

SUMMARY STATEMENT

State v. Huffaker, Docket No. 43643

In a case arising out of Custer County, the Idaho Supreme Court vacated a district court order suppressing written and oral incriminating statements made to law enforcement by Jon S. Huffaker (“Huffaker”).

At trial before the district court, Huffaker asserted that both his oral and written statements were inadmissible because they were made in response to police questioning, while in police custody, and before he was informed of his Fifth Amendment rights as required by *Miranda v. Arizona*, 384 U.S. 436, 444 (1966). The district court suppressed Huffaker’s incriminating statements. The State appealed.

In a unanimous decision, the Idaho Supreme Court held that the district court erred in suppressing Huffaker’s incriminating statements. First, it held that the objective facts alleged by Huffaker before the district court were insufficient to meet Huffaker’s burden of proving that, at the time of his oral statements, a reasonable person in his position would have understood his or her freedom of movement to be restrained to the degree associated with a formal arrest. Accordingly, Huffaker was not in custody such that *Miranda* warnings were required. Second, the Idaho Supreme Court held that Huffaker’s written statement should not have been suppressed by the district court because it was not made in response to police interrogation such that *Miranda* warnings were required.