

SUMMARY STATEMENT
State of Idaho v. John Doe (2024-36)
Docket Nos. 51980 & 51981

John Doe appealed from the district court's judgment, on intermediate appeal from the magistrate court, affirming the magistrate court's decree and order waiving juvenile jurisdiction over Doe and ordering Doe's charges to proceed in adult criminal court. This appeal involves two consolidated cases. In Docket No. 51980, the State filed a petition under the Juvenile Corrections Act (JCA) charging Doe with two felony charges and two misdemeanor charges. The magistrate court placed Doe on house arrest and ordered various conditions of release. One month later, in Docket No. 51981, the State filed a second JCA petition charging Doe with two additional felony charges and two additional misdemeanor charges.

The State filed a motion for a waiver of jurisdiction under the JCA in each case pursuant to Idaho Code § 20-508(1)(c) and listed five factors, enumerated in I.C. § 20-508(8), for the waiver. Following an evidentiary hearing, the magistrate court found waiver was appropriate and granted the State's motion in each case. Doe then appealed to the district court.

On intermediate appeal, Doe argued that even accepting the magistrate court's findings of fact as true and its interpretation of I.C. § 20-508(8) as correct, the magistrate court abused its discretion by improperly weighing the statutory factors. Doe then challenged the magistrate court's analysis on several of the I.C. § 20-508(8) factors: the seriousness of the offense, I.C. § 20-508(8)(a); whether the alleged offense was committed in an aggressive, violent, premeditated, or willful manner, I.C. § 20-508(8)(b); whether the alleged offense was against persons or property, I.C. § 20-509(8)(c); the maturity of Doe, I.C. § 20-508(8)(d); and Doe's record and previous history of contacts with the juvenile justice system, I.C. 20-508(8)(e). The district court, on intermediate appeal, affirmed the magistrate court's decision to waive juvenile jurisdiction, holding that the magistrate court did not abuse its discretion or incorrectly apply the legal standard for evaluating whether juvenile jurisdiction should be waived.

On appeal to this Court, Doe argued that the district court erred in affirming the magistrate court's decree and order because the magistrate court improperly considered I.C. § 20-508(8)(a), (b) and (e) and relied primarily on the existence of Doe's second pending juvenile petition in its waiver decision. The Court of Appeals affirmed the judgment of the district court, holding that the magistrate court did not err in considering Doe's second pending JCA petition and the factors

set forth in I.C. § 508(8)(a), (b), and (e) in its decision to waive juvenile jurisdiction of Doe in Docket Nos. 51980 and 51981.

Specifically, regarding Doe’s two pending juvenile petitions, the Court held that nothing in I.C. § 20-508(8)(a) precludes the magistrate court from considering all of a juvenile’s pending petitions and nothing in the statute requires an assessment of whether a subsequent petition contains charges that are more serious than the charges in the first petition. Next, pertaining to the magistrate court’s finding of premeditation and willfulness pursuant to I.C. § 20-508(8)(b), the Court held that while Doe challenged the finding that his actions were premediated, he did not challenge the finding that his actions were willful. Because Doe did not challenge the alternative basis, the Court affirmed the magistrate court’s finding. Finally, the Court disagreed with Doe’s argument that contact with the juvenile corrections system under I.C. § 20-508(8)(e) must involve programming or treatment. In this case, Doe received two felony charges and two misdemeanor charges, and one month later, while on strict house arrest, received new felony and misdemeanor charges of a similar nature. As the Court of Appeals also held in *Interest of Doe*, 167 Idaho 259, 469 P.3d 46 (2020), the magistrate court in this case correctly considered Doe’s “quick escalation in criminal behavior and commission of offenses while being closely monitored by juvenile probation.”

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