

## **SUMMARY STATEMENT**

*State of Idaho v. Chadlen Dewayne Smith*

Docket No. 49909

Chadlen Dewayne Smith appeals from his judgment of conviction for sexual exploitation of a child by possession of sexually exploitative material. The case began with allegations that Smith engaged in stalking behavior involving a police dispatcher, culminating in Smith's arrest. Following his arrest, law enforcement impounded his vehicle and conducted a warrantless inventory search, during which they seized electronic devices found inside. The devices contained sexually exploitative materials, which served as the sole basis for the State's criminal charge against Smith.

Smith appealed the district court's denial of his motions to suppress the evidence found on the electronic devices in his vehicle based on two Fourth Amendment arguments. First, he argued that his arrest for stalking lacked probable cause since it was a warrantless arrest for a misdemeanor committed outside the officer's presence. Smith contended that without the photos found on his phone, there would not have been an investigation or subsequent arrest. Second, he argued that the officer unreasonably impounded his car to perform an inventory search. Smith also appealed the district court's denial of his motion to dismiss on speedy trial grounds and motion to exclude internet search terms found on his electronic devices.

The Idaho Supreme Court affirmed the district court's determination that there was probable cause to believe that Smith committed the crime of misdemeanor stalking. However, the Court reversed the district court's decision denying Smith's motion to suppress and vacated his judgment of conviction. The Court concluded that the State did not meet its burden to show that the police officer's decision to impound Smith's vehicle served a community caretaking purpose, such as being parked in a no-parking zone, obstructing traffic, or violating any parking ordinances. The Court did not address Smith's remaining issues on appeal because the motion to suppress was dispositive.

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