

SUMMARY STATEMENT

State v. Steven Michael Chambers

Docket No. 45608

In this case arising out of Kootenai County, the Court of Appeals affirmed Steven Michael Chambers' judgment of conviction for battery with the intent to commit a serious felony. The State originally charged Chambers with rape. Chambers filed a motion to introduce evidence pursuant to I.R.E. 412, requesting admission of evidence that the victim made a false allegation of rape in relation to another individual approximately six months after she reported that Chambers raped her. The district court denied Chambers' motion, concluding that, under I.R.E. 412, the allegedly false allegation must precede the conduct underlying the pending charge. The district court also excluded the evidence under I.R.E. 403. Chambers entered a conditional guilty plea to an amended charge of battery with intent to commit a serious felony, reserving his right to challenge the denial of his I.R.E. 412 motion.

On appeal, Chambers asserted the district erred in denying his I.R.E. 412 motion. The Court of Appeals held that, although I.R.E. 412 does not impose a temporal requirement, the district court did not err in denying Chambers' motion because he failed to meet his burden of showing the victim's allegations against the other individual were false. The Court of Appeals also rejected Chambers' claim that exclusion of the evidence violated his rights under the Sixth and Fourteenth Amendments to the United States Constitution to confront his accuser and present a defense.