

SUMMARY STATEMENT

State v. Campbell

Docket No. 47037

Carli Campbell appeals her conviction as an accessory to a felony (I.C. § 18-205(1)) for withholding or concealing information about an aggravated battery that occurred in her home, allegedly committed by Matthew Cross. After the evidentiary phase of trial, Campbell requested that the district court instruct the jury that it was required to find Cross committed the alleged felony beyond a reasonable doubt, before it could find Campbell guilty as an accessory to a felony. The State opposed Campbell's request, and the district court agreed with the State, reasoning that while the State had to prove Campbell had knowledge of the conduct that constituted a felony, it was not required to find that Cross committed the felony.

On appeal, the Idaho Supreme Court affirmed Campbell's conviction, holding that there is no requirement under section 18-205(1) that the State must prove the identity of the principal, or establish their guilt beyond a reasonable doubt, in order to convict the accessory. The district court's instructions appropriately required the jury to find the Campbell had knowledge that someone had committed an aggravated battery, but she withheld that knowledge from law enforcement. Additionally, the Supreme Court concluded that the alleged error in the jury instructions was harmless due to the uncontroverted and overwhelming evidence of Campbell's guilt.

This summary constitutes no part of the opinion of the Court, but has been prepared by court staff for the convenience of the public.