SUMMARY STATEMENT
State v. Fierro-Garcia
Docket No. 50530-2023

Jose Eduardo Fierro-Garcia appeals his judgment of conviction for possession of methamphetamine. Fierro-Garcia moved to dismiss his criminal case nearly nine months after the State filed an Information against him and roughly a week before his trial was scheduled to begin, arguing that his speedy trial rights under Idaho Code section 19-3501 and Article I, section 13 of the Idaho Constitution were violated. Fierro-Garcia asserted that the State failed to demonstrate good cause for the delay under section 19-3501 and that, under the Idaho Constitution, a delay exceeding six months is presumptively prejudicial. The district court denied Fierro-Garcia's motion to dismiss, concluding that there was good cause for the delay for purposes of section 19-3501. That conclusion was based in part on a backlog of criminal cases awaiting trial due to the suspension of trials during the COVID-19 pandemic. The district court did not address Fierro-Garcia's arguments concerning the Idaho Constitution. Fierro-Garcia entered a conditional guilty plea, reserving the right to appeal the denial of his motion to dismiss.

On appeal, Fierro-Garcia argued that the district court erred in two ways when it denied his motion to dismiss. First, he argued that an overcrowded court calendar cannot constitute good cause for trial delay. Second, he argued that the district court erred by failing to accept his argument that a delay of six months is presumptively prejudicial for purposes of the Idaho Constitution's speedy trial provision.

The Idaho Supreme Court affirmed the district court's order denying Fierro-Garcia's motion to dismiss under Idaho Code section 19-3501. The Court determined that there was substantial and competent evidence to support the district court's finding that good cause existed for the trial delay in this case because the delay largely resulted from impacts associated with the suspension of jury trials due to the COVID-19 pandemic. The Court also considered and rejected Fierro-Garcia's argument that the delay violated his right to speedy trial under the Idaho Constitution. The Court concluded that Fierro-Garcia failed to demonstrate that a trial delay exceeding six months is presumptively prejudicial under the Idaho Constitution. As a result, the federal constitutional speedy trial factors applied, and Fierro-Garcia had not argued that the delay was prejudicial under those factors. As such, the Court affirmed the judgment of conviction.