

BOISE, FRIDAY, OCTOBER 3, 2025, at 10:00 A.M.

IN THE SUPREME COURT OF THE STATE OF IDAHO

STATE OF IDAHO,)	
)	
Plaintiff-Respondent,)	
)	
v.)	Docket No. 52929
)	
BENJAMIN CHARLES KNIGHT,)	
)	
Defendant-Appellant.)	
_____)	

Appeal from the District Court of the Sixth Judicial District of the State of Idaho,
Oneida County. Javier L. Gabiola, District Judge.

Erik R. Lehtinen, State Appellate Public Defender, Boise, for Appellant.

Raúl R. Labrador, Idaho Attorney General, Boise, for Respondent.

Benjamin Charles Knight appeals from the judgment of conviction entered upon the jury verdicts finding him guilty of three counts of unlawful possession of a firearm. Officers recovered the firearms after responding to a reported disturbance at Knight's residence, where they were informed Knight was a convicted felon with at least three firearms in the home. During the encounter, Knight admitted to knowledge of the firearms' presence in the home and ultimately led a sheriff's deputy to the whereabouts of each.

Throughout the criminal proceedings, Knight told the district court he could not afford an attorney and repeatedly requested "effective assistance of counsel." The district court encouraged Knight to apply for a public defender, and Knight responded that he did not want someone to represent him but needed legal counsel, which he asserted was his constitutional right. Ultimately, the district court appointed "shadow counsel" to assist Knight during jury selection and at trial but continued to refer to Knight as self-represented. Knight appeared without counsel throughout the pretrial stages of the case and filed many pro se motions, including a motion to suppress that was denied following an evidentiary hearing.

On appeal, Knight argues the district court violated his Sixth Amendment right to counsel because the district court made no effort to determine whether he voluntarily, knowingly, and intelligently waived that right and exercised a right to represent himself at trial instead. He requests a new trial to cure this alleged, structural defect. Knight also challenges the district court's denial of his motion to suppress, arguing he was unlawfully seized when the officers responded to a report of a disturbance at his residence.