

SUPREME COURT OF IDAHO

State of Idaho v. Bryon E. Prather, 135 Idaho 770

25 P.3d 83 (2001) · No. No. 25476 · Decided May 15, 2001

SUMMARY

The Idaho Supreme Court affirmed Bryon E. Prather's conviction under Idaho Code § 18-918(3) for felony domestic violence involving a traumatic injury. The court held that the statute was not unconstitutionally vague because it provided adequate notice and could be applied constitutionally in at least some circumstances. The court also rejected the claim that the statute improperly shifted the prosecution's burden of proof to the defense.

CASE DETAILS

COURT	Supreme Court of Idaho
WRITING FOR THE COURT	Justice Kidwell; Chief Justice Trout; Justice Schroeder; Justice Walters; Justice Pro Tem Burdick
JURISDICTION	Idaho
DECIDED	May 15, 2001
DOCKET	No. 25476
DISPOSITION	affirmed
PROCEDURAL POSTURE	Criminal appeal from a district court judgment upholding the constitutionality of Idaho Code section 18-918(3), followed by a jury conviction and sentence for felony domestic violence in the presence of a child.
STANDARD OF REVIEW	Constitutional challenges to statutes are reviewed de novo because they present pure questions of law. Statutes are presumed valid, and courts seek an interpretation that upholds constitutionality.
PRECEDENTIAL VALUE	Published Idaho Supreme Court opinion; precedential.
PARTIES	Bryon E. Prather v. State of Idaho

TOPICS

- void for vagueness
- due process
- statutory interpretation
- criminal procedure
- appellate procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Idaho Code section 18-918(3), defining felony domestic violence as willfully inflicting a traumatic injury on a household member, is unconstitutionally vague.
2. Whether Idaho Code section 18-918 impermissibly shifts the prosecution's burden of proof to the defense by requiring the defense to establish the absence of a traumatic injury for a misdemeanor conviction.

HOLDINGS

1. Idaho Code section 18-918(3) is not unconstitutionally vague because, read with the statutory definitions of household member, traumatic injury, and battery, it gives adequate notice of prohibited conduct and provides sufficient guidance to distinguish felony domestic violence from misdemeanor domestic battery.
2. Idaho Code section 18-918 does not violate due process by shifting the burden of proof to the defense because the prosecution must prove every element of felony domestic violence, including that the defendant willfully inflicted a traumatic injury.
3. Idaho Code section 18-918(3) requires willful conduct and incorporates the criminal-intent requirement applicable under Idaho law; it is not a strict-liability offense absent a clear legislative indication to that effect.

KEY QUOTATIONS

“Due process requires that individuals be informed of what the law commands or forbids and that people of common intelligence not be forced to guess at the meaning of the statute.” (135 Idaho 773)

“If, under these guidelines, the reviewing court can identify a core of circumstances to which the statute could be unquestionably constitutionally applied, it will uphold the statute.” (135 Idaho 774)

“Since the statute here clearly establishes the prosecutor's burden of proving a "traumatic injury" for a felony conviction, we hold, therefore, that the statute does not violate due process by shifting the burden of proof to the defense.” (135 Idaho 776)

FACTUAL BACKGROUND

Prather was charged on July 8, 1998, with felony domestic violence based on the willful infliction of a traumatic injury on a household member. He challenged Idaho Code section 18-918 as facially vague because it did not adequately define traumatic injury and argued that the statutory distinction between felony and misdemeanor domestic battery shifted the burden of proof to the defense. After the district court denied his motion, a jury convicted him and he received a five-year sentence, with two years fixed.

PROCEDURAL HISTORY

Prather was charged with domestic violence in the presence of a child under Idaho Code sections 18-918(3) and 18-918(7)(b). The district court denied his motion to dismiss, ruling that the statute was timely challenged or, alternatively, constitutional because it provided adequate notice and could be applied nonarbitrarily. A jury convicted Prather, the district court imposed a five-year sentence with two years fixed, and Prather appealed.

DISPOSITION

affirmed

CASES CITED

- State v. Hansen, 125 Idaho 927, 877 P.2d 898 (1994)
- State v. Cobb, 132 Idaho 195, 969 P.2d 244 (1998)
- Olsen v. J.A. Freeman Co., 117 Idaho 706, 791 P.2d 1285 (1990)
- Cowles Pub. Co. v. Magistrate Court, 118 Idaho 753, 800 P.2d 640 (1990)
- Smith v. Goguen, 415 U.S. 566 (1974)
- State v. Bitt, 118 Idaho 584, 798 P.2d 43 (1990)
- State v. Leferink, 133 Idaho 780, 992 P.2d 775 (1999)
- State v. Stiffler, 117 Idaho 405, 788 P.2d 220 (1990)
- State v. Sterrett, 35 Idaho 580, 207 P. 1071 (1922)
- State v. Randles, 117 Idaho 344, 787 P.2d 1152 (1990)
- State v. Humpherys, 134 Idaho 657, 8 P.3d 652 (2000)
- State v. Olsen, 103 Idaho 278, 647 P.2d 734 (1982)