

SUMMARY STATEMENT

State v. Frias

Docket No. 50950-2023

Brandon Frias appealed from the district court's decision affirming his misdemeanor conviction for firing timber or prairie lands. Frias and Lucas Daniels parked in a clearing on the side of Cold Creek Road in Power County, Idaho, to practice welding activities. Frias set up his mobile welding equipment, then took a nap in his truck while Daniels used Frias' equipment. Frias awoke to find that Daniels had started a fire that eventually grew into a large wildfire. A jury found Frias guilty of misdemeanor firing timber or prairie lands, a violation of Idaho Code section 18-7004. Frias twice moved for a judgment of acquittal. The magistrate court denied both motions. Frias appealed to the district court, arguing that the magistrate court erred in denying his motions for acquittal. The district court affirmed. Frias appealed to the Idaho Supreme Court.

On appeal, Frias argued that the district court erred in affirming the magistrate court's decisions denying his motions for judgment of acquittal. Frias argued that he did not participate in the act of igniting the fire, as was required by section 18-7004, because he was asleep in his truck when Daniels ignited the fire. Frias also argued that the State failed to demonstrate that he was criminally negligent, which he asserted was also required by the statute.

The Idaho Supreme Court affirmed Frias' judgment of conviction. The Court first held that Idaho Code section 18-7004 does not require participation in the act of ignition. The Court concluded that the statutory language "cause to be set on fire" required the State to establish that Frias was a proximate cause of the fire and that the State met that burden at trial. Next the Court held that section 18-7004 required the State to prove that Frias acted with criminal negligence, and that the State also met this burden at trial. The Court therefore affirmed the district court's decision affirming the magistrate court's decisions denying Frias' motions for acquittal.

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