

## SUMMARY STATEMENT

*State of Idaho v. Fletcher, Docket No. 50707*

Amanda Fletcher appealed the district court's denial of her motion to suppress methamphetamine and drug paraphernalia found when officers searched her car after a drug dog alerted during an exterior sniff of her vehicle. Fletcher was on probation at the time of the arrest and had waived her Fourth Amendment rights. On appeal, Fletcher argued that Article 1, Section 17 of the Idaho Constitution provides greater protection for dog sniffs and searches than the Fourth Amendment to the United States Constitution.

The Idaho Supreme Court disagreed and held that exterior sniffs of a vehicle by a drug dog are not a search under Article 1, Section 17 of the Idaho Constitution. Drug dog sniffs are in a class by themselves. They only reveal the presence of contraband and nothing else about the interior of a vehicle. The Court also held that the Idaho Constitution does not impose a heightened standard for the automobile exception to the warrant requirement. The historical justifications for the automobile exception remain valid today despite advances in modern technology. Finally, the Court determined that the automobile exception applied to the search of Fletcher's car. A drug dog alerted to the presence of contraband giving officers probable cause to search the vehicle. The denial of Fletcher's motion to suppress was affirmed.

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