

SUMMARY STATEMENT

State v. Juan Carlos Maldonado aka Carlos Juan Maldonado
Docket No. 45031

In this case arising out of Canyon County, the Court of Appeals affirmed Juan Carlos Maldonado's judgment of conviction for domestic abuse with traumatic injury with a persistent violator enhancement. During trial, the State sought to introduce statements made by the victim to medical personnel identifying Maldonado as the assailant. The district court admitted the statements over Maldonado's objection. On the second day of trial, the State inadvertently introduced the unredacted version of an audio exhibit that included a statement by the victim to a detective that Maldonado had been in prison and did not like to be disrespected. Maldonado moved for a mistrial, arguing that the reference to him having previously spent time in prison was prejudicial. The district court denied the motion, finding that, although the statement was inadmissible, the error could be remedied by striking the exhibit and instructing the jury to disregard it.

On appeal, Maldonado argued that the district court erred in allowing the responding medical personnel to testify about statements the victim made to them during the course of medical examinations regarding the identity of the assailant. Maldonado also argued that the district court erred by denying his motion for mistrial because the district court's limiting instruction was insufficient to cure the error. The Court of Appeals held that, even assuming the victim's statements to medical personnel regarding the source of her injuries were inadmissible, the error was harmless. The Court also affirmed the district court's denial of Maldonado's motion for mistrial because Maldonado failed to show that the victim's inadmissible statement contained an audio exhibit that was stricken and that the jury was instructed to disregard contributed to the jury's verdict.