

SUMMARY STATEMENT

State of Idaho v. Matthew Joseph Reed

Docket No. 44865

Matthew Joseph Reed pleaded guilty to possession of methamphetamine. At the sentencing hearing, the district court required Reed to successfully complete the period of retained jurisdiction, but also imposed two other prerequisites to Reed's probation eligibility: (1) completing a polygraph regarding past sex offenses; and (2) enrolling in the Good Samaritan Treatment Program. After Reed successfully completed the period of retained jurisdiction, the district court nonetheless relinquished jurisdiction and executed the original sentence because Reed did not take a polygraph and did not enroll in the Good Samaritan Treatment Program. Reed filed a motion for redispotion and a motion for reconsideration of his sentence, which the district court denied. Reed appealed.

On appeal, Reed argued the district court abused its discretion when it relinquished jurisdiction based on two unqualified conditions that were prerequisites to probation. In addition, Reed argued the district court abused its discretion by sentencing Reed based on his criminal history, rather than the possession charge at issue.

Because Reed asserted his Fifth Amendment right against self-incrimination and the district court nonetheless relinquished jurisdiction due to Reed's refusal to take a polygraph, the Idaho Court of Appeals held that the district court abused its discretion. The district court's explanation that it relinquished jurisdiction in part because Reed failed to enroll in the Good Samaritan Treatment Program was unpersuasive as an independent basis to relinquish jurisdiction.

The Idaho Court of Appeals therefore reversed the district court's order relinquishing jurisdiction and the district court's order denying Reed's motion for redispotion, and remanded the case for a redetermination before a different judge as to whether Reed's sentence should be suspended and he should be placed on probation. The Idaho Court of Appeals affirmed Reed's judgment of conviction and sentence.