

SUMMARY STATEMENT

State of Idaho v. Catheryn D. Fields

Docket No. 46422

Officers responded to a dispatch report of a fight in progress outside of a restaurant where multiple individuals were attempting to subdue a female, Catheryn D. Fields. The officers arrived, perceived a fight in progress, and that Fields was the aggressor. The officers introduced themselves, assumed physical control over Fields, placed her in handcuffs, and walked her away from the immediate scene. Fields became combative and eventually struck one officer with her heel. Fields was then arrested for battery on a law enforcement officer. Fields continued to kick and eventually struck another officer. The officers transported Fields to jail. During processing, Fields struck a third officer on the side of his head. The State charged Fields with three counts of battery on a law enforcement officer.

Prior to trial, Fields requested a jury instruction that purported to define when an officer was performing his or her duties. The district court denied the request to give the proposed jury instruction, and the jury subsequently found Fields guilty of all charges. On appeal, Fields alleges the district court erred by denying her proposed jury instruction.

The Idaho Court of Appeals held the district court did not err by denying Fields's proposed jury instruction. First, the Court of Appeals held that Fields's proposed jury instruction was not supported by the facts of the case. Second, the Court of Appeals held Fields's proposed jury instruction was an incorrect statement of law for three reasons. First, the jury instruction presupposed Fields was arrested when she was placed in handcuffs, but Fields was not arrested until she struck the first officer and was told she was under arrest. Second, the jury instruction assumed the officers were not engaged in the performance of official duties when Fields was handcuffed. Third, the jury instruction utilized a narrow definition of "duty" that had not been adopted by Idaho courts. Thus, the Court of Appeals held the district court did not err by denying Fields's proposed jury instruction. Therefore, the judgment of conviction is affirmed.