

SUPREME COURT OF THE STATE OF IDAHO

State v. Sonnie Flores

162 Idaho 298 (2017) · No. 43946 · Decided June 20, 2017

SUMMARY

The Idaho Supreme Court affirmed the district court’s orders relinquishing jurisdiction over Sonnie Flores and declining to reinstate it. The court held that the district court did not abuse its discretion in relinquishing jurisdiction based on Flores’s conduct at the retained-jurisdiction program, and that Idaho Criminal Rule 35 and Idaho Code section 19-2601(4) did not authorize reinstatement after jurisdiction had been relinquished.

CASE DETAILS

COURT	Supreme Court of the State of Idaho
WRITING FOR THE COURT	Burdick, Chief Justice; Eismann, Justice; Jones, Justice; Horton, Justice; Simpson, Justice Pro Tem
JURISDICTION	Idaho
DECIDED	June 20, 2017
DOCKET	43946
DISPOSITION	affirmed
PROCEDURAL POSTURE	Flores appealed from Twin Falls County district court orders relinquishing retained jurisdiction and denying his motion to reinstate jurisdiction.
STANDARD OF REVIEW	The decision to relinquish jurisdiction is reviewed for abuse of discretion. Statutory interpretation is reviewed de novo.
PRECEDENTIAL VALUE	Published, precedential Idaho Supreme Court opinion
PARTIES	Sonnie Flores v. State of Idaho

TOPICS

- criminal procedure
- probation
- sentencing
- statutory interpretation
- appellate procedure

PRACTICE AREAS

- criminal procedure
- sentencing
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QUESTIONS PRESENTED

1. Whether the district court abused its discretion by relinquishing jurisdiction based on the North Idaho Correctional Institution's report of Flores's misconduct and gang-related behavior.
2. Whether Idaho Criminal Rule 35 or Idaho Code section 19-2601(4) authorized the district court to reinstate jurisdiction after it had relinquished jurisdiction during the retained-jurisdiction period.

HOLDINGS

1. The district court did not abuse its discretion by relinquishing jurisdiction because it recognized that the decision was discretionary, applied the relevant legal standards, and supported its decision with record evidence of Flores's misconduct and gang-related behavior.
2. Neither Idaho Criminal Rule 35 nor Idaho Code section 19-2601(4) authorized the district court to reinstate jurisdiction after it had relinquished jurisdiction in this case. Rule 35 is limited to correction, modification, or reduction of criminal sentences, and the statute permits additional retained-jurisdiction periods only after probation has been granted.

KEY QUOTATIONS

“The interpretation of a statute is a question of law that the Supreme Court reviews de novo.” (4)

“Since jurisdiction was relinquished in this case, Flores’s request amounts to a request for an additional period of retained jurisdiction precluded by section 19-2601(4).” (5)

“Except in matters where the court has inherent power . . . the sentencing court has only the authority granted by the legislature.” (6)

FACTUAL BACKGROUND

Flores pleaded guilty to felony eluding a peace officer and was sentenced to a five-year unified term, with execution suspended and probation imposed. After probation was revoked for a second time, the district court retained jurisdiction for up to 365 days under Idaho Code section 19-2601(4). The North Idaho Correctional Institution reported that Flores engaged in gang-related conduct, associated with inmates involved in an assault, committed other misconduct, and used other offenders' PIN numbers for personal calls; the district court then relinquished jurisdiction. Flores moved to reinstate jurisdiction so he could complete the retained-jurisdiction program.

PROCEDURAL HISTORY

Flores pleaded guilty to felony eluding a peace officer and received a suspended five-year unified sentence with probation. After probation was revoked twice, the district court retained jurisdiction under Idaho Code section 19-2601(4). Following a report from the North Idaho Correctional Institution describing misconduct and gang-related behavior, the district court relinquished jurisdiction. The court denied Flores's subsequent Rule 35 motion seeking reinstatement of jurisdiction, and the Idaho Supreme Court affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Latneau, 154 Idaho 165, 166, 296 P.3d 371, 372 (2013)
- Swallow v. Emergency Med. of Idaho, P.A., 138 Idaho 589, 592, 67 P.3d 68, 71 (2003)
- State v. Statton, 136 Idaho 135, 137, 30 P.3d 290, 292 (2001)
- Hayes v. City of Plummer, 159 Idaho 168, 170, 357 P.3d 1276, 1278 (2015)
- State v. Burnight, 132 Idaho 654, 659, 978 P.2d 214, 219 (1999)
- State v. Brunet, 155 Idaho 724, 729, 316 P.3d 640, 645 (2013)
- State v. Coassolo, 136 Idaho 138, 143, 30 P.3d 293, 298 (2001)
- State v. Funk, 123 Idaho 967, 969, 855 P.2d 52, 54 (1993)