

BOISE, MONDAY, NOVEMBER 9, 2026, AT 10:00 A.M.

IN THE SUPREME COURT OF THE STATE OF IDAHO

STATE OF IDAHO,	)	
	)	
Plaintiff-Respondent,	)	
	)	
v.	)	Docket No. 53858
	)	
RAMON LUIS RODRIGUEZ, JR.,	)	
	)	
Defendant-Appellant.	)	
_____	)	

Appeal from the District Court of the Fourth Judicial District of the State of Idaho,
Ada County. Jonathan Medema, District Judge.

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

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

Ramon Luis Rodriguez appeals from the district court’s denial of his motion to suppress evidence supporting his conviction for possession of a controlled substance. Ada County Sheriff’s deputies approached Mr. Rodriguez while he was seated in his car at a rest area off Interstate 84, where he had stopped to troubleshoot a malfunctioning transmission. The deputies informed him that someone had reported seeing him drive around the rest area and look into parked vehicles.

After Mr. Rodriguez started the engine and shifted into gear to demonstrate the mechanical issue, a deputy asked him to turn the engine off and place the car back in park. The deputy also requested to see his identification. Mr. Rodriguez complied with both requests. He eventually consented to a search of the vehicle, during which deputies discovered “different items of methamphetamine.” The State subsequently charged him with possession of a controlled substance and possession of paraphernalia.

Before the district court, Mr. Rodriguez moved to suppress the evidence, arguing that his consent was invalid because the deputies had already subjected him to an unreasonable seizure in violation of the Fourth Amendment. The district court denied the motion, concluding that no unlawful seizure had occurred before he consented to the search. Mr. Rodriguez then entered a conditional guilty plea, preserving his right to appeal the suppression ruling.

The Court of Appeals affirmed. It held that Mr. Rodriguez had not been seized either when the deputy asked him to turn off and park the car or when the deputy requested his identification. The Idaho Supreme Court granted Mr. Rodriguez’s petition for review. On appeal, Mr. Rodriguez argues that the lower courts erred because (1) a reasonable person would view the deputy’s request to turn off and park the vehicle as a command that prevented them from leaving or ending the encounter; (2) the deputy’s request to examine his identification amounted to a command in light of I.C. § 49-316, which requires motorists to provide their driver’s license to law enforcement

upon request; and (3) the Idaho Constitution affords greater protection than the U.S. Constitution against “continued intrusion” into Idahoans’ privacy, including the type of law enforcement encounter at issue here.