
SEPTEMBER 2019
LAW ENFORCEMENT
DIGEST
CRIMINAL JUSTICE TRAINING COMMISSION
WASHINGTON

LAW ENFORCEMENT ONLINE TRAINING DIGEST

Welcome to the September 2019 **Law Enforcement Digest Online Training**! This LED covers select court rulings issued in the month of August from the Washington State Supreme Court, the Washington Courts of Appeal, the United States Supreme Court, and the Ninth Circuit Court of Appeals. The cases are briefly summarized, with emphasis placed on how the rulings may affect Washington law enforcement officers or influence future investigations and charges.

Each cited case includes a hyperlinked title for those who wish to read the court's full opinion, as well as references to select RCWs. Links to additional Washington State prosecutor and law enforcement case law reviews and references are also included.

The materials contained in this document are for training purposes. All officers should consult their department legal advisor for guidance and policy as it relates to their particular agency.

CRIMINAL JUSTICE TRAINING COMMISSION
WASHINGTON

LAW ENFORCEMENT ONLINE TRAINING DIGEST

September 2019 EDITION

Covering select case opinions issued in September 2019

1. **COMMUNITY CARETAKING; SEARCH AND SEIZURE**
2. **CELL PHONE; INVENTORY SEARCHES; SEARCH AND SEIZURE**
3. **INVENTORY SEARCHES; AUTOMATIC STANDING AND STOLEN VEHICLES; SEARCH AND SEIZURE**
4. **NEW CHILD RESTRAINT LAW – eff. January 1, 2020**
5. **ADDITIONAL RESOURCE LINKS: Legal Update for Law Enforcement (WASPC, John Wasberg) & Prosecutor Caselaw Update (WAPA, Pam Loginsky)**

CRIMINAL JUSTICE TRAINING COMMISSION
WASHINGTON

1 COMMUNITY CARETAKING; SEARCH AND SEIZURE

State v. Boisselle
No. 95858-1 (Sep. 12, 2019)
Washington State Supreme Court

FACTS:

911 Dispatch received an anonymous call reporting that "someone named Mike" had shot someone at a provided address. Shortly thereafter, the Puyallup Police tip line received an anonymous call that stated that "Mike" had shot someone, possibly killing them, and that it was in self-defense.

Two officers dispatched to the address received no response to knocking on the door, and were unable to see inside the duplex because the windows were all covered. They saw a light on in the upstairs bedroom, and could hear an aggressively barking dog inside. The officers noted a foul odor coming from the house and garage.

Officers contacted the listed owner of the property who told them he had rented the house to a tenant who moved out, and that he believed her son "Mike" was living there illegally. The listed owner told the officers that the property was now in bankruptcy, and he no longer owned it. Officers then contacted the former tenant who confirmed that her son Michael had been living in the duplex, but that she hadn't seen him in a few days. One officer approached the rear sliding door to the residence, causing the barking dog inside to charge at the door. This action moved the window coverings enough to allow the officer to see into the home where he noted overturned furniture that he thought may be a sign of a struggle.

1 COMMUNITY CARETAKING; SEARCH AND SEIZURE

State v. Boisselle
No. 95858-1 (Sep. 12, 2019)
Washington State Supreme Court

FACTS, Cont.

A bystander told the officers that his friend had been living in the duplex with "Michael," and hadn't been seen in several weeks. Auburn PD then contacted the officers with information that they were investigating a possible homicide/ missing person report associated with that roommate, and suggested that if there was any evidence of missing carpet inside the residence, that would be relevant to their case. The officers could see through the rear sliding door that there was missing carpet.

The officers testified that without being able to gain consent from a rightful owner/tenant, and not having anything on which to base a warrant (not knowing if there was even a crime to investigate), they felt it necessary to force entry to confirm the health and safety of the reported residents of the duplex. A sweep of the duplex that consisted of only looking in spaces large enough for a person to fit didn't turn up anyone.

Feeling that the foul odor was coming from the garage, the deputies forced entry from the duplex to the garage. As soon as the door was opened, all 4 could see a rolled-up carpet with a shoe coming out the end and maggots spilling out. When they opened the garage door and then went around to the front, they could also see an arm sticking out of the rolled-up carpet. At no time did the officers touch the carpet, or collect any evidence. The officers then secured the scene and applied for a search warrant.

1 COMMUNITY CARETAKING; SEARCH AND SEIZURE

State v. Boisselle
No. 95858-1 (Sep. 12, 2019)
Washington State Supreme Court

PROCEDURAL FACTS:

A jury convicted the defendant of 2nd Degree Murder and 2nd Degree Unlawful Possession of a Firearm. He appealed his convictions, arguing that the trial court erred in denying his motion to suppress because the officers' search of his home did not fall within the emergency aid function of the community caretaking exception under either Article 1, Section 7 of the Washington Constitution or the Fourth Amendment to the United States Constitution.

The Court of Appeals affirmed his conviction (May 2018 LED) holding that the officers' search was permissible because they had a reasonable belief that someone inside the duplex unit likely needed aid or assistance. The court declined to address the defendant's 4th Amendment argument stating that he'd failed to provide sufficient briefing to resolve the issue. The defendant now appeals to the Supreme Court.

1 COMMUNITY CARETAKING; SEARCH AND SEIZURE

State v. Boisselle
No. 95858-1 (Sep. 12, 2019)
Washington State Supreme Court

TRAINING TAKEAWAY: Community Caretaking Exception to Warrant Requirement

The officers' warrantless entry into the defendant's home was unlawful because the emergency aid community caretaking function search was pretext for a criminal investigation, conducted after officers had formulated their suspicion that a crime had taken place, motivated by the desire to conduct an evidentiary search, and done in the absence of any evidence of a present emergency.

Under the community caretaking exception, officers may make a limited invasion of constitutionally protected privacy rights when it is necessary for officers to perform their community caretaking functions.

This exception recognizes that officers have duties that exceed the typical detection and investigation of crime, such as delivery emergency messages, giving directions, searching for lost children, assisting stranded motorists, and rendering first aid.

1 COMMUNITY CARETAKING; SEARCH AND SEIZURE

State v. Boisselle

No. 95858-1 (Sep. 12, 2019)
Washington State Supreme Court

TRAINING TAKEAWAY: Pretext and the Community Caretaking Function

Pretext considers the totality of the circumstances, including both the *subjective intent* of the officer and the *objective reasonableness* of the officer's behavior.

The court found that the officers' motivation to enter the defendant's residence was more clearly investigative in nature than community caretaking:

- They were at the location after two anonymous 911 calls reported a murder.
- Once at the house, the officers noticed a strong odor they believed to either be garbage or a decomposing body.
- They were at the house to confirm whether a crime had been committed or if a crime victim was inside.
- Once they could see inside the home, they saw what might have been signs of a struggle and a patch of what appeared to be missing carpet.
- A man across the street expressed concern that his friend was missing and may have been associated with the address.
- They knew that neither the victim or defendant had been seen for several days.
- They had been at the property for over 2 hours by the time they made entry.

A warrantless entry conducted under suspicion that a crime has been committed is not justified under the community caretaking function – its investigative intent would lead it to be analyzed under the exigent circumstances exception.

1 COMMUNITY CARETAKING; SEARCH AND SEIZURE

State v. Boisselle
No. 95858-1 (Sep. 12, 2019)
Washington State Supreme Court

TRAINING TAKEAWAY: Investigative Intent and Dissenting Opinion on Mixed Motive Entry

Acting under the community caretaking function requires the officer's actions to be "totally divorced" from the detection and investigation of criminal activity. State v. Kinzy (2000)

- Note that the opinion of the four dissenting justices in this split (5 justices signed the majority opinion, and 4 signed the dissent) opinion call out the majority for what they believe to be the misstatement of a bright line "investigative intent = no community caretaking exception" rule supposedly taken from the *Kinzy* opinion.

- The Dissent would instead leave room for "mixed motive" warrantless entry in the community caretaking context, much as exists for traffic and investigatory stops.

Either way, officers should be aware that their motivation will be evaluated to ensure that warrantless entries justified under the community caretaking exception are not merely pretextual for a purely criminal investigation.

1 COMMUNITY CARETAKING; SEARCH AND SEIZURE

State v. Boisselle
No. 95858-1 (Sep. 12, 2019)
Washington State Supreme Court

TRAINING TAKEAWAY: Community Caretaking Warrantless Search Test

The Community Caretaking exception justifies a warrantless search if:

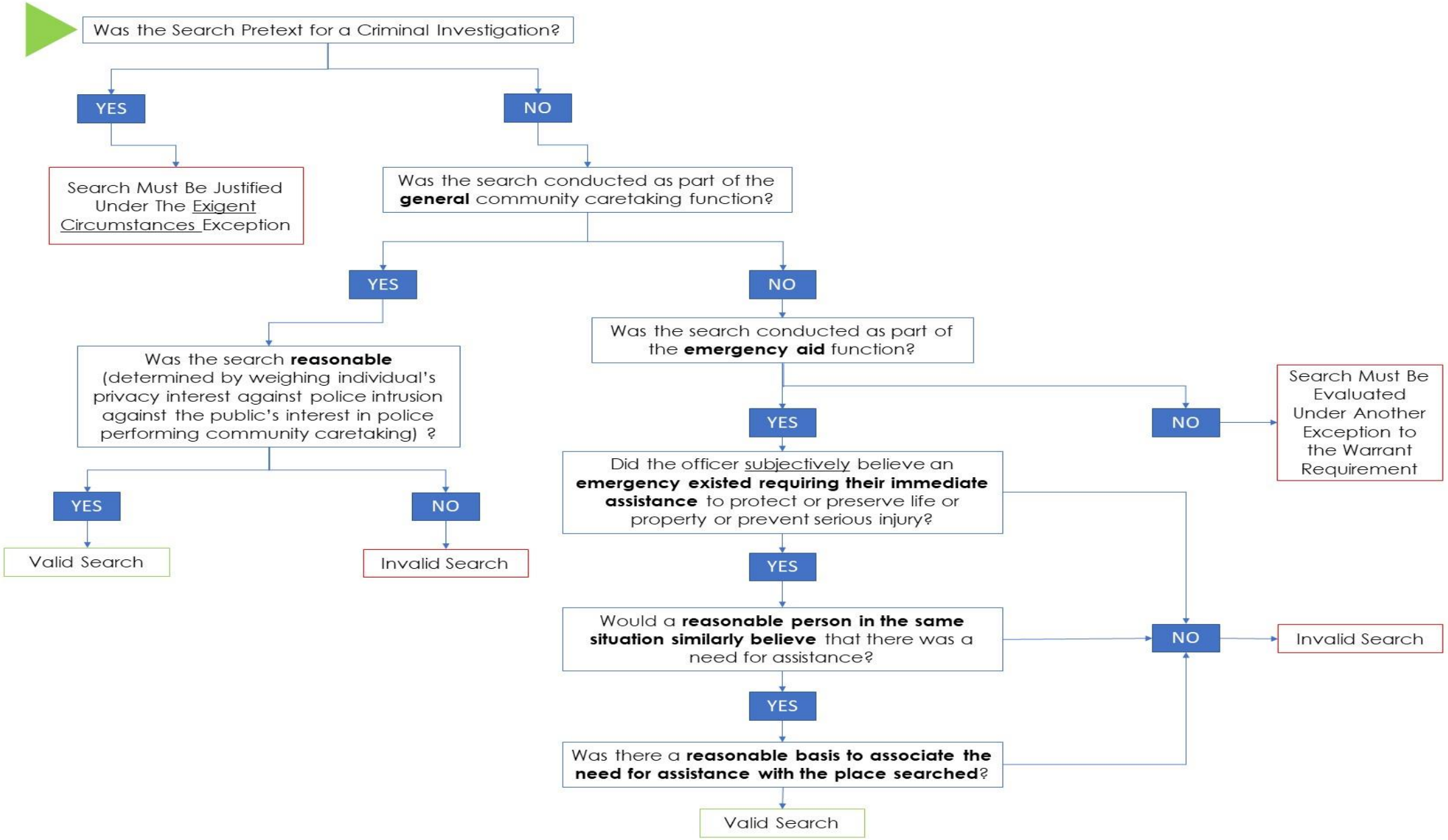
(1) The exception is **not being used as a pretext** to conduct a criminal investigation; and

(2) (a) The search falls within an officer's **general community caretaking function**, such as performing a routine check on health or safety, and the search was reasonable – as determined by weighing a person's privacy interest in freedom from police intrusion and the public's interest in having police perform a community caretaking function; OR

(b) The search falls within an officer's **emergency aid function**, such as coming to the aid of persons believed to be in danger of death or physical harm, and

1. the officer subjectively believed an emergency existed requiring their immediate assistance to protect or preserve life or property, or to prevent serious injury,
2. a reasonable person in the same situation would similarly believe that there was a need for assistance, and
3. there was a reasonable basis to associate the need for assistance with the place searched.

Was a Warrantless Search Properly Conducted Under the Community Caretaking Function?



1 COMMUNITY CARETAKING; SEARCH AND SEIZURE

State v. Boisselle
No. 95858-1 (Sep. 12, 2019)
Washington State Supreme Court

TRAINING TAKEAWAY: No "Decomposing Body" Rule Created

The Court declined to adopt a new rule that would authorize officers to make warrantless searches of homes under the community caretaking exception in order to recover decomposing bodies.

Officers will still need to have a valid exception to the warrant requirement or a search warrant to enter a home to search for or retrieve a decomposing body.

1 COMMUNITY CARETAKING; SEARCH AND SEIZURE

State v. Boisselle
No. 95858-1 (Sep. 12, 2019)
Washington State Supreme Court

PRACTICE TIP: Failure to Notify Coroner of the Existence and Location of Human Remains

Washington Prosecutor's Association Senior Staff Attorney, Pamela Loginsky, helpfully notes that if you have probable cause to believe a decomposing body is in a home, and reason to believe the death hasn't been reported, the search warrant application may allege a violation of RCW 68.50.020 (Failure to Notify Coroner of the Existence and Location of Human Remains).

- Your warrant application should include a statement about contacting the coroner or medical examiner's office to confirm that they have no record of a death reported at the address to be searched.

2 CELL PHONE; INVENTORY SEARCHES; SEARCH AND SEIZURE

United States v. Garay
No. 18-50054 (9th Cir. Sep. 17, 2019)
Ninth Circuit Court of Appeals

FACTS:

When deputies attempted to stop the defendant for a traffic violation, he led them on a high-speed chase ending with crashing his rental car into a ditch and attempting to flee on foot. A search of his person revealed thousands of dollars in cash and quantities of four different illegal drugs. He was placed under arrest.

With the car totaled in a ditch, the deputies arranged for a tow. In preparation, they conducted an inventory search of the vehicle that turned up two loaded rifles, ammunition, and two cell phones (one of which was claimed by the passenger). The vehicle impound form noted the firearms, but failed to list any other property.

The deputies obtained a local search warrant for the defendant's cell phone by describing the drugs and cash found on the defendant's person, his high-speed flight from the attempted traffic stop, and the officer's knowledge based on training and experience that individuals who possess firearms often take pictures of them and communicate via text message to further their criminal activity.

2 CELL PHONE; INVENTORY SEARCHES; SEARCH AND SEIZURE

United States v. Garay
No. 18-50054 (9th Cir. Sep. 17, 2019)
Ninth Circuit Court of Appeals

FACTS, cont.:

When the case was referred for federal prosecution, a second, federal warrant was issued on the same information, as well as the "collective experiences" of law enforcement agents that felons prohibited from possession guns use mobile phones to coordinate buying and selling guns. The cell phone contained photographs tying the defendant to the firearms.

The district court ruled that the phone was lawfully seized in an inventory search of the car and that the warrants authorizing the search of the phone's contents were supported by probable cause. The defendant now appeals his conviction under 18 U.S.C. § 922(g)(1) for Felon in Possession of a Firearm.

2 CELL PHONE; INVENTORY SEARCHES; SEARCH AND SEIZURE

United States v. Garay
No. 18-50054 (9th Cir. Sep. 17, 2019)
Ninth Circuit Court of Appeals

TRAINING TAKEAWAY: Inventory Search, Cell Phone Seizure, and Cell Phone Searches

Officers may seize cell phones discovered in a crashed car during an inventory search where the inventory search was not conducted in bad faith or for the sole purpose of investigation.

Inventory searches serve an administrative purpose of safeguarding the contents of an impounded vehicle, and must not be a ruse for a general rummaging in order to discover incriminating evidence.

2 CELL PHONE; INVENTORY SEARCHES; SEARCH AND SEIZURE

United States v. Garay
No. 18-50054 (9th Cir. Sep. 17, 2019)
Ninth Circuit Court of Appeals

TRAINING TAKEAWAY: Inventory Search, Cell Phone Seizure, and Cell Phone Searches

Once seized in an inventory search, a valid search warrant is required to search the contents of a cell phone legally seized during an inventory search of a crashed car.

The authority to seize the cell phone did not extend to a search of its contents.

The parameters of the search extended beyond the merely administrative function of the inventory and seizure of the physical item, and into investigation when it was the contents (suspected to contain evidence of the crime) of the cell phone that law enforcement was after.

2 CELL PHONE; INVENTORY SEARCHES; SEARCH AND SEIZURE

United States v. Garay
No. 18-50054 (9th Cir. Sep. 17, 2019)
Ninth Circuit Court of Appeals

TRAINING TAKEAWAY: Inventory Search and Administrative Errors

Absent evidence suggesting the police were attempting to circumvent the law by using the guise of an inventory search to actually conduct an investigative search, administrative errors on the inventory form will not invalidate an otherwise valid search.

An **inventory search** is an administrative function by which officers may conduct a warrantless search of a lawfully impounded vehicle to determine the contents for the purpose of protecting the owner's belongings, shielding law enforcement against allegations of missing items, ensuring public safety, providing community caretaking, and other administrative functions.

Although policy can be instructive in supporting the legitimacy of an inventory search, it does not define constitutional rights.

Deviating from agency policy by listing some of the property in the Vehicle Report, but not listing additional property that was instead booked as evidence, substantially accomplished what the inventory form was designed to do (removing and safeguarding the contents of the car before it was towed).

2 CELL PHONE; INVENTORY SEARCHES; SEARCH AND SEIZURE

United States v. Garay
No. 18-50054 (9th Cir. Sep. 17, 2019)
Ninth Circuit Court of Appeals

PRACTICE POINTER: Developing Your Expertise

Although the court didn't find the defendant's argument persuasive that the officers hadn't established the reliability of their supposed expertise as affiants in the search warrant, it's a good reminder that simple steps such as adequately describing your relevant training and expertise can eliminate potential court challenges with very little effort required on your part.

When you write that you "know something" in an affidavit, make sure somewhere in the affidavit you're explaining WHY you know that thing.

- Training and experience?
- Other evidence you've already gathered during your investigation?
- A fellow officer, witness statement, etc?

3 INVENTORY SEARCHES; AUTOMATIC STANDING AND STOLEN VEHICLES; SEARCH AND SEIZURE

State v. Peck

No. 96069-1 (Sep. 26, 2019),
consolidated with *State v. Tellvik, No. 96073-9*
Washington State Supreme Court

FACTS:

While a homeowner was demonstrating her home's new surveillance system to a friend on her cell phone, she witnessed two men burglarizing a home shortly after 1am. The woman called 911, and officers arrived at the home within minutes to find a pickup truck stuck in the snow in front of the house with two men attempting to free it.

The officers contacted the two men, frisked them, and detained them. Backup officers ran the truck's registration and discovered it was stolen. The two men were arrested for Possession of a Stolen Vehicle.

After being read *Miranda*, Peck agreed to speak to an officer. He said he had been picked up earlier in the day in the pickup by Tellvik. He hadn't seen Tellvik ever drive the truck, and noted that he started it with a screwdriver. Peck denied that either man had gone into any of the buildings or the house. When asked if he had anything in the truck, Peck hesitated before saying that a cell phone, a car battery, and a small bag of tools belonged to him. He told the officer that the truck wasn't running well, so they brought the extra battery and tools in case it broke down.

3 INVENTORY SEARCHES; AUTOMATIC STANDING AND STOLEN VEHICLES; SEARCH AND SEIZURE

State v. Peck

No. 96069-1 (Sep. 26, 2019),
consolidated with *State v. Tellvik, No. 96073-9*
Washington State Supreme Court

FACTS, cont.:

When the homeowner arrived, she confirmed that she didn't know either man, that they didn't have permission to be on her property, and that her outbuilding, which was open, had been locked when she left. The latch and door appeared to have been pried open. When asked about the battery and bag of tools Peck claimed was his, the homeowner stated that they were hers and had been stored in the outbuilding. The officers found a pry bar in the snow beneath the truck's side door.

Because the truck was stolen and on private property, the officers impounded it and called for a tow truck. They then conducted an inventory search of the truck. During the search the officer discovered that the truck's ignition was punched out. The officer located and opened a black zippered nylon case that seemed to hold CDs. He testified that he did this because there was "no telling what could be in it," and he "didn't know if it belonged to the owner of the truck..[and could] have registration documents in it." Inside the zippered case was packaged methamphetamine, an electronic scale, and a smoking pipe.

3 INVENTORY SEARCHES; AUTOMATIC STANDING AND STOLEN VEHICLES; SEARCH AND SEIZURE

State v. Peck

No. 96069-1 (Sep. 26, 2019),
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Washington State Supreme Court

FACTS, cont.:

The defendants were charged with several crimes including Possession of a Controlled Substance with Intent to Deliver. Their motion to suppress the contents of the black zippered nylon case was denied, and the trial court held the inventory search was proper and found no evidence of pretext. Both men appealed their subsequent convictions. The Court of Appeals reversed the trial court's denial of the motion to suppress the contents of the zippered case.

The Supreme Court now reviews the Court of Appeals and issues a split (5 justices in the majority, 4 dissenting) opinion as to whether (1) the men have the legal ability to challenge the inventory search and (2) whether opening the zipped CD case found in the truck exceeded the lawful scope of the inventory search.

3 INVENTORY SEARCHES; AUTOMATIC STANDING AND STOLEN VEHICLES; SEARCH AND SEIZURE

State v. Peck

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Washington State Supreme Court

TRAINING TAKEAWAY: Automatic Standing to Challenge Search of the Stolen Vehicle

Automatic Standing

- **The enhanced privacy protections of Article 1, Section 7 of the WA Constitution grant a defendant automatic standing to challenge a search or seizure, despite being unable to technically have a privacy interest in such property, if:**
  1. **Possession is an essential element of the charged offense, AND**
  2. **The defendant was in possession of the contraband at the time of the contested search or seizure. State v. Simpson (1980)**

Mere denial of ownership does not eliminate standing.

All 9 justices agreed that under the Washington doctrine of automatic standing, the men, even as thieves, retained the ability to assert possessory interest in the truck and its searched contents, and were therefore entitled to challenge the search of the stolen truck because they (1) maintained possession of the truck and contraband up until the point of the inventory search and seizure, and (2) were charged with a crime of possession.

3 INVENTORY SEARCHES; AUTOMATIC STANDING AND STOLEN VEHICLES; SEARCH AND SEIZURE

State v. Peck

No. 96069-1 (Sep. 26, 2019),
consolidated with *State v. Tellvik, No. 96073-9*
Washington State Supreme Court

TRAINING TAKEAWAY: Inventory Searches

A warrantless inventory search, performed in good faith and not as pretext for an investigatory search, is a valid exception to the warrant requirement, limited in both scope and purpose to:

(1) Determine ownership and protect the vehicle owner's (or occupants') property,

(2) Safeguard bailees (tow driver, tow company, police) from the true owners' claims that their property was damaged, stolen, or lost after it was taken into police custody; and

(3) Ensure the owner, officers, and bailees are protected from any potentially dangerous or illegal items that might otherwise be left in the vehicle.

3 INVENTORY SEARCHES; AUTOMATIC STANDING AND STOLEN VEHICLES; SEARCH AND SEIZURE

State v. Peck

No. 96069-1 (Sep. 26, 2019),
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Washington State Supreme Court

TRAINING TAKEAWAY: Inventory Searches

It would undermine the purpose of an inventory search to require an unlocked case of unknown ownership to be inventoried simply as a closed container.

- The item would remain easily obtainable to anyone in contact with the truck, the contents unknown, and therefore vulnerable to theft or loss and potentially creating a hazard or harm depending on what was inside.

The court notes that an inventory search of a vehicle known to be stolen is simply different from other inventory searches as there is an additional need to identify who owns the vehicle and who owns its contents in order to do an adequate inventory.

3 INVENTORY SEARCHES; AUTOMATIC STANDING AND STOLEN VEHICLES; SEARCH AND SEIZURE

State v. Peck

No. 96069-1 (Sep. 26, 2019),
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Washington State Supreme Court

TRAINING TAKEAWAY: Opening an Unlocked, Non-Personal Container During an Inventory Search

Where the circumstances strongly indicate that ownership is unknown, a proper inventory search of a stolen vehicle extends to opening unlocked, innocuous* closed containers in order to determine ownership.

* *"Innocuous" here meaning nothing too personal in nature or apparently dangerous.*

3 INVENTORY SEARCHES; AUTOMATIC STANDING AND STOLEN VEHICLES; SEARCH AND SEIZURE

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Washington State Supreme Court

The court distinguishes the search of this "innocuous" unlocked container from searches of containers, locked and unlocked, where the container has an additional "aura of privacy" such as luggage, a shaving kit, or a purse, and therefore are granted additional protection.

- Luggage (closed toiletry bag) inside a locked trunk with no indication of dangerous contents (i.e. not a kit of burglar tools or a gun case) = unlawful inventory search (Houser)
- Zipped shaving kit bag found on the seat of a stolen truck which prior to the search (pretext, no consent) the officer suspected contained the methamphetamine the driver mentioned was on the seat = unlawful search (Wisdom)
- Locked trunk opened with trunk release and fishing tackle box found inside searched = unlawful search, didn't address the closed container because opening the locked trunk was a threshold issue (White)

3 INVENTORY SEARCHES; AUTOMATIC STANDING AND STOLEN VEHICLES; SEARCH AND SEIZURE

State v. Peck

No. 96069-1 (Sep. 26, 2019),
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Washington State Supreme Court

TRAINING TAKEAWAY: Totality of the Circumstances is Critical

In determining whether an inventory search can include opening closed containers, the court is clear that the particular facts of each case are critical, and its ruling in this case is narrow.

Opening the zippered CD case was permissible during the inventory because:

- The officer testified that the case appeared to be a black zippered nylon case commonly used to hold CDs, and therefore the court found that it gave off no additional "aura of privacy" to suggest it deserved greater protection from search due to its personal nature.
- The officer had no way of knowing who it's owner was – the owner of the truck, the homeowner, the two men, or an entirely unknown party – and even suggested that it was possible it contained the truck's registration documents.
- The case here was found in the passenger compartment of a known stolen vehicle with shattered back windows and a punched-out, screwdriver-started ignition that had been properly impounded (thus factually distinguishable from *Houser* where the item was personal luggage, in a locked trunk, in the defendant's own vehicle, and searched pursuant to an unlawful impound).

3 INVENTORY SEARCHES; AUTOMATIC STANDING AND STOLEN VEHICLES; SEARCH AND SEIZURE

State v. Peck

No. 96069-1 (Sep. 26, 2019),
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Washington State Supreme Court

PRACTICE POINTERS:

- The ruling in this case is split, meaning the justices aren't all in agreement, and as the language in the opinion indicates, there is significant difference of opinion between the two camps. This issue will continue to be shaped in further cases.
- Inventory searches are to be used judiciously for their intended administrative and community caretaking purposes, and never as a ruse to conduct an otherwise unauthorized investigatory search.
- If you have a sneaking or significant suspicion that there is evidence of a crime where you want to search, just **get a warrant**!

WASHINGTON STATE CAR SEAT LAWS CHANGING
JANUARY 1, 2020

Up to Age 2	Rear-Facing Car Seat	✓ All children under age 13 must ride in the back seat when practical.
Ages 2 – 4	Car Seat with a Harness (rear or forward facing)	✓ Child restraint system must comply with US DOT standards and be used according to vehicle and child restraint manufacturer.
Ages 4 and older, under 4'9" tall	Car or Booster seat and in the back seat	✓ For the best protection, a child should remain in each stage of restraint until they reach the maximum height and weight based on the manufacturer's instructions
Ages 4 and older, over 4'9"	Properly fitted seat belt (typically starting at 8-12 years old) and in the back seat	

RESOURCES:

- Printable **Brochures & Flyers** (English, Spanish, Chinese, Russian, Korean, Tagalog)
- Current WA State Child Passenger Restraint Law **RCW 46.61.687**
- Car Seat Safety Check Locations: **www.safercar.gov/parents**
- General Info about Car Seats (and other WA Traffic Safety Initiatives): **wacarseats.com**
- Resources for Car Seat Technicians: **WTSC Partners**

FIVE-STEP TEST: MOVING FROM A BOOSTER TO A SEATBELT

MOST CHILDREN NEED A BOOSTER UNTIL 8-12 YEARS OLD

FURTHER READING

For further cases of interest to law enforcement, please see the comprehensive monthly Legal Update for Law Enforcement prepared by Attorney John Wasberg (former longtime editor of the original LED), which is published on the WASPC Law Enforcement Resources webpage:

http://www.waspc.org/legal-update-for-washington-law-enforcement

The Washington Prosecutor's Association publishes a comprehensive weekly summary of a wide range of caselaw geared toward the interests of Washington State Prosecutors. This resource is authored by WAPA Staff Attorney Pam Loginsky.

http://70.89.120.146/wapa/CaseLaw.html

Questions?

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