

SUMMARY STATEMENT

Murray v. Dalton, Docket No. 51314

This appeal concerned an attempt by Alayna Dalton to terminate a guardianship over her seventeen-year-old child, Jane Doe (“Jane”). The magistrate court appointed Tenna and Tim Murray, Alayna’s mother and stepfather, as temporary guardians of Jane and later made the guardianship permanent. Alayna argued that several of Idaho’s guardianship laws unconstitutionally infringe on the fundamental rights of parents and that the lower court’s decision was not based on substantial evidence of her unfitness as a parent. Alayna also argued that the lower court should have terminated the guardianship because the Murrays’ alienating behavior adversely impacted Jane’s welfare and the parent-child relationship. Alayna asked this Court to reverse the decision of the magistrate court denying her petition to terminate the guardianship. We affirmed.

The Idaho Supreme Court held that the Idaho Parental Rights Act did not apply to the guardianship at issue in this case because private parties initiating guardianship proceedings do not qualify as “governmental efforts” under the Act. The Court also held that Idaho Code sections 15-5-209 and 15-5-212 were constitutional. Having held that the Idaho Parental Rights Act did not apply, the statutes were analyzed under rational basis review. The Court also held that the magistrate court’s findings of: (1) Alayna’s parental unfitness and (2) the Murrays’ actions constituting parental alienation did not warrant termination of the guardianship were not clearly erroneous.

Justice Zahn authored an opinion concurring in the result, joined by Justice Brody. The concurring Justices would apply strict scrutiny because Idaho’s guardianship statutes constitute “governmental efforts” that restrict or interfere with the fundamental rights of parents. That said, the concurring Justices would hold that the guardianship statutes are constitutional because they survive strict scrutiny.

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