

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF  
CALIFORNIA

Emiliano Isidro Enriquez v. R. Godwin

Enriquez v. Godwin · No. 1:21-cv-0930 JLT HBK (HC) · Decided February 26, 2025

SUMMARY

The United States District Court for the Eastern District of California adopted the magistrate judge’s findings and recommendations and denied Emiliano Isidro Enriquez’s petition for a writ of habeas corpus under 28 U.S.C. § 2254. The court declined to issue a certificate of appealability and directed the clerk to close the case.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                      |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Eastern District of California                                                                                                                                                                                                                                                                                                  |
| WRITING FOR THE COURT | Jennifer L. Thurston                                                                                                                                                                                                                                                                                                                                                 |
| JURISDICTION          | United States District Court for the Eastern District of California                                                                                                                                                                                                                                                                                                  |
| DECIDED               | February 26, 2025                                                                                                                                                                                                                                                                                                                                                    |
| DOCKET                | 1:21-cv-0930 JLT HBK (HC)                                                                                                                                                                                                                                                                                                                                            |
| DISPOSITION           | dismissed                                                                                                                                                                                                                                                                                                                                                            |
| PROCEDURAL POSTURE    | State prisoner sought federal habeas relief under 28 U.S.C. § 2254. The district court reviewed de novo the magistrate judge's findings and recommendations after petitioner filed no objections, adopted those findings and recommendations, denied the petition, declined to issue a certificate of appealability, and closed the case.                            |
| STANDARD OF REVIEW    | De novo review under 28 U.S.C. § 636(b)(1) of the magistrate judge's findings and recommendations. For the merits of the § 2254 claims, relief was unavailable unless the state court decision was contrary to, or involved an unreasonable application of, clearly established Supreme Court precedent, or was based on an unreasonable determination of the facts. |
| PRECEDENTIAL VALUE    | unpublished                                                                                                                                                                                                                                                                                                                                                          |
| PARTIES               | Emiliano Isidro Enriquez v. R. Godwin                                                                                                                                                                                                                                                                                                                                |

TOPICS

federal habeas corpus

post-conviction relief

evidence

criminal procedure

reasonable doubt

## PRACTICE AREAS

Federal habeas corpus

Post-conviction relief

Criminal procedure

Evidence

## QUESTIONS PRESENTED

1. Whether the claim challenging denial of the motion to set aside the Information presented a cognizable federal habeas claim.
2. Whether the state court's rejection of the sufficiency-of-the-evidence claims was contrary to, or an unreasonable application of, clearly established Supreme Court precedent or rested on an unreasonable determination of the facts.
3. Whether the use of officers' reports and gang-expert testimony violated clearly established federal confrontation or hearsay principles.
4. Whether alleged errors in the jury instructions warranted federal habeas relief.
5. Whether the claim concerning uncorroborated accomplice testimony stated a federal constitutional claim or, alternatively, demonstrated constitutionally insufficient evidence.
6. Whether a certificate of appealability should issue.

## HOLDINGS

1. A claim based solely on an alleged violation of state law is not cognizable on federal habeas review under 28 U.S.C. § 2254. The court therefore denied relief on this ground.
2. The state appellate court's rejection of petitioner's sufficiency-of-the-evidence claims was not contrary to, or an unreasonable application of, clearly established Supreme Court precedent and did not involve an unreasonable determination of the facts.
3. Petitioner was not entitled to habeas relief based on the use of officers' reports and gang-expert testimony because the state court correctly identified and applied the clearly established federal law governing confrontation claims involving hearsay, and petitioner failed to demonstrate constitutional error.
4. The alleged errors concerning the jury instructions did not warrant federal habeas relief.
5. The claim concerning uncorroborated accomplice testimony did not state a cognizable federal habeas claim because it was premised on state law. To the extent it could be construed as a sufficiency-of-the-evidence claim, it still failed because a rational trier of fact could conclude petitioner was the shooter and the state court's rejection was not unreasonable under clearly established Supreme Court precedent.
6. A certificate of appealability should not issue because petitioner failed to make a substantial showing of the denial of a constitutional right and reasonable jurists would not find the denial of the petition debatable or wrong.

## KEY QUOTATIONS

*“The petition for writ of habeas corpus (Doc. 1) is DENIED.”* (Order at 1)

*“The Court declines to issue a certificate of appealability.”* (Order at 1)

## FACTUAL BACKGROUND

Enriquez was convicted in California state court and challenged his conviction through federal habeas proceedings. His petition raised claims concerning the denial of a motion to set aside the Information, sufficiency of the evidence, jury instructions, the admission or use of gang-expert testimony and officers' reports, and reliance on uncorroborated accomplice testimony. The state appellate court had rejected the federal claims, and the magistrate judge found that the state court reasonably rejected the claims or that some claims presented only state-law issues.

## PROCEDURAL HISTORY

Enriquez filed a petition for writ of habeas corpus challenging his state-court conviction on grounds involving the denial of a motion to set aside the Information, sufficiency of the evidence, jury instructions, gang-expert testimony, and uncorroborated accomplice testimony. The magistrate judge concluded that the claims were either based on state law or failed under the governing federal habeas standards, recommended denial of the petition, and recommended denial of a certificate of appealability. After the objection period expired without objections, the district court conducted de novo review, adopted the findings and recommendations in full, denied relief, declined to issue a certificate of appealability, and directed the clerk to close the case.

## DISPOSITION

dismissed

## CASES CITED

- Miller-El v. Cockrell, 537 U.S. 322, 335-36 (2003)
- Wilkerson v. Wheeler, 772 F.3d 834, 839 (9th Cir. 2014)