

SUMMARY STATEMENT

State v. Karst

Docket No. 50130-2022

The Idaho Supreme Court reversed the district court's denial of Desiree Elaine Karst's motion to reimburse for court-ordered fees following the invalidation of her conviction.

Desiree Elaine Karst appealed the district court's denial of her motion to reimburse the \$569.50 she paid in court-ordered fees following her conditional guilty plea to various charges. On a previous appeal, Karst's conviction was invalidated by the Idaho Supreme Court and, after the case was sent back to the trial court, the prosecutor dismissed the criminal charges against her. Karst filed a motion to reimburse the court-ordered fees she paid following her conviction, arguing she was entitled to have her fees returned now that her conviction had been invalidated and the charges dropped. Karst argued that the State's retention of her funds after her conviction had been overturned violated her due process rights under the United States Constitution. The district court denied Karst's motion on the basis that it lacked jurisdiction to consider it, and advised Karst that she would have to sue each governmental entity that received a portion of the fees. Karst appealed the denial of her motion.

The Idaho Supreme Court held that the district court had jurisdiction to consider Karst's motion and reversed its decision denying the motion. The Court held that the district court has subject matter jurisdiction to consider Karst's motion to reimburse because it was timely filed within the 42-day appeal period in which the district court retains subject matter jurisdiction over a case. The Court held that the district court has personal jurisdiction to consider Karst's motion because the State appeared generally and submitted to the district court's jurisdiction when it filed criminal charges against Karst.

Next, the Court held that the State is the proper party for Karst's motion to reimburse because the State enacted the laws that mandated that Karst pay fees as a result of her conviction. Because the State occasioned the deprivation of Karst's property through its laws, the Court held it is appropriate for Karst to seek reimbursement from the State when her conviction was vacated and charges were not refiled. The Court held that requiring Karst to file multiple civil suits to recover the fees she paid is more than a minimal procedure and would violate her due process rights.

The Court remanded to the district court. The Court directed that if Karst can prove by a preponderance of the evidence that she paid \$569.50 in fees because of her now-invalidated conviction, that the dismissal of her conviction is final, and that she has not been recharged or that she was acquitted in a subsequent trial, that she is entitled to have her fees returned.

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