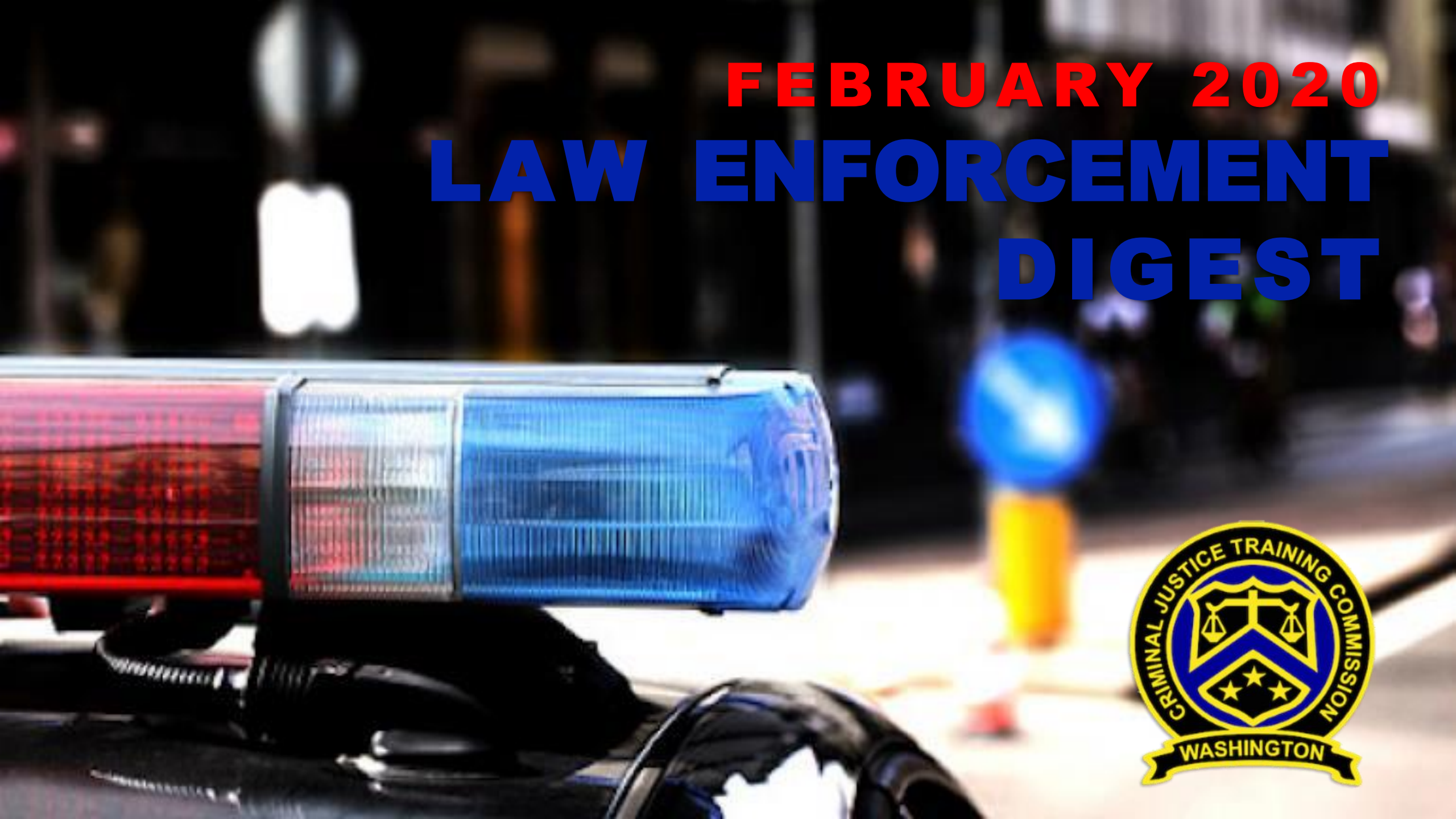
FEBRUARY 2020
LAW ENFORCEMENT
DIGEST
CRIMINAL JUSTICE TRAINING COMMISSION
WASHINGTON

LAW ENFORCEMENT ONLINE TRAINING DIGEST

Welcome to the February 2020 **Law Enforcement Digest Online Training**! This LED covers select court rulings issued in the month of February 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.

LAW ENFORCEMENT ONLINE TRAINING DIGEST

FEBRUARY 2020 EDITION

Covering select case opinions issued in February 2020

1. **UNLAWFUL IMPRISONMENT**
2. **INDECENT EXPOSURE; SUFFICIENCY OF THE EVIDENCE**
3. **SEARCH WARRANTS; CELL PHONE; SEARCH AND SEIZURE**
4. **USE OF FORCE; §1983; QUALIFIED IMMUNITY; PURSUIT**
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CRIMINAL JUSTICE TRAINING COMMISSION
WASHINGTON

1 UNLAWFUL IMPRISONMENT

State v. Dillon
No. 78592-3-I (Feb. 3, 2020)
Court of Appeals, Division I

FACTS:

While entering a 7/Eleven store, the victim encountered a man standing near the store entrance. He noticed the man had scratches on his face, was bleeding, and appeared intoxicated. The victim assumed the man was panhandling and told him he didn't have any change. The man entered the store 10-15 seconds behind the victim. The victim, who is partially sight impaired, did his shopping while listening to music on his headphones. As he completed his purchase and began to walk to the exit, the man stood three feet in front of the door and yelled at the victim in a slurred voice to, "get your ass back over there." He also threatened to cut and shoot the victim.

Fearing for his safety, the victim moved to the back of the store. When he again tried to leave, the man told him, "I told you one time; get your ass back over there." and used a racial slur. The victim used his Bluetooth headphones to discretely call 911. During this altercation, other shoppers continued to enter and exit without issue, and the two store clerks were telling the man to leave. The victim later reported to officers that the man appeared to be intimidating the store clerks.

1 UNLAWFUL IMPRISONMENT

State v. Dillon
No. 78592-3-I (Feb. 3, 2020)
Court of Appeals, Division I

FACTS, cont.:

The responding officer located the man in the parking lot of the 7-Eleven talking to someone in an SUV and handcuffed him. As the officer was walking the man to his patrol car, the man headbutted the officer in the face causing injury.

The man was charged with Assault 3 for headbutting the officer, and Felony Harassment and Unlawful Imprisonment for his interactions with the victim in the 7-Eleven. He now appeals his conviction for the Unlawful Imprisonment charge (he was also convicted of Assault 3).

1 UNLAWFUL IMPRISONMENT

State v. Dillon
No. 78592-3-I (Feb. 3, 2020)
Court of Appeals, Division I

TRAINING TAKEAWAY – UNLAWFUL IMPRISONMENT:

A victim is "knowingly restrained" where the defendant restrained the victim's movement in a manner that substantially interfered with his liberty by threatening the victim with violence, intimidating him, and blocking the victim's exit from a store.

Unlawful imprisonment, RCW 9A.40.040, requires that the defendant "knowingly restrain another person."

Restraint is defined with 4 components:

1. Restricting another's movement;
2. Without that person's consent;
3. Without legal authority; and
4. In a manner that substantially interferes with that person's liberty.

1 UNLAWFUL IMPRISONMENT

State v. Dillon
No. 78592-3-I (Feb. 3, 2020)
Court of Appeals, Division I

TRAINING TAKEAWAY – UNLAWFUL IMPRISONMENT:

Restraint is "without consent" if it is accomplished by physical force, intimidation, or deception. RCW 9A.40.010(6)

A substantial interference in the victim's liberty requires more than a "petty annoyance, a slight inconvenience, or an imaginary conflict."

- The defendant's actions (threats of violence, blocking the door, and intimidating the store employees and the victim) restricted the victim's movement, without his consent, to a degree greater than a slight inconvenience or imaginary conflict.

1 UNLAWFUL IMPRISONMENT

State v. Dillon
No. 78592-3-I (Feb. 3, 2020)
Court of Appeals, Division I

TRAINING TAKEAWAY – WITHOUT LEGAL AUTHORITY:

Establishing that the restraint was "without legal authority" is only required in unique cases where the defendant claims to have had a good faith belief that they had legal authority to imprison a person, such as those involving bounty hunters.

Although the facts of this case didn't require proof that the defendant acted without legal authority, by accidentally including the element in their jury instructions as an element of the crime, the prosecutor created a need to prove it where it otherwise wouldn't have existed.

- The testimony that the defendant threatened to kill or shoot the victim, jumped at him as he tried to leave, and never claimed to have any authority, are enough to satisfy reasonable proof that the defendant was "without legal authority."

1 UNLAWFUL IMPRISONMENT

State v. Dillon
No. 78592-3-I (Feb. 3, 2020)
Court of Appeals, Division I

TRAINING TAKEAWAY – ALTERNATE MEANS OF ESCAPE:

Having a reasonable alternate means of escape is a defense to the crime of unlawful imprisonment, not an element of the crime, so the state isn't required to prove the lack of an alternate means of escape in order to establish that the victim was restrained.

- Your narrative and/or witness statements should cover the availability and/or reasonableness of alternate escape routes to provide the best evidence for the prosecutor, and to prevent that being used as a defense to the charge.

- While the convenience store most likely had a back door, it wouldn't typically be accessible to a customer, and the intent shown by the defendant blocking access to the front door and the victim being forced to retreat to the back of the store for his safety is very clear.

2 INDECENT EXPOSURE; SUFFICIENCY OF THE EVIDENCE

State v. Stewart
No. 78846-9-I (Feb. 10, 2020)
Court of Appeals, Division I

FACTS:

While out shopping, the victim observed the defendant behind a dumpster between two stores. The man was kneeling with his hand moving rapidly up and down in his genital area. Her initial thought was that the man was having a seizure. She glanced back and made eye contact with the man. He continued the same actions with his arm, and the woman concluded he was masturbating. The woman went into the nearby store to report this, and the store clerk called 911.

The responding officer located the man across the street from the store. He first denied having been by the store, but admitted he had been there after the officer told him that other people had reported seeing him there. The man claimed he might have had a seizure, but did not request medical assistance.

2 INDECENT EXPOSURE; SUFFICIENCY OF THE EVIDENCE

State v. Stewart
No. 78846-9-I (Feb. 10, 2020)
Court of Appeals, Division I

FACTS, cont.:

In a subsequent interview, the man told the officer that if he's having a seizure, he has about 12 seconds to loosen his clothes, and that he had loosened his belt and his outer layer pants were likely down to his knees. Evidence of a white stain on the defendant's pants tested positive for semen, but that fact was not included in the court's findings, and is therefore not included in this appeal.

The defendant was found guilty of Indecent Exposure at a bench trial, and he now appeals the sufficiency of the evidence for that conviction.

2 INDECENT EXPOSURE; SUFFICIENCY OF THE EVIDENCE

State v. Stewart
No. 78846-9-I (Feb. 10, 2020)
Court of Appeals, Division I

TRAINING TAKEAWAY – Sufficiency of Obscene Exposure:

There is sufficient evidence as to the existence of an obscene exposure where the victim testified that she saw the suspect moving his arm rapidly back and forth in the area in front of where his genitals would be.

The fact that the woman did not actually see the man's genitals to note if they were outside of his pants at the time, or know if his pants were down, does not bar the sufficiency of the evidence that proved he was committing an obscene exposure.

2 INDECENT EXPOSURE; SUFFICIENCY OF THE EVIDENCE

State v. Stewart
No. 78846-9-I (Feb. 10, 2020)
Court of Appeals, Division I

TRAINING TAKEAWAY – Indecent Exposure:

A person is guilty of RCW 9A.88.010(1) - Indecent Exposure if they "intentionally make any open and obscene exposure of [their] person or the person of another knowing that such conduct is likely to cause reasonable affront or alarm."

- **Another person must be present when the obscene exposure occurs.**
- **The offender must know that the exposure would likely cause reasonable alarm.**
- **There does not have to be a witness who sees the defendant's genitalia.**
  State v. Vars (2010)

3 SEARCH WARRANTS; CELL PHONE; SEARCH AND SEIZURE

State v. Fairley
No. 35616-7-III (February 18, 2020)
Court of Appeals, Division III

FACTS:

In July 2013, officers received reports of a telephonic bomb threat directed at a college campus. An investigation led to a cell phone number associated with an individual named Steven Brown living in Kennewick. The Superior Court issued a warrant authorizing law enforcement to search Brown's residence and his Jeep Cherokee. The warrant was based on a probable cause affidavit indicating evidence of the crime of threats to bomb would be found at his property. The warrant authorized seizure of listed property, including Brown's cell phone, but did not specifically authorize a search or the cell phone or any of the other listed items to be seized. No subsequent warrants were sought or obtained.

The seized cell phone was subjected to a forensic examination. In the course of the search, investigators recovered 17 text messages sent to Brown's cell phone from a number associated with the defendant. Although there was no indication the defendant was involved in the bomb threats, the recovered text messages revealed that the defendant had communicated with Brown's daughter for the purposes of prostitution. The defendant was then charged with multiple misdemeanor offenses. He now challenges the admission of the evidence against him that was obtained from the search of Brown's cell phone.

3 SEARCH WARRANTS; CELL PHONE; SEARCH AND SEIZURE

State v. Fairley
No. 35616-7-III (February 18, 2020)
Court of Appeals, Division III

TRAINING TAKEAWAY – Request to Search After Seizure:

A search warrant to seize a cell phone does NOT authorize a search of the content of the phone.

To search a lawfully seized cell phone, officers must obtain a second search warrant that is sufficiently particularized to limit the type of data to be seized and distinguish between material for which probable cause exists from data that should remain private.

3 SEARCH WARRANTS; CELL PHONE; SEARCH AND SEIZURE

State v. Fairley
No. 35616-7-III (February 18, 2020)
Court of Appeals, Division III

TRAINING TAKEAWAY – SEARCH WARRANT PARTICULARITY:

A valid search warrant must be (1) based on probable cause and (2) particularly describe the place to be searched and the persons or things to be seized.

The 4th Amendment Particularity Requirement prohibits general searches, and is intended to create a warrant where discretion as to how and what to search is not left up to the officers executing the warrant.

Warrants to search cell phones, which contain particularly personal and expansive information implicating First Amendment protections, are held to a high degree of particularity. State v. McKee (2019)

- The warrant must describe the items to be seized with as much specificity as possible.
- Particularity prevents "overseizure" and "oversearching" beyond the warrant's probable cause.

3 SEARCH WARRANTS; CELL PHONE; SEARCH AND SEIZURE

State v. Fairley
No. 35616-7-III (February 18, 2020)
Court of Appeals, Division III

TRAINING TAKEAWAY – Restricting Cell Phone Search:

A well-defined search warrant removes the need for the officer(s) executing the warrant to use their own judgment in deciding what may and may not be searched.

For a cell phone, in addition to being limited by the crime under investigation, the scope of the warrant may also be restricted to:

- **Specific areas of the phone** (e.g., applications pertaining to the phone, photos, or text messages),
- **Content** (e.g., outgoing call numbers, photos of the target and suspected criminal associates, or text messages between the target and suspected associates), and
- **Time frame** (e.g. materials created or received within 24 hours of the crime under investigation).

The court may also require compliance with a certain search protocol designed to minimize intrusion into personal data irrelevant to the criminal investigation.

3 SEARCH WARRANTS; CELL PHONE; SEARCH AND SEIZURE

State v. Fairley

No. 35616-7-III (February 18, 2020)
Court of Appeals, Division III

TRAINING TAKEAWAY – DIFFERENT FROM BLOOD TESTING:

The court points out that a warrant relating to the search of a cell phone is distinguishable from the search of a blood sample in a DUI case because of the vast amount of private, protected information accessible on a cell phone.

- The information on a cell phone is of a more private nature and likely to be subject to the greater protections of the First Amendment.
- The target of a blood draw search is narrow and obvious – the blood sample is tested under well-established protocol for the presence of alcohol and/or drugs. (see, *State v. Martines*, 2015)
- A cell phone search is complex, particularly as our cell phones have become mini-computers with a broad range of materials and ability to access information outside of their physical contents.

Cell Phone searches can't be merely "top to bottom" searches of the entire device and its contents – they have to be restricted to particular types and locations of data related to the suspected criminal activity.

3 SEARCH WARRANTS; CELL PHONE; SEARCH AND SEIZURE

State v. Fairley
No. 35616-7-III (February 18, 2020)
Court of Appeals, Division III

PRACTICE POINTER:

This case originated in 2013, and as technology has advanced, law enforcement practices and caselaw have continued to be refined. It would be highly unusual in 2020 for a search warrant to be requested that didn't specifically include language justifying and requesting the ability to search the seized item in a specific manner for the purpose of obtaining particularly described evidence.

- At a minimum, an application for a cell phone search warrant should cover the area of the phone to be searched, the type of content sought, and the time frame of the material.

Take particular care when applying for warrants to search cell phones and other technology that contains highly private information. Rely on the newest legal guidance, training, and forms in drafting your affidavit to ensure that you are in alignment with the most current technology and case law.

4 USE OF FORCE; §1983; QUALIFIED IMMUNITY; PURSUIT

Orn v. City of Tacoma

No. 18-35379 (February 3, 2020)
Ninth Circuit Court of Appeals

FACTS:

In 2011, an officer encountered Orn driving without his lights on and attempted to make a traffic stop. Seeing the officer, but knowing that he was driving his wife's car and she would need it to go to work, he began to drive toward his house. During the pursuit, Orn drove 25-35 mph, and stopped at stop lights. The original pursuing officer was joined by 2 other patrol cars. During an attempt to box the car in, Orn drove onto a curb to go around the officers and continued down a closed roadway.

The officers were able to guess based on the direction of travel and the return on the license plate that Orn was driving toward his home address. The primary officer knew the apartment complex had 2 entrances, and seeing that the man was driving into the south entrance, he drove around to the north entrance and used his patrol SUV to block the lane. As Orn entered the south entrance, he was trailed by the other patrol cars. He drove up to where the primary officer's SUV was parked, slowed, and came to a brief stop.

4 USE OF FORCE; §1983; QUALIFIED IMMUNITY; PURSUIT

Orn v. City of Tacoma

No. 18-35379 (February 3, 2020)
Ninth Circuit Court of Appeals

FACTS, cont.:

The primary officer was standing in the grassy area near his parked SUV. He had his gun drawn and pointing at the ground. He yelled commands for Orn to stop, but after a brief stop, Orn drove away from where the officer was standing. Orn attempted to navigate through a narrow opening between the passenger side of the officer's SUV and a nearby parked car by driving onto a curb onto a small patch of grass between the two vehicles and turning his car to the right. It was estimated Orn was driving 5 mph during this maneuver.

A second officer backed his patrol car into Orn's line of travel to attempt to cut off any path of escape through the apartment complex's north entrance. That cause Orn to turn his vehicle more sharply to the right to avoid hitting that officer's car. As he passed the first officer's SUV, Orn clipped the SUV's passenger-side rear quarter panel, and also struck the right front corner of the second officer's car. The first officer ran toward the passenger side of Orn's vehicle and began firing. The first round entered through the front passenger-side window, and the second and third rounds entered through the rear passenger-side window.

4 USE OF FORCE; §1983; QUALIFIED IMMUNITY; PURSUIT

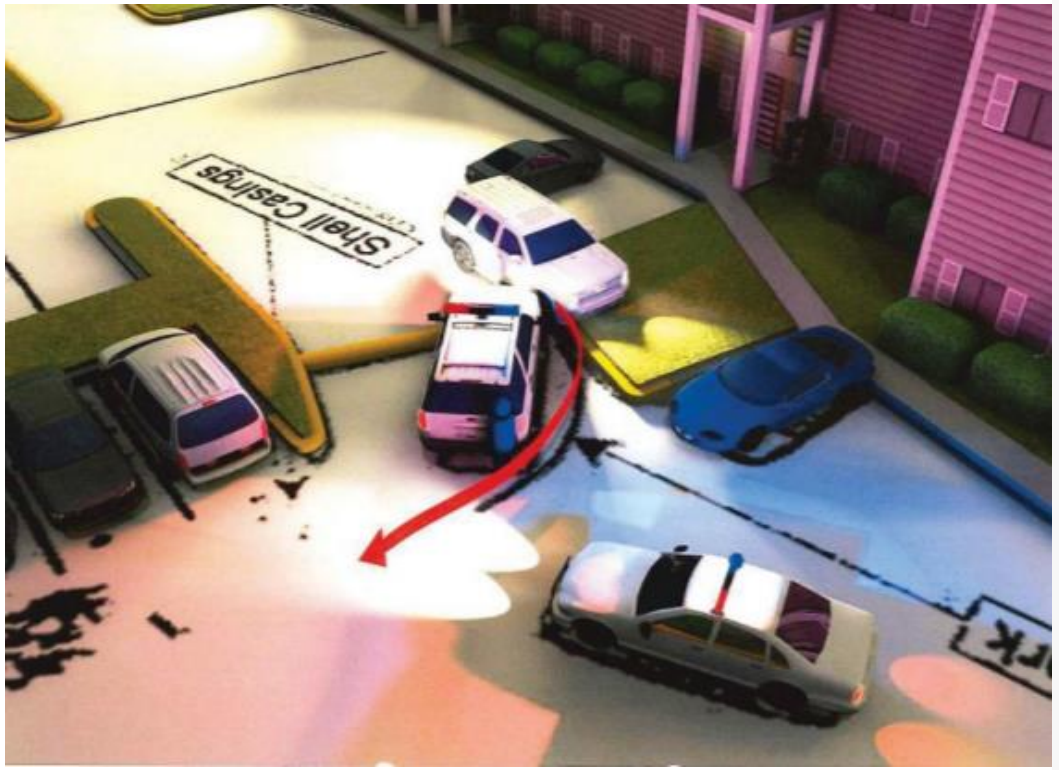
Orn v. City of Tacoma

No. 18-35379 (February 3, 2020)
Ninth Circuit Court of Appeals

FACTS, cont.:

Orn was struck in the spine, causing his body to go numb. He slumped into the passenger seat, and the engine of his vehicle revved loudly as his foot floored the accelerator. The primary officer ran behind the car as it sped away, firing seven more rounds through Orn's rear windshield.

Orn's vehicle continued forward, striking several parked cars before crashing into a chain-link fence. Officers took Orn into custody and summoned aid. Orn was ultimately paralyzed from the waist down as a result of the bullet that lodged in his spine.



4 USE OF FORCE; §1983; QUALIFIED IMMUNITY; PURSUIT

Orn v. City of Tacoma

No. 18-35379 (February 3, 2020)
Ninth Circuit Court of Appeals

FACTS, cont.:

Orn was charged with using his vehicle to assault the primary officer and attempting to elude. The jury found him not guilty of both charges, and guilty on a lesser-included offense of failure to obey a law enforcement officer.

He sued the officer and his employer under 42 U.S.C. §1983 alleging a violation of his 4th Amendment right to be free from the use of excessive force. The officer moved for summary judgment on the basis of qualified immunity, but the district court denied his motion. He now appeals that order.

4 USE OF FORCE; §1983; QUALIFIED IMMUNITY; PURSUIT

Orn v. City of Tacoma

No. 18-35379 (February 3, 2020)
Ninth Circuit Court of Appeals

PROCEDURAL NOTE - Summary Judgment Legal Standard:

In reviewing a lower court's ruling on a summary judgment motion, the court looks at the facts of the case in the light most favorable to the plaintiff. Therefore, legally, even if the officer's version of the facts contradicts the plaintiff's, it is the plaintiff's version that is taken as true for the purpose of evaluating the ruling.

- The primary officer contends that Orn's vehicle was heading directly for him, requiring the officer to jump out of the way to avoid being struck.
- As viewed under the summary judgment legal standard, the facts considered by the court are those favoring Orn's version, which was that Orn was not heading toward the officer who eventually fired his weapon.

4 USE OF FORCE; §1983; QUALIFIED IMMUNITY; PURSUIT

Orn v. City of Tacoma

No. 18-35379 (February 3, 2020)
Ninth Circuit Court of Appeals

TRAINING TAKEAWAY:

An officer is NOT entitled to qualified immunity for shooting a man during a slow speed pursuit when the law at the time was clearly established and prohibited the use of deadly force because the officer lacked an objectively reasonable basis for believing that his own safety was at risk when firing in to the side or rear of a vehicle moving away from him.

4 USE OF FORCE; §1983; QUALIFIED IMMUNITY; PURSUIT

Orn v. City of Tacoma

No. 18-35379 (February 3, 2020)
Ninth Circuit Court of Appeals

PROCEDURAL NOTE – QUALIFIED IMMUNITY TEST:

When an officer asserts a defense of qualified immunity, the court conducts a 2-part test:

(1) Do the facts taken in the light most favorable to the plaintiff show that the officer's conduct violated a constitutional right?

(2) If so,was the right in question clearly established at the time of the officer's actions, such that any reasonably well trained officer would have known that his conduct was unlawful?

4 USE OF FORCE; §1983; QUALIFIED IMMUNITY; PURSUIT

Orn v. City of Tacoma
No. 18-35379 (February 3, 2020)
Ninth Circuit Court of Appeals

TRAINING TAKEAWAY – QUALIFIED IMMUNITY:

The court determines whether an officer's use of force violates the 4th Amendment by balancing the nature of the intrusion on the suspect's rights against the governmental interest.

The 4 "Graham" Factors to be considered are:

- The severity of the crime;
- Whether the suspect poses an immediate threat to the safety of the officer or others;
- Whether the suspect is actively resisting arrest;
- Whether the suspect was attempting to evade arrest by flight. See, Graham v. Connor

4 USE OF FORCE; §1983; QUALIFIED IMMUNITY; PURSUIT

Orn v. City of Tacoma

No. 18-35379 (February 3, 2020)
Ninth Circuit Court of Appeals

TRAINING TAKEAWAY – Use of Deadly Force to Apprehend a Fleeing Suspect:

An officer may use deadly force to apprehend a fleeing suspect only if the officer has probable cause to believe that the suspect poses a threat of serious physical harm, either to the officer or to others.

Such a threat may exist if:

- **There is probable cause to believe he has committed a crime involving the infliction or threatened infliction of serious physical harm, or**
- **The suspect threatens the officer or others with a weapon capable of inflicting such harm.**

4 USE OF FORCE; §1983; QUALIFIED IMMUNITY; PURSUIT

Orn v. City of Tacoma

No. 18-35379 (February 3, 2020)
Ninth Circuit Court of Appeals

TRAINING TAKEAWAY – Moving Vehicle as Deadly Weapon:

A moving vehicle can pose a threat of serious physical harm, but only if someone is at risk of being struck by it.

- **An officer who fires into the side or rear of a vehicle moving away from him lacks an objectively reasonable basis for claiming that he did so out of fear for his own safety.**

Looking at the facts in the light most favorable to Orn, the officer was never at risk of being struck by Orn's car because he was never in the vehicle's path of travel.

- As Orn's car moved past the officer's SUV, the officer ran toward the passenger side of Orn's vehicle and opened fire through the passenger side window.
- At that point, the officer could not have reasonably feared for his own safety because he was on the side of Orn's vehicle as it was travelling away from him.
- The officer was also not in harm's way when he fired the second time after chasing after Orn's car and firing through the rear windshield.

4 USE OF FORCE; §1983; QUALIFIED IMMUNITY; PURSUIT

Orn v. City of Tacoma

No. 18-35379 (February 3, 2020)
Ninth Circuit Court of Appeals

TRAINING TAKEAWAY – Moving Vehicle as Deadly Weapon:

The officer's contention that his version of the facts should be used to conclude that he was in reasonable fear for his safety does not meet the "blatantly contradicts" standard necessary to stray from using the facts in the light most favorable to Orn. See, Scott.

- Even when examined according to the officer's version of the facts, the suspect's car was only moving at 5 miles per hour. The officer therefore could have avoided any risk of being hit by the car by simply taking a step backwards.

4 USE OF FORCE; §1983; QUALIFIED IMMUNITY; PURSUIT

Orn v. City of Tacoma

No. 18-35379 (February 3, 2020)
Ninth Circuit Court of Appeals

TRAINING TAKEAWAY – Danger to Others:

Although the first officer reasonably (but mistakenly) believed that his partner had exited the SUV and may have been standing in the area where the suspect's vehicle was headed, and that his actions were therefore justified to protect him, that becomes moot if a jury could conclude that the first officer had never been at risk of being struck by the car.

Given the slow speed of the entire pursuit, there was also no evidence to support that Orn was a threat to the public in his attempted flight.

- *Although the officer's version of the facts of the case aren't considered in this determination of whether he is eligible for qualified immunity, the disputed facts will be what the jury will weigh in making its determination of fault at trial.*

4 USE OF FORCE; §1983; QUALIFIED IMMUNITY; PURSUIT

Orn v. City of Tacoma

No. 18-35379 (February 3, 2020)
Ninth Circuit Court of Appeals

TRAINING TAKEAWAY – Existence of Established Law:

Qualified immunity is designed to ensure that officers receive fair notice of the illegality of their conduct, and therefore demands more than a general standard due to the highly fact-based nature of the cases.

At the time of this incident (2011), at least 7 federal circuit courts had ruled that an officer lacks an objectively reasonable basis for believing that his own safety is at risk when firing into the side or rear of a vehicle moving away from him.

The officer's position again rests on asking the court to examine the case from his version of the facts.

However, even if that were to happen, the 9th Circuit had previously ruled that if a fleeing vehicle is moving slow enough to allow the officer to step to the side to avoid being hit, then it does not justify the use of deadly force. See, Acosta v. City and County of San Francisco (1996)

The officer is not entitled to a defense of qualified immunity because he violated the suspect's right to be free from excessive force when he shot into the passenger and rear windows of the suspect's car as it drove away from him, and the violation of that right was clearly established at the time of the incident.

COVID-19

SAFE SERVICE OF ORDERS

The King County Prosecutor's Office has issued a legal advisory regarding safe and legal service of Civil Protection Orders and DV No Contact Orders during the COVID-19 pandemic.

You can reference it here: KCPAO LE Advisory - Order Service during Covid19

BREATH TESTING

The WSP Impaired Driving Section has issued a best practices guide for breath testing suspected impaired drivers during the COVID-19 pandemic.

You can reference it here: Best Practice for Breath Testing During COVID19

REMINDER: Always consult with your agency legal advisor before altering any practice or procedures.

COVID-19

WASPC has created an extensive list of COVID-19 resources and guidance for Washington law enforcement.

Access the page here: **WASPC COVID-19 Guidance for Law Enforcement**

REMINDER: Always consult with your agency legal advisor before altering any practice or procedures.

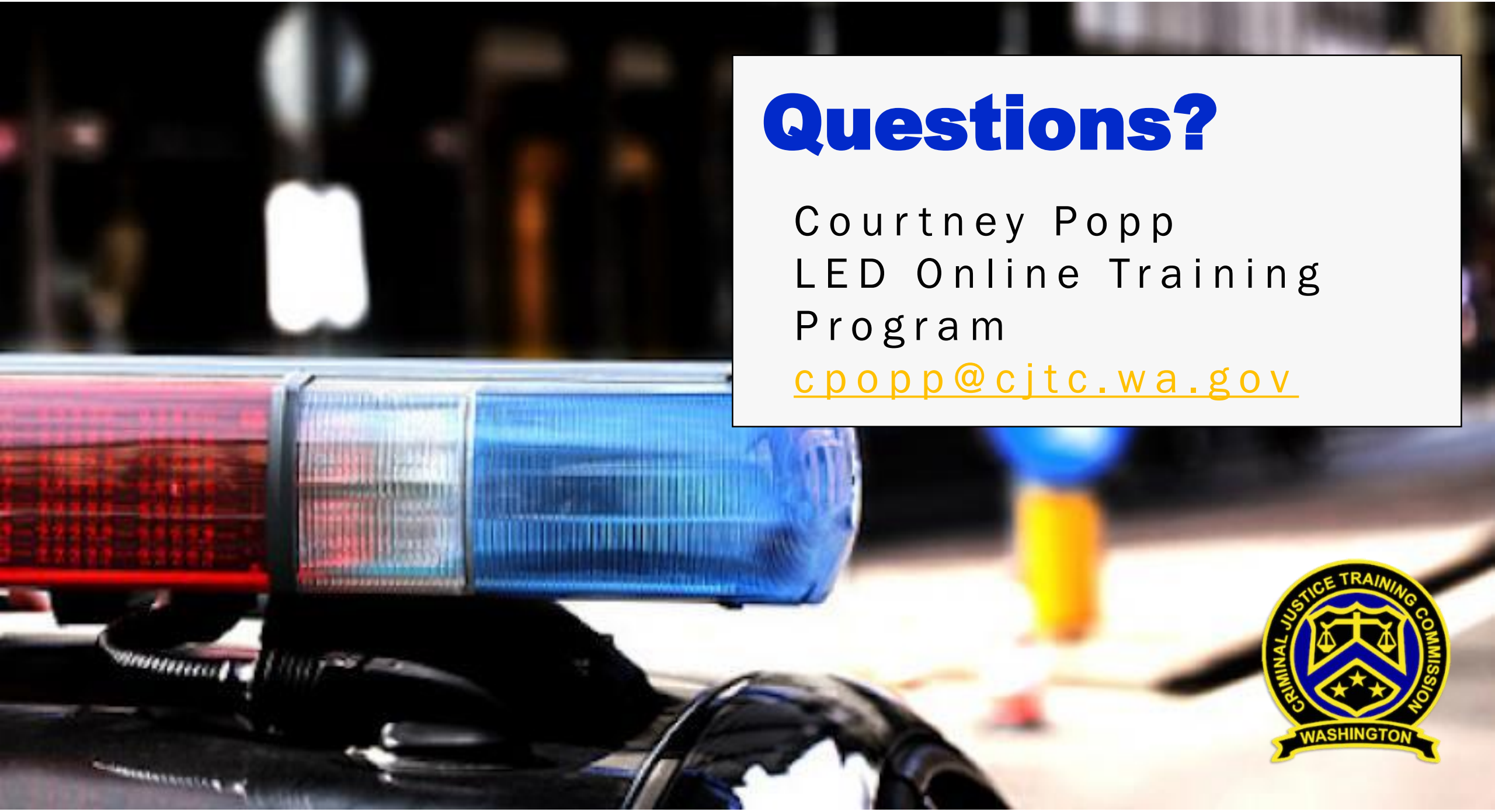
FURTHER READING

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?

Courtney Popp
LED Online Training Program
cpopp@cjtc.wa.gov