UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF CALIFORNIA

Joseph Leonard v. Patrick Eaton

No. 2:19-cv-0230-TLN-SCR (E.D. Cal. Oct. 29, 2025) · No. No. 2:19-cv-0230-TLN-SCR · Decided October 30, 2025

SUMMARY

This document is a magistrate judge's Findings and Recommendations in a federal habeas corpus action under 28 U.S.C. § 2254. Petitioner Joseph Leonard challenges his California convictions for murder and attempted murder arising from a McDonald's parking-lot altercation, asserting claims involving jury instructions, sufficiency of the evidence, ineffective assistance of counsel, PTSD, and Miranda. The court recommends denying habeas relief on the merits and addresses additional claims raised in the petitioner's traverse.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Sean C. Riordan, United States Magistrate Judge
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	October 30, 2025
DOCKET	No. 2:19-cv-0230-TLN-SCR
DISPOSITION	other
PROCEDURAL POSTURE	Findings and recommendations on a state prisoner's second amended petition for a writ of habeas corpus under 28 U.S.C. § 2254.
STANDARD OF REVIEW	Under AEDPA, relief is available only if the state-court adjudication was contrary to, or involved an unreasonable application of, clearly established Supreme Court precedent, or was based on an unreasonable determination of the facts under 28 U.S.C. § 2254(d). Sufficiency-of-the-evidence claims are reviewed under Jackson v. Virginia, jury-instruction claims under the due-process standard described in Estelle v. McGuire, and ineffective-assistance claims under Strickland v. Washington with AEDPA's doubly deferential review. The court independently reviews the record when no reasoned state-court decision exists.
PRECEDENTIAL VALUE	nonprecedential

PARTIES	Joseph Leonard v. Patrick Eaton

TOPICS

federal habeas corpus · post-conviction relief · ineffective assistance · miranda rights · due process

PRACTICE AREAS

federal habeas corpus · criminal procedure · constitutional law · ineffective assistance of counsel · evidence

QUESTIONS PRESENTED

1. Whether reopening closing argument after the jury began deliberating violated Leonard's rights to due process and a fair trial.
2. Whether the trial court's failure to instruct on imperfect defense of another violated due process.
3. Whether counsel was ineffective for failing to request a provocation instruction and for other alleged failures involving PTSD evidence, witnesses, alleged perjury, videotape presentation, and Miranda-related objections.
4. Whether the evidence was constitutionally insufficient to establish premeditation and support the murder and attempted-murder convictions.
5. Whether Leonard's recorded statements were obtained in violation of Miranda.
6. Whether Leonard was incompetent at trial because of alleged PTSD or medication.
7. Whether new claims raised for the first time in the federal traverse were barred by failure to exhaust state remedies.
8. Whether Leonard was entitled to an evidentiary hearing.

HOLDINGS

1. The state court's rejection of Leonard's fair-trial and due-process claim was not contrary to or an unreasonable application of clearly established federal law because no Supreme Court precedent establishes a constitutional prohibition on reopening argument after deliberations begin.
2. Leonard was not entitled to federal habeas relief based on the failure to give an imperfect-defense-of-another instruction because the evidence, including Leonard's own testimony, did not provide a sufficient basis for the instruction, and the state court's decision was reasonable under clearly established federal law.
3. Leonard's Miranda claim should be denied because the recorded statements admitted at trial were spontaneous custodial statements, not statements made in response to police interrogation.
4. Leonard did not establish that the California courts unreasonably rejected his ineffective-assistance claims under Strickland and AEDPA.
5. The state court reasonably rejected Leonard's challenge to the sufficiency of the evidence supporting first degree murder and premeditated attempted murder.

6. Leonard was not entitled to relief on his claim that PTSD or medication rendered him incompetent at trial because the record contained no evidence that his mental state was sufficiently altered to make him incompetent.
7. The new claims raised for the first time in the federal traverse should be denied because they were not properly exhausted in state court, and the newly submitted evidence could not provide a basis for relief under Cullen v. Pinholster.

KEY QUOTATIONS

> *"Absent relevant Supreme Court authority, the undersigned cannot conclude that petitioner is entitled to relief on claim one."* (at 17)

> *"These are custodial but no interrogation statements so it's not a Miranda situation."* (at 29)

> *"Therefore, they should be denied as unexhausted."* (at 42)

FACTUAL BACKGROUND

Leonard became involved in an altercation with Toussaint Harrison and Justin Oliphant in a McDonald's parking lot. After an initial confrontation involving a chain and knives, Leonard drove his truck toward the men, struck Harrison, pursued Oliphant, and later kicked Harrison while he lay injured; Harrison died from blunt-force injuries. Leonard was convicted of first degree murder and premeditated attempted murder, with deadly-weapon and hate-crime findings, and received a forty-years-to-life sentence.

PROCEDURAL HISTORY

Leonard was convicted in Sacramento County Superior Court of first degree murder and premeditated attempted murder and was sentenced to forty years to life. The California Court of Appeal affirmed the conviction, and the California Supreme Court denied review. After the California Supreme Court denied Leonard's state habeas petition without comment, he filed a federal § 2254 petition. The magistrate judge recommends denying the petition on the merits and denying an evidentiary hearing; the recommendation was subject to review by the assigned district judge after objections.

DISPOSITION

other

CASES CITED

- Cullen v. Pinholster, 563 U.S. 170 (2011)
- Magana-Torres v. Harrington, No. 2:10-cv-2669-WBS-TJB, 2011 U.S. Dist. LEXIS 146140 (E.D. Cal. Dec. 20, 2011)
- United States v. Evanston, 651 F.3d 1080 (9th Cir. 2011)
- Taylor v. Sullivan, No. CV 12-3550-BRO JPR, 2013 U.S. Dist. LEXIS 119905 (C.D. Cal. Aug. 22, 2013)
- Early v. Packer, 537 U.S. 3 (2002)

- Bell v. Cone, 535 U.S. 685, 694 (2002)
- Harrington v. Richter, 562 U.S. 86, 99-105 (2011)
- Yarborough v. Alvarado, 541 U.S. 652, 664 (2004)
- Lockyer v. Andrade, 538 U.S. 63, 71-72 (2003)
- Bradley v. Duncan, 315 F.3d 1091, 1101 (9th Cir. 2002)
- Duhaime v. Ducharme, 200 F.3d 597, 600 (9th Cir. 2000)
- Robinson v. Ignacio, 360 F.3d 1044, 1057 (9th Cir. 2004)
- Rice v. Collins, 546 U.S. 333, 338 (2006)
- Frantz v. Hazey, 533 F.3d 724 (9th Cir. 2008) (en banc)
- Wilson v. Sellers, 584 U.S. 122 (2018)
- Ylst v. Nunnemaker, 501 U.S. 797 (1991)
- Johnson v. Williams, 568 U.S. 289, 297 n.1 (2013)
- Estelle v. McGuire, 502 U.S. 62, 71-72 (1991)
- Henderson v. Kibbe, 431 U.S. 145, 155 (1977)
- Villafuerte v. Stewart, 111 F.3d 616, 624 (9th Cir. 1997)
- Mullaney v. Wilbur, 421 U.S. 684, 697-98, 703-04 (1975)
- Beck v. Alabama, 447 U.S. 625, 635-38 (1980)
- Miranda v. Arizona, 384 U.S. 436 (1966)
- Oregon v. Elstad, 470 U.S. 298, 306, 317 (1985)
- Berkemer v. McCarty, 468 U.S. 420, 429 (1984)
- Juan H. v. Allen, 408 F.3d 1262, 1271 (9th Cir. 2005)
- Strickland v. Washington, 466 U.S. 668, 690, 692-94 (1984)
- In re Winship, 397 U.S. 358, 364 (1970)
- Jackson v. Virginia, 443 U.S. 307, 319, 326 (1974)
- Schlup v. Delo, 513 U.S. 298, 330 (1995)
- Boyer v. Belleque, 659 F.3d 957, 964-65 (9th Cir. 2011)
- Delgado v. Lewis, 223 F.3d 976, 982 (9th Cir. 2000)
- Martinez v. Ylst, 951 F.2d 1153 (9th Cir. 1991)

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