper asked Simanton if he had anything on his person. Simanton took a glass pipe out of his pocket and handed it to the trooper. A subsequent search of Simanton's vehicle discovered a user amount of methamphetamine.

Simanton filed a motion to suppress arguing the trooper unlawfully extended the duration of the stop after learning the jail was not accepting misdemeanor warrant arrestees at the time. The district court entered an order granting Simanton's motion to suppress, ruling that the stop was not supported by reasonable suspicion.

On appeal to the Court of Appeals, the State argued that the district court misapplied *Kansas v. Glover*, 140 S. Ct. 1183 (2020), and it was lawful for the trooper to stop Simanton. The Court of Appeals held that it is reasonable to infer a driver of a vehicle is also the registered owner without other negating information; therefore, the traffic stop was reasonable due to the outstanding warrant. Nevertheless, Simanton argued the stop was unlawfully extended when the trooper was informed the jail was not accepting misdemeanor warrant arrestees and asked questions about illegal substances. The Court of Appeals held Trooper Gurney did not unlawfully extend the stop since the stop was pursuant to a valid arrest warrant. Accordingly, the Court of Appeals held that Simanton's motion to suppress should have been denied and remanded the case for further proceedings.

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