

United States Court of Appeals
For the Eighth Circuit

No. 25-1653

United States of America

Plaintiff - Appellee

v.

Daniel Medina-Martinez, also known as Walter Daniel Lopez-Felipe

Defendant - Appellant

Appeal from United States District Court
for the Western District of Arkansas - Hot Springs

Submitted: May 11, 2026

Filed: September 4, 2026

[Unpublished]

Before L.R. SMITH, BENTON, and STRAS, Circuit Judges.

PER CURIAM.

Caught with several pounds of cocaine in his SUV during a traffic stop, Daniel Medina-Martinez ended up with a conviction of possession with the intent of distributing it. See 21 U.S.C. § 841(a)(1), (b)(1)(B)(ii)(II). Although he claims the stop violated the Fourth Amendment, we affirm.

I.

What first caught a trooper's eye was how closely Medina-Martinez was following the vehicle in front of him. As the trooper pulled behind his SUV, he also noticed "something in the windshield hanging from the rear[view mirror]." Thinking that he had violated Arkansas law in a couple of ways, the trooper stopped him.

Implausible and evasive answers to routine questioning only heightened the trooper's suspicions. Eventually Medina-Martinez agreed to a search that uncovered three packages of cocaine totaling over seven pounds in the center console.

Facing multiple charges, Medina-Martinez moved to suppress the drugs. After the district court¹ denied the motion, he conditionally pleaded guilty to the drug count in exchange for the dismissal of a charge of illegally reentering the country. *See* 8 U.S.C. § 1326(a)(2), (b)(2). The issue he reserved, which is whether the traffic stop violated the Fourth Amendment, is the one we decide today.

II.

Whether the stop was "reasonable" is subject to de novo review, except for the factual findings underlying the ruling, which we review for clear error. *United States v. Ramos-Caraballo*, 375 F.3d 797, 800 (8th Cir. 2004). The stop was based in part on a suspected violation of an Arkansas statute that prohibits "ha[ving] any substance or material except rearview mirrors and decals required by law attached to the windshield . . . [that] obstructs the operator's view or the safe operation of the vehicle." Ark. Code Ann. § 27-37-304(a)(1)(A). As the trooper explained at the suppression hearing, he spotted "something" hanging from the rearview mirror as the SUV drove past. He later discovered that the "something" was some *things*: two

¹The Honorable Susan O. Hickey, then Chief Judge, now United States District Judge for the Western District of Arkansas.

“scent tree[]” air fresheners and a rosary. Even without these details, however, what he saw from the road was enough to provide “a reasonable basis for the belief that [the driver was] violating” Arkansas law. *United States v. Williams*, 39 F.4th 1034, 1042 (8th Cir. 2022); *cf. Ramos-Caraballo*, 375 F.3d at 801 (upholding a traffic stop under a similar Nebraska law after an officer “testified that he observed . . . [the defendant’s] car pass[] him on the interstate with an air-freshener hanging from the rearview mirror”).

Medina-Martinez largely ignores the obstructed-view justification for the stop. Instead, he focuses on the alleged tailgating, which he blames on the other vehicle braking suddenly when the trooper pulled onto the highway. Whether Medina-Martinez *also* tailgated the other vehicle makes no difference here, because just one suspected “traffic violation—however minor—creates probable cause to stop . . . a vehicle.” *Ramos-Caraballo*, 375 F.3d at 801 (citation omitted). The items hanging from the mirror, in other words, provided their own justification.

III.

We accordingly affirm the judgment of the district court.
