

BOISE, WEDNESDAY, OCTOBER 7, 2026, AT 10:00 A.M.

IN THE SUPREME COURT OF THE STATE OF IDAHO

STATE OF IDAHO,	)	
	)	
Plaintiff-Respondent,	)	
	)	Docket No. 52256
v.	)	
	)	
JOHN JOSEPH ABRAHAM, JR.,	)	
	)	
Defendant-Appellant.	)	

Appeal from the District Court of the First Judicial District of the State of Idaho, Kootenai County. John T. Mitchell, District Judge.

Erik R. Lehtinen, State Appellate Public Defender, Boise, for Appellant.

Raúl R. Labrador, Idaho Attorney General, Boise, for Respondent.

John Joseph Abraham, Jr., appeals the district court's order relinquishing jurisdiction following a period of retained jurisdiction. After Abraham pleaded guilty to possession of controlled substances and admitted to being a persistent violator, the district court imposed a unified sentence of six years with two years fixed and placed Abraham on probation. As a condition of probation, the district court ordered Abraham to enroll in and successfully complete the Kootenai County Mental Health Court.

Not quite two months later, the State filed a notice of probation violation and a motion to terminate Abraham from mental health court. The notice of probation violation alleged that Abraham violated several conditions of probation, including that he engaged in improper sexual conduct toward a female mental health court participant. Abraham admitted to violating the terms of his probation and the district court revoked Abraham's probation, imposed his underlying sentence, and retained jurisdiction under Idaho Code section 19-2601(4). During the disposition hearing on the probation violation, the district court advised Abraham that it would not consider putting Abraham on probation after the retained jurisdiction period unless Abraham obtained a psychosexual evaluation, polygraph, and was readmitted to the Kootenai County Mental Health Court. When Abraham appeared at the review hearing following the retained jurisdiction period, he had not obtained a psychosexual evaluation or participated in a polygraph and was not readmitted to mental health court. The district court entered an order relinquishing jurisdiction.

Abraham appeals and argues that the district court abused its discretion when it relinquished jurisdiction for three reasons. He argues that the district court's requirement that he obtain a psychosexual evaluation and polygraph was not reasonably related to his underlying charges, that the district court's order retaining jurisdiction was ambiguous, that it was impossible

for Abraham to obtain a psychosexual evaluation and polygraph, and that the mental health court staff said he could not be readmitted to mental health court until he completed those tasks. The State argues that the district court did not abuse its discretion in relinquishing jurisdiction. The State asserts that the district court's requirements were not erroneous given Abraham's mental health diagnoses and his admission that he engaged in sexually inappropriate conduct toward a female mental health court participant. As a result, the district court's conditions were imposed so the district court could determine whether Abraham could be safely placed on probation in the community.