Research Strategy--Spring 2015

- Finding the Law
- Reading the Law
- Updating the Law
Goal

• Find mandatory authority. (Wren chart)

• Use persuasive authority when:
  – No mandatory exists
  – Weak mandatory
  – Challenge the mandatory
Issues

• Was vehicle stop based on “reasonable suspicion” by police officers under Oregon statutes 131.605 and 131.615 (similar car spotted near vandalism scene; suspect slinks down in seat)

• Was officer’s inquiry about the use or possession of drugs within limited scope of the vehicle stop under Oregon statutes 131.605 and 131.615 (not the reason for stop; no warrants; rave t-shirt)
Thinking about the Problem

• You need search terms. Use TARP (things, action, relief, parties) to determine facts and legal theories

• May not succeed at first, but must start somewhere.
Finding the Law—Search Methods

- Index
- Topic
- Known authority
- Full text searching (online only)
- Some combination of these
Finding the Law

• Start with secondary sources?

• Check for constitutional provisions and statutes.

• Try to find leading case(s).

• Use leading case(s) to find cases from your jurisdiction.
Why Use Secondary Sources?

• To determine what law applies

• For analysis of the law

• To find jargon in the area

• To learn the black letter rules

• To identify important primary sources
Narrative Secondary Sources

- Books
- American Law Reports
- Encyclopedias (national & state)
- Legal periodicals
- Restatements
Books on Westlaw
Topic method: Table of Contents

Chapter 11. Searches of Vehicles and Vessels

- § 11:3. Stops and searches based on probable cause: Ross rule
- § 11:4. --Searches of passengers' belongings
- § 11:5. --Closed containers: California v. Acevedo
- § 11:6. Inventory searches
- § 11:7. --Legitimate impoundment of the vehicle
- § 11:8. --Scope of inventory and container searches
- § 11:9. Forfeiture of vehicle as instrumentality of crime
- § 11:10. --Validity of seizure
- § 11:11. --Search of vehicle legitimately seized
- § 11:12. Other stops of vehicles--Investigative stops
- § 11:13. --Traffic stops
§ 11:12. Other stops of vehicles—Investigative stops

Police officers may stop a vehicle for investigative purposes based on specific and articulable facts which, taken together with rational inferences from those facts, reasonably warrant suspicion of criminal conduct on the part of the occupants of the vehicle. \(^1\) The authority to stop a moving vehicle based upon less than probable cause derives from Terry v. Ohio, \(^2\) as applied by the Supreme Court to vehicles. \(^3\) Thus, a routine traffic stop justifies other incidents of a Terry search, such as a patdown of the driver and a brief search of the car. \(^4\)

\(^1\) See
\(^3\) See Terry v. Ohio, 392 U.S. 1 (1968).
Keyword Search for Journal Articles
Lexis/Westlaw/Bloomberg Law Search Methods

Terms and Connectors

v.

Natural Language
Terms and Connectors

• Must link **terms** with **connectors** (/p, /s, +3)

• Phrases in quotation marks

• Allows truncation (* and !)

• Only retrieves docs within search parameters

• No term-dropping
Natural Language

• String together words that might be relevant
• No truncation or connectors
• Enclose phrases in quotation marks
• String alternative terms together
• Some term-dropping to achieve results
• No natural language searching on Bloomberg Law
Finding the Law

• Start with secondary sources?

• Check for constitutional provisions and statutes.

• Try to find leading case(s).

• Use leading case(s) to find cases from your jurisdiction.
Statutes and Constitution

- ORS 131.605, 131.615
- U.S. Const. amend. IV – search and seizure
- Or. Const. art 1, § 9 – search and seizure
More on Finding the Law

• Use *annotated codes* to find statutes & constitutions. *No annotated codes on Bloomberg Law*
Reading the Law--Statutes

• Read text carefully

• Note related sections in code’s statutory scheme -- Title, Chapter, Section

• Read the annotations
§ 131.605 (Known-Authority) on Lexis Advance
Searching Lexis Advance annotations
Exclusionary rule does not apply to evidence obtained following illegal stop when defendant, after stop, committed new crime justifying arrest. State v. Weiland, 72 Or App 25, 695 P2d 85 (1985), Sup Ct review denied

NOTES OF DECISIONS
Reasonable suspicion

Stop of only vehicle observed traveling in general area where crime had just occurred was reasonable. State v. Jones, 23 Or App 706, 543 P2d 1103 (1975); State v. Teal, 94 Or App 381, 765 P2d 827 (1988); State v. Nguyen, 176 Or App 258, 31 P3d 489 (2001)

Where anonymous informant reported, inter alia, that operator of yellow Ford pickup had nearly forced him off road, had appeared very intoxicated and had pulled rifle on him during dispute, officer had requisite "reasonable suspicion" to detain driver; overruling State v. Caproni, 19 Or App 789, 529 P2d 974 (1974). State v. Lindstrom, 37 Or App 513, 588 P2d 44 (1978)

When police officer sighted car similar to one listed on "hot sheet," but did not know license number of stolen vehicle, sufficient basis for stop existed. State v. Worthington, 39 Or App 775, 593 P2d 1241 (1979), Sup Ct review denied

Unusually slow speed of vehicle that only partially matched description of suspect vehicle

When police officer sighted car similar to one listed on "hot sheet," but did not know license number of stolen vehicle, sufficient basis for stop existed. State v. Worthington, 39 Or App 775, 593 P2d 1241 (1979), Sup Ct review denied

Unusually slow speed of vehicle that only partially matched description of suspect vehicle did not provide reasonable suspicion justifying stop. State v. Ponce, 43 Or App 665, 603 P2d 1243 (1979)

Where police officer, parked in front of police station, heard sound of breaking glass at about 3 a.m. and soon after saw defendant's car come down alley from police parking lot, circumstances were sufficient to arouse suspicion that crime had been committed. State v. Schedler, 47 Or App 181, 614 P2d 591 (1980), Sup Ct review denied

Where police officer knew that robbery had been committed five hours before, defendant's car matched description of car involved in robbery and defendant sought to evade officer after officer began to trail him, reasonable suspicion existed to stop defendant. State v. Armstrong, 52 Or App 161, 628 P2d 1206 (1981), Sup Ct review denied
ORS § 131.605

This data is current through the 2013 Legislative Session

**Oregon Revised Statutes Annotated > TITLE 14 PROCEDURE IN CRIMINAL MATTERS GENERALLY > Chapter 131- Preliminary Provisions: Limitations: Jurisdiction; Venue; Criminal Forfeiture; Crime Prevention > Crime Prevention > (Stopping of Persons)**

131.605 Definitions for ORS 131.605 to 131.625.

As used in ORS 131.605 to 131.625, unless the context requires otherwise:

1. "Crime" has the meaning provided for that term in ORS 161.515.
2. "Dangerous weapon," "deadly weapon" and "person" have the meanings given those terms in ORS 161.015.
3. "Frisk" is an external patting of a person's outer clothing.

Unique to Lexis Advance
Topic Summary: Reasonable Suspicion

Practice Area: Criminal Law & Procedure
Jurisdiction: U.S. Federal
Context:
Criminal Law & Procedure > ... > Warrantless Searches > Stop & Frisk > Reasonable Suspicion

Definitions (1)

1. Reasonable suspicion is defined as particularized and objective basis for suspecting the particular person stopped of criminal activity. United States v. Guerrero, 472 F.3d 784

Seminal Cases (10)

1. Terry v. Ohio, 392 U.S. 1
2. Fla. v. Royer, 460 U.S. 491
3. United States v. Sokolow, 490 U.S. 1

View more
Statutes and Rules (1)
1. U.S. Const. Amendment Amend. 4

Secondary Sources (10)
1. 1-2 Criminal Constitutional Law § 2.07
2. 1-15 Search and Seizure § 15.5
3. 4-81 Criminal Defense Techniques § 81.08

Burden of Proof (1)
1. The level of suspicion necessary to support a stop is less than a fair probability of wrongdoing and considerably less than proof of wrongdoing by a preponderance of the evidence. United States v. Herring, 373 Fed. Appx. 131

Standards of Review (1)
1. Determinations of reasonable suspicion should be reviewed de novo on appeal. United States v. Miranda, 393 Fed. Appx. 243
§ 131.615 (Known-Authority) on Lexis Advance

131.615 Stopping of persons.

(1) A peace officer who reasonably suspects that a person has committed or is about to commit a crime may stop the person and, after informing the person that the peace officer is a peace officer, make a reasonable inquiry.

(2) The detention and inquiry shall be conducted in the vicinity of the stop and for no longer than a reasonable time.

(3) The inquiry shall be considered reasonable if it is limited to:
   (a) The immediate circumstances that aroused the officer’s suspicion;
   (b) Other circumstances arising during the course of the detention and inquiry that give rise to a reasonable suspicion of criminal activity; and
   (c) Ensuring the safety of the officer, the person stopped or other persons present, including an inquiry regarding the presence of weapons.

(4) The inquiry may include a request for consent to search in relation to the circumstances specified in subsection (3) of this section or to search for items of evidence otherwise subject to search or seizure under ORS 133.535.

(5) A peace officer making a stop may use the degree of force reasonably necessary to make the stop and ensure the safety of the peace officer, the person stopped or other persons who are present.

History

1973 c.836 § 31; 1997 c.866 § 1
Searching Lexis Advance case annotations

56. Police officer had reasonable suspicion to stop a vehicle under Or. Rev. Stat. § 131.615(1) based on a homeowner’s report that she observed the truck outside her house in a high crime area at 1:50 a.m. and saw someone place a bike in the back of the truck. The officer confirmed the homeowner’s description and the license plate number; the officer also observed the driver’s and defendant’s furtive behavior as they saw the patrol car pass. State v. Wiseman, 245 Ore. App. 136, 261 P.3d 76, 2011 Ore. App. LEXIS 1140 (2011).

57. Citizen informant’s call was sufficiently reliable to support a lawful stop under Or. Rev. Stat. § 131.615 and Or. Const. art. 1, § 9 even though the caller was reporting his spouse’s observations, because the report’s details, including the description of defendant’s clothing, location, and actions, were sufficient to show that neither the caller nor the caller’s spouse had fabricated the report. State v. Mitchele, 240 Ore. App. 86, 251 P.3d 760, 2010 Ore. App. LEXIS 1676 (2010).
(1996).

**Constitutional Law: State Constitutional Operation**

12. Given dispatch report of fight in progress, defendant's statement that the and his wife were fighting, and officer's knowledge of defendant's previous assaults on his wife, officer could "reasonably suspect," under *Or. Rev. Stat. § 131.605(4)*, that a crime was committed; therefore a "stop" as that term was defined by *Or. Rev. Stat. § 131.605(6)* was lawful under *Or. Rev. Stat. § 131.615(1)* and *Or. Const. art. I, § 9*, and though an officer's questioning of a suspect during the authorized stop was permissible only to the immediate circumstances that aroused the officer's suspicion under *Or. Rev. Stat. § 131.615(3)*, during the stop of defendant's vehicle for investigation of domestic violence, the officer's independent reasonable suspicion of illegal drug activity was aroused, and questions as to the presence of drugs were permissible. *State v. Nevel, 126 Ore. App. 270, 868 P.2d 1338, 1994 Ore. App. LEXIS 164* (1994).

**Criminal Law & Procedure: Criminal Offenses: Controlled Substances:**

**Manufacture: General Overview**

13. Where defendant, convicted for manufacturing a controlled substance, challenged the initial stop and argued that the sheriff's officers lacked a reasonable suspicion that he engaged in the manufacture of controlled substances, the court held that the stop was justified by the initial suspicion, as well as a reasonable suspicion that defendant might have a controlled substance on his person, given his manifest nervousness and flightiness, and the fact that he was seen by police officers to be looking for drugs.
Exclusionary rule does not apply to evidence obtained following illegal stop when defendant, after stop, committed new crime justifying arrest. State v. Weiland, 72 Or App 25, 695 P2d 85 (1985), Sup Ct review denied

NOTES OF DECISIONS

Reasonable suspicion

In general

Where officer knows crime has been committed, question becomes whether reasonable possibility exists that person observed is connected to that crime, so factors that would otherwise be of marginal significance may justify stop. State v. Denny, 27 Or App 455, 566 P2d 719 (1976); State v. Ott, 54 Or App 309, 634 P2d 825 (1981), Sup Ct review denied; State v. Richards, 57 Or App 140, 643 P2d 1348 (1982)

A stop must be justified by facts suggesting criminal activity which can be objectively evaluated apart from police instinct. State v. Valdez, 277 Or 621, 561 P2d 1006 (1977); State v. Carter/Dawson, 34 Or App 21, 578 P2d 790 (1978), aff'd 287 Or 479, 600 P2d 873 (1979); State v. Hoggans, 35 Or App 669, 582 P2d 466 (1978); State v. Scott, 59 Or App 220, 650 P2d 985 (1982); State v. Lichty, 313 Or 579, 835 P2d 904 (1992)

Officer's subjective suspicion concerning occupants of automobile does not invalidate stop based on objectively identifiable traffic violation. State v. Carter/Dawson, 34 Or App 21, 578 P2d 790 (1978), aff'd 287 Or 479, 600 P2d 873 (1979); State v. Tucker, 286 Or 485, 595 P2d 1364 (1979); State v. Zimmerlee, 45 Or App 107, 607 P2d 982 (1980), Sup Ct
Named citizen informant's conclusional statement that bag of cocaine fell out of wallet was shorthand relation of objective observations upon which officer could rely to form reasonable suspicion substance was cocaine. *State v. Lichty, 313 Or 579, 835 P2d 904 (1992)*

**Based on presence in area**


Notwithstanding that defendant was walking in area of high vice activity and talking to known prostitute, stop of defendant for suspicion of attempted prostitution was not reasonable. *State v. Brown, 31 Or App 501, 570 P2d 1001 (1977)*

**Where officer received police dispatch that burglary had been committed in last half hour within approximately three miles of place officer observed defendant's car, and car was driven evasively, there was justification for officer to reasonably suspect criminal activity. *State v. Bartosz, 34 Or App 123, 578 P2d 426 (1978)***

Where crime had just occurred in low traffic area at late hour, stop of nearby vehicle partially matching and partially contradicting description of suspect vehicle was justified. *State v. Ragsdale, 34 Or App 549, 579 P2d 286 (1978)*, Sup Ct review denied
Evidence that, upon seeing marked police car behind him, driver pulled off and exchanged places with passenger, and when officer again followed car, former driver kept glancing back, was sufficient "reasonable suspicion" for stop. State v. Albertsen, 37 Or App 679, 590 P2d 615 (1978), Sup Ct review denied

Where officers heard CB transmissions allegedly concerning illegal fishing between defendant and others and observed furtive conduct there was sufficient grounds for stop under this section. State v. Pratt, 41 Or App 149, 597 P2d 842 (1979), Sup Ct review denied

Unusually slow speed of vehicle that only partially matched description of suspect vehicle did not provide reasonable suspicion justifying stop. State v. Ponce, 43 Or App 665, 603

Scope of

Detention and inquiry beyond time, place and subject-matter limits codified in this section, which are all components of "intrusiveness," constitute invalid random intervention into liberty and privacy of a person. State v. Carter/Dawson, 34 Or App 21, 578 P2d 790 (1978), aff'd 287 Or 479, 600 P2d 873 (1979)

Where display of wad of money at tavern had been explained to officer's satisfaction, continuation of stop was not proper. State v. Warner, 284 Or 147, 585 P2d 681 (1978)

Search of car was impermissible intrusion in traffic stop after defendant had been frisked, was outside car, and had cooperated with officers. City of Portland v. Poindexter, 38 Or App 551, 590 P2d 781 (1979)

Where police officer had reasonable cause to stop vehicle, but ascertained that driver had no criminal record or outstanding process against him, further detention was unreasonable and evidence obtained after defendant's proper identity was ascertained was properly suppressed. State v. Perry, 39 Or App 37, 591 P2d 379 (1979)

Permissible scope of questioning was exceeded where defendant was questioned about possible presence of weapons in vehicle when immediate circumstance that aroused
officer's suspicion was that vehicle was apparently parked in violation of municipal ordinance. *State v. Kennedy*, 68 Or App 529, 683 P2d 116 (1984)

Questioning concerning contents of bag was beyond scope of stop for suspicion of unrelated crime and unsupported by independent suspicion: consent to search based on admission of contents under above circumstances was not voluntary and evidence must be suppressed. *State v. Smith*, 73 Or App 287, 698 P2d 973 (1985)

Where warrant check does not take inordinately long time to complete, process does not exceed legitimate scope of stop. *State v. Smith*, 73 Or App 287, 698 P2d 973 (1985)

Where police checked vehicle passenger for valid driver license, continuation of stop of passenger after license check came back clear was unlawful. *State v. Castrejon*, 79 Or App 514, 719 P2d 916 (1986)

Circumstances that aroused officer's suspicion must still exist when officer begins inquiry and, where police officer asked defendant for driver license when circumstances arousing suspicion (initial belief defendant was someone else recently cited for driving while suspended) no longer existed, motion to suppress evidence obtained was proper. *State v. Harris*, 88 Or App 433, 745 P2d 813 (1987), Sup Ct review denied

Where search occurred after and as result of arrest pursuant to outstanding warrant, even
See annotations for secondary sources


2012 article--comment
as to leave a certain amount of judicial elbow room for the exercise of discretion."  

Conclusion

This Comment has examined nearly forty years of Oregon state and statutory law to answer the question posed from the start: Is there a subject matter limitation on officer inquiries during routine traffic stops in Oregon? Twenty years ago, the answer would have been "yes," based on case law, such as State v. Evans and State v. Carter, and its application of ORS 131.615 and 810.410. However, the enactment of ORS 136.432, in addition to subsequent case law such as State v. Amaya and State v. Gomes, has collectively answered "no" to whether Oregon law recognizes a subject matter limitation. In sum, Oregon law does not recognize a subject matter limitation to officer inquiries that are unrelated to the traffic reason for the stop--for the time being.

The difficulty springs from the inherent tension between our commitment to safeguarding the precious, and all too fragile, right to go about one's business free from unwarranted government interference, and our recognition that the police must be allowed some latitude in gathering information from those individuals who are willing to cooperate. Given these difficulties, it is perhaps [1422] understandable that our efforts to strike an appropriate balance have not produced uniform results. 157

- Justice Brennan
Finding the Law

- Start with secondary sources?
- Check for constitutional provisions and statutes.
- Try to find leading case(s).
- Use leading case(s) to find cases from your jurisdiction.
State v. Armstrong: One Good Case (Known-Authority)

There was sufficient proof to support defendant's conviction.

Outcome
The court affirmed defendant's conviction.

- Controlled Indexing on Lexis Advance to find more cases

[Highlighted sections of a Lexis Advance search result]
Topic Summary: Investigative Stops

Practice Area: Criminal Law & Procedure
Jurisdiction: U.S. Federal
Context:
Criminal Law & Procedure > Search & Seizure > Warrantless Searches > Investigative Stops

Definitions (1)
1. The basic requirement [is] that an investigative stop must be predicated on reasonable suspicion that criminal activity is afoot. United States v. Simmons, 560 F.3d 98

Seminal Cases (9)
1. Ala. v. White, 496 U.S. 325
2. United States v. Sokolow, 490 U.S. 1

Other Jurisdictions
- California
- Dist. of Columbia
- Florida
- Georgia
- Illinois

View more
State v. Gaffney, 36 Ore. App. 105

State sought review of the decision of the District Court, Multnomah County (Oregon) that entered an order suppressing evidence on the ground that defendant was illegally stopped by police officers and dismissed harassment and criminal mischief charges that arose out of defendant's action after the stop. The lower court entered an order that suppressed evidence on the ground that defendant was illegally stopped by police officers and dismissed harassment and criminal mischief charges that arose out of defendant's action towards the police after the illegal stop. The court reversed and remanded because it found that while...

Overview: Order that suppressed evidence and dismissed harassment and criminal mischief charges was improper because although police illegally stopped defendant, he still should have been prosecuted for independent crimes that occurred after the stop.
State v. Armstrong: One Good Case (Known-Authority)

Key Number System (Controlled Indexing) to Find More Cases on WestlawNext or in a West Print Digest
Limit to Or. cases on § 131.605

State v. Hunt


Headnote: An investigatory stop must be based on a police officer's subjective belief that a crime has been or is about to be committed, and that subjective belief must be objectively reasonable under the totality of the circumstances.


State v. Holdorf


Headnote: The standard of reasonable suspicion justifying a police intrusion on the liberty interest to be free from unreasonable searches and seizures when a person is stopped was intended to be less than the standard of probable cause to arrest. U.S.C.A. Const.Amend. 4; West's Or.Const. Art. 1, § 9; West's Or.Rev. Stat. Ann. § 131.615(1).
a police officer as a drug deal. Their initial investigation is - was unfruitful. **[B]efore the investigation was concluded, the described gold Lexus drove up and immediately vanished. [W]hat the officers then knew was that a gold Lexus with this license plate that had been described as being involved in repeated reports of a drug transaction was associated with two girls who are in a room registered just to one and they had more than reasonable suspicion to continue the stop and discuss it further.**

Tr 75-76. The trial court concluded that defendant's subsequent consents to search and Mirandized statements did not derive from an unlawful stop. Tr 76. Accordingly, the trial court ruled that there was “nothing here to suppress, so I will deny the motion to suppress.” Tr 76.

**Standard of Review**

A trial court's express and implied findings of fact are binding on a reviewing court, provided the record contains constitutionally sufficient *13 evidence to support them. This court reviews a trial court's legal conclusions for errors of law. State v. Ehly, 317 Or 66, 74-75, 854 P2d 421 (1993).

**Argument**

Under Article I, section 9, of the Oregon Constitution, a police officer must have reasonable suspicion that a person has been involved in criminal activity to temporarily “stop” that person and make a reasonable inquiry. State v. Ashbaugh, 349 Or 297, 308-09, 244 P3d 380 (2010).
Reading the Law -- Cases

• Read synopsis/overview & important headnote(s)
• Read text relating to headnote(s)
• Read other parts of case necessary to understand it
• Note additional sources mentioned
• Read entire case if intend to rely on it
More on Finding the Law

• Use competing sources for selective (Lexis Advance) v. comprehensive coverage (WestlawNext)
O.R.S. § 131.615

131.615. Investigatory stops

Currentness

(1) A peace officer who reasonably suspects that a person has committed or is about to commit a crime may stop the person and, after informing the person that the peace officer is a peace officer, make a reasonable inquiry.

(2) The detention and inquiry shall be conducted in the vicinity of the stop and for no longer than a reasonable time.
For Bluebook Citation
Searching WestlawNext annotations

Reasonable suspicion, investigatory stop or stop-and-frisk
Also listed as Investigatory stop or stop-and-frisk - Reasonable suspicion

Purpose of a Terry stop is to allow the officer to pursue his investigation without fear of violence. U.S. v. Miles (2001) 247 F.3d 1009. Arrested - 60.2(10)

A Terry stop generally involves no more than a brief stop, interrogation and, under proper circumstances, a brief check for weapons, and if the stop proceeds beyond these limitations, an arrest occurs, which requires probable cause under Fourth Amendment. U.S. v. Miles (2001) 247 F.3d 1009. Arrested - 60.2(10)
Unique to WestlawNext--Westsearch
More on Finding the Law

Use Shepard’s and KeyCite to find additional cases and secondary sources
Use KeyCite to Find More Cases

Use Shepard’s to Find More Cases
Updating the Law

• Cases -- Shepard’s or KeyCite or BCite
  – Watch for negative history and treatment cases.

• Statutes -- or use Shepard’s or KeyCite
  – Watch for legislative and judicial treatment
Use Shepard’s for updating

Remember history v. treatment
Use KeyCite for updating
State v. Nevel

Court of Appeals of Oregon. February 9, 1994 126 Or.App. 270 868 P.2d 1338 (Approx. 9 pages)

There is no negative direct history.

Negative Citing References (3)

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- A yellow flag indicates a document has some negative treatment.
- A red flag indicates a document is no longer good law for at least one point of law.
- A blue-striped flag indicates a document has been appealed to the U.S. Courts of Appeals or the U.S. Supreme Court (excluding appeals originating from agencies).

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For more information on using KeyCite, please see the KeyCite tutorial in the Help Center.
131.615. Investigatory stops
West's Oregon Revised Statutes Annotated  Title 14. Procedure in Criminal Matters Generally  (Approx. 2 pages)

Proposed Legislation (1)
2015 OR H.B. 2707 (NS)

2015 Oregon House Bill No. 2707, Oregon Seventy-Eighth Legislative Assembly (Jan. 14, 2015), VERSION: Prefiled, PROPOSED ACTION: Amended
When Should I Stop?

• Stop when find same sources through independent means.

• Have you looked in the really important places?

• Did you update everything?

• Do you understand the law? If not, you are definitely not done!

• You are not going to find all law on an issue!
There is no one right way to do research.

Master a wide variety of research tools to develop an effective method.