

SUMMARY STATEMENT
State of Idaho v. Cyrus Wolf Buehler
Docket No. 48172

Cyrus Wolf Buehler appeals from his judgment of conviction for aggravated driving under the influence (DUI). Buehler contends the district court abused its discretion by ruling pretrial to exclude his proffered evidence of causation and to admit the State's evidence regarding his blood alcohol content (BAC). While driving, Buehler failed to yield to a bicyclist, who collided into Buehler's vehicle and sustained serious injuries. Buehler's BAC measured 0.181 and 0.179, and the State charged Buehler with aggravated DUI.

In preparation for trial, Buehler disclosed an accident reconstructionist as an expert witness to testify about facts related to the bicyclist's conduct and his motorized bicycle. On the State's motion, the district court excluded the expert's testimony, concluding it was irrelevant. Additionally, the court denied Buehler's motions in limine seeking to admit evidence indicating the bicyclist caused the collision and granting the State's motions to exclude similar evidence. Finally, the court denied Buehler's motion in limine to exclude evidence of his BAC because, at the time of the collision, the officer's certification to operate the testing device had lapsed.

On appeal, the Idaho Court of Appeals affirmed the district court's pretrial evidentiary rulings. The Court concluded that the district court did not abuse its discretion by ruling to exclude evidence of the bicyclist's conduct because, to prove aggravated DUI, the State only needed to prove "some causal connection" between Buehler's driving under the influence and the bicyclist's serious injuries, thereby making the bicyclist's conduct irrelevant. Further, the Court concluded the district court did not abuse its discretion by ruling Buehler's BAC was admissible because the State presented expert testimony establishing the officer's conformity with the testing procedures and the test results' reliability.

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