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STATE OF WASHINGTON

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BY RONALD L. CARPENTER

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IN THE SUPREME COURT OF THE STATE OF WASHINGTON

STATE OF WASHINGTON,

Petitioner,

v.

JESUS DAVID BUELNA VALDEZ AND

REYES RIOS RUIZ,

Respondents.

No. 80091-0

Clark County No.05-1-01064-9 AND

05-1-01065-7

STATEMENT OF ADDITIONAL  
AUTHORITIES

Pursuant to RAP 10.8, the Petitioner, State of Washington, represented by the Prosecuting Attorney for Clark County, by and through his Deputy, Michael C. Kinnie, hereby submits the following authorities in line with the synopsis of the issue posted by the Supreme Court.

Whether a narcotics dog sniff of the exterior and interior of the defendant's van incident to his arrest constituted a search under article I, section 7 of the Washington Constitution, and if so, whether the search was lawful.

**State**

State v. Flores-Moreno, 72 Wn. App. 733, 866 P.2d 648, review denied,

124 Wn.2d 1009, 879 P.2d 292 (1994)

State v. Dearman, 92 Wn. App. 630, 635, 962 P.2d 850 (1998), *review denied*,

Statement of Additional Authorities - 1

CLARK COUNTY PROSECUTING ATTORNEY  
1013 FRANKLIN STREET • PO BOX 5000  
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1 137 Wn.2d 1032, 980 P.2d 1286 (1999)

2 State v. Wolohan, 23 Wn. App. 813, 598 P.2d 421 (1979), *review denied*,

3 93 Wn.2d 1008 (1980)

4 State v. Boyce, 44 Wn. App. 724, 726, 723 P.2d 28 (1986)

5 State v. Stanphill, 53 Wn. App. 623, 630-31, 769 P.2d 861 (1989)

6 State v. Jackson, 82 Wn. App. 594, 606, 918 P.2d 945 (1996) *review denied*,

7 131 Wn.2d 1006, 932 P.2d 644 (1997).

8 State v. Young, 123 Wn.2d 173, 187-88, 867 P.2d 593 (1994)

9  
10 ***Federal***

11  
12 Illinois v. Caballes, 543 U.S. 405, 125 S. Ct. 834, 838, 160 L. Ed. 2d 842 (2005)

13 United States v. Place, 462 U.S. 696, 103 S. Ct. 2637, 77 L. Ed. 2d 110 (1983)

14 United States v. Williams, 69 F.3d 27, 28 (5th Cir. 1995) *cert. denied*,

15 116 S. Ct. 1284 (1996)

16 United States v. Diaz, 25 F.3d 392, 394 (6th Cir. 1994)

17 United States v. Ludwig, 10 F.3d 1523, 1527 (10th Cir. 1993)

18 Florida v. Royer, 460 U.S. 491, 506, 103 S. Ct. 1319, 75 L. Ed. 2d 229 (1983)

19 United States v. Lingenfelter, 997 F.2d 632, (9th Cir. 1993)

20  
21 Respectfully submitted this 28 day of April, 2008.

22  
23 ARTHUR D. CURTIS  
24 Prosecuting Attorney  
25 Clark County, Washington

26 By:

  
MICHAEL C. KINNIE, WSBA #7869  
Senior Deputy Prosecuting Attorney