

BOISE, WEDNESDAY, JUNE 3, 2026 AT 8:45 A.M.

IN THE SUPREME COURT OF THE STATE OF IDAHO

STATE OF IDAHO,)	
)	
Plaintiff-Respondent,)	
)	Docket No. 53632
v.)	
)	
WILLIAM J. SATTERFIELD,)	
)	
Defendant-Appellant.)	

Appeal from the District Court of the Third Judicial District, State of Idaho, Canyon County. Brent L. Whiting, District Judge.

Erik R. Lehtinen, State Appellate Public Defender, Boise, for Appellant.

Raúl R. Labrador, Idaho Attorney General, Boise, for Respondent.

William J. Satterfield was arrested on an outstanding warrant in Caldwell, Idaho, by a Nampa City police officer. Following his arrest, the State charged Satterfield with various offenses after drug paraphernalia and a firearm were found in his vehicle. Satterfield filed a motion to suppress, arguing that the unauthorized extraterritorial arrest violated his rights under the Fourth Amendment and Article I, section 17 of the Idaho Constitution. The district court agreed that the Nampa City police officer lacked the requisite legal authority to conduct the extraterritorial arrest under Idaho Code section 67-2337. However, the district court denied the motion to suppress, concluding that the statutory violation did not rise to the level of a constitutional violation.

Pursuant to a plea deal, Satterfield entered a conditional guilty plea to unlawful possession of a firearm, reserving his right to appeal the denial of his suppression motion. On appeal, Satterfield argues that Article I, section 17 of the Idaho Constitution prohibits unauthorized extraterritorial arrests based on the common law in effect at the time the Idaho Constitution was adopted, which limited law enforcement officers' territorial jurisdiction.