

SUMMARY STATEMENT

State v. Davis

No. 46013

The Supreme Court affirmed the Payette County district court's order denying Jacob S. Davis's motion for a new trial. Following his convictions in two separate cases, and subsequent appeals, Davis moved for a new trial in both cases based, in part, on the grounds of newly discovered evidence. Under that claim, Davis asserted that the State failed to preserve exculpatory evidence on Facebook, allowing the evidence to be destroyed. The district court denied both motions. On appeal, Davis argued that the district court abused its discretion by applying the *State v. Drapeau*, 97 Idaho 685, 551 P.2d 972 (1976) standard to his newly discovered evidence claim rather than the *Arizona v. Youngblood*, 488 U.S. 51 (1988) standard, and as a result of this abuse of discretion, his right to a fair trial was violated. The Supreme Court disagreed, holding that the district court did not err in applying the *Drapeau* standard because Davis explicitly invoked that standard, and even had the district court applied the *Youngblood* standard, Davis's claim would have failed because he could not prove bad faith on the part of the State.