

SUMMARY STATEMENT

State v. Campbell

Docket No. 49269

While investigating a stolen motorcycle, a state trooper detained Benny Dean Campbell and discovered heroin and methamphetamine in Campbell's backpack. Campbell was charged with drug trafficking and possession charges. He filed a motion to suppress the evidence, arguing that by initially placing him in handcuffs, the trooper converted his detention into an unlawful seizure under the Fourth Amendment to the United States Constitution. The district court agreed, concluding that Campbell's detention was a de facto arrest. However, the court also determined that the evidence was still admissible under an exception to the Fourth Amendment's exclusionary rule. The court ruled that the attenuation doctrine applied and, thus, denied the motion. Campbell then entered a conditional plea agreement that preserved his right to appeal the denied suppression motion.

On appeal, the Idaho Supreme Court affirmed the district court's order and Campbell's judgment of conviction. The Court first explained that the district court correctly concluded that a de facto arrest had occurred because the use of handcuffs was an unreasonable measure where there was no evidence presented at the suppression suggesting that the officer had a reasonable concern for his safety. However, even with the unlawful seizure, the Supreme Court concluded that under the inevitable discovery exception, a theory rejected by the district court, suppression was unnecessary. The Supreme Court noted that the trooper would have received instructions from Campbell's probation officer to search his backpack regardless of whether the handcuffs had been used. Accordingly, the motion was properly denied by district court even though it was denied under a different theory.

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