

IN THE COURT OF APPEALS OF THE STATE OF NEVADA

JACOB AARON WOOD,  
Appellant,  
vs.  
THE STATE OF NEVADA,  
Respondent.

No. 90150-COA

**FILED**

**JAN 13 2026**

ELIZABETH A. BROWN  
CLERK OF SUPREME COURT,  
BY Ell Jones  
DEPUTY CLERK

*ORDER OF AFFIRMANCE*

Jacob Aaron Wood appeals from a second judgment of conviction after remand, entered pursuant to a jury verdict, of felon in possession of a firearm and possession of a schedule I or II controlled substance of less than 14 grams, first or second offense. Second Judicial District Court, Washoe County; Lynne K. Jones, Judge.<sup>1</sup>

Prior to trial, Wood moved to suppress evidence of a firearm on grounds that a warrantless inventory search was invalid because it did not produce a true inventory of the vehicle's contents as required by Sparks Police Department policy. The State opposed Wood's suppression motion, arguing that (1) Wood lacked standing to object to the vehicle search because the vehicle was stolen, (2) the inventory search was lawful, and (3) the State had probable cause to search the vehicle under the automobile exception to the warrant requirement. In denying the motion, the district

---

<sup>1</sup>The Hon. Kathleen A. Sigurdson, District Judge, considered and denied Wood's motion to suppress evidence prior to trial and after this court's two prior orders affirming in part and vacating in part the prior judgments of conviction and remanding the matter for further proceedings.

26-0932

court determined that Wood had standing to challenge the search but that the search was valid under the inventory search exception to the warrant requirement. The district court did not address the State's alternative argument regarding the automobile exception to the warrant requirement.

Wood was convicted of felon in possession of a firearm.<sup>2</sup> Wood appealed, arguing the district court erred by denying his motion to suppress. On June 15, 2023, this court entered an order affirming in part and vacating in part Wood's judgment of conviction and remanding the matter to the district court. *See Wood v. State*, No. 85047-COA, 2023 WL 4041506 (Nev. Ct. App. June 15, 2023) (Order Affirming in Part, Vacating Judgment in Part and Remanding). In that order, this court held that the district court did not clearly err in its determination that Wood had standing to challenge the vehicle search. *Id.* at \*4-5. However, this court further held that the district court erred in determining that the inventory search was conducted in a lawful manner. *Id.* at \*6. Because the district court did not make findings of fact or conclusions of law regarding the applicability of the automobile exception, we remanded the matter "for the district court to determine, in the first instance and based on the existing district court record, whether the automobile exception justified the warrantless search in this case." *Id.* at \*7. As such, the district court was required to determine on remand whether the vehicle was readily mobile and whether a police officer had probable cause to believe the vehicle

---

<sup>2</sup>Wood was also convicted of possession of a schedule I or II controlled substance of less than 14 grams, first or second offense. Wood did not challenge this conviction on appeal.

contained contraband or evidence of a crime. *Id.* (citing *State v. Lloyd*, 129 Nev. 739, 50, 312 P.3d 467, 474 (2013)).

On August 7, 2023, the district court issued a new order denying Wood's motion to suppress. The district court's analysis focused on whether Wood owned or had rightful possession of the vehicle at issue, and it determined that Wood lacked standing to challenge the vehicle search and that the inventory search was "reasonable."

On July 26, 2024, this court entered an order affirming in part and vacating in part Wood's new judgment of conviction after remand and remanding the matter to the district court. *See Wood v. State*, No. 87278-COA, 2024 WL 3560180 (Nev. Ct. App. July 26, 2024) (Order Affirming in Part, Vacating Judgment in Part and Remanding). In that order, we held that our prior determinations that Wood had standing to challenge the search and that the inventory search was unlawful were the law of the case and the district court was therefore not free to revisit those issues on remand. *Id.* at \*2. We remanded this matter to the district court "to determine, in the first instance and based on the existing district court record, whether the automobile exception justified the warrantless search," and directed the district court that it "must make specific factual findings regarding whether the vehicle was readily mobile and whether a police officer had probable cause to believe the vehicle contained contraband or evidence of a crime." *Id.* (citing *Lloyd*, 129 Nev. at 749-50, 312 P.3d at 473-74).

On January 9, 2025, the district court issued its order denying Wood's motion to suppress following the remand. In assessing whether the automobile exception applies, the district court found that the vehicle was

readily mobile and that “upon learning the vehicle was confirmed to be stolen, the police had probable cause to search the vehicle because the police had reasons to believe the vehicle had evidence of a crime.”

On appeal, Wood does not dispute the district court’s finding that the vehicle was mobile but asserts the district court’s findings as to probable cause are inadequate. Wood argues the record does not support the district court’s finding that the vehicle was “confirmed to be stolen,” and contends the district court did not articulate what “specific items” of contraband or evidence of a crime the officers had probable cause to believe the vehicle contained. Wood requests that this court therefore vacate the judgment of conviction.

While the State agrees the district court erred by finding the vehicle was “confirmed to be stolen,” it contends the district court’s order otherwise properly found the vehicle was “reported stolen.” The State raises a concern that it is “unclear whether the district court concluded that the vehicle’s status as reported stolen, by itself, constituted probable cause,” and suggests that this court remand the matter to the district court to make specific probable cause findings. We conclude remand is unnecessary because the record supports the district court’s ultimate conclusion that the vehicle’s status as reported stolen, standing alone, gave the officers probable cause to search the vehicle pursuant to the automobile exception to the warrant requirement.

“A motion to suppress presents mixed questions of law and fact.” *Lloyd*, 129 Nev. at 743, 312 P.3d at 469. We review the district court’s findings of fact for clear error, but we review the “district court’s legal conclusion regarding the constitutionality of [the] challenged search . . . de

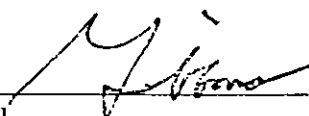
novo.” *Id.* Although the district court’s order included one reference to the vehicle as “confirmed stolen,” other portions of the order found that the vehicle was “reported stolen.” Of particular significance, the district court found in the conclusion to the order that “police had probable cause to search the vehicle because, upon a search of the VIN, the vehicle came back *reported* stolen.” (Emphasis added.) We therefore conclude that, notwithstanding the single reference to the vehicle as “confirmed to be stolen,” the district court’s finding that the vehicle had been reported stolen is supported by the record and is not clearly erroneous.

As for the district court’s legal conclusion that the police had probable cause to search the vehicle, and thus that the automobile exception to the warrant requirement applied, we agree with the court’s determination. Under the automobile exception, if a vehicle is readily mobile and probable cause exists to believe it contains contraband or evidence of a crime, “the automobile exception to the warrant requirement imposed by the Fourth Amendment and the Nevada Constitution’s cognate provision [will justify] the search.” *Lloyd*, 129 Nev. at 751, 312 P.3d at 474. “Evidence of a vehicle’s ownership is *always* relevant to the crime of driving a vehicle without the owner’s consent; registration and title documents are evidence of ownership and are often kept in a car.” *United States v. Edwards*, 769 F.3d 509, 515 (7th Cir. 2014). The record here shows that the officers confirmed the vehicle had been reported stolen by running the VIN and license plate and by speaking to the owner. Wood provided inconsistent information to the officers. Wood initially told officers he did not know the vehicle was stolen and had purchased it from an unnamed friend but also stated he had searched online to determine whether the vehicle was stolen.

Under the circumstances, the officers had probable cause to search the vehicle pursuant to the automobile exception to locate evidence related to the vehicle's ownership. *See United States v. Scott*, 705 F.3d 410, 417 (9th Cir. 2012) ("In determining whether probable cause [to believe a vehicle contains evidence of a crime] exists, [the] court evaluates the totality of the circumstances."); *cf. Devenpeck v. Alford*, 543 U.S. 146, 152 (2004) ("Whether probable cause exists depends upon the reasonable conclusion to be drawn from the facts known to the arresting officer at the time of the arrest."). Accordingly, we

ORDER the second judgment of conviction after remand  
AFFIRMED.

  
\_\_\_\_\_, C.J.  
Bulla

  
\_\_\_\_\_, J.  
Gibbons

  
\_\_\_\_\_, J.  
Westbrook

cc: Hon. Lynne K. Jones, District Judge  
Washoe County Public Defender  
Attorney General/Carson City  
Washoe County District Attorney  
Washoe District Court Clerk