

SUMMARY STATEMENT
State of Idaho v. John Doe (2023-33)
Docket No. 51081

In this case arising out of Ada County, the Court of Appeals affirmed the district court's decision, on intermediate appeal from the magistrate court, affirming the order and decision, finding that Doe was under the purview of the Juvenile Corrections Act (JCA). On appeal, Doe argued that the district court erred by affirming the magistrate court's order denying Doe's motion to suppress statements he made during his interview with Detective Johnson. Doe asserted that the detective subjected Doe to a custodial interrogation without warnings pursuant to *Miranda v. Arizona*, 384 U.S. 436 (1966). The Court held that, to assess whether a minor suspect was in custody during an interview and law enforcement is aware of the suspect's age, courts must consider factors specific to juveniles such as the child's age, maturity, experience with law enforcement, and whether a parent or supportive adult was present. Doe emphasized the lack of a supportive adult, his age, and the accusatory nature of the interview as the most glaring indicators of the custodial nature of the interview.

The Court analyzed several factors and determined that the location of the interview, the length of the interview, and Detective Johnson's presence in plain clothing during the interview all weighed against finding custody. With respect to the access to a supportive adult, Doe argued that, regardless of his stepfather's availability during the interview, the alleged abusive relationship rendered the stepfather unsupportive. In determining custody for *Miranda* purposes, the presence of a supportive adult is most significant when a juvenile struggles to understand the situation or when law enforcement restricts the juvenile's access to that adult. The Court held that, although the record indicated that Doe's relationship with his stepfather was strained, the detective did not deny or prevent Doe's access to his stepfather.

As to Doe's age, the Court noted that the record indicated Doe was a fifteen-year-old of average or above-average intelligence who displayed an understanding of the legal system; first, by noting that polygraph results are inadmissible in court and, later, by invoking his right to counsel to terminate the interview. Doe also argued that the accusatory nature of the interview weighed heavily in favor of finding custodial interrogation. The Court held that the magistrate court's determination that the interview was neutral was clearly erroneous since Detective Johnson

repeatedly asserted Doe's guilt, emphasized the credibility of the victim's statements, and framed nearly all subsequent questions as accusations rather than neutral inquiries.

Ultimately, the Court determined that, under the totality of the circumstances, a reasonable fifteen-year-old of Doe's maturity and in his position would have felt free to terminate the interview and leave. Thus, the Court held that the district court did not err in affirming the magistrate court's order and decision regarding purview, finding that Doe was under the purview of the JCA.

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