

LOUISIANA COURT OF APPEAL, SECOND CIRCUIT

State of Louisiana v. Keatre Monique Daniels

No. 56,701-KA (La. Ct. App. 2d Cir. Dec. 17, 2025) · No. 56,701-KA · Decided December 17, 2025

SUMMARY

The Louisiana Court of Appeal, Second Circuit, affirmed Keatre Monique Daniels’s convictions for possession of a firearm or carrying a concealed weapon by a convicted felon, illegal use of weapons, and aggravated second degree battery. The court rejected challenges to the admissibility and reliability of a single-photo identification, the sufficiency of the evidence, and the excessiveness of Daniels’s consecutive sentences. The court upheld the aggregate sentence of 37 years at hard labor.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | Louisiana Court of Appeal, Second Circuit                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| WRITING FOR THE COURT | Ellender, J.; Stephens, J.; Thompson, J.                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| JURISDICTION          | Louisiana Court of Appeal, Second Circuit                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| DECIDED               | December 17, 2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| DOCKET                | 56,701-KA                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| DISPOSITION           | affirmed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| PROCEDURAL POSTURE    | Daniels appealed her convictions for possession of a firearm or carrying a concealed weapon by a convicted felon, illegal use of weapons or dangerous instrumentalities, and aggravated second degree battery, and her consecutive sentences totaling 37 years at hard labor.                                                                                                                                                                                                                                        |
| STANDARD OF REVIEW    | Identification admissibility was reviewed for abuse of discretion, with reliability assessed under the totality of the circumstances. Sufficiency of the evidence was reviewed under Jackson v. Virginia, viewing the evidence in the light most favorable to the prosecution. Sentence excessiveness was reviewed under the two-prong inquiry requiring compliance with La. C. Cr. P. art. 894.1 and review for constitutional excessiveness, with sentencing decisions otherwise reviewed for abuse of discretion. |
| PRECEDENTIAL VALUE    | published                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
| PARTIES               | Keatre Monique Daniels v. State of Louisiana                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |

TOPICS

suppression of evidence

evidence

criminal procedure

sentencing

appellate procedure

## PRACTICE AREAS

criminal law

criminal procedure

appellate sentencing

## QUESTIONS PRESENTED

1. Whether the single-photograph identification was unduly suggestive and unreliable so as to require suppression.
2. Whether the evidence was sufficient under *Jackson v. Virginia* to support the three convictions beyond a reasonable doubt.
3. Whether the individual and consecutive aggregate sentences totaling 37 years at hard labor were constitutionally excessive or otherwise an abuse of discretion.

## HOLDINGS

1. The single-photograph identification was sufficiently reliable under the totality of the circumstances, and the district court did not abuse its discretion by admitting it.
2. The evidence, viewed in the light most favorable to the prosecution, was sufficient for a rational factfinder to find Daniels guilty beyond a reasonable doubt of all three offenses.
3. The individual maximum sentences and the consecutive aggregate sentence of 37 years at hard labor were not constitutionally excessive, and the district court did not abuse its discretion in imposing consecutive terms.

## KEY QUOTATIONS

*“It is not the mere existence of suggestiveness which violates due process; rather, it is the likelihood of misidentification.”* (6)

*“The central question is whether, under the totality of the circumstances, the identification was reliable even though the confrontation procedure was suggestive.”* (7)

*“The standard of appellate review for a sufficiency of the evidence claim in a criminal case is whether, after viewing the evidence in the light most favorable to the prosecution, any rational trier of fact could have found the essential elements of the crime beyond a reasonable doubt.”* (8)

*“A sentence violates La. Const. art. I, § 20, if it is grossly out of proportion to the seriousness of the offense or nothing more than a purposeless and needless infliction of pain and suffering.”* (13)

## FACTUAL BACKGROUND

Police responded to a shooting in Shreveport where the victim had been shot in both legs. Neighbor Ann Stewart testified that she saw Daniels, whom she had known and seen almost daily for about a year, argue with the victim and identified Daniels from a single photograph as the shooter. The victim testified that Daniels confronted him about scratching her car, later returned with a gun, and shot him multiple times. Police did not

recover the firearm, ammunition, vehicle, DNA, fingerprints linking Daniels to the shooting, or surveillance video, but fingerprint evidence connected Daniels to a prior felony conviction.

## PROCEDURAL HISTORY

After a jury trial, Daniels was found guilty as charged on all three counts. The district court denied her motions for new trial and post-verdict judgment of acquittal, imposed consecutive sentences of 20 years, 2 years, and 15 years, and ordered the sentences to be served without benefits where applicable. The Louisiana Second Circuit affirmed the convictions and sentences.

## DISPOSITION

affirmed

## CASES CITED

- State v. Long, 154 So. 3d 799 (La. App. 2 Cir. 2014)
- Manson v. Brathwaite, 432 U.S. 98 (1977)
- State in Interest of MB, 217 So. 3d 555 (La. App. 4 Cir. 2017)
- State v. Sparks, 68 So. 3d 435 (La. 2011)
- State v. Johnson, 182 So. 3d 1039 (La. App. 2 Cir. 2015)
- State v. Brown, 907 So. 2d 1 (La. 2005)
- State v. Williams, 375 So. 2d 364 (La. 1979)
- State v. Harper, 646 So. 2d 338 (La. 1994)
- State v. Whitaker, 413 So. 3d 553 (La. App. 2 Cir. 2025)
- State v. Miller, 561 So. 2d 892 (La. App. 2 Cir. 1990)
- State v. Guillory, 61 So. 3d 801 (La. App. 3 Cir. 2011)
- State v. Hudson, 299 So. 3d 131 (La. App. 4 Cir. 2020)
- Jackson v. Virginia, 443 U.S. 307 (1979)
- State v. Tate, 851 So. 2d 921 (La. 2003)
- State v. Mussall, 523 So. 2d 1305 (La. 1988)
- State v. Pigford, 922 So. 2d 517 (La. 2006)
- State v. Galloway, 384 So. 3d 1167 (La. App. 2 Cir. 2024)
- State v. Sutton, 436 So. 2d 471 (La. 1983)
- State v. Calloway, 1 So. 3d 417 (La. 2009)
- Tibbs v. Florida, 457 U.S. 31 (1982)
- State v. Kelly, 195 So. 3d 449 (La. 2016)
- State v. Robinson, 874 So. 2d 66 (La. 2004)
- State v. Young, 320 So. 3d 356 (La. 2021)
- State v. Clanton, 285 So. 3d 31 (La. App. 4 Cir. 2019)

- State v. Gant, 352 So. 3d 824 (La. App. 2 Cir. 2023)
- State v. Johnson, 709 So. 2d 672 (La. 1998)
- State v. Smith, 433 So. 2d 688 (La. 1983)
- State v. Lanclos, 419 So. 2d 475 (La. 1982)
- State v. Dorthey, 623 So. 2d 1276 (La. 1993)
- State v. Weaver, 805 So. 2d 166 (La. 2002)
- State v. Williams, 893 So. 2d 7 (La. 2004)
- State v. Cozzetto, 974 So. 2d 665 (La. 2008)
- State v. Green, 225 So. 3d 1033 (La. 2017)
- State v. Ned, 56,447 (La. App. 2 Cir. Oct. 1, 2025), \_\_ So. 3d \_\_

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