

SUMMARY STATEMENT
State of Idaho v. Samuel Juarez
Docket No. 47699

In this case arising out of Twin Falls County, the Court of Appeals affirmed Samuel Juarez’s judgment of conviction for aggravated battery and being a persistent violator. Prior to trial, the district court struck Juarez’s notice of alibi and excluded testimony regarding an alibi defense because the notice of alibi was deficient. At trial, the district court excluded two of Juarez’s witnesses because they were not properly disclosed during discovery. A jury found Juarez guilty of aggravated battery, after which he admitted to being a persistent violator. Juarez appealed.

On appeal, Juarez argued the district court abused its discretion by excluding testimony regarding his alibi defense and excluding two of his witnesses as a sanction for Juarez’s discovery violations. Juarez also argued the errors were not harmless. The Court of Appeals held that the district court did not abuse its discretion in sanctioning Juarez by excluding his alibi witnesses because: (1) a defendant can be held responsible for trial counsel’s discovery violation and, in any event, there was a lack of evidence in the record that the deficient notice of alibi was the “fault” of Juarez’s trial counsel; (2) the district court found prejudice to the State; and (3) the district court was not required to consider lesser sanctions because Juarez did not make an offer of proof as to what his alibi would have been. The Court of Appeals also held that Juarez failed to argue to the district court that the State was not prejudiced by the late disclosure of his trial witnesses and, thus, failed to show that the district court erred in sanctioning Juarez by excluding the two witnesses at trial. Finally, the Court of Appeals held that, even if the district court erred in both discovery sanctions, the errors were harmless because Juarez did not make an adequate offer of proof regarding the expected testimony of his alibi witnesses and the two trial witnesses.

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