

SUMMARY STATEMENT

State v. Haggard

Docket No. 47577

The Idaho Supreme Court reversed the appellate decision of a district court affirming Clinton Haggard's judgment of conviction. The judgment of conviction followed a September 2017 court trial after which the magistrate court found Clinton Haggard guilty of misdemeanor domestic battery in violation of Idaho Code section 18-918(3)(b). Haggard appealed, arguing that the trial court's failure to make findings on his jury-trial waiver, or inquire into the waiver in open court, constituted fundamental error. Haggard's appeal was first assigned to the Court of Appeals, which reversed. The appeal came before the Idaho Supreme Court on the State's timely petition for review.

The Court reversed the district court's decision, reasoning that Haggard was able to show fundamental error on appeal because his waiver of the right to a jury trial was ineffective. The Court determined that the trial court never inquired into Haggard's waiver of the right to a jury trial in open court and failed to make any findings on whether Haggard's waiver was knowing, voluntary, and intelligent. As a result, the Court remanded the case to the district court with instructions for it to remand to the magistrate court with instructions to vacate the judgment of conviction.