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Jeffrey Allen Koistinen

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

Jeffrey Allen Koistinen,

Defendant.

23-cr-01495-AMM (EJM)

**DEFENDANT’S MOTION TO
SUPPRESS POST-ARREST
STATEMENTS AND FRUITS**

The Defendant, Jeffrey Allen Koistinen (“Defendant” or “Mr. Koistinen”), by and through undersigned counsel, hereby moves this Court pursuant to Rule 12(b)(3) of the Federal Rules of Criminal Procedure and the Fifth and Sixth Amendments of the United States Constitution, for suppression of his post-arrest statements on grounds that he was subject to custodial interrogation without being advised of his *Miranda* rights, and additionally he had already invoked his right to counsel prior to the questioning.

Mr. Koistinen was placed under arrest on August 17, 2022 by officers of the Marana Police Department and Tucson Police Department. Body-worn camera of involved officers confirm that Mr. Koistinen was never read his *Miranda* warning, never waived his *Miranda* rights, invoked his right to counsel, and was asked a question likely to elicit an

1 incriminating response while handcuffed and in the back of a police patrol vehicle. For these
2 reasons, Mr. Koistinen seeks suppression of those statements for all purposes for which they
3 may be offered against him.
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6 **I. STATEMENT OF FACTS**
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8 On or about August 17th, 2022, Mr. Koistinen and his wife Genevie drove from
9 their home in Marana, Arizona at approximately 6:20 p.m. At 6:23 p.m., Officer Phillip
10 Hengsteler of the Tucson Police Department was directed to pull the Koistinens over, and
11 conducted a traffic stop on the white Tesla SUV driven by Mr. Koistinen. Law enforcement
12 had obtained a search warrant for the Koistinen home, and were surveilling the home when
13 the Koistinen's drove away.
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16 Hengsteler had Mr. Koistinen step out of the vehicle, and more officers arrived on
17 scene. Hengsteler's body-worn camera was activated throughout the encounter and a
18 transcript thereof is attached hereto as *Exhibit A*. Hengsteler had established Mr. Koistinen's
19 identity and address prior to having him exit the vehicle.
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21 At 4:53 into Hengsteler's body-worn camera, Mr. Koistinen says "we were told by
22 our attorney don't say anything to you guys." Mr. Koistinen was subsequently searched and
23 placed into the back of a patrol vehicle by Marana Police Officer Cameron Duarte. A
24 transcript of Officer Duarte's body-worn camera is attached hereto as *Exhibit B*. Neither
25 Duarte nor Hengsteler advised Mr. Koistinen of his *Miranda* rights. Hengsteler remained on
26 scene, and indicated to other officers on scene that an addendum would be needed to search
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1 the vehicle. Throughout the recorded portions of both body cameras, Officer Duarte and
2 Sergeant Dittiger ask questions of Mr. Koistinen about gaining entry to his unlocked home.
3 Officer Hengsteler asks Mr. Koistinen only about the location of his phone, which can be
4 heard on both body-worn cameras.
5

6 Hengsteler questioned both Mr. Koistinen and his wife concerning the location of
7 Mr. Koistinen's phone. After being handcuffed and placed in the back of a patrol vehicle, Mr.
8 Koistinen was approached by Hengsteler who asked him where his phone was located.
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10 **II. MEMORANDUM OF POINTS AND AUTHORITIES**

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12 Mr. Koistinen's post-arrest statements should be suppressed on grounds that he was
13 subjected to custodial interrogation without being advised of his *Miranda* rights and on
14 grounds that he had already advised officers he had an attorney and did not wish to make a
15 statement. The Fifth Amendment requires that no person "be compelled in any criminal case
16 to be a witness against himself." U.S. CONST. amend. V. Because custodial interrogation
17 generates "inherently compelling pressures which work to undermine the individual's will
18 to resist and to compel him to speak where he does not otherwise do so freely," the
19 government may not use statements elicited through custodial interrogation unless the
20 use of procedural safeguards guarantee that the accused has been informed of and has freely
21 waived the Constitutional privileges of the Fifth Amendment. *Miranda v. Arizona*, 384
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1 U.S. 436, 467 (1966). The rule in *Miranda* is a prophylactic one; that is, a statement made in
2 violation of *Miranda* must be suppressed even if it was made “voluntarily.” *Florida v. Powell*,
3 559 U.S. 50, 59 (2010).
4

5 **a. Mr. Koistinen was not informed of his *Miranda* rights**

6 While no “talismanic incantation” of warnings is necessary to satisfy the
7 requirements of *Miranda*, the admonishment administered by the officers must still
8 reasonably convey the constitutional rights of the defendant. *California v. Prystock*, 453
9 U.S. 355, 359 (1981) (*per curiam*). To guarantee the Fifth Amendment’s right against self-
10 incrimination, an individual taken into custody by law enforcement officers for questioning
11 “must be adequately and effectively apprised of his rights.” *Miranda*, 384 U.S. 436, 467; U.S.
12 Const. amend. V. First, officers must inform the suspect in “clear and unequivocal terms” of
13 his right to remain silent. *Id.* at 467–68. Second, they must make the suspect “aware not only
14 of the privilege, but also of the consequences of forgoing it,” by informing the suspect that
15 “anything” he says during questioning “can and will be used against [him] in court.” *Id.* at
16 469. This warning must be provided so that the suspect knows “that he is faced with a phase
17 of the adversary system—that he is not in the presence of persons acting solely in his
18 interest.” *Id.* Third, they must inform the individual of his “right to have counsel present”
19 before and during questioning, so that “the individual’s right to choose between silence and
20 speech remains unfettered.” *Id.* Fourth, and finally, so that the right to counsel is not
21 “hollow,” the suspect must be informed that, if he does not have the funds to afford an
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1 attorney, one will be appointed for him. *Id.* at 473. These four warnings are “an absolute
2 prerequisite” to interrogation and provide the “[o]nly . . . ascertainable assurance” that the
3 suspect is aware of his rights. *Id.* at 471; see *United States v. Reyes-Bonilla*, 671 F.3d 1036,
4 1044 (9th Cir.), *cert. denied*, 568 U.S. 905 (2012) (“A waiver of rights cannot be found to
5 have been considered or intelligent where there is no evidence that the detainee was first
6 advised of those rights in a language he could understand.”). It is thus irrelevant whether,
7 absent express warnings or their fully effective equivalent, a suspect actually understood his
8 rights. *Miranda*, 384 U.S. at 471, 479 (stating “circumstantial evidence” of a suspect’s
9 awareness of his rights to be insufficient); *United States v. Botello-Rosales*, 28 F.3d 865, 867
10 n.2 (9th Cir. 2013) (holding “irrelevant” whether suspect understood his rights
11 when warnings were deficient); *United States v. Longbehn*, 850 F.2d 450, 453 (8th
12 Cir.1988) (rejecting the argument that the suspect’s position as a police officer obviates
13 the requirement of a *Miranda* warning). Furthermore, after these warnings are issued,
14 the government cannot seek to admit custodial statements unless the government
15 proves by a preponderance of the evidence that the suspect voluntarily, knowingly, and
16 intelligently waived his *Miranda* rights.

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23 In the present case, no warning was given at all. This is not a close case assessing
24 the sufficiency of a vague or partial warning. At no point prior to, during, nor after Mr.
25 Koistinen’s arrest did officers advise him of his *Miranda* rights. Allowing for Mr. Koistinen’s
26 statements to be used against him in court proceedings even though they were elicited in
27 violation of *Miranda* would flout the Court’s will in the most clear-cut and blatant way
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1 possible. That Mr. Koistinen may have had some understanding of his rights independent of
2 being advised by law enforcement is of no consequence; there is no evidence of any adequate
3 warning when Mr. Koistinen was arrested.
4

5 **b. Mr. Koistinen was in custody when interrogated by Officer Hengsteler**

6 For *Miranda* to apply, a person must be in “custody.” A person is in “custody”
7 when he is deprived of “freedom of action in any significant way.” *Miranda*, 384 U.S.
8 at 444; *Oregon v. Mathiason*, 429 U.S. 492, 495 (1977) (*per curiam*); *Stansbury v.*
9 *California*, 511 U.S. 318, 322 (1994) (defining custody as a “formal arrest or restraint
10 on freedom of movement of the degree associated with a formal arrest”). “In
11 determining whether an individual was in custody, a court must examine all of the
12 circumstances surrounding the interrogation.” *Stansbury*, 511 U.S. at 322; *United States*
13 *v. Craighead*, 539 F.3d 1073, 1082 (9th Cir. 2008) (court must examine the “totality of
14 circumstances surrounding the interrogation”). The test is whether “a reasonable
15 innocent person in such circumstances would conclude that after brief questioning he or
16 she would not be free to leave.” *United States v. Booth*, 669 F.2d 1231, 1235 (9th Cir.
17 1981).
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23 Mr. Koistinen was handcuffed, placed in the back of a patrol vehicle, and isolated
24 from his nine-months-pregnant wife prior to being questioned by Hengsteler regarding the
25 location of his phone. He had already been told first that he was detained and not free to leave
26 by Officer Hengsteler, and subsequently told by Officer Duarte that he was under arrest while
27 being handcuffed and prior to being placed in the back of the police car.
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c. Officer Hengsteler's questioning constituted interrogation

“The term ‘interrogation’ means ‘any words or actions on the part of the police (other than those normally attendant to arrest and custody) that the police should know are reasonably likely to elicit an incriminating response.’” *United States v. Washington*, 462 F.3d 1124, 1132 (9th Cir. 2006) (quoting *Rhode Island v. Innis*, 446 U.S. 291, 301 (1980)).

Importantly, the “routine gathering of background biographical information, such as identity, age, and address, usually does not constitute interrogation.” *Id.*; see also *United States v. Booth*, 669 F.2d 1231, 1238 (9th Cir. 1981). The Ninth Circuit has “recognize[d] the potential for abuse by law enforcement officers who might, under the guise of seeking ‘objective’ or ‘neutral’ information, deliberately elicit an incriminating statement from a suspect.” *Booth*, 669 F.2d at 1238. To account for this risk, the Ninth Circuit applies an “objective” test to determine whether questioning constituted interrogation. *Washington*, 462 F.3d at 1132. Seemingly routine biographical questions can constitute interrogation if, in light of all the circumstances, the officers should have known that their words or actions were reasonably likely to elicit an incriminating response. *Booth*, 669 F.2d at 1238. In making this determination, “the focus is upon the defendant’s perceptions.” *United States v. Moreno-Flores*, 33 F.3d 1164, 1169 (9th Cir. 1994). courts must determine whether “the questions are reasonably likely to elicit an incriminating response in a particular situation.” *United States v. Mata-Abundiz*, 717 F.2d 1277, 1280 (9th Cir. 1983).

Officer Hengsteler has already voiced that Mr. Koistinen was under arrest, and advised other officers on scene that an addendum would need to be sought to search Mr.

1 Koistinen's vehicle. With Mr. Koistinen already secured in the back of a patrol vehicle,
2 Hengsteler both actually and reasonably knew that questions regarding the location of Mr.
3 Koistinen's phone would elicit an incriminating response - such was his purpose. This
4 questioning was not related to Mr. Koistinen's booking, and does not fall within the "routine
5 gathering of background biographical information, such as identity, age, and address," which
6 had been determined prior to arrest during the initial portion of the traffic stop.
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9 **d. Mr. Koistinen had invoked his right to counsel**

10 The Supreme Court explained in *Edwards v. Arizona* that "when an accused has
11 invoked his right to have counsel present during custodial interrogation," he must not be
12 "subject to further interrogation by the authorities until counsel has been made available to
13 him, unless the accused himself initiates further communication, exchanges, or conversations
14 with the police." 451 U.S. 477, 484–85 (1981). A valid waiver of that right cannot be
15 established by showing only that he responded to further police-initiated custodial
16 interrogation even if he has been advised of his rights.") *Id.*; see also *Michigan v. Harvey*, 494
17 U.S. 344, 349 (1990) (once defendant invokes his right to counsel, subsequent waiver of that
18 right—even if voluntary and knowing under traditional standards—is "presumed invalid"). To
19 request counsel, a suspect "must articulate his desire to have counsel present sufficiently
20 clearly that a reasonable police officer in the circumstances would understand the statement
21 to be a request for an attorney." *Davis v. United States*, 512 U.S. 452, 459 (1994).
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23 Here, Mr. Koistinen had not only invoked his right to counsel, but was placed into
24 the back of a police vehicle. He could not have initiated the questioning that began when
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1 Hengsteler approached the vehicle, opened the car door, and began to ask questions of an
2 arrested suspect who had invoked his right to counsel.
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5 **III. CONCLUSION**

6 For the foregoing reasons, Mr. Koistinen respectfully requests that the Court grant
7
8 his motion to exclude his post-arrest statements of August 17, 2026, or at minimum hold an
9 evidentiary hearing to determine whether his *Miranda* rights were violated.
10

11 RESPECTFULLY SUBMITTED: July 28, 2026
12

13
14 s/ Nicholas Loncar
15 NICHOLAS LONCAR
16 Attorney for Defendant
17 Jeffrey Allen Koistinen
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PROOF OF SERVICE

I am employed in the County of Pima, State of Arizona. I am over the age of 18 and not a party to the within action; my business address is 2030 E Broadway Blvd, Ste 123, Tucson, Arizona 85719.

On July 28, 2026, I served the document described as:

DEFENDANT'S MOTION TO SUPPRESS POST-ARREST STATEMENTS AND FRUITS

Through the Court's ECF Electronic filing and service system.

EXECUTED ON JULY 28, 2026.

/s/ Nicholas Loncar

Nicholas Loncar

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Defendant's Motion to Suppress Post-Arrest
Statements and Fruits

Exhibit

A

Transcript of Body Worn Camera of
Officer Hengsteler

Ofc. Hengsteler ("H"): (00:35) Hey sir, how are you?

Jeffrey Koistinen ("JK"): Good

H: I'm good. How are you today? Good.

H: Do you have your license, insurance and registration?

JK: Yeah.

H: Perfect.

JK: What did you stop me for?

H: (00:45) If you would step out and have a quick word what's going. And then I have to ask, just because it's Tucson, not that you don't have a right to it, but are there any weapons in the vehicle?

JK: Nope.

H: Okay. Perfect.

JK: (unintelligible)

H: Ok. Thank you, sir. What is your, Mr. ...

JK: Koistinen

H: Koitsinen?

JK: Yep.

H: (01:30) Okay. Valid 2-23-2021. We can worry about that later. Yeah, if you step back here, it's

JK: Sure.

H: (02:30) Metro 104 Traffic. It's going to be young. Tom, Edward, Sam, Lincoln, Adam we are at Moore and Thornydale.

H: (03:05) Koistinen, right?

JK: Koistinen, yep.

H: Koistinen. That's an awesome name. So Mr. Koistinen, apparently there is an investigation involving you and your residence. Are you aware of anything going on like that?

JK: Not at my residence. I know there was two other houses that I own there a problem.

H: So again, I don't even know if it's a problem per se in regards to your residence, but essentially your residence is involved.

JK: How is my residence involved?

H: There's going to be a detective come and explain all that to you. I'm just kind of the guy that comes out here and makes contact with you. So we're going to be hanging out for a while.

JK: Ok.

H: (03:46) You're not free to go.

JK: Can we go back to my house?

H: We can, momentarily. I understand. I see you have your wife- is that your wife?

JK: (04:00) My wife, she's, yep.

H: I don't want to make assumptions, but she's pretty,

JK: She's pretty - she's very far along.

H: Yeah. Okay. So look, I'm a human. I treat people right. You won't, won't get any negativity from me. I want good for all human beings. And that's the way I was raised and that's the way I was raised with this job. So is that your attorney?

JK: Yep.

H: Okay.

JK: I'm going to give the card to my wife.

H: Yeah, absolutely.

JK: (04:27) Hey Genevie, send a text message to this number right there.

H: He's actually in - your attorney drives the white.

JK: Yeah.

H: Yeah, we're already talking to him. So he's aware. So you can come hang out with me please. Yeah, so.

JK: You don't need to say anything.

H: So that's where we're at.

JK: (04:53) We were told my our attorney don't say anything to you guys.

H: Hey, that is your constitutional right. If anybody loves the constitution to me. So we can just hang out and we can talk about the sky, we can talk about these nice people you've got or we can just stand, it's going to be up to you. And my goal will be to get you back to that residence as quickly as possible.

JK: Okay.

H: There's going to be a warrant served at that house.

JK: Are they going to mess shit it up or -

H: No, we don't -

JK: Well what are they going to do? Because you guys went over to Brandon's house and

H: Well, I wasn't there.

JK: (05:28) Okay.

H: So I don't know anything that happened at Brandon's house. I don't know if there was dirt left on the floor or what status that house was in. Because I was not never there. I got brought into this noon today.

JK: Okay.

H: But I can tell you that we are held to a very high standard, especially given what we do and who we work for that we don't get to just treat people's property poorly.

JK: Alright.

H: (06:00) And if we are, if there's anyone in our group that makes the decision to do that, they're probably not going to like the end result. So, that's where we're at. Do you have any questions for me?

JK: No.

H: No? We're just going to hang out out as soon as I get work from the bosses and the detectives (unintelligible).

JK: (06:23) Are they down there now?

H: I'm not sure where they're at. I know there are some detectives close to your house. I dunno how close.

JK: Are they down there, talking with the attorney and Brandon?

H: Yes, there's a group with them.

JK: Okay.

H: (06:38) I am not going to put you in handcuffs right now, but I may have to.

JK: I mean you have no reason to.

H: (06:50) Well what I'm hearing is technically you might be under arrest, so I don't want to do that. I think clearly you've done very, very well for yourself. You're not looking to make a complicated situation more complicated, so I'm not going to do that. Especially (unintelligible).

JK: (07:12) Okay.

H: You are being detained. (Unintelligible). (Sound turned off from 07:33-07:49)

H: (07:55) Let me call my boss. Could you hand out with him for a minute?
(Sound turned off 08:08-10:21)

Unidentified Officer: No, not yet.

H: Not yet. I was just going to try and remove the cellular devices.

H: Hi, ma'am. How are you?

Genevie Koistinen ("GK"): Okay.

H.: Good. Good. Hey, so would you -- this is just an officer safety thing. I'm not going to go through your items.

GK: Okay.

H: I'm not going to go through any of it. Believe me, I -- I have a strong respect for the Constitution and all that it does. And I understand that you guys have all spoken with your attorney, so I'm not even going to ask you questions, but I would like to hold onto your items. Would you be okay with that?

GK: (Unintelligible) what items?

H: (10: 57) Your purse and your phone, mainly. I'm just going to put them over here. It -- it's more an officer safety thing. I don't want you calling somebody that might show up and make this a more - even more complicated situation. So would you be okay with that, just putting them right here?

GK: My purse?

H: And your phone.

GK: (Unintelligible).

H: You can put your phone -- yeah. Thank you so much. I appreciate that. And then is that your husband's phone?

GK: No, this is my glucose test.

H: Oh, okay.

GK: (Unintelligible).

H: Where's his phone?

GK: What's that?

H: His phone.

GK: I don't know.

H: You don't know. (11:30) Okay. No worries. No trouble at all. If you start to get too warm or anything or you feel uncomfortable, you let me know right away. I want to make sure you're comfortable. Okay?

Unidentified Officer: You need some bags bro?

H: No, I got a dog back there.

H: (12:39) He's under arrest, yeah. She is not, this needs to be, they need to get an addendum to the warrant to search that. So.

H: (13:30) Where's your phone?

JK: What's that?

H: Where's Your phone?

JK: It's in the car, or she has it.

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Defendant's Motion to Suppress Post-Arrest
Statements and Fruits

Exhibit

B

Transcript of Body-Worn Camera of
Officer Duarte

Officer Cameron Duarte BWC - Jeffrey Koistinen Arrest August 17, 2022

Officer Duarte (01:36): You guys expecting somebody? You expecting somebody?

Officer Hengsteler (03:19): Can you go ahead and search him?

Officer Duarte (03:24): Can you do me a favor. Hands behind your back. Lace your fingers. Lace fingers intertwined them between each other. There you go. Just like that. No weapons or anything on you.

Officer Duarte (04:43): You are not free to leave. You are under arrest. These officers are going to let you know exactly what your charges are. I just got here (inaudible).

Officer Duarte (05:04): Just a little bag. Do you have a cage or no?

Officer Hengsteler (05:08): No (inaudible).

Officer Duarte (05:09): Oh, okay. That's fine. I'll put him in my (inaudible).

Mr. Kositinen (05:10): You guys aren't arresting my wife, are you?

Officer Duarte (05:12): I have no idea man. I just got here. I'm going to put you in the back of my car. I'll get the air on.

Officer Duarte (05:30): No rush to get in the car.

Mr. Koistinen (05:31): It's kind hard to - can you give that the bag of my stuff to my wife because my credit card's in there.

Officer Duarte (05:38): Perfect. I can do that. So you want her to have everything that -

Mr. Koistinen (05:41): Yeah, she can just have everything.

Officer Duarte (05:42): Yep. Okay. Lemme get this. 5-5-0. Lincoln - 1 - 3. Car (inaudible). Stand by.

Mr. Koistinen (05:58): Some change in there.

Officer Duarte (06:00): Yeah. I'm just going to get it all out.

Officer Hengsteler (06:20): Just put this on your front seat?

Officer Duarte (06:22): Yeah, he said all of it can go with his wife

Officer Hengsteler (06:24): Ok.

Officer Hengsteler (06:41): Where's your phone?

Mr. Koistinen (06:41): What's that?

Officer Hengsteler (06:41): Where's your phone?

Mr. Koistinen (06:43): (Unintelligible)

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Officer Cameron Duarte BWC - Jeffrey Koistinen Arrest August 17, 2022

Officer Duarte (07:19): Got the air on.

Mr. Koistinen (07:21): Yeah. I can feel it.

Officer Duarte (07:40): Are the keys to the house in this car? Let me ask him.

Officer Duarte (07:54): Are the keys to your house on your key ring for this car?

Mr. Koistinen (07:57): This car just has a little key card.

Officer Duarte (08:01): To get into where? To open your garage or open your gate or,

Mr. Koistinen (08:05): Well, my front door's not locked.

Officer Duarte (08:07): Your front door's unlocked?

Mr. Koistinen (08:08): Yep.

Officer Duarte (08:09): Okay. So you don't have the keys to your house right

Mr. Koistinen (08:10): Now? No, I think they're - I don't think I have any keys on me. But I know the front door's unlocked, so-

Officer Duarte (08:16): Okay.

Officer Duarte (09:36): Do you have any dogs or anything in your house?

Mr. Koistinen (09:38): Yeah, we have a Shihtzu and two Pomeranians in there.

Officer Duarte (09:40): Okay. So just the three little dogs?

Mr. Koistinen (09:43): Yeah

Officer Duarte (09:44): They're not vicious or anything like that?

Mr. Koistinen (09:46): No.

Officer Duarte (10:11): Do they run around the house or are they kenneled up?

Mr. Koistinen (10:18): (Unintelligible) The front door's unlocked. (Unintelligible).

Officer Duarte (11:38): These are my car

Sgt Dittiger (12:14): Two of the dogs are out rolling around or

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Officer Cameron Duarte BWC - Jeffrey Koistinen Arrest August 17, 2022

Mr. Koistinen (12:15): I can't remember (unitelligible).

Sgt Dittiger (12:28): Where's she at? Where's wife now?

Officer Duarte (12:44): And obviously last chance, there's nothing else on you? Nothing hidden anywhere that I can't see. Nothing in your shoes. So it's anything like that. Okay.

Mr. Koistinen (12:52): No. Did they say what's going on here?

Officer Duarte (12:54): Yeah. I'll get with these guys in a little bit and then I'll get more info for you. Basically, like I said, I showed up late to the party. I'm just following orders at this point. So in the meantime, just make sure you're comfortable, hang out if you have any questions for you, we'll come up and,

Officer Duarte (42:45): Hey man. That gated area where you have that box trailer at?

Mr. Koistinen (42:48): Yeah.

Officer Duarte (42:49): How do you get in there?

Mr. Koistinen (42:50): You just got to pull, there's a small, the small part of the gate and then there's the bigger part of the gate.

Officer Duarte (42:57): Okay.

Mr. Koistinen (42:57): So if you pull the small, you got to kind of force it, lift it up and pull it out. And then on the other one, the other one will swing out. You just got to release the little hook in the ground.

Officer Duarte (43:11): Okay. It's one of those little drop latches that goes in the dirt?

Mr. Koistinen (43:13): Yeah. Or you can also get in there through the back if you want it. Open. The big one, you can get in there if you just need to. Are you trying to get inside the trailer? Yep. Yeah, so you can also just go, it's easier to go through the back garage. Oh. Maybe through the backyard area. There's a gate. There's a little door back there into that area.

Officer Duarte (43:34): Okay. Alright.

Mr. Koistinen (43:35): Yep. And then there's a walk-in on the side of the trailer that is unlocked.

Officer Duarte (43:41): Okay. Yep. Did you get all that? Okay. So he said there's a small portion of the gate and a big portion of the gate you got to lift and pull the small portion, kind of force it open. And then the big one also.