

STATE OF IDAHO }
COUNTY OF KOOTENAI } SS
IN THE DISTRICT COURT OF THE FIRST JUDICIAL DISTRICT OF THE STATE OF IDAHO FILED:

IN AND FOR THE COUNTY OF KOOTENAI

2018 MAY -9 AM 10:45

THE STATE OF IDAHO

Plaintiff,

vs.

Tanner, Jaron Andrew

Defendant,

DOB: 9-22-92

SSN: [REDACTED]-4945

DL#: CC231138E

State: ID

COURT CASE #: CR28-18-7132

DEPARTMENT REPORT #: 18-18802

CLERK DISTRICT COURT

PROBABLE CAUSE DECLARATION IN SUPPORT

OF WARRANTLESS ARREST AND/OR

REFUSAL/FAILURE OF EVIDENTIARY TEST AND

ORDER FINDING PROBABLE CAUSE

Molly R. [Signature]
DEPUTY

I, Sgt J. Hyle #2318, the undersigned, hereby declare and/or otherwise state that the following is true and correct:

1. I am a peace officer employed by the Kootenai County Sheriff's Office.
2. The above named defendant was arrested on the 9th day of May, 2018 at the time of 0217 for the offense(s) [list offense(s) and code] and/or (check any applicable boxes below)
 - ☐ Driving under the influence of alcohol, drugs or other intoxicating substances, Idaho Code 18-8004.
 - ☐ Second DUI offense in the last ten (10) years, prior offense date and location:
 - ☐ Two or more DUI offenses in the last ten (10) years, prior offense dates and locations:
 - ☐ Driving without privileges, Idaho Code 18-8001.
 - ☒ Possession of controlled substance, Idaho Code 37-2732 ☒ felony ☐ misdemeanor
 - ☒ Possession of paraphernalia, Idaho Code 37-2734A.
 - ☐ Reckless driving, Idaho Code 49-1401.
 - ☐ Domestic battery, Idaho Code 18-918.
3. Location of Occurrence: Hayden x Schmidt, Kootenai County, Idaho.
4. The above named defendant was identified as: Jaron A. Tanner
 - ☐ Military ID ☐ State ID Card ☐ Student ID Card ☒ Driver's License ☐ Credit Cards
 - ☐ Paperwork found ☐ Verbal ID by defendant
 - ☐ Witness: identified defendant.
 - ☐ Other:
5. ☐ Actual physical control established by: ☐ Observation by declarant ☐ Observation by Officer
 - ☐ Admission of Defendant to: , ☐ Statement of Witness:
 - ☐ Other:

☐ This is an arrest initiated by a private citizen. The basis for the request for the issuance of a Complaint is set forth in the police report attached and incorporated herein. The information and statements provided to me by , the complaining party, are true and correct to the best of my knowledge.
5. I believe that there is probable cause that the above described offense(s) was (were) committed by the defendant based on the following facts: On 5/9/18 at approximately 0217 hours, I (Sgt Hyle) conducted a traffic stop on a vehicle for speeding doing 31 mph in a 25 mph zone on Government x Dakota after it was seen stop at a known drug house for a short amount of time.. As the vehicle began to stop on Hayden x Schmidt, it quickly pulled back onto the road, crossed the road and pulled into the Super 1 parking lot

before stopping. The driver was identified as Jaron A. Tanner by his Idaho DL. During the stop, a PFPD K9 responded and alerted to the odor of narcotics coming from the vehicle. During a search of the vehicle, I located a black zippered pouch hidden under the ash tray in the center console with a baggie of methamphetamine, a used syringe and a methamphetamine pipe. Tanner was mirandized but refused to answer any questions. He was taken into custody for possession of methamphetamine and possession of paraphernalia.

DUI DECISION PTS (check applicable boxes and give supporting comments)

- ☐ Odor of alcoholic beverage:
- ☐ Admitted consumption of alcohol:
- ☐ Slurred Speech:
- ☐ Impaired Memory:
- ☐ Glass/Bloodshot eyes:
- ☐ Gaze Nystagmus:
- ☐ Walk & Turn:
- ☐ One Leg Stand:
- ☐ Other:
- ☐ Drugs Suspected:
- ☐ Drug Recognition Evaluation Performed:
- ☐ Accident Involved:
- ☐ Injuries:

☐ Prior to testing, defendant was substantially informed of the consequences of refusal and failure of the test as required by Sections 18-8002 and 18-8002A, Idaho Code.

☐ Defendant was tested for alcohol concentration, drugs or other intoxicating substances. The test(s) was (were) performed in compliance with Sections 18-8003 and 18-8004(4) Idaho Code and the standards and methods adopted by the Idaho State Police.

- ☐ BAC tested by breath using: ☐ Intoxilyzer 5000 ☐ LIFELOC FC20 ☐ Alco Sensor Instrument Serial #
Other: _____ Name of person administering BAC test: _____ ☐ Date Certification expires: _____
- ☐ BAC result:
- ☐ Blood and/or Urine Test results pending: ☐ Yes ☐ No
- ☐ Defendant refused test as follows:

NOTE: THE NAME OF THE DECLARANT AND THE DATES MUST BE TYPED BELOW FOR ELECTRONIC SUBMISSION TO THE COURT. THIS FORM SHOULD THEN BE PRINTED, SIGNED AND SUBMITTED WITH THE REST OF THE COMPLAINT PAPERWORK.

I declare under penalty of perjury pursuant to the law of the State of Idaho that the foregoing is true and correct.

DATE: 05/09/18 SIGNED: _____

(Name and signature of Declarant)

PRINTED NAME: Sgt J. Hyle #2318

ORDER FINDING PROBABLE CAUSE

The defendant, Jaron A. Tanner, having been arrested without a warrant for the offense(s) of I.C. 37-2732(c)1 - Possession of Controlled Substance- Methamphetamine and I.C. 37-2734A1 - Possession of Drug Paraphernalia, and the Court having examined the declaration of Sgt J. Hyle,

PRE-BOOKING INFORMATION SHEET

KOOTENAI COUNTY PUBLIC SAFETY BUILDING

Booking # _____

Name ID # _____ Date 5/9/2018

ARRESTEE:

Name: TANNER JARON ANDREW
Last First Middle

AKA NONE

Address 5355 E. FERNAN HILL RD.

City COEUR D ALENE State ID Zip 83814

Home Phone (208)661-9212 SS# ██████-4945

City/State of Birth CDA, ID DOB 9/22/1992 Employer UNEMPLOYED

D.L. # CC231138E State ID Occupation N/A Work Phone # N/A

PHYSICAL DESCRIPTION:

Height 5 ' 10 " Weight 200 Sex M Hair BLN Eyes BLU

Race W Glasses N Contacts N Facial Hair GOATEE

Scars, Marks, Tattoos TATTOO-RT ARM CROSS, TATTOO- RT ARM DEER, TATTOO- RT ARM BUTTERFLY

TATTOO- LT ARM "TANNER"

Clothing Description BLACK T-SHIRT, BLUE JEANS

ARRESTING OFFICER INFORMATION:

Date / Time of Arrest 5/9/2018 / 0016 Location W. HAYDEN AVE. X N. SCHMIDT Dist 31

Arresting Officer SGT. J. HYLE # 2318 Agency KCSO Arrival at PSB 0131

CHARGES AND BAIL:

ARREST TYPE: ☒ ON VIEW ☐ WARRANT ☐ CITIZEN ☐ OTHER

M/F	Code	Charges	Fat	Sentence	Warrant or Case #
1 F	37-2732C1	POSS. CONT. SUB. METHAMPHETAMINE			
2 M	37-2734A	POSS. DRUG PARAPHERNALIA			
3					
4					
5					
6					

Is the arresting officer aware of any mental or physical conditions this inmate may have which might affect his/her safety or ability to be held without special attention by jail staff? ☒ No ☐ Yes (Explain) _____

Did the arrestee arrive with prescription medication? ☒ No ☐ Yes

VEHICLE INFORMATION:

Vehicle Lic. 7BM5467 ST ID YR 94 Make HONDA Model PRELUDE Body 4 Color(s) WHI / _____

Vehicle Disposition IMPOUND BY SCHAFFERS TOWING

CITIZEN ARREST: I hereby arrest the above named suspect on the charge(s) indicated and request a peace officer to take him/her into custody. I will appear as directed and sign a complaint against the person I have arrested.

Arresting Person Signature		Address		Phone #	
Arresting Person Name (Printed)		Race	Sex	DOB	Employer
Officer	ID #	Approved By	ID #	Date	
SGT. J. HYLE	2318	J. Hyle	2318	5/9/2018	

VICTIMS RIGHTS INFORMATION:

Name	Code	Mult. Victims		Address:	Phone:
		Yes	No		
Occupation	Race/Sex	Age	DOB	Business Address	Bus. Phone:



Kootenai County Sheriff's Office

Report for Incident 18-18802

Nature: DRUGS

Address: W HAYDEN AVE & N SCHMIDT
ST

Location: 31

HAYDEN ID 83835

Offense Codes: NC, CSDE

Statute Codes: 37-2732c1, I37-2734A1

Received By: B. CRAWFORD

How Received: O

Agency: KCSD

Responding Officers: J.HYLE, A.NYE, A.ZITTERKOPF

Responsible Officer: J.HYLE

Disposition: ACT 05/09/18

When Reported: 00:31:11 05/09/18

Occurred Between: 00:30:59 05/09/18 and 00:31:04 05/09/18

Assigned To:

Detail:

Date Assigned: **/**/**

Status:

Status Date: **/**/**

Due Date: **/**/**

Complainant:

Last:

First:

Mid:

DOB: **/**/**

Dr Lic:

Address:

Race:

Sex:

Phone:

City: ,

Offense Codes

Reported: NC Not Classified

Observed:

Additional Offense: NC Not Classified

Additional Offense: CSDE Controlled Subs/Drug
Equipment

Additional Statutes: 37-2732c1

Additional Statutes: I37-2734A1

Circumstances

QU QUANTUM

Responding Officers:

Unit :

J.HYLE

2318

A.NYE

2357

A.ZITTERKOPF

2323

Responsible Officer: J.HYLE

Agency: KCSD

Received By: B. CRAWFORD

Last Radio Log: **.*.*.* **/**/**

How Received: O Officer Report

Clearance: 1 ARREST REPORT TAKEN

When Reported: 00:31:11 05/09/18	Disposition: ACT Date: 05/09/18	
Judicial Status:	Occurred between: 00:30:59 05/09/18	
Misc Entry:	and: 00:31:04 05/09/18	
Modus Operandi:	Description :	Method :
LT	LOCATION TYPE	LT13 HWY/RD/ALLEY
D	DRUGS/LIQUOR	D34

Involvements

Date	Type	Description	Relationship
05/09/18	Name	TANNER, ARLES IRENE	MENTIONED
05/09/18	Name	SMITH, CALEB JOSEPH	OTHER INVOLVED
05/09/18	Name	BARKER, ERIC CLAYTON	OTHER INVOLVED
05/09/18	Name	TANNER, JARON ANDREW	OFFENDER
05/09/18	Vehicle	WHI 1994 HOND PRE ID	Impound
05/09/18	Cad Call	00:31:11 05/09/18 TRAFFIC STOP	Initiating Call
05/09/18	Property	WHI Drug METHAMPHETAMINE 0	Seized
05/09/18	Property	BLK Paraphernalia Pouch Pipe 0	Seized
05/09/18	DS	DET/RG	DISSEMINATION

Narrative

KCSO [xx] CRIME REPORT [] INCIDENT REPORT

ADDITIONAL NAMES/DESCRIPTIONS:
-----INJURIES: NO: XX YES: DESCRIBE:
-----PHOTOS/VIDEO TAKEN: NO: YES: XX PHOTOGRAPHER I.D. : 2318 BODY CAM
-----RELATED REPORT NUMBER(S):

NARRATIVE: On 5/9/18 at approximately 0217 hours, I (Sgt Hyle) was on patrol in the area of north Hayden as Deputy Fanciullo was watching activity at 151 Walrose Loop, as we have received numerous pieces of information about OI-Caleb Smith dealing drugs from the residence.

Deputy Fanciullo said he observed a white Honda Prelude arrive at the residence in questions, stay for a short time and then leave again. The vehicle turned and went south on Government from Walrose Loop. Deputy Fanciullo also advised the muffler was loud.

I know through my training and experience, that people often arrive at drug dealer's houses, stay for a short amount of time while they purchase drugs, then leave again.

I observed the vehicle traveling south on Government in front of me passing Miles. I observed that it did not slow down from 35 mph as it passed the posted 25 mph speed limit sign on Government. The vehicle eventually hit its brakes but I verified it at 31 mph in a posted 25 mph zone.

I caught up to the vehicle as it was turning onto Hayden from Government. I activated my overhead lights at Hayden x Schmidt to conduct a traffic stop. The vehicle immediately started to pull to the right side of the road and yield, however, before it came to a stop, it quickly jerked back onto the roadway, sped up and turned left into the Super 1 parking lot. It then accelerated quickly and I activated my siren as well. The vehicle then began to turn right behind a bank in the parking lot before finally stopping.

I called for a cover as the vehicle stopped, drew my pistol and ordered the driver to put his hands out the window. To this point, I could not see in the vehicle nor could I tell how many occupants were inside but based on the information about where the car was coming from and the erratic actions the driver took, I believed the driver may be up to nefarious activity more than just the simple speeding violation.

Deputy Nye arrived on scene and I detained the driver, who was identified by his Idaho DL as O-Jaron A. Tanner. He was belligerent and asked why he was being stopped. I said for speeding and he calmed down a bit.

Deputy Nye identified the passenger as OI-Eric C. Barker by his Idaho ID.

Jaron tried to tell me that he was in fact pulling over, he was just trying to get to a parking lot to get out of the roadway for my safety, even though it was 0217 in the morning and there was very light traffic, if any, on the roadway. It seemed like he was trying to explain away the actions by making them about me and my safety. Having been a peace officer for many years and having made many traffic stops, it is my experience that when someone is looking for a safe place to pull over, they will often turn on their hazard lights but continue at a slow rate of speed until they find somewhere suitable. However, when people make such jerky and erratic movements after the emergency lights have been activated, they are trying to conceal or obtain a weapon or trying to conceal illegal items.

Knowing where Jaron was coming from, I asked him where he was coming from and he said he would rather not say, which seemed odd if someone was not up to anything illegal.

I also noticed a large dog in the back of the car that was very calm in the back seat. The dog never made any noise during the entirety of the stop.

I ran Jaron's information and found he was clear. But Deputy Fanciullo informed me that the vehicle had recently been involved in a heroin trafficking case.

I called for PFPD Off. Bowne to respond to my location with his K9.

I began to issue Jaron a speeding ticket and attempted to verify the registration and insurance and Jaron said the documents were with his friend's property in the jail.

Jaron said his friend got arrested in the car and the insurance and registration went into his property and he could not get it released to him. He then told me he had a hard time getting the car out of impound due to his friend having the title.

As I was issuing the citation, I ran the registration and there was no insurance attached to it and the vehicle as in fact registered to Jaron. I also found a call for service where the vehicle was mentioned in a stolen vehicle report. The report mentioned Jaron as someone who went and took the car from an address on Blue Creek without permission of the RP, who claimed her son was the owner. There was a lot of confusion in the call about who actually owned the car and who possessed the title of the car.

I asked Jaron about it, since he mentioned having issues getting the car out of impound, and he said he got the car from a friend's house on a "ranch". He said he tried to contact his friend's dad to tell him he was taking the car, but couldn't get ahold of him. He then just took the car. I found it odd that he earlier mentioned having issues getting the car out of impound, even though he was not the one that got it out of impound.

While I had Jaron in hand cuffs and standing in front of my patrol car, he kept moving around nervously and kept looking around. To me it seemed like he was looking for somewhere to run to.

Based on all of this information and Jaron's actions, I was very suspicious that there was something more going on with the traffic stop. Off Bowne arrived and deployed his K9 around the vehicle. He then informed me the K9 alerted on the vehicle.

During the contact, Jaron had mentioned many times his dog did not like strangers and would bite us. He also told me he didn't have a leash or a collar for the dog. I found this very strange since the dog had yet to make any type of noise, or movement for that matter, and there were several deputies moving around the vehicle which one would think would have made the dog begin to bark. The dog, instead, looked scared and timid.

I then informed Jaron I was going to search the car and asked if he could hold onto his dog to prevent it from attacking us. He told me he did not want me to search the car and I told him I was going to but I needed him to take care of the dog. He got upset and asked if I could call his mother to do it and I told him I wanted him to put a leash on the dog and put him in the back of my patrol car. I also found it odd that he wanted me to call someone from not on scene to come and take care of the dog that he should be more than capable of doing. I also know that people who have illegal items in their vehicles often have aggressive dogs in their cars to deter law enforcement from wanting to push for a search or an arrest. I also know they often do not have collars or leashes on the dog to make an excuse for why they have a hard time controlling the dog. Each of these comments made my suspicion grow even more that Jaron was up to something.

It appeared as if Jaron began to panic knowing I was going to search the car. I took him out of handcuffs and told him to get the dog out of the car and use a set of leg restraints that Deputy Nye provided as a leash. Jaron opened the driver's door then put his hands on his seat and hung his head in, what I surmised to be a look of defeat. He did this a few times then he put the makeshift leash on the dog, pulled him out of the car and carried him to the back of my patrol car and put him in the back, without the dog so much as whimpering, let alone snapping or growling at any of us.

Deputy Zitterkopf and Deputy Nye then had Barker, who had been cooperative and very calm to this point, exit the vehicle.

Deputy Zitterkopf and I began to search the vehicle and I noticed the ash tray in the middle console was loose. I pulled it out and saw a black zippered pouch inside sitting on the transmission hump. The pouch contained a clear glass methamphetamine pipe, a used syringe and a clear plastic baggie with a white crystal substance that I recognized to be methamphetamine.

We searched the rest of the car and found nothing else of significance.

I then mirandized Barker to ask him about the meth. He seemed surprised that I was asking about meth and kept saying he smokes "Pot" in Washington.

I then mirandized Jaron and he did not want to speak to me. I informed him he was under arrest for the meth and he asked when the last time we searched the car was. I told him I just searched the car and he said he was talking about when his friend was arrested. He was saying something to the affect that drugs were found in the car last time and was trying to claim they could have been there since then. It appeared he was still trying to deflect what was going on and I told him that nothing associated with methamphetamine use was found that time, only heroin.

Deputy Nye transported Jarno to PSB. We called his grandma, M-Arles Tanner, at his request to get the dog and some of the food in the car so it wouldn't spoil. When Arles arrived on scene, she said the dog was just scared and would bite someone if it got cornered and scared.

This just solidified what I had seen and believed to this point, that Jaron was trying to keep me from searching the car due to his aggressive dog, as opposed to the dog being very calm but scared.

Schaffers responded and impounded the car.

I later submitted the evidence to KCSO Evidence and the methamphetamine field tested positive for the presumptive presence of methamphetamine.

This incident was captured on my body worn camera. For the complete details and circumstances of this case please refer to the videos. This report is a summary of the events to my best ability.

DISPOSITION: CA

Vehicles**Vehicle Number:** 18-02695**License Plate:** 7BM5467**State:** ID**Vehicle Year:** 1994**Make:** HOND Honda**Color:** WHI /**Vehicle Type:** PCAR Passenger Car**License Type:** PC Regular Passenger Automobile**Expires:** 02/29/20**VIN:** JHMBB2151RC000222**Model:** PRE**Doors:** 0**Value:** \$0.00**Owner:****Last:** TANNER**First:** JARON**Mid:** ANDREW**DOB:** 09/22/92**Dr Lic:** CC231138E**Address:** 5355 E FERNAN HILL RD**Race:** W**Sex:** M**Phone:** (208)661-9212**City:** COEUR D'ALENE, ID 83814**Agency:** KCSO KOOTENAI CO SHERIFF'S
OFFICE**Date Recov/Rcvd:** **/**/****Officer:** N.FRANSSEN**Area:** 27 POST

FALLS CITY

UCR Status:**Wrecker Service:** SCHA SCHAFFERS**Local Status:** III Involved in Incident**Storage Location:** 625 W DALTON AV**Status Date:** 03/29/18**Release Date:** 04/24/18**Comments:**

RELEASED BY SCHAFFERS 4/24/2018

Property

Property Number: 18-05291**Item:** Drug**Owner Applied Nmbr:****Brand:** METHAMPHETAMINE**Model:****Year:** 0**Quantity:** 1**Meas:** GM**Serial Nmbr:****Total Value:** \$0.00**Color:** WHI**Owner:** TANNER JARON ANDREW 352247**Agency:** KCSO KOOTENAI CO SHERIFF'S
OFFICE**Tag Number:****Accum Amt Recov:** \$0.00**Officer:** J.HYLE**UCR:****UCR Status:****Local Status:****Storage Location:****Crime Lab Number:****Status Date:** 05/09/18**Date Released:** **/**/****Date Recov/Rcvd:** **/**/****Released By:****Amt Recovered:** \$0.00**Released To:****Custody:** **/**/** **/**/****Reason:****Comments:** Found hidden inside center console in a black pouch

Property Number: 18-05292**Item:** Paraphernalia**Owner Applied Nmbr:****Brand:** Pouch**Model:** Pipe**Year:** 0**Quantity:** 3**Meas:****Serial Nmbr:****Total Value:** \$0.00**Color:** BLK**Owner:** TANNER JARON ANDREW 352247**Agency:** KCSO KOOTENAI CO SHERIFF'S
OFFICE**Tag Number:****Accum Amt Recov:** \$0.00**Officer:** J.HYLE**UCR:****UCR Status:****Local Status:****Storage Location:****Crime Lab Number:****Status Date:** 05/09/18**Date Released:** **/**/****Date Recov/Rcvd:** **/**/****Released By:****Amt Recovered:** \$0.00**Released To:****Custody:** **/**/** **/**/****Reason:**

Comments: Black zippered pouch found hidden inside center console with pipe and used syringe inside. Syringe disposed of in sharps container.

Name Involvements:**OTHER246329****INVOLVED :**

Last: BARKER
DOB: 03/06/91
Race: W **Sex:** M

First: ERIC
Dr Lic: BB240244K
Phone: (208)660-9124

Mid: CLAYTON
Address: 1089 W OHIO MATCH RD
City: RATHDRUM, ID 83858

OFFENDER : 352247

Last: TANNER
DOB: 09/22/92
Race: W **Sex:** M

First: JARON
Dr Lic: CC231138E
Phone: (208)661-9212

Mid: ANDREW
Address: 5355 E FERNAN HILL RD
City: COEUR D'ALENE, ID 83814

OTHER233930**INVOLVED :**

Last: SMITH
DOB: 10/13/81
Race: W **Sex:** M

First: CALEB
Dr Lic: CB171674E
Phone: (208)964-1308

Mid: JOSEPH
Address: 122 E WALROSE LOOP
City: HAYDEN, ID 83835

MENTIONED :183867

Last: TANNER
DOB: 09/17/46
Race: W **Sex:** F

First: ARLES
Dr Lic: CA122931K
Phone: (208)687-0272

Mid: IRENE
Address: 14713 N ARBOR ST
City: RATHDRUM, ID 83858

AGENCY KCSO		DISTRICT 31		KOOTENAI COUNTY SHERIFF IMPOUND NOTIFICATION		CASE # 18-18802	
DATE AND TIME 5-9-18 0134		DAY W				LICENSE NUMBER 7Bm 5467	
LOCATION W HAYDEN AVE X N SCHMIDT ST				<input type="checkbox"/> ABANDONED <input checked="" type="checkbox"/> ARREST <input type="checkbox"/> HAZARD <input type="checkbox"/> EVIDENCE <input type="checkbox"/> RECOVERED STOLEN <input type="checkbox"/> PRIVATE PROPERTY <input type="checkbox"/> ACCIDENT INVOLVED <input type="checkbox"/> KCSO TOW <input type="checkbox"/> PREFERENCE TOW			
YEAR 1994	MAKE HONDA	MODEL PRE	COLOR WHITE	VIN NUMBER JH4MB32151KC01010222	ODOMETER READING 17719		
VEHICLE: <input type="checkbox"/> LOCKED <input checked="" type="checkbox"/> UNLOCKED WHEELS <input checked="" type="checkbox"/> TIRES <input checked="" type="checkbox"/> WHEEL COVERS <input checked="" type="checkbox"/> RADIO/STEREO <input checked="" type="checkbox"/> SPEAKERS <input checked="" type="checkbox"/> DRIVING LIGHTS <input checked="" type="checkbox"/> TOOLS <input checked="" type="checkbox"/> BATTERY <input checked="" type="checkbox"/> ENGINE <input checked="" type="checkbox"/> TRANSMISSION							
PROPERTY AND EQUIPMENT INVENTORY - LIST MISC. ITEMS							
1. CLOTHES		4. Trash		7.			
2. MISC HOUSEHOLD ITEMS		5.		8.			
3. Knives		6.		9.			
10. FOOD		11.		12.			
13. Paperwork		14.		15.			
GENERAL CONDITION OF VEHICLE INTERIOR: <input type="checkbox"/> GOOD <input checked="" type="checkbox"/> FAIR <input type="checkbox"/> POOR				RUNNING CONDITION: <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO <input type="checkbox"/> UNKNOWN			
EXTERIOR: <input type="checkbox"/> GOOD <input checked="" type="checkbox"/> FAIR <input type="checkbox"/> POOR <input type="checkbox"/> COMPLETE VEHICLE STRIP							
NEW DAMAGE <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		ACCIDENT RELATED <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		IF NOT ACCIDENT RELATED, LIST:			
APPRAISED VEHICLE VALUE: <input type="checkbox"/> LESS THAN \$750 <input checked="" type="checkbox"/> MORE THAN \$750				IDENTIFICATION OF APPRAISER: 2318			
NOTICE TO REGISTERED OWNER							
TO NAME (LAST, FIRST, MIDDLE) TANNER JARON ANDREW		ADDRESS 14713 N ARBOR ST RATHDRUM ID 83858					
ORIGINAL AGENCY				CASE #		DATE OF THEFT	
LIEN HOLDER OF RECORD							
ADDRESS		CITY		STATE		ZIP	
THIS NOTICE IS TO INFORM YOU THAT THE ABOVE LISTED MOTOR VEHICLE WHICH IS REGISTERED TO YOU HAS BEEN IMPOUNDED BY AUTHORITY OF IDAHO CODE LIST IDAHO CODE FOR REASON OF IMPOUND <input checked="" type="checkbox"/> 49-662/49-1803A <input type="checkbox"/> 49-1803 <input type="checkbox"/> 49-1804 <input type="checkbox"/> 49-1806							
TOWING COMPANY SCHAFFERS TOWING							
ADDRESS 625 W DALTON AVE		CITY CPA		STATE ID		ZIP 83815	
TELEPHONE NUMBER 208-667-7336		STORAGE LOCATION (IF DIFFERENT THAN TOWING COMPANY)					
AMOUNT OF POSSESSORY LIEN: <input type="checkbox"/> STORAGE AT \$ PER DAY: (STORAGE MAY CONTINUE TO ACCRUE AT THE RATE SPECIFIED) <input checked="" type="checkbox"/> TOWING \$ CONTACT TOWING COMPANY FOR TOTAL							
Unless your vehicle was impounded for investigation, you may contact the towing company and claim your vehicle any time prior to the sale by providing you are the owner and paying all accrued charges. You have the right, under the authority of Section 49-1805, Idaho Code, to request a Post-Storage Hearing to determine if there was probable cause for the towing and storage of the vehicle. To receive a Post-Storage Hearing, You or your agent must make the request to the law enforcement agency IN WRITING within ten (10) days of the date of this notice.							
POLICE HOLD AT KCSO <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO		ADDITIONAL INSTRUCTIONS					
CUSTODY RECEIPT: I CERTIFY THAT THE ABOVE DESCRIBED PROPERTY AND EQUIPMENT WAS RECEIVED BY ME ON THE TIME AND DATE NOTED 5-9-18 0139				SIGNATURE OF PERSON TAKING CUSTODY			
RELEASED TO: PLEASE CHECK THIS INVENTORY - ANY EXCEPTION MUST BE NOTED BEFORE THIS PROPERTY LEAVES THE PREMISES				SIGNATURE OF PERSON PROPERTY RELEASED TO			
ADDITIONAL INFORMATION:							
IMPOUND AUTHORIZED BY OFFICER SGT. J. HYLE		ID 2318		DEPT KCSO		APPROVED BY J. Hyle 2318	
						DATE 5/9/18	

Jeanne M. Howe, Deputy Public Defender
The Law Office of the Public Defender of Kootenai County
PO Box 9000
Coeur d'Alene, Idaho 83816
Phone: (208) 446-1700; Fax: (208) 446-1701
Bar Number: 7903
iCourt Email: pdfax@kcgov.us

**IN THE DISTRICT COURT OF THE FIRST JUDICIAL DISTRICT OF THE
STATE OF IDAHO, IN AND FOR THE COUNTY OF KOOTENAI**

STATE OF IDAHO,)	
)	CASE NUMBER CR28-18-0007132
Plaintiff,)	
)	
V.)	DEFENDANT'S SUPPLEMENTAL
)	REQUEST FOR DISCOVERY
JARON ANDREW TANNER,)	
)	
Defendant.)	

PLEASE TAKE NOTICE that the undersigned pursuant to Rule 16 of the Idaho Criminal Rules, the Fourth, Fifth, Sixth, Eighth and Fourteenth Amendments to the Constitution of the United States, and Article I, § 1, 2, 13 and 17 of the Constitution of the State of Idaho requests discovery and inspection of all materials discoverable by defendant per I.C.R. 16(b)(1)-(8) and the aforementioned Constitutional provisions including but not limited to the following information, evidence and materials:

- 1.) **Copies of all CAD reports associated with investigation related to KCSO Incident report #18-18802;**
- 2.) **Recordings of all radio transmissions between the law enforcement personnel, including transmission between deputies, officers, and Dispatch personnel involved in the investigation related to the investigation related to KCSO Incident report #18-18802;**

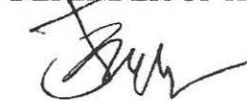
- 3.) Copies of all law enforcement personnel videos and recordings related to the investigation that is the basis for Kootenai County criminal case CR-17-0022041 (defendant Desiree Elaine Karst);
- 4.) Copies of all CAD reports related to the investigation for Kootenai County related to the investigation of Kootenai County criminal case CR-17-0022041 (defendant Desiree Elaine Karst); and
- 5.) All training records for KCSO Sergeant Hyle.

The undersigned further requests permission to inspect and copy said information, evidence and materials within FOURTEEN (14) days, unless this information is given to this office at a sooner time.

DATED this 14th day of August, 2018.

THE LAW OFFICE OF THE PUBLIC
DEFENDER OF KOOTENAI COUNTY

BY:



JEANNE M. HOWE
DEPUTY PUBLIC DEFENDER

CERTIFICATE OF DELIVERY

I hereby certify that a true and correct copy of the foregoing was personally served by placing a copy of the same as indicated below on the 1 day of August, 2018, addressed to:

Kootenai County Prosecutor FAX 446-2168 / kcpareports@kcgov.us

