

IN THE SUPREME COURT OF THE STATE OF IDAHO
Docket No. 53632

STATE OF IDAHO,	)	
	)	Boise, June 2026 Term
Plaintiff-Respondent,	)	
	)	Opinion Filed: September 11, 2026
v.	)	
	)	Melanie Gagnepain, Clerk
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.

The judgment of the district court is affirmed.

Erik R. Lehtinen, State Appellate Public Defender, Boise, for Appellant William J. Satterfield. Kimberly A. Coster argued.

Raúl R. Labrador, Idaho Attorney General, Boise, for Respondent State of Idaho. Kale Gans argued.

MEYER, Justice.

Does a city police officer’s violation of Idaho Code section 67-2337(2) when making an extraterritorial arrest constitute an error of such constitutional dimension that it requires suppression of the evidence? William J. Satterfield was arrested on an outstanding warrant in Caldwell, Idaho, by a Nampa City police officer who made the extraterritorial arrest in violation of Idaho Code section 67-2337(2). The State charged Satterfield with various offenses after drug paraphernalia and a gun were found in his vehicle. Satterfield filed a motion to suppress, arguing that the officer’s unlawful extraterritorial arrest violated his constitutional rights. Following an evidentiary hearing, the district court denied his motion to suppress, concluding that the statutory violation did not rise to the level of a constitutional violation. Satterfield appeals his judgment of conviction for unlawful possession of a firearm by a convicted felon under Idaho Code section 18-3316, and a persistent violator sentencing enhancement under Idaho Code section 19-2514.

On appeal, Satterfield argues that Article I, section 17 of the Idaho Constitution prohibits unauthorized extraterritorial arrests based on the common law that was in effect at the time the

Idaho Constitution was adopted, which limited the territorial jurisdiction of law enforcement officers. The Court of Appeals initially heard this appeal and affirmed. This Court granted Satterfield's petition for review. For the reasons stated below, we affirm the district court's decision.

I. FACTUAL AND PROCEDURAL BACKGROUND

In 2022, the Idaho Commission of Pardons and Parole (Parole Commission) issued an arrest warrant for Satterfield for absconding. The arrest warrant authorized "all chiefs of police, marshals of cities and villages, sheriffs of counties, and all police, prison and peace officers," and their deputies, to detain and deliver Satterfield into the custody of the Parole Commission.

In March 2023, Officer M. Flores informed Nampa police officer Garrett Salladay that Satterfield was in Caldwell, Idaho. According to the district court, it was "unclear from the record if Officer Flores worked for Nampa or Caldwell Police Departments or if he specifically contacted Officer Salladay for an inter-departmental assist." Officer Salladay subsequently located Satterfield in Caldwell, made a traffic stop, and arrested him on the outstanding warrant. At this time, there was no active crime being committed by Satterfield. As a result of his arrest, law enforcement searched Satterfield's vehicle and found narcotics and a stolen firearm. The State subsequently charged Satterfield with grand theft by possessing stolen property, Idaho Code sections 18-2403(4), -2407(1)(b); unlawful possession of a firearm, Idaho Code section 18-3316; and possession of drug paraphernalia, Idaho Code section 37-2734A. Satterfield was also alleged to be a persistent violator pursuant to Idaho Code section 19-2514.

Satterfield filed a motion to suppress the evidence found in his car, arguing that his arrest was unconstitutional under the Fourth Amendment to the United States Constitution and Article I, section 17 of the Idaho Constitution because Officer Salladay had made an extraterritorial arrest in violation of Idaho Code section 67-2337(2). Section 67-2337(2) authorizes peace officers to perform their duties outside of the territorial limits of their political subdivision only if: (1) "[a] request for law enforcement assistance is made by a law enforcement agency of said jurisdiction[.]" (2) "[t]he peace officer possesses probable cause to believe a crime is occurring involving a felony or an immediate threat of serious bodily injury or death to any person[.]" or (3) "[w]hen a peace officer is in fresh pursuit" I.C. § 67-2337(2)(a)–(c).

Following the hearing, the district court entered an order denying Satterfield's motion to suppress. The court concluded that, although Salladay acted outside his jurisdictional territory

without any applicable exception to section 67-2337(2) when he arrested Satterfield, the statutory violation did not rise to the level of a constitutional violation. Consequently, suppression of the evidence found during the search of his car was not an available remedy.

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. The State dismissed the remaining charges. The district court subsequently entered its judgment of conviction imposing a sentence of nine years, with three years fixed. Satterfield filed a timely notice of appeal. The case was assigned to the Idaho Court of Appeals, which affirmed the district court's decision. *State v. Satterfield*, No. 51162, 2025 WL 2447844 (Idaho Ct. App. Aug. 26, 2025). Satterfield petitioned this Court for review, which we granted.

II. STANDARDS OF REVIEW

“On review of a case from the Court of Appeals, this Court gives due consideration to the Court of Appeals’ decision, but directly reviews the decision of the trial court.” *State v. Bishop*, 146 Idaho 804, 810, 203 P.3d 1203, 1209 (2009) (citing *State v. Sheahan*, 139 Idaho 267, 272–73, 77 P.3d 956, 961–62 (2003)). “When this Court reviews a trial court’s denial of a motion to suppress, we employ a bifurcated standard of review.” *State v. Smith*, 175 Idaho 635, 641, 569 P.3d 137, 143 (2025) (citing *State v. Ramos*, 172 Idaho 764, 770, 536 P.3d 876, 882 (2023)). “This Court accepts the trial court’s findings of fact unless they are clearly erroneous but freely reviews the trial court’s application of constitutional principles to the facts found.” *Id.* (citation modified).

III. ANALYSIS

The question on appeal is whether a violation of Idaho Code section 67-2337(2) “constitutes an error of such constitutional dimension that it requires suppression of the evidence.” *State v. Lancaster*, 171 Idaho 236, 241, 519 P.3d 1176, 1181 (2022). Satterfield’s primary contention is that the failure to comply with the territorial limitation in Idaho Code section 67-2337(2) renders his seizure unreasonable under Article I, section 17, of the Idaho Constitution because extraterritorial arrests were historically prohibited at common law. He further argues that this common law principle was embedded in Article XII, section 2, of the Idaho Constitution. In response, the State argues that the district court correctly determined that the failure to comply with the territorial limitations in section 67-2337(2) involves a statutory violation—not a violation

of a constitutional right.¹ For the reasons stated below, we agree and affirm the district court’s decision.

Both the Fourth Amendment and Article I, section 17 protect “[t]he right of the people to be secure in their persons, houses, papers and effects” against unreasonable searches and seizures. U.S. Const. amend. IV; Idaho Const. art. I, § 17. “Like the Fourth Amendment, the purpose of Article I, section 17 is to protect Idaho citizens’ reasonable expectation of privacy against arbitrary governmental intrusion.” *State v. Pulizzi*, 174 Idaho 733, 736, 559 P.3d 1220, 1223 (2024) (alteration omitted) (quoting *State v. Albertson*, 165 Idaho 126, 129, 443 P.3d 140, 143 (2019)). “Because evidence obtained in direct violation of the Idaho Constitution may not be used as evidence against the victim of illegal government action, such violations require the application of Idaho’s independent exclusionary rule.” *Lancaster*, 171 Idaho at 241, 519 P.3d at 1181 (citations omitted). “However, the suppression of evidence is a court-created remedy to ensure compliance with constitutional standards, and it is not appropriate to extend that remedy to violations that are merely statutory.” *Id.* (citation modified).

Despite the similarity of language and purpose between the Fourth Amendment and Article I, section 17, “the protections afforded by these two constitutional provisions are not always coextensive.” *State v. Pool*, 172 Idaho 47, 51, 529 P.3d 712, 716 (2023). Indeed, “state courts are at liberty to find within the provisions of their constitutions greater protection than is afforded under the federal constitution as interpreted by the United States Supreme Court.” *State v. Donato*, 135 Idaho 469, 471, 20 P.3d 5, 7 (2001) (citation modified). However, “this Court has found there is ‘merit in having the same rule of law applicable within the borders of our state, whether an interpretation of the Fourth Amendment or its counterpart—Article I, [section] 17 of the Idaho Constitution—is involved. Such consistency makes sense to the police and the public.’” *Id.* (quoting *State v. Charpentier*, 131 Idaho 649, 653, 962 P.2d 1033, 1037 (1998)). “Thus, as a general matter, the federal framework is appropriate for analysis of state constitutional questions

¹ Idaho Code section 20-1007 provides in pertinent part that

[a]ny person released to parole shall be given notice that he waives his constitutional rights under the fourth amendment to the constitution of the United States and section 17, article I of the constitution of the state of Idaho and consents to warrantless search and seizure of his person . . . motor vehicle, or other real or personal property . . . at any time, day or night, with or without cause, by a . . . peace officer as defined in section 19-5101(d), Idaho Code.

I.C. § 20-1007(2). However, the State has not argued that Satterfield waived his rights under Article I, section 17 of the Idaho Constitution. Accordingly, the issue is waived. *State v. Pylican*, 167 Idaho 745, 750 n.1, 477 P.3d 180, 185 n.1 (2020).

unless the state constitution, the unique nature of the state, or Idaho precedent clearly indicates that a different analysis applies.” *Pulizzi*, 174 Idaho at 737, 559 P.3d at 1224 (citation modified).

In *State v. Benefiel*, 131 Idaho 226, 953 P.2d 976 (1998), this Court evaluated whether a tribal law enforcement officer’s traffic stop outside of his territorial jurisdiction violated the Fourth Amendment of the United States Constitution. We concluded that the Fourth Amendment only required the officer to have reasonable suspicion to conduct the traffic stop, which was established by the officer’s observation of the driver’s erratic driving. *Id.* at 229, 953 P.2d at 979. Therefore, the officer’s seizure outside of his territorial jurisdiction did not violate the Fourth Amendment. *Id.*; see also *United States v. Ryan*, 731 F.3d 66, 70–71 (1st Cir. 2013) (holding that the Fourth Amendment did not require suppression of evidence obtained after an arrest by a federal officer outside his territorial jurisdiction); *Oglesby v. Lesan*, 929 F.3d 526, 533–34 (8th Cir. 2019) (“[F]or Fourth Amendment purposes, the relevant question is whether an arrest was reasonable, not whether an arrest violated state law or whether an officer was acting within his geographical jurisdiction.” (citations omitted)).

In this case, there is no dispute that the warrant issued by the Parole Commission gave local peace officers, such as Officer Salladay, a sufficient legal basis to arrest Satterfield. See I.C. § 20-1007(5). Under *Benefiel*, the fact that Officer Salladay conducted this arrest outside of his territorial jurisdiction does not establish that a Fourth Amendment violation occurred. Therefore, to prevail on appeal, Satterfield must establish that the federal constitutional analysis set forth in *Benefiel* should not apply based on the Idaho Constitution, the unique nature of the state, or under Idaho precedent. See *Pulizzi*, 174 Idaho at 737, 559 P.3d at 1224.

In interpreting the Idaho Constitution, “the primary object is to determine the intent of the framers.” *Lancaster*, 171 Idaho at 242, 519 P.3d at 1182 (quoting *State v. Clarke*, 165 Idaho 393, 397, 446 P.3d 451, 455 (2019)) “The best resource is the compilation of the Proceedings and Debates of the Constitutional Convention of Idaho 1889 (I.W. Hart ed., 1912).” *Clarke*, 165 Idaho at 397, 446 P.3d at 455. “When no debate takes place surrounding a particular provision, we may examine the framers’ intent in light of the practices at common law and the statutes of Idaho when that section was adopted and ratified by the people of Idaho.” *Planned Parenthood Great Nw. v. State*, 171 Idaho 374, 404, 522 P.3d 1132, 1162 (2023) (internal quotation marks omitted) (quoting *Clark*, 165 Idaho at 397, 446 P.3d at 455). However, we have cautioned that

preexisting statutes and the common law may be used to help inform our interpretation of the Idaho Constitution, but they are not the embodiment of, nor are they incorporated within, the Constitution. To hold otherwise would elevate statutes and the common law that predate the Constitution's adoption to constitutional status.

Clarke, 165 Idaho at 397, 446 P.3d at 455.

“At the 1889 constitutional convention, the Search and Seizure Clause was read and adopted with some debate, but the discussion only concerned a proposed change of the word ‘unreasonable’ to ‘unlawful’ in the phrase ‘unreasonable searches and seizures’ which was ultimately rejected.” *Planned Parenthood Great Nw.*, 171 Idaho at 408, 522 P.2d at 1166 (quoting *Proceedings & Debates of the Constitutional Convention of Idaho 1889*, at 372, 1635–36 (I. W. Hart ed., 1912)). The rejection of this amendment suggests that the framers did not intend to limit the protections afforded by Article I, section 17, to those searches and seizures that violated then-existing statutes or ordinances. However, the debate does not clarify what the framers considered to be “unreasonable” searches and seizures, including whether the framers would have viewed unauthorized extraterritorial arrests as “unreasonable.” Lacking any further indication of the framers’ intent from the Proceedings and Debates, we turn to the next best evidence of what the framers would have considered “reasonable” at the time: the practices at common law and the statutes of Idaho in effect when Article I, section 17 was ratified.

Here, Satterfield has not alleged (nor have we found) that Idaho’s territorial statutes placed jurisdictional limitations on a peace officer’s arrest authority. *See generally* Idaho Rev. Stat. §§ 7516–7531 (Territory 1887) (governing arrest warrants); Idaho Rev. Stat. §§ 7538–7554 (Territory 1887) (governing arrests). Instead, Satterfield contends that the common law’s territorial limitations on local police authority were codified in Idaho Code section 67-2337. Yet, section 67-2337 cannot provide any guidance regarding the framers’ intent because the earliest version of this statute was enacted *after* the Idaho Constitution was ratified in 1889. *See* Act of Mar. 2, 1973, ch. 66, § 1, 1973 Idaho Sess. Laws 111–12.

However, Satterfield is correct that a peace officer’s authority to conduct an extraterritorial arrest was limited under the common law. The common law, as it developed throughout the United States prior to 1889, “appears to be that, in the absence of statutory authority, an arrest may not be made under a warrant outside the territorial jurisdiction of the court or magistrate issuing the warrant, or outside the territorial jurisdiction of the officer to whom the warrant is addressed.” *Territorial Extent of Power to Arrest Under a Warrant*, 61 A.L.R. 377 (1929) (collecting

authorities); *see also* *The King v. Weir*, 1 Barn. & C. 288, 107 Eng. Rep. 108 (K.B. 1823); *Kindred v. Stitt*, 51 Ill. 401, 408–09 (1869); *Butolph v. Blust*, 41 How. Pr. 481, 491–92 (N.Y. Gen. Term. 1871). Thus, “[w]hen an arrest was made on a warrant, it was necessary that it be made within the jurisdiction of the officer making it.” Charles M. Kneier, *Territorial Jurisdiction of Local Law Enforcement Officers*, 9 N.C. L. Rev. 283, 283 (1931) (collecting authorities). “The sole exception to this rule at common law was when the officers were in ‘fresh pursuit’ of a suspected felon fleeing that jurisdiction.” *People v. Lahr*, 147 Ill. 2d 379, 382, 589 N.E.2d 539, 540 (1992).

Even so, this does not establish that the framers intended to elevate the common law territorial limitations to constitutional status. As set forth above, while “the common law may be used to help inform our interpretation of the Idaho Constitution,” it is not the embodiment, nor is incorporated within, the Constitution. *Lancaster*, 171 Idaho at 242, 519 P.3d at 1182 (quoting *Clarke*, 165 Idaho at 397, 446 P.3d at 455). Satterfield has not identified any Idaho precedent addressing the common law limitations on extraterritorial arrests. Moreover, Satterfield has not identified any unique state interest supporting his position. *See Pulizzi*, 174 Idaho at 737, 559 P.3d at 1224.

Satterfield claims that the framers incorporated the common law in Article XII, section 2, of the Idaho Constitution, which states: “Any county or incorporated city or town may make and enforce, within its limits, all such local police, sanitary and other regulations as are not in conflict with its charter or with the general laws.” Idaho Const. art. XII, § 2. However, Satterfield did not provide any substantive argument in support of his claim. Nor did he provide authority to support the proposition that Article XII, section 2, which sets territorial limitations on a city’s ability to enforce its own regulations, was intended to prohibit peace officers from enforcing *state* law outside of their territorial jurisdiction. As a result, we will not consider this argument on appeal as it is mentioned only in passing and unsupported by argument or authority. *See Bach v. Bagley*, 148 Idaho 784, 790, 229 P.3d 1146, 1152 (2010).

In conclusion, Satterfield failed to establish that “the state constitution, the unique nature of the state, or Idaho precedent clearly indicates that a different analysis applies” to extraterritorial arrests. *Pulizzi*, 174 Idaho at 737, 559 P.3d at 1224. Thus, the Fourth Amendment analysis applies, and Officer Salladay’s arrest of Satterfield was constitutionally permissible because Salladay possessed a warrant authorizing the arrest. Accordingly, the district court correctly concluded that, although Salladay violated Idaho Code section 67-2337(2) when he arrested Satterfield, the

statutory violation did not carry a constitutional dimension that warranted suppression of the evidence against Satterfield. *See Lancaster*, 171 Idaho at 244, 519 P.3d at 1184.

We emphasize, however, that the “[r]efusal to suppress the evidence does not condone conduct by officers that exceed their authority or jurisdiction.” *Benefiel*, 131 Idaho at 230, 953 P.2d at 980 (Schroeder, J., specially concurring). As Justice Schroeder explained in his special concurrence in *Benefiel*, the exclusionary rule “was not created to exclude evidence that was obtained as the result of an officer’s illegal action that did not violate a constitutional guarantee when there are other adequate deterrents to the police misconduct.” *Id.* Where an officer violates his statutory limitation on his authority to act, “[a]dequate sanctions exist other than the exclusion of evidence to deter such conduct, including potential civil liability and criminal prosecution.” *Id.*

For these reasons, we hold that the district court did not err in denying Satterfield’s motion to suppress.

IV. CONCLUSION

We affirm the judgment of the district court.

Chief Justice BEVAN and Justices BRODY, MOELLER and ZAHN CONCUR.