

BOISE, IDAHO, MONDAY, JUNE 13, 2022, AT 8:50 A.M.

IN THE SUPREME COURT OF THE STATE OF IDAHO

STATE OF IDAHO,)	
)	
Plaintiff-Respondent,)	
)	
v.)	Docket No. 49270
)	
PATRICK TYLER MAAHS,)	
)	
Defendant-Appellant.)	
)	

Appeal from the District Court of the Fourth Judicial District of the State of Idaho, Ada County. Deborah A. Bail, District Judge.

Thomas Monaghan Law, PLLC, Boise, for Appellant.

Lawrence G. Wasden, Idaho Attorney General, Boise, for Respondent.

This case concerns whether a district court erred in denying a defendant's motion to suppress evidence by concluding that law enforcement officers properly conducted an investigative detention. Patrick Maahs appeals from his judgment of conviction for trafficking methamphetamine, arguing the district court erred in denying his motion to suppress because (1) its factual findings were unsupported by officer body camera footage; (2) it improperly concluded that officers had reasonable suspicion to detain him; and (3) it incorrectly determined that officers conducted an investigatory detention as opposed to a de facto arrest.

The Idaho Court of Appeals affirmed the district court's decision denying Maahs's motion to suppress, reasoning that law enforcement had reasonable suspicion to detain Maahs and that the methods used in detaining him did not exceed the scope of an investigatory detention. Maahs petitioned this Court for review, arguing that the Court of Appeals' decision conflicted with precedent concerning de facto arrests. This Court granted review.