

# **Bond Case Briefs**

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## **LIMITATION OF ACTIONS - UTAH**

### **Grillone v. Peace Officer Standards and Training Council**

**Supreme Court of Utah - April 3, 2025 - P.3d - 2025 WL 1007306 - 2025 UT 7**

Former police officer sought judicial review of order of Peace Officer Standards and Training Division (POST) suspending his peace officer certification for three years after POST learned that officer had resigned from his position as a police officer while under investigation for providing false or misleading information to prosecutor handling a traffic citation against officer's mother.

The Court of Appeals affirmed, and officer filed petition for certiorari.

The Supreme Court held that:

- As matter of first impression, statutes of limitation for civil actions in judicial code do not apply to administrative disciplinary proceedings unless legislature has incorporated them by statute;
- Statute governing POST disciplinary proceedings did not subject POST-adjudicative proceedings to catch-all four year statute of limitations for relief not otherwise provided for by law; and
- POST disciplinary proceeding brought against officer at least five years after he had resigned from his position was not time barred.