

LOUISIANA COURT OF APPEAL, SECOND CIRCUIT

State of Louisiana v. Laquinton Eckles

No. 56,621-KA · No. 56,621-KA · Decided December 17, 2025

SUMMARY

The Louisiana Second Circuit Court of Appeal affirmed Laquinton Eckles’s convictions for molestation of a juvenile and indecent behavior with juveniles, as well as his consecutive sentences of 10 years and 5 years. The court rejected his sufficiency-of-the-evidence and excessive-sentence claims and remanded solely to correct the minutes to reflect that the 5-year sentence was imposed without hard labor.

CASE DETAILS

COURT	Louisiana Court of Appeal, Second Circuit
WRITING FOR THE COURT	Robinson, J.; Stone, J.; Stephens, J.
JURISDICTION	Louisiana Court of Appeal, Second Circuit
DECIDED	December 17, 2025
DOCKET	56,621-KA
DISPOSITION	other
PROCEDURAL POSTURE	Defendant appealed jury convictions for molestation of a juvenile and indecent behavior with juveniles, the denial of his motion for new trial and motion for post-verdict judgment of acquittal, and his sentences.
STANDARD OF REVIEW	Sufficiency of the evidence is reviewed under Jackson v. Virginia by asking whether, viewing the evidence in the light most favorable to the prosecution, any rational trier of fact could have found every essential element beyond a reasonable doubt. Sentences are reviewed for constitutional excessiveness and manifest abuse of discretion; a sentence is unconstitutional if it is grossly disproportionate to the offense or constitutes a purposeless and needless infliction of pain and suffering.
PRECEDENTIAL VALUE	Published Louisiana Court of Appeal opinion
PARTIES	Laquinton Eckles v. State of Louisiana

TOPICS

criminal procedure

appellate procedure

evidence

sentencing

standard of review

PRACTICE AREAS

criminal law

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QUESTIONS PRESENTED

1. Whether the evidence was sufficient to support the convictions for molestation of a juvenile and indecent behavior with juveniles.
2. Whether the appellate court should consider an ineffective-assistance claim based on the alleged failure to challenge the victim's competency.
3. Whether Eckles's individual and consecutive sentences were constitutionally excessive.
4. Whether the sentencing minutes accurately reflected the sentence imposed for indecent behavior with juveniles.

HOLDINGS

1. The evidence was sufficient for a rational trier of fact to find Eckles guilty beyond a reasonable doubt of molestation of a juvenile.
2. The evidence was sufficient for a rational trier of fact to find Eckles guilty beyond a reasonable doubt of indecent behavior with juveniles.
3. The court declined to consider the ineffective-assistance claim on direct appeal because such claims are more properly raised in an application for post-conviction relief in the trial court.
4. The ten-year and five-year sentences, imposed consecutively, were not constitutionally excessive.
5. The sentencing minutes had to be corrected to remove the hard-labor condition incorrectly recorded for the five-year indecent-behavior sentence.

KEY QUOTATIONS

“CONVICTIONS AND SENTENCES AFFIRMED; REMANDED.” (16)

FACTUAL BACKGROUND

Eckles, the victim's father, began spending time with his fifteen-year-old daughter in 2022 after having had little prior contact with her. After a Mother's Day visit during which Eckles failed to return the child at the promised time, the child disclosed to her mother, counselor, and a forensic interviewer that Eckles had discussed sex with her, touched her breasts and vaginal area, forced her to touch his penis, exposed himself, and showed her pornography. The jury credited the child's disclosures and related testimony despite conflicting defense evidence and found Eckles guilty of molestation of a juvenile and indecent behavior with juveniles.

PROCEDURAL HISTORY

Eckles was charged by amended bill of information with molestation of a juvenile and indecent behavior with juveniles. A jury found him guilty as charged. The trial court denied his post-verdict motions, imposed consecutive sentences of ten years at hard labor for molestation and five years for indecent behavior without a hard-labor condition, and Eckles appealed. The court of appeal affirmed the convictions and sentences but remanded for correction of the sentencing minutes to remove the incorrectly recorded hard-labor condition.

DISPOSITION

other

REMAND INSTRUCTIONS

Remand to the trial court to correct the minutes so that the five-year sentence for indecent behavior with juveniles is recorded as imposed without a hard-labor condition.

CASES CITED

- Jackson v. Virginia, 443 U.S. 307 (1979)
- State v. Tate, 01-1658 (La. 5/20/03), 851 So. 2d 921, cert. denied, 541 U.S. 905 (2004)
- State v. Pigford, 05-0477 (La. 2/22/06), 922 So. 2d 517
- State v. Dotie, 43,819 (La. App. 2 Cir. 1/14/09), 1 So. 3d 833, writ denied, 09-0310 (La. 11/6/09), 21 So. 3d 297
- State v. Casey, 99-0023 (La. 1/26/00), 775 So. 2d 1022, cert. denied, 531 U.S. 840 (2000)
- State v. Smith, 94-3116 (La. 10/16/95), 661 So. 2d 442
- State v. Green, 49,741 (La. App. 2 Cir. 4/15/15), 164 So. 3d 331
- State v. Jackson, 53,497 (La. App. 2 Cir. 5/20/20), 296 So. 3d 1156
- State v. Sutton, 436 So. 2d 471 (La. 1983)
- State v. Hampton, 52,403 (La. App. 2 Cir. 11/14/18), 261 So. 3d 993, writ denied, 19-0287 (La. 4/29/19), 268 So. 3d 1029
- State v. Lilly, 468 So. 2d 1154 (La. 1985)
- State v. Hernandez, 55,256 (La. App. 2 Cir. 8/9/23), 369 So. 3d 962
- State v. Redfearn, 44,709 (La. App. 2 Cir. 9/23/09), 22 So. 3d 1078, writ denied, 09-2206 (La. 4/9/10), 31 So. 3d 381
- State v. Galloway, 54,704 (La. App. 2 Cir. 2/1/23), 354 So. 3d 919, writ denied, 23-00366 (La. 5/31/23), 361 So. 3d 467
- State v. Mims, 619 So. 2d 1059 (La. 1993)
- State v. Benson, 53,578 (La. App. 2 Cir. 11/10/20), 305 So. 3d 135
- State v. Dorthey, 623 So. 2d 1276 (La. 1993)
- State v. Bell, 53,712 (La. App. 2 Cir. 1/13/21), 310 So. 3d 307
- State v. Weaver, 01-0467 (La. 1/15/02), 805 So. 2d 166
- State v. Trotter, 54,496 (La. App. 2 Cir. 6/29/22), 342 So. 3d 1116

- State v. Cozzetto, 07-2031 (La. 2/15/08), 974 So. 2d 665
- State v. Gibson, 54,400 (La. App. 2 Cir. 5/25/22), 338 So. 3d 1260, writ denied, 22-00978 (La. 3/7/23), 356 So. 3d 1053
- State v. Heath, 53,559 (La. App. 2 Cir. 11/10/20), 304 So. 3d 1105, writ denied, 20-01422 (La. 4/7/21), 313 So. 3d 981
- State v. Sandifer, 54,103 (La. App. 2 Cir. 12/15/21), 330 So. 3d 1270
- State v. Lynch, 441 So. 2d 732 (La. 1983)