

SUMMARY STATEMENT

State v. Sanchez
Docket No. 45627

The Idaho Supreme Court affirmed the Ada County district court's judgment of conviction for threats against a public servant entered against Byron Lee Sanchez. Sanchez's conviction is based on a letter he sent in September 2016 while in prison for a felony injury to a child offense arising out of Gem County. The State charged Sanchez with one count of threats against a public servant under Idaho Code section 18-1353(1)(b) with an enhancement under Idaho Code section 19-2520F because Sanchez committed the offense on the grounds of a correctional facility. A jury convicted Sanchez and he was sentenced to five years in prison, with four years fixed.

On appeal, the Idaho Supreme Court rejected Sanchez's argument that Idaho Code section 18-1353(1)(b) was unconstitutionally overbroad and vague after determining that the statute covered a wide range of speech or conduct within the State's power to prohibit and did not prohibit a substantial amount of protected speech or conduct. The Court also held that the district court properly admitted testimony from the prosecutor about his reaction to the letter because an element of the crime charged was whether Sanchez threatened harm. Thus, the testimony was relevant to whether the letter was a threat or an attempt at negotiation. Next, the Court determined that the district court did not abuse its discretion when it admitted evidence of Sanchez's conviction for injury to a child because that evidence was relevant to show motive and intent under Rule 404(b) of the Idaho Rules of Evidence. The Court also ruled that the district court properly admitted evidence of Sanchez's post-conviction petition because the evidence was relevant to the legal theories presented by both parties. Finally, the Court determined that, in light of the prior holdings, the cumulative error doctrine was inapplicable to Sanchez's case.