

SUMMARY STATEMENT

State of Idaho v. John Doe (2016-26)

Docket Nos. 47401 & 47402

In two consolidated cases, the State charged N.C., a juvenile, with a total of forty-two felony counts of possession of sexually exploitative material and moved for the magistrate court to waive juvenile jurisdiction, allowing N.C. to be prosecuted as an adult in adult criminal court. After a waiver hearing, the magistrate court waived juvenile jurisdiction. N.C. appealed to the district court, and the district court affirmed the magistrate court's waiver order. N.C. appeals from the order of the district court, on intermediate appeal from the magistrate court, waiving juvenile jurisdiction.

On appeal, N.C. alleges the district court erred in affirming the decision of the magistrate court because the magistrate court's waiver order constituted an abuse of discretion. N.C. argues the magistrate court: (1) misinterpreted two of the statutory factors when it decided to waive N.C. into adult court; (2) made findings of fact that were not supported by substantial and competent evidence; and (3) used the probable cause standard of proof, instead of the beyond a reasonable doubt standard, to support its waiver order.

The Idaho Court of Appeals held a magistrate court's waiver decision is a discretionary decision that must be supported by substantial and competent evidence. The Court held the district court did not err because the magistrate court appropriately considered the statutory factors guiding its decision to waive juvenile jurisdiction and its factual findings were supported by substantial and competent evidence.