

[Wilson v. Commonwealth, 709 C.D. 2018 \(2019\)](#). Judge Neuman authored the Court's opinion.

Holding: The Court affirmed the trial court's dismissal of Wilson's appeal from a license suspension imposed after he refused a chemical breath test under Pennsylvania's Implied Consent Law. The Court held that the arresting officer had legal authority under the Municipal Police Jurisdiction Act (MPJA) to pursue and arrest Wilson outside of his primary jurisdiction and that the officer had reasonable grounds to believe Wilson was driving under the influence.

Analysis: The Court reasoned that probable cause under the MPJA was supported by the officer's speed measurement using an Accutrak timing device and his testimony regarding the standard procedures used, despite the absence of formal proof of the device's statutory compliance. It further held that reasonable grounds for DUI investigation existed based on the officer's observations of alcohol odor, glassy eyes, limited HGN test clues, and Wilson's refusal to perform other sobriety tests or take a preliminary breath test.

Background: The case arose after a traffic stop initiated in North Strabane Township and concluded in Peters Township, where the officer invoked implied consent warnings after Wilson refused testing. The Court emphasized the lower evidentiary standard for probable cause in administrative license suspension cases compared to criminal proceedings.

Applicable Law: Pennsylvania's Implied Consent Law, codified at 75 Pa. C.S. § 1547, provides that any person who drives in the Commonwealth is deemed to have given consent to chemical testing if a police officer has reasonable grounds to believe that the person was operating a vehicle under the influence of alcohol or drugs. If a driver refuses to submit to the chemical test after being properly warned, the Pennsylvania Department of Transportation (PennDOT) is required to suspend that person's driver's license under Section 1547(b)(1)(i).