STATE OF WISCONSIN

COURT OF APPEALS

DISTRICT IV

Case No. 2015AP0195 – CR

STATE OF WISCONSIN,

Plaintiff-Respondent,

v.

STEVE C. DETERDING,

Defendant-Appellant.

Appeal from an Order Denying Defendant's Motions to Suppress Entered in the Dane County Circuit Court, the Honorable Mariann Sumi, presiding

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BRIEF-IN-CHIEF AND APPENDIX OF DEFENDANT-APPELLANT

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Statement on Oral Argument

The issues presented by this appeal are simple and based primarily and evidentiary and factual grounds. The issues presented can be addressed fully without the need for oral argument. This appeal does present new legal issues or relate to a possible change of law. Therefore, oral argument is not recommended and publication is recommended.

Statement of the Issues

I. Whether the trial court erred when it allowed the removal of the bottle from Appellant's pocket?

Answered by the trial court: No.

II. Whether the trial court erred in concluding that Trooper Larson had an adequate basis for field sobriety tests?

Answered by the trial court: No.

Summary of the Arguments

I. The trial court, in error, allowed the removal of the bottle in Appellant's pocket. The trial court found that because Trooper Larson did not immediately recognize the object in Appellant's pocket, Terry allowed removal of the object.

II. The trial court, in error, concluded that Trooper Larson was justified in conducting field sobriety tests. This conclusion was based on the total facts not suppressed at the trial court level, however, the trial court erred in allowing the bottle into evidence. Because the bottle should have been suppressed

and without the bottle there was no reason to extend the stop to include field sobriety tests. Therefore the trial court erred in allowing field sobriety tests.

Statement of the Case

I. Procedural Background

The defendant-appellant, Steve Deterding (hereinafter Appellant), was charged with Operating While Intoxicated-5th Offense contrary to Wis. Stat. § 346.63 (1)(a). (Crim. Compl., R. at 2, Aug. 22, 2013). Appellant waived his preliminary hearing and not guilty pleas were entered on his behalf. (Waiver of Right to Prelim. Hr'g, R. at 6, Sept. 23, 2013; Arraignment Hr'g, 3:5-11). Appellant filed three motions to suppress. (R. at 9-11, Nov. 21, 2013). A motion hearing was held on all three issues on February 18, 2014. (R. at 12, Feb. 18, 2014).

At the motion hearing, the court ordered that any evidence collected from within Appellant's vehicle be suppressed. (Mot. Hr'g 65:17-20; 66:16-20, Feb. 18, 2014). The court denied the other two motions. (Mot. Hr'g 67:5-7). After the denial of motions 1 and 3, Appellant entered a plea and was sentenced by the court. (R. at 17, 20; Plea Hr'g 7:7-11, May 12, 2014). Appellant was subsequently revoked from probation and sentenced following revocation. (R. at 31-35). This appeal follows.

II. Factual Background

On April 16, 2013, Appellant was driving his vehicle on Interstate 39/90/94 near DeForest, Wisconsin. (Mot. Hr'g 7:18-8:9). At approximately 4:13 p.m.,

State Trooper Timothy Larson received a call regarding erratic driving and received a description of a black Ford Taurus with a specific license plate number. (Mot. Hr'g 8:5-23). Trooper Larson received additional calls regarding this vehicle, including that it had struck a barrier near Highway 151. (Mot. Hr'g 9:11-15). Trooper Larson stopped behind the vehicle and made contact with Appellant, who was trying to change a tire. (Mot. Hr'g 9:24-25).

Trooper Larson asked Appellant about the erratic driving and Appellant reported that he was falling asleep while driving. (Mot. Hr'g 12:6-10). Appellant further reported that he had been working since 4 a.m. (Mot. Hr'g 12:12-16). During this conversation, Appellant had been pacing. (Mot. Hr'g 13:13-14). Also while speaking to Appellant, Trooper Larson observed a small knife with a clip in Appellant's front pants pocket. (Mot. Hr'g 14:13-23). Trooper Larson removed the knife from Appellant's pocket. (Mot. Hr'g 15:1).

Trooper Larson then conducted a pat down search of Appellant. (Mot. Hr'g 15:17-20). Trooper Larson felt a large hard object in Appellant's front pants pocket, which Trooper Larson could not identify by feel. (Mot. Hr'g 15:19-23). Trooper Larson testified that it was not readily apparent that the item was not a weapon. (Mot. Hr'g 15:24-16:1). Further, Trooper Larson testified, "I felt a hard object. I didn't know what it was." (Mot. Hr'g 40:16-17). Trooper Larson continued that, "I guess I can't describe hard. It was a thick, plastic bottle," when pressed to describe what the object felt like during the pat-down. (Mot. Hr'g 40:20-21). At this point, Appellant's trial counsel continues, "It didn't fit the idea

of the feeling of any weapon that you're aware of, did it?" to which Trooper Larson responded, "I don't know until I pull it out to find out what it is." (Mot. Hr'g 40:22-25). Trooper Larson removed the item from Appellant's pocket and determined that it was a plastic bottle filled with urine. (Mot. Hr'g 16:2-7). Trooper Larson asked Appellant what the urine was for, to which Appellant replied a drug test for work. (Mot. Hr'g 16:15-19). After the pat down, Trooper Larson placed Appellant in the back seat of his squad car to wait for backup. (Mot. Hr'g 17:5-3:6).

While in the squad car, Trooper Larson and Appellant had a conversation about the urine discovered on Appellant. (Mot. Hr'g 18:1-5). Appellant told Trooper Larson that he kept the urine for work drug tests because he smoked marijuana from time to time. (Mot. Hr'g 18:7-8). Appellant denied smoking any marijuana that day. (Mot. Hr'g 18:9-13). After the conversation, Trooper Larson began searching Appellant's vehicle. (Mot. Hr'g 18:20-21).

Trooper Larson stated that his purpose for searching the vehicle was to determine what substance Appellant was under the influence of that day. (Mot. Hr'g 19:5-6). However, Trooper Larson indicated that the only signs of impairment beyond the driving was that Appellant was continually pacing. (Mot. Hr'g 18:9-12). Notably absent was the odor of alcohol or marijuana on Appellant's person. (Mot. Hr'g 38:20-22). During the search, Trooper Larson discovered a burnt marijuana cigarette, plastic bags and alcohol prep pads. (Mot. Hr'g 19:21-20:3). Trooper Larson testified that the plastic bags would be

consistent with storage of illegal substances. (Mot. Hr'g 20:6-7). He also testified that the alcohol prep pads would be consistent with the type used to prep injection sites. (Mot. Hr'g 20:10-12). However, Trooper Larson conceded that the prep pads could be used for completely benign purposes. (Mot. Hr'g 42:23-25).

After the search, Trooper Larson removed Appellant from the scene to conduct field sobriety tests. (Mot. Hr'g 20:23-24). Appellant was taken approximately one-half mile from the scene to an area that had a flat level surface for field sobriety tests. (Mot. Hr'g 21:2-9). Trooper Larson conducted the standard three test field sobriety tests. (Mot. Hr'g 22:10-12). Trooper Larson also conducted a preliminary breath test with a result of 0.00. (Mot. Hr'g 25:5-7). After completion of the field sobriety tests and preliminary breath test, Trooper Larson placed Appellant under arrest. (Mot. Hr'g 25:13-14).

Argument

I. Standard of Review

"In reviewing the denial of a motion to suppress evidence, [the court] will uphold the circuit court's findings of fact unless they are against the great weight and clear preponderance of the evidence. State v. McGill, 234 Wis. 2d 560, 567-68 (2000). The court will "then independently review those facts to determine whether the constitutional requirement of reasonableness is satisfied. Id., at 568.

II. The Trooper Did Not State Sufficient Facts to Justify Removing the Plastic Bottle From Appellant's Pocket.

Appellant takes no issue with the initial contact by police with Appellant and with Trooper Larson's initiating a pat-down for weapons. Trooper Larson was responding to several calls of erratic or dangerous driving on the highway. Subsequently, Trooper Larson located a vehicle matching the description with matching licenses plates. Trooper Larson observed an individual, Appellant, outside of the car, which had a flat tire. Trooper Larson began contact with Appellant, and during a discussion of what had happened, observed a knife in Appellant's pocket. Trooper Larson asked to be allowed to remove the knife, which he was allowed to do by Appellant, and then proceeded to perform a pat-down for other weapons on Appellant. Because "Terry allows a pat-down when an officer is justified in believing that the person being investigated at close range is armed and presently dangerous," Appellant does not take issue with the initial contact or initiating a pat-down. Minnesota v. Dickerson, 508 U.S. 336, 373 (1993).

The violation of Appellant's rights occurred not from doing a pat-down, but from when Trooper Larson reached into Appellant's pocket and removed a plastic bottle, which ultimately contained urine. A Terry frisk "must be strictly limited to that which is necessary for the discovery of weapons which might be used to harm the officer or others nearby." Id. "The scope of a Terry search must be limited to a pat-down reasonably designed to discover guns, knives, clubs or other hidden

instruments for the assault of the police officer." State v. Guy, 172 Wis. 2d 86, 100 (1992) (quoting Terry v. Ohio, 392 U.S. 1, 29 (1968)).

> A Terry frisk is not to see if the defendant is hiding something that may be evidence of illegal activity. As the U.S. Supreme Court has made clear, "nothing in Terry can be understood to allow a generalized cursory search for weapons or, indeed, any search whatever for anything but weapons."

McGill, 234 Wis. 2d at 581 (Abrahamson, dissenting) (quoting, 234 Wis. 2d at 581 (Abrahamson, dissenting) (quoting Ybarra v. Illinois, 444 U.S. 85, 93-94 (1979)). Dickerson expanded the plain sight doctrine to also include the "plain-feel" doctrine, which applies during a pat-down. *See* Dickerson, 508 U.S. at 375-76). Plain-feel and plain-sight are governed by a shared rule that for either to apply, "the evidence must be in plain view [or plain feel], the officer must have a lawful right of access to the object itself, and the object's incriminating character must be immediately apparent." Guy, 172 Wis. 2d at 101 (internal quotes omitted).

Trooper Larson, given the above rules, failed to provide the necessary suspicion or probable cause to justify the removal of the bottle from Appellant's pocket. Trooper Larson testified that he felt a hard object; a thick plastic bottle. Trooper Larson never testified to any reason that he believed the object to be contraband. "If . . . the police lack probable cause to believe that an object in plain view is contraband without conducting some further search of the object – i.e. if its incriminating character is not immediately apparent, the plain-view doctrine cannot justify its seizure." Dickerson, 508 U.S. at 375 (internal quotes omitted). By the feel of the object, it appears that Trooper Larson was able to determine that

it was, at least likely to be, a plastic bottle. Trooper Larson certainly did not indicate that it felt like something that could be or contain contraband.

However, removal of the bottle did not appear to be justified on the theory that the bottle was likely contraband. Instead, the State, at the trial court level, relied on the reasoning of Triplett and an effective pat-down justification. Denying Appellant's motion to suppress on this reasoning was error.

Triplett held that "an officer is entitled not just to a pat-down but to an *effective* pat-down in which he or she can reasonably ascertain whether the subject of the pat-down has a weapon; where an effective pat-down is not possible, the officer may take other action reasonably necessary to discover a weapon." State v. Triplett, 2005 WI App 255 ¶12 (emphasis in original). In Triplett, the Court of Appeals applied the effective pat-down rule to a situation where the officer could not effectively feel near the subject's waist due to the subject's frame and heavy clothing. Id. at ¶¶5, 14. The officer in Triplett confined his pat-down to the outer clothing by wiggling or shaking the belt loop of the subject, which caused a baggie of cocaine to free itself and fall from the subject's pants. *See* Id. Triplett does not, and cannot, stand for the proposition that an officer may do anything to gain an effective pat-down, but must, instead, restrain himself or herself to reasonable searches based on the scenario involved. Id. at ¶13.

Triplett implicitly recognizes that an officer must limit the expansion of a Terry pat-down to the "least intrusive means available." Triplett at ¶15 (internal citation omitted). The same effective pat-down rule came into play in State v.

Limon, where the Court of Appeals applied the effective pat-down rule to the search of a purse. *See* State v. Limon, 2008 WI App 77, ¶¶8, 36, 41. Limon presented unique circumstances where officers responded to a loitering and drug use complaint, discovered three persons at the location, observed marijuana and were outnumbered. Id. at ¶¶3-6. One of the officers asked to see Limon's purse – which she apparently handed over willingly – and looked inside. Id. at ¶8. Important to the decision in Limon is that the court expressly rejected the private nature of a purse when compared to the concern for officer safety. Id. at ¶39.

The Triplett effective pat-down analysis is inapplicable to the present case for several reasons. First, there were no unique hindrances to the pat-down. Trooper Larson never indicated that he could not access an area or get a good feel of what the objects in Appellant's clothing were. In fact, Trooper Larson testified that he felt a hard object; that it was a "thick, plastic bottle." (Mot. Hr'g 40:20-21). Trooper Larson was able to ascertain the general character of the item. Second, unlike in Limon, Trooper Larson was not outnumbered, was not responding to a complaint of criminal activity, nor had he observed any criminal behavior at the point of the pat-down. Finally, it does not appear that the trial court relied on such a rational, but instead focused on an atypical weapon rational. Therefore, none of the rationales relating to contraband could have justified Trooper Larson's reach into Appellant's pockets. This is made even clearer by the fact that the court based its decision on an atypical weapon theory.

In its argument, the State ignored the basic dictate of Dickerson. "A protective search – permitted without a warrant and on the basis of reasonable suspicion less than probable cause – must be strictly 'limited to that which is necessary for the discovery of weapons which might be used to harm the officer or others nearby.'" Dickerson, 508 U.S. at 373. The State argued that an effective pat-down under Triplett was allowed here, but presented no facts that would justify an intrusion into Appellant's pocket. Trooper Larson had alternative avenues to address what was felt in Appellant's pocket – a simple question as to what the item was would have revealed its non-threatening nature – but reaching into Appellant's pocket, a place of heightened privacy, was not one of those avenues. And, to consider the inside of a pocket less or equally private as the outside of the clothing ignores both the sensitive nature of a pants pocket – given its proximity to the groin and thin layer of cloth – and the basic procedure approved of in Terry. The State's position that an effective pat-down allows the penetration of a pocket for removing an item would swallow the rule in Dickerson and Terry. Nearly every object an officer feels during a pat-down would not be absolutely identifiable by touch. An officer is not likely to be able to discern whether a hard item in a pants pocket is a wallet, a cell phone, a cigarette case or any other number of items. And because the officer could not "know" what it was, the officer would then be able to reach into a person's pocket to identify what the hard item was, be it a wallet, cell phone, or, in this case, a plastic bottle. "Where, as here, 'an officer who is executing a valid search for one item seizes a different

item,' this Court rightly 'has been sensitive to the danger . . . that officers will enlarge a specific authorization, furnished by a warrant or exigency, into the equivalent of a general warrant to rummage and seize at will.'" Dickerson, 508 U.S. at 378.

This does not necessarily require that an officer be convinced the object is a weapon. McGill, 234 Wis. 2d at 575. "All that is required is a *reasonable belief* that the object might be a weapon. Id. (emphasis in orginal). "The words 'could be' and 'did not know' are not those of probable cause or immediate apparency." Id. at 585 (Abrahamson, dissenting). The same can be said of reasonable suspicion or reasonable belief. Not knowing is not the same as believing something could be. Trooper Larson testified that he felt a hard object; a thick plastic bottle. Not only does it appear that Trooper Larson was allowed an effective pat-down – he was able to describe the item as a thick plastic bottle – without removing the item, he never evinced any belief that the item was a weapon, nor that it was probably contraband. Instead, he felt a bottle, not something he described as being consistent with a weapon, and decided it was something he wanted to take a look at without having any particularized reason for doing so. This flaw leads directly to the flaw in the reasoning of the trial court.

The trial court focused its decision on a risk of atypical weapons as a justification for removing the bottle. Specifically, the court stated:

> He performs a pat down. He feels a hard object. Now, it does not have to be a gun or something that feels like a gun to warrant taking it out of the pocket. It could be an explosive device. It could be something that could be

> detonated. It could be a can of Mace as Mr. Olsen brings up, but it's something unusual that ordinarily would not be carried in a pocket.

(Mot. Hr'g 64:14-21). This reasoning defies all logic and common sense. The trial court casually accepts without reason or explanation that Appellant – or any citizen – could be traveling around with some sort of explosive in his front pocket. Trooper Larson expressed no such concern. There was nothing about Appellant that may have raised such a concern. Trooper Larson was not investigating a terror cell or responding to a bomb threat. There was no indication from Appellant that he may have a bomb or, for that matter, any other weapons. Appellant's willingness to allow Trooper Larson to seize the knife begs the question of why would Appellant then jeopardize both the officer's life and his own to detonate a bomb? Finally, this type of wild hypothesizing ignores the basic concerns addressed in Terry, that a suspect may have concealed a gun, club or knife; weapons more commonly used to endanger officers in the line of duty. *See* Terry, 392 U.S. at 29.

Wisconsin has not directly addressed the issue of atypical weapons but guidance can be found in foreign jurisdictions. California appears to be the first jurisdiction to address the issue. In People v. Collins, the California Supreme Court held:

> that an officer who exceeds a pat-down without first discovering an object which feels reasonably like a knife, gun, or club must be able to point to specific and articulable facts which reasonably support a suspicion that the particular suspect is armed with an atypical weapon which would feel like the object felt during the pat-down.

People v. Collins, 1 Cal.3d 658, 663, 463 P.2d 403 (Cal. 1970). The California Supreme Court specifically disapproved of fanciful speculation such as that in People v. Armenta, where it was theorized that a soft object might have been a rubber water pistol loaded with carbolic acid. *See* Id.; State v. Brisendine, 13 Cal.3d 528, 543-44, 532 P.2d 1099 (Cal. 1975). Georgia has addressed this issue numerous times, including as recently as 2002, when it explained that:

> to satisfy the Fourth Amendment when dealing with what may be an unusual weapon, "an officer must provide specific and articulable facts which reasonably support a suspicion that the particular suspect is armed with an atypical weapon which would feel like the object felt during the pat-down.

Howard v. State, 558 S.E.2d 745, 747, 253 Ga. App. 158 (Ga. App. 2002).

The rationale should be the same here. Trooper Larson had other avenues available to him short of removing the item; e.g. tracing the contours of the object from outside the clothing. There was nothing special about Appellant that would justify reaching into his pocket to examine an object that "could be an explosive device." Allowing the type of fanciful speculation like that of the trial court would eviscerate Terry, Dickerson, and their progeny.

Allowing the type of intrusion committed in the present case leaves no protection for the privacy of citizens. It is not hard to envision using this rationale to justify removal of nearly all items on the person of someone subjected to a pat-down. If the officer "doesn't know" what the item is, he or she gets to remove the item and inspect it closely. That may be the best way to guarantee officer safety, but "in our country police officers do not have this power. Police officers are not

authorized under the federal constitution to frisk every person they stop." McGill, 234 Wis. 2d at 579 (Abrahamson, dissenting) (citing Sibron v. New York, 392 U.S. 40, 64, 20 L. Ed. 2d 917, 88 S.Ct. 1889 (1968)). That same prohibition extends to expanding the scope of a Terry frisk. The officer must have some expanded reasonable suspicion. Although there is a slight risk that this bottle was an explosive (or mace, which seems unlikely given the size and shape of the bottle), the slight risk involved does not outweigh a citizen's right to be free from unreasonable searches and seizures; it does not justify penetrating the outer clothing and reaching into a person's front pocket, a place of high privacy.

Finally, even if removal of the bottle from Appellant's pocket is allowable, any follow-up at that point is still a violation of Dickerson. Once the bottle was removed, it would be apparent that it was no sort of weapon, but Trooper Larson proceeded to question Appellant about the bottle anyway. Questioning about items that are not weapons is an intrusion beyond the scope of a Terry frisk. *See* U.S. v. Lemons, 153 F.Supp.2d 948, 959 (E.D. Wis. 2001). "An overreaching investigation includes questioning that falls outside the scope of the purpose for the seizure." Id. (internal citation omitted). Therefore, even if removal was allowed, questioning about the bottle still amounts to a Dickerson violation and the information about its contents and purpose must be suppressed.

III. The Trial Court Erred When it Found an Adequate Basis for Field Sobriety Tests

Two separate questions are posed at this point. The first and simple question is whether the trial court erred by finding an adequate basis for field sobriety tests based on the evidence not suppressed at the trial court level. Specifically, whether Appellant's erratic driving, possession of urine to pass a drug test and admission to using marijuana in the past, but not recently gives an adequate basis for field sobriety tests. There is likely no error based on these factors. However, if this court finds that the bottle of urine is inadmissible, the trial court could not have found that Trooper Larson had the necessary suspicion to conduct field sobriety tests.

If the search of Appellant's pocket is found to be a violation, either at the time Trooper Larson reached into Appellant's pocket or at the point when Trooper Larson questioned Appellant about the bottle, the analysis changes for allowing field sobriety tests. However, the conclusion is the same whether the violation regarding the bottle occurred at the time it was seized or when Trooper Larson questioned Appellant about it. Trooper Larson did not have an adequate basis for requesting field sobriety tests.

If this court finds error in allowing the urine bottle, any evidence gathered as a result must also be suppressed. The exclusionary rule "extends to both tangible and intangible evidence that is fruit of the poisonous tree or, in other

words, evidence obtained 'by exploitation of' the illegal government action." State v. Felix, 2012 WI 36, ¶30.

Although it does not appear that Wisconsin has ever made any specific holding on what level of suspicion is necessary for field sobriety tests, the State at the trial court level focused on probable cause to detain for field sobriety tests. This was likely done due to the taking of Appellant to another location for field sobriety tests. However, for the purposes of this appeal, the level of proof necessary is largely irrelevant because Trooper Larson, without the urine bottle, would not have had even a reasonable suspicion to request field sobriety tests. For that reason, and because if reasonable suspicion is lacking probable cause will also be lacking, this brief will focus on reasonable suspicion.

Assuming, *arguendo*, that the bottle of urine is suppressed, in some manner, which leaves Trooper Larson with only erratic driving as a basis for field sobriety tests. Trooper Larson had received several complaints of erratic driving and observed Appellant pacing outside his car, which had a flat tire. Trooper Larson was told by Appellant that he was tired due to a long day at work. This information does not amount to reasonable suspicion that criminal activity – operating while intoxicated – is afoot. The situation may have been different had Trooper Larson observed an odor of alcohol or illegal drugs, but he did not. The situation may also have been different if Appellant had admitted to recent drug use or there was some other indication of drug use (e.g. track marks or injection sites) or if Appellant had slurred or slow speech. However, except for the erratic driving,

no indications of intoxication were present to justify the extension of the stop for field sobriety tests. Therefore, because without the urine bottle there was no grounds for field sobriety tests, the field sobriety tests and their fruits – the blood draw and its results – must be suppressed.

Conclusion

For these reasons the decision of the trial court on February 18, 2014 finding that Trooper Larson was allowed to remove the urine bottle during a pat-down should be reversed. Further, the decision of the trial court to allow Trooper Larson to request Appellant perform field sobriety tests should also be reversed.

Dated this _____ day of _____, 2015.

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Certification as to Form/Length

I hereby certify that this brief conforms to the rules contained in §809.19(8)(b) and (c) for a brief and appendix produced with a proportional serif font. The length of the brief is 4,685 words.

This brief was prepared using *Microsoft Word 2013* word processing software. The length of the brief was obtained using the Word Count function of the software.

Dated this _____day of _____, 2015.

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I hereby certify that I have submitted an electronic copy of this brief, excluding the appendix, if any, which complies with the requirements of § 809.19 (12).

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Dated this _____day of _____, 2015.

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