

# MINNESOTA SUPREME COURT

## State of Minnesota v. Alfredo Torrez

Torrez · No. A24-0818 · Decided May 6, 2026

### SUMMARY

The Minnesota Supreme Court held that a district court accepting a contingent guilty plea must inquire into the nature of the contingency and conduct a heightened inquiry into the risk of coercion. Because the district court failed to conduct the required inquiry concerning the State’s promise of leniency to the defendant’s wife, the court held that plea withdrawal was the proper remedy. The court reversed the court of appeals and remanded for further proceedings.

### CASE DETAILS

|                       |                                                                                                                                                                                                            |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | Minnesota Supreme Court                                                                                                                                                                                    |
| WRITING FOR THE COURT | Hennesy, Justice                                                                                                                                                                                           |
| JURISDICTION          | Minnesota Supreme Court                                                                                                                                                                                    |
| DECIDED               | May 6, 2026                                                                                                                                                                                                |
| DOCKET                | A24-0818                                                                                                                                                                                                   |
| DISPOSITION           | reversed_and_remanded                                                                                                                                                                                      |
| PROCEDURAL POSTURE    | Torrez appealed from the denial of his motion to withdraw guilty pleas entered under a contingent plea agreement. The Minnesota Court of Appeals affirmed, and the Minnesota Supreme Court granted review. |
| STANDARD OF REVIEW    | The validity of a guilty plea presents a question of law reviewed de novo.                                                                                                                                 |
| PRECEDENTIAL VALUE    | published precedential opinion                                                                                                                                                                             |
| PARTIES               | Alfredo Torrez v. State of Minnesota                                                                                                                                                                       |

### TOPICS

- plea bargaining
- criminal procedure
- appellate procedure
- remedies

### PRACTICE AREAS

- criminal procedure
- plea bargaining
- appellate procedure
- remedies

### QUESTIONS PRESENTED

1. Whether Torrez could challenge the voluntariness of his guilty pleas for the first time on direct appeal.
2. What inquiry a district court must conduct to ensure the voluntariness of a contingent guilty plea involving promised leniency for a third party.
3. Whether the district court's inquiry was sufficient when it accepted Torrez's contingent pleas without conducting a heightened coercion inquiry.
4. What remedy applies when a district court fails to conduct the required heightened inquiry into a contingent plea.

## HOLDINGS

1. A defendant may challenge the constitutional validity and voluntariness of a guilty plea for the first time on direct appeal without being limited to plain-error review.
2. To ensure that a contingent guilty plea is voluntary, the district court must inquire into the details of the contingent plea agreement and conduct a heightened inquiry beyond the standard Minnesota Rule of Criminal Procedure 15.01 colloquy targeting any possible coercion.
3. The district court's inquiry was legally insufficient because it did not conduct a heightened inquiry targeting the coercive risk inherent in Torrez's contingent pleas.
4. When the district court fails to adequately inquire into the voluntariness of a contingent guilty plea at the time the plea is entered, the defendant must be allowed to withdraw the plea.

## KEY QUOTATIONS

*“To ensure that a contingent plea is voluntary, a district court must inquire into the nature of the contingency and conduct a heightened inquiry into any risk of coercion; the proper remedy for failing to do so is plea withdrawal.” (1)*

*“We reaffirm the principles set out in *Danh* and, consistent with that case, we hold today that a district court must inquire into the details of a contingent plea agreement and conduct a heightened inquiry—beyond the standard Rule 15.01 inquiry—targeting any possible coercion to ensure that, notwithstanding any contingency, a guilty plea is truly voluntary.” (11)*

*“Therefore, plea withdrawal is the proper remedy.” (14)*

## FACTUAL BACKGROUND

In October 2022, law enforcement discovered suspected methamphetamine and drug paraphernalia during a search of Torrez's residence. Torrez was charged with four felony controlled-substance offenses and later entered a plea agreement requiring guilty pleas to two counts in exchange for dismissal of the other counts and promised leniency for his wife. Although the terms of the contingent agreement were disclosed at the plea hearing, the district court did not conduct the standard voluntariness inquiry or a heightened inquiry into coercion arising from the promise of leniency for Torrez's wife.

## PROCEDURAL HISTORY

After being charged with four felony controlled-substance offenses, Torrez pleaded guilty to first-degree sale of a controlled substance and conspiracy in exchange for dismissal of two counts and promises of leniency for his wife. The district court denied his later motion to withdraw the pleas and sentenced him. The court of appeals affirmed, but the Minnesota Supreme Court reversed and remanded for plea withdrawal.

## DISPOSITION

reversed\_and\_remanded

## REMAND INSTRUCTIONS

Reverse the court of appeals and remand to the district court to allow Torrez to withdraw his guilty pleas and conduct further proceedings consistent with the opinion.

## CASES CITED

- State v. Jones, 7 N.W.3d 391, 395 (Minn. 2024)
- Bonnell v. State, 984 N.W.2d 224, 226–27 (Minn. 2022)
- State v. Raleigh, 778 N.W.2d 90, 94, 96 (Minn. 2010)
- Brown v. State, 449 N.W.2d 180, 182 (Minn. 1989)
- State v. Danh, 516 N.W.2d 539, 540, 542–45 (Minn. 1994)
- Butala v. State, 664 N.W.2d 333, 339–40 & n.4 (Minn. 2003)
- In re Ibarra, 666 P.2d 980, 985–87 (Cal. 1983)
- Commonwealth v. Dupree, 275 A.2d 326, 328 (Pa. 1971)
- People v. Mosby, 92 P.3d 841, 844 (Cal. 2004)
- State v. Propotnik, 216 N.W.2d 637, 638 (Minn. 1974)
- United States v. Hodge, 412 F.3d 479, 491–92 (3d Cir. 2005)
- McCarthy v. United States, 394 U.S. 459, 470 (1969)
- State v. Torrez, No. A24-0818, 2025 WL 1291305, at \*1, \*3 (Minn. App. May 5, 2025)
- Perkins v. State, 559 N.W.2d 678, 686 (Minn. 1997)