

CALIFORNIA COURT OF APPEAL, FOURTH APPELLATE DISTRICT,
DIVISION THREE

People v. Christensen

People v. Christensen · No. G062920 · Decided July 30, 2025

SUMMARY

The California Court of Appeal affirmed a judgment imposing life without parole on 18-year-old Jeff Andrew Christensen for aggravated kidnapping involving bodily harm or confinement creating a substantial likelihood of death. The court rejected his federal and state constitutional challenges to the sentence, concluding that the sentence was not cruel or unusual or grossly disproportionate to his conduct and criminal history. The court modified the judgment by striking a \$300 parole revocation fine because Christensen was ineligible for parole.

CASE DETAILS

COURT	California Court of Appeal, Fourth Appellate District, Division Three
WRITING FOR THE COURT	Moore, Acting P. J.; Sanchez, J.; Motoike, J.
JURISDICTION	California Court of Appeal, Fourth Appellate District, Division Three
DECIDED	July 30, 2025
DOCKET	G062920
DISPOSITION	affirmed
PROCEDURAL POSTURE	Defendant appealed from a judgment of conviction and sentencing in the Superior Court of Orange County, challenging his life-without-parole sentence under the federal and state constitutional prohibitions against cruel and unusual or cruel or unusual punishment and challenging the imposition of a parole revocation fine.
STANDARD OF REVIEW	The constitutionality of punishment is reviewed independently as a question of law, while underlying disputed facts are viewed in the light most favorable to the judgment. The court independently reviewed the cruel-and-unusual-punishment claims.
PRECEDENTIAL VALUE	published
PARTIES	Jeff Andrew Christensen v. The People

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QUESTIONS PRESENTED

1. Whether imposing life without parole on an offender who was 18 years old when he committed aggravated kidnapping violates the Eighth Amendment.
2. Whether Christensen's life-without-parole sentence is grossly disproportionate to his culpability and therefore violates article I, section 17 of the California Constitution.
3. Whether the trial court erred by imposing a \$300 parole revocation fine under Penal Code section 1202.45 when Christensen was sentenced to life without parole and was ineligible for parole.

HOLDINGS

1. The Eighth Amendment does not prohibit sentencing an 18-year-old offender to life without parole. The constitutional rules governing juvenile offenders do not extend categorically to offenders who were at least 18 when they committed the offense.
2. The life-without-parole sentence for Christensen's aggravated kidnapping is not cruel or unusual under article I, section 17 of the California Constitution because it is not grossly disproportionate to his individual culpability.
3. A parole revocation fine under Penal Code section 1202.45 may not be imposed when the defendant is ineligible for parole. The \$300 fine was improperly imposed and must be stricken.

KEY QUOTATIONS

“The age of 18 is the point where society draws the line for many purposes between childhood and adulthood.” (at 10)

“When there is no parole eligibility, the [parole revocation] fine is clearly not applicable.” (at 15)

FACTUAL BACKGROUND

Christensen was 18 when he helped abduct a victim at gunpoint for a drug dealer seeking to collect \$100,000. During approximately 28 hours of captivity, Christensen repeatedly pointed a gun at the victim, threatened the victim's family, punched and kicked him, cut his arm with a machete, and helped move him into a closet that was boarded and screwed shut. Christensen had an extensive history of violent and delinquent conduct, including numerous juvenile-hall stays, an attempted stabbing of his brother, assault of his mother, gang-related firearm conduct, probation violations, and assaults of inmates while awaiting trial.

PROCEDURAL HISTORY

A jury convicted Christensen in 2023 of aggravated kidnapping under Penal Code section 209, subdivision (a), finding bodily harm or confinement creating a substantial likelihood of death and firearm use. The superior court

imposed life without parole for the aggravated kidnapping, a consecutive 10-year firearm enhancement, and a \$300 parole revocation fine. The Court of Appeal rejected the constitutional sentencing challenges but held the parole revocation fine improper because Christensen was ineligible for parole.

DISPOSITION

affirmed

REMAND INSTRUCTIONS

The judgment is modified by striking the \$300 parole revocation fine imposed under Penal Code section 1202.45. In all other respects, the judgment is affirmed as modified.

CASES CITED

- People v. Wilson, 56 Cal. App. 5th 128, 166-167 (2020)
- People v. Baker, 20 Cal. App. 5th 711, 723 (2018)
- Harmelin v. Michigan, 501 U.S. 957, 959 (1991)
- United States v. Reynolds, 215 F.3d 1210, 1214 (11th Cir. 2000)
- Graham v. Florida, Graham v. Florida, 560 U.S. 48, 82 (2010)
- Miller v. Alabama, Miller v. Alabama, 567 U.S. 460, 465 (2012)
- People v. Caballero, 55 Cal. 4th 262, 267-268 (2012)
- People v. Howard, 74 Cal. App. 5th 141, 145-146 (2021)
- Roper v. Simmons, 543 U.S. 551, 568, 574 (2005)
- People v. Flores, 9 Cal. 5th 371, 429 (2020)
- People v. Powell, 6 Cal. 5th 136, 191-192 (2018)
- People v. Argeta, 210 Cal. App. 4th 1478, 1482 (2012)
- People v. Windfield, 59 Cal. App. 5th 496, 525-526 (2021)
- People v. Montelongo, 55 Cal. App. 5th 1016, 1030-1032 (2020)
- People v. Abundio, 221 Cal. App. 4th 1211, 1220 (2013)
- In re Dannenberg, 34 Cal. 4th 1061, 1096 (2005)
- People v. Brewer, 65 Cal. App. 5th 199, 213-214 (2021)
- People v. Johnson, 183 Cal. App. 4th 253, 296-297 (2010)
- People v. Castillo, 233 Cal. App. 3d 36, 66 (1991)
- People v. Ordonez, 226 Cal. App. 3d 1207, 1236-1237 (1991)
- People v. Oganessian, 70 Cal. App. 4th 1178, 1183 (1999)
- People v. Callejas, 85 Cal. App. 4th 667, 669 (2000)
- State v. O'Dell, 183 Wash. 2d 680, 691-692 (2015)

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