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Attorneys for Defendant

**IN THE FIFTH DISTRICT COURT
WASHINGTON COUNTY, STATE OF UTAH**

STATE OF UTAH,

Plaintiff,

vs.

WARREN STEIED JEFFS,

Defendant.

**DEFENDANT'S MOTION
TO SUPPRESS**

Case No. 061500526

Judge James L. Shumate

Defendant, Warren Jeffs, by and through his counsel, hereby move this Court to suppress all physical evidence seized from Jeffs on or about August 28, 2006, and all statements made by Jeffs to law enforcement officials as a result of an illegal traffic stop and detention. The traffic stop was illegal because it was not based on a reasonable suspicion of a traffic violation. Furthermore, the trooper's actions unreasonably

exceeded the scope of the traffic stop. As such, all evidence derived from the illegal detention must be suppressed. The Defendant requests an evidentiary hearing on this motion. This motion is based on Utah R. Crim. Pro. 12(d), and the Fourth and Fourteenth Amendment of the United States Constitution, as well as Article I, Section 14 of the Utah Constitution.

This Motion is supported by a Memorandum of Law submitted contemporaneously herewith.

DATED this 13th day of March, 2007.

BUGDEN & ISAACSON, L.L.C.

By: 

WALTER F. BUGDEN, JR.
TARA L. ISAACSON

WRIGHT, JUDD & WINCKLER
RICHARD A. WRIGHT

Attorneys for Defendant

CERTIFICATE OF SERVICE

I hereby certify that, on the 2 day of March, 2007, I caused to be served a true and correct copy of the foregoing by the method indicated below, and addressed to the following:

Brock R. Belnap
Washington County Attorney
178 North 200 East
St. George, UT 84770

- HAND DELIVERY
- U.S. MAIL
- OVERNIGHT MAIL
- FACSIMILE:

