

SUMMARY STATEMENT

State v. Jane Doe

Docket. No. 49095

Jane Doe appealed the district court’s decision upholding the magistrate court’s judgment that Doe committed the offense of battery—placing Doe within the purview of the Juvenile Corrections Act. On appeal, Doe argued that the magistrate court erred by using and applying the self-defense law reflected in Idaho Criminal Jury Instructions 1517 and 1518, instead of Idaho Code section 19-202A, Idaho’s “stand your ground” statute. Doe contended that the statute’s legal standards differ from Instructions 1517 and 1518, and that the statutory standards should have been applied to her self-defense claim. The Idaho Supreme Court disagreed. The Court explained that the “stand your ground” statute simply codified aspects of Idaho self-defense law that have existed at common law for over 100 years, without abrogating those aspects it left uncodified. Thus, the district court did not err in upholding the magistrate court’s use and application of the pattern instructions, which presumptively reflected the elements of common law self-defense law in Idaho and were consistent with the “stand your ground” statute.

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