

SUMMARY STATEMENT

State of Idaho v. Samuel Christopher Carter

Docket No. 50666

In this case arising out of Twin Falls County, the Court of Appeals affirmed Samuel Christopher Carter's judgment of conviction for four counts of lewd conduct with a child under sixteen and one count of sexual abuse of a child under sixteen. The case arises from allegations that Carter sexually abused his five-year-old child. The child was interviewed at St. Lukes Children at Risk Evaluation Services (CARES) clinic by a licensed master social worker, observed by a nurse practitioner and law enforcement, and a medical examination of the child immediately followed. At trial, the State moved to admit the video recording of the CARES interview. Carter objected, arguing admission of the interview violated his constitutional rights because the child did not testify. The district court overruled the objection, admitted the recording, and the jury found Carter guilty of all counts.

On appeal, Carter argued that the district court erred by admitting the CARES interview because it was testimonial in nature and its admission deprived him of a fair opportunity to confront and challenge the evidence against him. Carter relied on the forensic nature of the questioning, law enforcement involvement, absence of an immediate medical emergency, and child's failure to testify. The State responded that the interview was conducted primarily for medical and protective purposes and that its admission did not render the trial fundamentally unfair.

The Court held that Carter failed to show the district court erred by admitting the CARES interview. Considering the totality of the circumstances, the Court concluded the primary purpose of the interview was medical, not investigative. The Court emphasized that the interview occurred before any medical evaluation, while Carter retained custodial rights, and was integrated into an immediate medical assessment addressing unresolved concerns regarding the child's health and safety. Because the interview was not testimonial, its admission did not violate Carter's due process rights. The Court therefore affirmed Carter's judgment of conviction and declined to address Carter's harmless-error argument.

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