

SUMMARY STATEMENT

State v. Hoskins
Docket No. 46605

The Idaho Supreme Court reversed the Bannock County district court's decision denying Justin K. Hoskins's motion to suppress, vacated his judgment of conviction for possession of a controlled substance, and remanded for further proceedings. Hoskins's conviction stemmed from a traffic stop in which he was a backseat passenger. During the stop, a state trooper obtained the owner's consent to search the vehicle. Before doing so, the trooper instructed Hoskins to exit the vehicle and leave his personal items in the car. A later search of those items revealed methamphetamine and Hoskins was charged with possession. In opposition to Hoskins's motion to suppress, the State argued that Hoskins lacked standing to object to the search based on consent and the district court denied the motion on that basis. Hoskins then entered a conditional guilty plea reserving his right to appeal.

On appeal, both parties agreed the district court erred in ruling that Hoskins lacked standing to object to the search of his personal items. Nevertheless, the State argued that the district court's decision could be affirmed based on the plain-view doctrine. The State contended that appellate courts may affirm a correct decision on an unpreserved theory under the "right-result, wrong-theory rule." Hoskins prevailed in the Court of Appeals and this Court granted the State's timely petition for review. The Idaho Supreme Court held that the State may not advance a new theory on appeal under the "right-result, wrong-theory rule" when it failed to advance that theory to the trial court. The Court also denied the State's request to remand the case for additional argument reasoning that the State's new theory on appeal did not alter the State's failure to carry the burden below.