

SUMMARY STATEMENT

State of Idaho v. Corey Allen Thiel – Docket No. 41811

In a case arising out of Ada County, the Idaho Supreme Court affirmed the judgment of the district court. This appeal stems from a magistrate judge's refusal to approve of an early release of Corey Allen Thiel (Thiel) from the Ada County Jail, despite a recommendation from the Ada County Sheriff's Office that Thiel satisfied the requirements of the good-time early release statute. Idaho Code section 20-621 authorizes commutation of county jail sentences for good behavior, making county inmates with good records while incarcerated eligible for five (5) days off for each and every month of their sentence. A prisoner's eligibility, however, is conditioned upon receiving a recommendation from the supervising county sheriff. The primary issue in this case is whether the statute vests the magistrate court with the discretion to reject a recommendation from a sheriff. The State argues that the magistrate court is vested with this discretion, and if not, that the statute violates separation of powers. In its intermediate appellate capacity, the district court held that the magistrate court has no discretion in the process because the statute creates a ministerial duty for the magistrate judge. The Supreme Court affirmed the judgment of the district court that the statute vests no discretion with the magistrate judge, and further held that the statute does not violate separation of powers principles under the Idaho Constitution.