

BOISE, FRIDAY, OCTOBER 4, 2024 at 10:00 A.M.

IN THE SUPREME COURT OF THE STATE OF IDAHO

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| MICHAEL THERON HAYES, |) | |
| |) | |
| Petitioner-Appellant, |) | |
| |) | |
| v. |) | Docket No. 51510 |
| |) | |
| STATE OF IDAHO, |) | |
| |) | |
| Respondent. |) | |
| _____ |) | |

Appeal from the District Court of the Fourth Judicial District of the State of Idaho, Ada County, Samuel Hoagland, District Judge.

Ferguson Durham, PLLC, Boise, for Appellant.

Raúl R. Labrador, Idaho Attorney General, Boise, for Respondent.

Michael Theron Hayes appeals from the judgment summarily dismissing his petition for post-conviction relief. In the underlying criminal case, Hayes was charged with battery on a correctional officer. During the jury trial, three officers testified Hayes kicked an officer in the shin and grabbed another officer’s groin. Hayes testified he had been battered by the officers without provocation, asserting that he had never battered the officers. Hayes also testified that the injuries he sustained caused him to urinate blood and that he had provided urine samples containing blood to a prison nurse for analysis. However, the nurse who examined Hayes after the altercation testified that he never conducted an analysis of Hayes’ urine. The jury found Hayes guilty of one count of battery, and his judgment of conviction was affirmed on direct appeal by this Court in *State v. Hayes*, 166 Idaho 646, 462 P.3d 1110 (2020).

Thereafter, Hayes filed a petition for post-conviction relief, claiming prosecutorial misconduct and ineffective assistance of counsel. Hayes alleged his trial attorney was ineffective for not introducing corroborating medical evidence related to Hayes’ injuries, particularly that there was blood in his urine following the altercation. Hayes also claimed the prosecuting attorney committed misconduct when she presented the nurse’s inaccurate testimony at trial because the prosecuting attorney was aware that medical evidence supported Hayes’ claims. Hayes attached numerous exhibits to his petition, including a lab report purporting to show that Hayes had blood in his urine following the altercation. The State filed an answer, a motion for summary disposition, and a motion to strike exhibits and portions of Hayes’ affidavit. The district court partially granted the State’s motion to strike and ultimately granted the State’s motion for summary dismissal.

Hayes timely appealed, arguing that the district court erred when it struck certain exhibits. On that point, Hayes argued the rules of evidence are relaxed in a post-conviction case because the legislature intended the Uniform Post-Conviction Procedure Act (UPCPA) to be a simple procedure in which courts were to take account of substance, regardless of defects of form. Hayes also argued that he had alleged sufficient facts that would entitle him to relief on both of his claims. The appeal was initially heard by the Court of Appeals, which affirmed the district court's judgment in an unpublished opinion. Hayes then filed a petition for review with this Court, which was granted.