

SUMMARY STATEMENT

State v. Mansfield

Docket No. 49742

Dustin Mansfield appealed from his judgment of conviction for introduction of contraband into a correctional facility. In March 2022, fourteen months after the State filed an information against him, Mansfield filed a motion to dismiss based on an alleged violation of his statutory and constitutional rights to a speedy trial. The district court denied the motion. Applying the tolling provision from the Idaho Supreme Court's emergency orders in response to the COVID-19 pandemic, the district court concluded that the six-month time period to hold a trial under Idaho Code section 19-3501(2) had not yet elapsed because in-person trials were prohibited due to COVID-19 infection rates statewide or in Bannock County during a significant portion of Mansfield's case. The district court also determined that the COVID-19 pandemic and the emergency orders prohibiting jury trials in response to the pandemic constituted good cause for any delay and concluded that Mansfield's right to a speedy trial under the state and United States constitutions had not been violated. Mansfield then entered a conditional guilty plea to one count of introduction of contraband into a correctional facility, preserving his right to appeal the district court's denial of his motion to dismiss.

On appeal, Mansfield argued that the district court erred by improperly calculating the time that had elapsed in his case under Idaho Code section 19-3501(2), which requires a criminal defendant to be brought to trial within six-months of the date the information is filed against him, unless good cause for the delay is shown. Mansfield also argued that the COVID-19 pandemic and emergency orders prohibiting in-person trials did not constitute good cause or a valid reason for the delay in his case and the Idaho Supreme Court lacked authority to issue emergency orders suspending the constitutional right to a speedy trial at various time points during the pandemic.

The Idaho Supreme Court affirmed the judgment of conviction. The Court concluded that the COVID-19 pandemic and emergency orders prohibiting trials during significant portions of Mansfield's case constituted good cause for the delay beyond the correctly calculated six-month statutory window under Idaho Code section 19-3501. The Court also concluded that the emergency orders did not suspend the constitutional right to a speedy trial and were a valid reason for the delay in bringing Mansfield to trial.

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