

SUMMARY STATEMENT
State of Idaho v. Jesse Michael Savala
Docket No. 50581

In this case arising out of Bannock County, the Court of Appeals affirmed Jesse Michael Savala’s judgment of conviction for burglary. He challenged the denial of his motion to dismiss for an alleged violation of his statutory speedy trial right. Savala argues that the district court erred by denying his motion because the State did not show, and the district court did not find, good cause for not bringing him to trial within the six-month statutory speedy trial period.

On appeal, Savala first argued that, to determine whether statutory “good cause” exists, the courts should analyze the factors outlined in Idaho Criminal Rule 28 instead of the four factors discussed in *Barker v. Wingo*, 407 U.S. 514 (1972). Next, Savala argued that the State did not preserve the argument that the district court properly considered “good cause.” Savala also argued that the district court erred because it failed to present its rationale for denying his motion to dismiss as required by the Idaho Supreme Court in *State v. Ruiz*, ___ Idaho ___, 567 P.3d 789 (2025). Finally, Savala asserted that the State failed to show whether good cause existed under the factors outlined in I.C.R. 28. In response, the State argued that “good cause” for the delay was presented, and the district court correctly denied Savala’s motion to dismiss.

The Court held that, given the mandatory language in I.C.R. 28, the district court should have considered the I.C.R. 28 factors in determining the motion to dismiss for violation of Savala’s statutory speedy trial right. However, its failure to do so does not mandate reversal here because the record is adequate for appellate review. Next, the Court held that the State preserved its argument in support of finding good cause for the delay by citing to Idaho Code § 19-3501 and referencing the six-month limitation and the good cause requirement in its objection. The Court also held that the facts and application of law in *Ruiz* are distinguishable from the case at issue. Finally, the Court performed an analysis under the factors outlined in I.C.R. 28 and determined that no factors weighed in support of Savala’s claim that his statutory right to speedy trial was violated without good cause. Ultimately, the Court affirmed that the application of the factors in I.C.R. 28 support the district court’s conclusion that Savala was not entitled to dismissal based on a statutory speedy trial violation.

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