

SUMMARY STATEMENT

State of Idaho v. William J. Satterfield

Docket No. 51162

William J. Satterfield appeals from his judgment of conviction for unlawful possession of a firearm and a persistent violator sentencing enhancement. Satterfield argues the district court erred in denying his motion to suppress because the Nampa City Police officer did not have jurisdiction to arrest Satterfield in the city of Caldwell, resulting in an extraterritorial arrest. Satterfield asserts that an extraterritorial arrest violates Article I, Section 17 of the Idaho Constitution and, thus, the evidence seized should be suppressed. The State argues that an extraterritorial arrest is a statutory violation, not a constitutional violation, so suppression is not warranted.

The framers of Article I, Section 17 explicitly addressed whether Article I, Section 17 should be amended to substitute “unlawful” for “unreasonable” in the provision. The framers explicitly rejected the amendment, and the motion failed. As a result, the framers explicitly rejected the idea that an arrest had to be lawful to be constitutional. Because the framers of Idaho’s constitution explicitly rejected any substantive language differences between the Idaho and federal search and seizure provision, and there is nothing otherwise unique about Idaho or its precedent, then the Idaho Court of Appeals would analyze Article I, Section 17 similarly to the Fourth Amendment to the United States Constitution.

In *Virginia v. Moore*, 533 U.S. 164 (2008), the United States Supreme Court held that an extraterritorial arrest does not violate the Fourth Amendment. Because an unlawful, extraterritorial arrest does not violate the Fourth Amendment, and Article I, Section 17 of the Idaho Constitution is analyzed similarly, the Idaho Court of Appeals held that an extraterritorial arrest does not violate Article I, Section 17 of the Idaho Constitution and the district court did not err in denying Satterfield’s motion to suppress.

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