

CALIFORNIA COURT OF APPEAL, FOURTH APPELLATE DISTRICT,
DIVISION ONE

People v. Aguilar

Aguilar · No. D083172 · Decided January 2, 2026

SUMMARY

The California Court of Appeal reversed Enrique Aguilar’s convictions and remanded for a new trial after concluding that the trial court improperly overruled an objection to the prosecution’s peremptory challenge of a prospective Latina juror. The court held that the asserted reason—juror confusion about intent—was unsupported by substantial evidence and was presumptively invalid under Code of Civil Procedure section 231.7. The court applied de novo review and determined that the statutory error was prejudicial.

CASE DETAILS

COURT	California Court of Appeal, Fourth Appellate District, Division One
WRITING FOR THE COURT	DATO, Acting Presiding Justice; DO, Justice; RUBIN, Justice
JURISDICTION	California Court of Appeal, Fourth Appellate District, Division One
DECIDED	January 2, 2026
DOCKET	D083172
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Aguilar appealed from a judgment entered after a jury convicted him of multiple offenses arising from a shootout with San Diego police officers. He challenged the denial of his objection under Code of Civil Procedure section 231.7 to the prosecution's peremptory challenge of a prospective juror.
STANDARD OF REVIEW	The denial of an objection under Code of Civil Procedure section 231.7 is reviewed de novo, while the trial court's express factual findings are reviewed for substantial evidence. Appellate review is limited to the reasons stated by the trial court, and the court may not speculate about unstated justifications.
PRECEDENTIAL VALUE	Published and certified for publication
PARTIES	Enrique Aguilar v. The People

TOPICS

jury selection

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standard of review

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the trial court's finding that Juror 1 was confused or equivocal about intent was supported by substantial evidence.
2. Whether the prosecution's stated rationale for exercising a peremptory challenge was presumptively invalid under Code of Civil Procedure section 231.7 and, if so, whether the presumption was rebutted.
3. Whether the trial court improperly denied Aguilar's objection to the peremptory challenge under the de novo review required by section 231.7.

HOLDINGS

1. The trial court's finding that Juror 1 gave equivocal or confused answers about intent was unsupported by substantial evidence.
2. Juror confusion is a presumptively invalid reason for exercising a peremptory challenge unless the trial court can confirm that the asserted behavior occurred based on its own observations or the observations of counsel for the objecting party.
3. The trial court erred in overruling Aguilar's objection because the prosecution failed to demonstrate that an objectively reasonable person would view its rationale as unrelated to Juror 1's ethnicity.

KEY QUOTATIONS

“The denial of an objection made under this section shall be reviewed by the appellate court de novo, with the trial court’s express factual findings reviewed for substantial evidence.” (at 9)

“As a result, the trial court’s unexplained finding of “confusion” on Juror 1’s part is entirely unsupported by substantial evidence.” (at 11)

“Applying de novo review in light of the presumption, we conclude the prosecution failed to demonstrate “that an objectively reasonable person would view the [proffered] rationale as unrelated to [Juror 1’s] . . . ethnicity.”” (at 11-12)

FACTUAL BACKGROUND

On September 16, 2019, Aguilar led a San Diego police officer on a foot chase while brandishing a gun, followed by an exchange of gunfire between Aguilar and two officers. No officers were struck, but Aguilar was shot in the hip, and a bullet fired from his direction struck the door of a nearby store. Before trial, the prosecutor used a peremptory challenge against Juror 1, whom the judge and attorneys perceived to be Latina, asserting that she was confused about the concept of intent. The trial court accepted that rationale and overruled Aguilar's objection based on alleged ethnic discrimination.

PROCEDURAL HISTORY

A San Diego County Superior Court jury convicted Aguilar of two counts of attempted voluntary manslaughter, three counts of assaulting a peace officer with a semiautomatic firearm, shooting at an occupied building, possessing methamphetamine while armed with a loaded and operable firearm, and being a felon in possession of a firearm. The trial court overruled Aguilar's objection to the prosecution's peremptory challenge of Juror 1, finding the juror's answers equivocal and confused. The Court of Appeal reversed the judgment and remanded for a new trial because the finding was unsupported by substantial evidence and the prosecution's stated rationale was presumptively invalid under section 231.7.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The judgment is reversed and the case is remanded for a new trial.

CASES CITED

- People v. Jimenez (2024) 99 Cal.App.5th 534, 539-540
- People v. Rhoades (2019) 8 Cal.5th 393, 423
- People v. Caparotta (2024) 103 Cal.App.5th 874, 893
- People v. Barnes (2024) 107 Cal.App.5th 560, 578
- Batson v. Kentucky (1986) 476 U.S. 79
- People v. Wheeler (1978) 22 Cal.3d 258
- People v. Jaime (2023) 91 Cal.App.5th 941
- People v. Anderson (2009) 47 Cal.4th 92, 104
- People v. Eroshevich (2014) 60 Cal.4th 583, 591
- People v. Barragan (2004) 32 Cal.4th 236, 247