SUPREME COURT, STATE OF COLORADO Ralph L. Carr Judicial Center 2 East 14th Avenue Denver, CO 80203 Certiorari to the Colorado Court of Appeals Case Number 2022CA9	DATE FILED May 29, 2025 1:15 PM FILING ID: D690D0FCB3A05 CASE NUMBER: 2025SC169
Petitioner MARQUIS DANTRE HAZARD v. Respondent THE PEOPLE OF THE STATE OF COLORADO	
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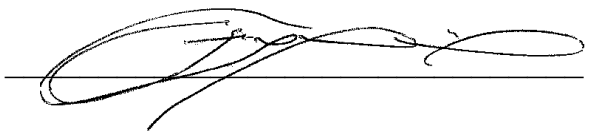
PETITION FOR WRIT OF CERTIORARI	

CERTIFICATE OF COMPLIANCE

I hereby certify that this brief complies with all requirements of C.A.R. 32 and C.A.R. 53, including all formatting requirements set forth in these rules.

Specifically, the undersigned certifies that this petition complies with the applicable word limit and formatting requirements set forth in the above rules. It contains 3,800 words.

I acknowledge that my brief may be stricken if it fails to comply with any of the requirements of C.A.R. 32 and C.A.R. 53.



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Marquis Hazard, the Petitioner, respectfully requests this Court to grant a writ of certiorari to the Colorado Court of Appeals to review its decision. C.A.R. 49. As grounds, he states:

ISSUES PRESENTED

Whether mandatory sentences of life imprisonment without the possibility of parole are cruel and excessive punishment for late adolescents under article II, section 20 of the Colorado Constitution and the Eighth Amendment to the United States Constitution.

OPINION BELOW

A copy of the decision below, *People v. Hazard* (22CA9), is attached.

JURISDICTION

The division issued its opinion January 30, 2025. Hazard timely sought rehearing, which was denied on February 27, 2025. The deadline was extended to May 29, 2025. This petition is timely.

OTHER CASES

Counsel is unaware of another case before this court presenting these issues.

THE CASE

Trench shot and killed Marcus Denton and Denton's girlfriend, Serena Garcia, while he was sitting in their car's back seat. Tr. 10/5/21, p.46:17-25. Trench tried to set the car ablaze with gasoline as he left, but he set himself on fire and extinguished the car fire by shutting his door. Tr. 10/5/21, pp.103, 112. Trench, still on fire, got into Hazard's girlfriend's car. Hazard and his girlfriend, Shailynn Ryles helped put out the flames. Tr. 10/5/21, pp.112-14. They heard popping before Trench exited Garcia's car but didn't know Trench shot the people inside. Tr. 10/5/21, pp.105-06. Holding the handgun, he yelled at Hazard to drive. Tr. 10/6/21, p.56:7-10.

They took Trench home, where he lived with his family. Tr. 10/5/21, pp.114-22. His family reported what Trench said he did. Tr. 9/28/21, pp.113-14. Police searched the home, locating the 9mm handgun used in the shooting and clothes in a trash bag that smelled of gasoline. Tr. 9/28/21, p.49:8-16; 10/5/21, p.46:17-25.

Police investigated Hazard and Ryles after learning Trench was in touch with them earlier. Trench and Hazard were acquainted through online videogaming, and

they discussed Hazard giving Trench a ride for $5,000. Ex. 215. The details of this alleged arrangement were never clarified. The prosecution alleged Hazard agreed to assist Trench in the murder and robbery. It argued their decision to meet at the spot of the shooting the night before, where one of them fired a gun, and their texts the morning of the shooting, demonstrated Trench and Hazard agreed to commit a murder and robbery. Ex. 190(a).

According to the prosecution, Hazard would be at the cul-de-sac (where Trench shot the victims) in his girlfriend's car to get Trench. Before leaving, Trench texted Hazard to ask where he was and ultimately said, "Yeah I got you we good I'm just bout to dome him and get up outta [t]here." Ex. 190(a). The term, "dome" is a term that gamers use to describe shooting someone in the head in a video game. Tr. 10/1/21, p.33:7-17. Hazard replied, "Yup for sure." Ex. 190(a). Trench's text doesn't mention shooting Garcia, who was also present and killed.

Both Ryles and Hazard spoke with police. Hazard admitted agreeing to give Trench a ride but denied knowing Trench planned to rob and kill. Ex. 215. They both admitted to helping Trench dispose of some of his clothes and items from the car out of fear, and Hazard was worried about getting caught up in Trench's crimes (a fear Trench validated by blaming Hazard for the murders). Ex. 215. Each feared Trench, who had tried to enter their car while on fire with a burning bottle of gas in

his hand and who remained armed with the handgun. Ex. 215; Tr. 10/6/21, pp.43-44. Hazard admitted returning to the car before it was located and removed a backpack containing marijuana and a phone. Ex. 215.

The State charged Hazard with multiple counts of each first-degree murder, aggravated robbery, and conspiracy, and it charged him with one count of accessory and evidence tampering. CF, pp.17-26. He was convicted as charged. CF, pp.654-68; Tr. 2/8/21, pp.4-5.

The division affirmed in part and vacated in part. [Slip Op., ¶2].

REASONS FOR GRANTING THE WRIT

This court should grant review to decide these fundamental, recurring issues of first impression for late adolescents under our state and federal cruel and unusual punishment protections.

A. Standard of Review and Preservation

This issue is preserved. CF, pp.672-75, 688-89. This Court reviews the constitutionality of a sentence *de novo*. *Wells-Yates v. People*, 2019 CO 90M, ¶35.

B. Applicable Facts

Hazard challenged section 18-3-102's mandatory sentence of life imprisonment without the possibility of parole (LWOP) as violating article II, section 20 of the Colorado Constitution and the Eighth Amendment of the United States

Constitution. [CF, pp 672-75]. The trial court concluded that *Graham v. Florida* drew the line at age eighteen for when someone could be sentenced to LWOP. 560 U.S. 48, 74-75 (2010). Thus it rejected his challenges under the Colorado and U.S. Constitutions. CF, pp.688-89; Tr 11/19/21, pp.30-31. The court imposed two LWOP sentences. Tr 11/19/21, pp.45-48; CF, pp.682-87.

C. Resolving these recurring issues of first impression is critical to the fair administration of criminal justice.

The Eighth Amendment and article II, section 20 of the Colorado Constitution prohibit cruel and excessive punishment. *See* U.S. Const. amends. VIII, XIV; Colo. Const. art. II, § 20; *Atkins v. Virginia*, 536 U.S. 304, 311 (2002); *Wells-Yates*, ¶5. Punishment must be "graduated and proportioned to the offense." *Atkins*, 536 U.S. at 311 (quoting *Weems v. United States*, 217 U.S. 349, 367 (2002)(cleaned up)). "The language of the Eighth Amendment reflects a fundamental acknowledgement of the essential dignity of each person and a concomitant recognition that legislative prerogatives of defining and punishing criminal conduct, while accorded great deference, are not absolute." *People v. Cisneros*, 855 P.2d 822, 832 (Colo. 1993)(Kirshbaum, J., concurring in part and dissenting in part); *Roper v. Simmons*, 543 U.S. 551, 560 (2005).

Addressing the scope of one our fundamental rights will resolve a recurring issue. "Two in five people–11,600 individuals–sentenced to LWOP between 1995

and 2017 were under 26 at the time of their sentence." *See* The Sentencing Project, Ashley Nellis and Niki Monazzam, *Left to Die in Prison: Emerging Adults and Younger Sentenced to Life without Parole*, available https://www.sentencingproject.org/reports/left-to-die-in-prison-emerging-adults-25-and-younger-sentenced-to-life-without-parole/ (accessed 3/24/25); *see also* Colorado Division of Criminal Justice, Department of Public Safety, *Firearm Usage in Violent Crimes: Calendar Year: 2019-2023*, p5, Fig.2, available https://cdpsdocs.state.co.us/ors/Docs/Briefs/2024-11_FirearmUsage-ViolentCrimes-2019-2023.pdf ("Offenders aged 18 to 24 consistently have the highest firearm usage rate in violent crime.")(accessed 3/24/25).

The decision below also resolves a matter of first impression. Undersigned counsel is unaware of a published opinion addressing this issue. The importance of this issue is also seen in the broad forthcoming amicus support. This court should grant review. *See* C.A.R. 49(a).

D. This case presents an ideal vehicle to resolve these issues.

For several reasons, this case presents the right vehicle to decide these issues. First, these issues present questions of law, which are reviewed de novo. Second, they are fully preserved, having been raised and ruled on in the district court and by the decision below. Third, the division based its decision squarely on this

court's opinion in *Sellers v. People*, 2024 CO 64. [Slip Op., ¶¶36-37]. This case affords this court the opportunity to address the unsettled scope of article II, section 20. Jake Mazeitis, Hon. Melissa Hart, *The Role of State Justices in Advancing State Constitutional Law: Some Thoughts from Colorado*, 2024 Wis. L. Rev. 1447, 1451, 1466 (2024)(discussing the importance of developing state constitutional jurisprudence).

Fourth, correctly resolving this issue should be outcome determinative. Hazard didn't kill the victims and wasn't present in the car when they were killed, and he was only nineteen years old. The prosecution indicated it would accept a 25-year DOC sentence for Hazard's involvement. CF, pp.188-204. But the court could consider none of this when imposing Hazard's sentences, which, if allowed to stand, will guarantee he will die in prison. *See* § 18-1.3-401(1)(a)(V)(A).

E. The decision below is wrong.

The decision below wrongly concluded that the United States Supreme Court has rejected this argument. Whether a sentence is excessive is a question reserved to the courts, which must judge a sentence against "evolving standards of decency that mark the progress of a maturing society." *Atkins*, 536 U.S. 311-12. Courts must start with "objective" factors or evidence of contemporary values, which include legislation, sentencing practices, international opinion, and expert

consensus. *See id*. at 311-12, 316 n. 21; *Graham v. Florida*, 560 U.S. 48, 62, 68-69 (2010). The measure of the changing standards is the "consistency of the direction of change." *Atkins*, 536 U.S. at 315.[1] Ultimately, however, courts must make their own judgment to determine whether a sentence is excessive. *Coker v. Georgia*, 433 U.S. 584, 597 (1977). "The judicial exercise of independent judgment requires consideration of the culpability of the offenders at issue in light of their crimes and characteristics, along with the severity of the punishment in question." *Graham*, 560 U.S. at 67. In exercising independent judgement, courts must determine whether the challenged sentence "serves legitimate penological goals." *Id*. "A sentence lacking any legitimate penological justification is by its nature disproportionate to the offense." *Id*. at 71.

[1] States as far-flung as California and Kentucky have moved consistently toward increasing the threshold age to impose LWOP, indicating a consensus against imposing this harsh sentence on late adolescents. The states that have expanded protection from LWOP beyond 18-year-olds are: California (no LWOP for those under 25), Cal. Penal Code § 3051 (2024) (see *People v. Briscoe*, 105 Cal. App. 5th 479 (2024), review denied (Dec. 11, 2024)); Massachusetts (no LWOP for those under 25), *Commonwealth v. Mattis*, 493 Mass. 216 (2024); Michigan (mandatory LWOP for people under 21 unconstitutional under state constitution), *People v. Taylor*, 2025 WL 1085247, at *1 (Mich. Apr. 10, 2025); Connecticut (no LWOP for those under 21), Conn. Gen. Stat. § 54-125a (West 2024); Washington (no LWOP for those under 21), *In re Pers. Restraint of Monschke*, 482 P.3d 276 (Wash. 2021); and Kentucky (prohibiting LWOP for "youthful offenders" without specifying relevant age), § 640.040, K.R.S. (2024).

Applying this framework, the Supreme Court held that the State may neither execute those under eighteen years old at the time of offense nor sentence them to LWOP for non-homicide offenses. *See Graham*, 560 U.S. at 75; *Roper*, 543 U.S. at 569. Drawing on a long line of precedent that demonstrates that "youth is more than a chronological fact," the Court established and reaffirmed that punishment of youthful offenders is unlike punishment of adults. *See Roper*, 543 U.S. at 569 (quoting *Eddings v. Oklahoma*, 455 U.S. 104, 115 (1982)). The Court relied on an unimpeachable body of research in the areas of neuroscience and psychology that demonstrates juveniles' brains aren't yet fully developed. *See, e.g., Miller v. Alabama*, 567 U.S. 460, 472 n.5 (2012). Studies continue to confirm common-sense—juveniles have a "lack of maturity and underdeveloped sense of responsibility," which often results in impetuous and reckless behavior. *Miller*, 567 U.S. at 471-72; *Roper*, 543 U.S. at 569. Juveniles are also more susceptible to outside pressures and their personality traits are therefore "more transitory" than adults. *Id*. at 570.

Based on these traits of youth, the Court concluded that the death penalty and LWOP have little or no penological justification for juveniles. Juveniles are less susceptible to deterrence and are less culpable than adults, which considerably weakens the argument that these severe sentences support retribution and

deterrence rationales for punishment. *Graham*, 560 U.S. at 71-72; *Roper*, 543 U.S. at 570-71. And the goals of incapacitation and rehabilitation cannot justify the harshest sentences on juveniles: "incorrigibility is inconsistent with youth," and a life sentence without parole "foreswears altogether the rehabilitative ideal." *Miller*, 567 U.S. at 472-73 (quoting *Graham*, 560 U.S. at 72-74).

While the Supreme Court hasn't held juveniles may never receive LWOP, it has invalidated mandatory LWOP sentences, even in cases where the juvenile is convicted of murder. *See Miller*, 567 U.S. at 479. Punishing late adolescents with a life sentence also differs from punishing true adults because the differences in severity between a life sentence for a late adolescent and a life sentence for a true adult. LWOP is Colorado's most severe punishment, and it shares salient characteristics with capital punishment. *See* § 18-1.3-401(1)(a)(V.5)(A), C.R.S. 2022; *Graham*, 560 U.S. at 69-70. The forfeiture of life under each is absolute, and the hope of restoration and release is nonexistent. *See Graham*, 560 U.S. at 69-70. But a life sentence for a late adolescent is more extreme than for a true adult. *See id*. at 70. "Under this sentence a juvenile offender will on average serve more years and a greater percentage of his life in prison than an adult offender. A 16–year–old and a 75–year–old each sentenced to life without parole receive the same punishment in name only." *Id*.

When a state seeks to impose its most severe penalties on a young person, like the death penalty or LWOP, the Eighth Amendment and the Colorado Constitution impose barriers on the State's ability to dole out the sentence even if that sentence is not categorically cruel and unusual. The sentencer must, for example, consider the person's individual characteristics when deciding the sentence. *See Miller*, 567 U.S. at 474; *Woodson v. North Carolina*, 428 U.S. 280, 303-04 (1976)(plurality opinion); *People v. Dist. Ct.*, 586 P.2d 31, 34 (Colo. 1978). "An offender's age is relevant to the Eighth Amendment, and criminal procedure laws that fail to take defendants' youthfulness into account at all would be flawed." *Graham*, 560 U.S. at 76. Thus, the Supreme Court has held mandatory LWOP sentences for juveniles convicted of homicides is unconstitutional. *Miller*, 567 U.S. at 479.

Thus, there is no basis to conclude that LWOP for a nineteen year-old satisfies any valid penological goal more than it would a juvenile. Therefore, under *Miller*, *Graham* and *Roper's* logic, a mandatory LWOP sentence for a late adolescent who is marginally over eighteen at the time of offense violates the Eighth Amendment's ban on cruel and unusual punishment. *See* U.S. Const. amends. VIII, XIV; *Miller*, 567 U.S. at 479; *Graham*, 560 U.S. at 76.

Although *Roper* and its progeny addressed the constitutionality of juvenile sentences, they didn't establish that the cases' principles cease to apply to those

who are eighteen and older or that states may not decide their own constitutions bar LWOP for late adolescents under twenty-one. *See, e.g., Taylor*, supra; *Monschke*, supra; *Mattis*, supra.

In *Monschke*, the Washington Supreme Court relied on the same body of neuroscience and common sense underlying *Roper* and its progeny to invalidate the mandatory LWOP sentencing scheme to those who were nineteen and twenty at the time of the offense (murder)—those who were still "juveniles in all but name at the time of their crimes." *See Monschke*, 482 P.3d at 280. The court determined that drawing an absolute line at eighteen for the sentencer's consideration of youth as a sentencing factor is no less arbitrary, or unconstitutional, than eliminating sentencing discretion in capital cases for the sentencer to consider intellectual functioning when the defendant possesses an IQ level above 70. *See id*. at 283, 284-85, 287 (citing *Hall v. Florida*, 572 U.S. 701 (2014)); *see People v. Parks*, 987 N.W.2d 161, 174 (Mich. 2022)(citation omitted); *Taylor*, supra.

So even if Hazard's mandatory LWOP sentences don't violate the Eighth Amendment, this court should hold that they violate article II, section 20 of the Colorado Constitution. The decision below incorrectly concluded that article II, section 20 doesn't provide greater protection than the Eighth Amendment. It believed this conclusion was required by this court's precedent: "our supreme court

has declined to interpret article II, section 20, of the Colorado Constitution to provide greater protection than the Eighth Amendment." The opinion cites *Sellers*, ¶36, for this proposition. [Slip Op., ¶36]. From this, the division concluded it couldn't accept Hazard's argument that his LWOP sentences violate the Colorado Constitution because "[t]he exercise of [the division's] independent judgment is still limited by 'standards elaborated by controlling precedents." [Slip Op., ¶37 (quoting *Graham*, 560 U.S. at 61 (citation omitted)].

But *Sellers* mentions an alleged *lack* of precedent interpreting article II, section 20 more broadly than the Eighth Amendment, not precedent interpreting the two provisions congruently. *Id*. *Sellers* then "declined to do so now" based on "unambiguous statutory language" addressing the specific issue before the court, apparently without any contrary local conditions or circumstances warranting a broader interpretation. *Id*., ¶36.

When this court interprets our state constitution congruently with its federal counterpart, it says so. *See*, *e.g.*, *Compan v. People,* 121 P.3d 876, 885, 866 n.4 (Colo. 2005)(declining request to "overrule our congruent [Confrontation Clause] precedent"), *overruled on other grounds by Nicholls v. People*, 2017 CO 71; *Lucero v. People,* 476 P.2d 257, 259 (Colo. 1970)(article II, section 16's speedy

trial guarantee "is congruent with" Sixth Amendment). *Sellers*, however, indicates the court hasn't yet interpreted article II, section 20 more broadly.

And *Sellers* appears to have overlooked *People v. Young*, 814 P.2d 834, 846 (Colo. 1991)(plurality opinion). There, the court decided a challenge to Colorado's then-existing capital sentencing scheme under article II, sections 20 and 25, which it interpreted more broadly than the Eighth Amendment. *Id*. (alternatively holding "that to authorize imposition of the death penalty when aggravators and mitigators weigh equally, as does the current version of section 16–11–103, violates fundamental requirements of certainty and reliability under the cruel and unusual punishments and due process clauses of the Colorado Constitution")(internal citations omitted); *see also*, *e.g.*, *Wells-Yates*, ¶10. *Sellers*'s interpretation of article II, section 20, is most accurately understood as declining to read that protection more broadly in the narrow circumstance presented where there was an unambiguous statute addressing the matter and apparently no further indication that local conditions indicated otherwise. *See People In Interest of A.L.-C.*, 2016 CO 71, ¶20 (looking to "the narrowest grounds supporting the outcome" when interpreting supreme court precedent); *People v. Stellabotte*, 2018 CO 66, ¶28 (limiting precedent to the facts presented).

Like the high courts in Michigan, Washington, and Massachusetts, this court should conclude that the mandatory LWOP sentence for a nineteen-year-old violates the article II, section 20's ban on cruel and unusual punishment. Although article II, section 20 and the Eighth Amendment contain identical language, the language is generalized, warranting interpretive differences based on local considerations. *See People v. McKnight*, 2019 CO 36.

This court has construed article II, section 7 as "highly generalized" and found it to provide greater protection than the Fourth Amendment on several occasions. *Id*., ¶39; *see*, *e.g.*, *People v. Corr*, 682 P.2d 20, 27-28 (Colo. 1984)(Article II, Section 7 provided protects privacy interest in telephone toll records); *Charnes v. DiGiaocomo*, 612 P.2d 1117, 1120-21 (Colo. 1980)(same regarding bank records). Article II, section 20 is even more generalized as it does not proscribe any similar procedural guidelines.

Colorado's ban on cruel and unusual punishment is more expansive. *See, e.g., Young*, supra at 842; *Rocky Mountain Gun Owners v. Polis*, 2020 CO 66, ¶37 ("parallel text does not mandate parallel interpretation"). Article II, section 20's "fundamental requirements of certainty and reliability" go to the heart of this issue where fact-intensive, evidence-based sentencing is essential and a LWOP sentence is comparable in many ways to capital punishment. *Graham*, 560 U.S. at 69-70.

This Court has an affirmative obligation to interpret the Colorado Constitution independently due to "the inherently separate and independent functions of the states in a system of federalism." *Young*, 814 P.2d at 842; *see also Rocky Mountain Gun Owners*, ¶¶31-36. The country's federalist system supports constitutional interpretive independence in two additional ways, as this court recognized.

First, this court recently supported its departure from federal constitutional interpretation in *McKnight*, where the defendant was convicted of drug possession, noting that criminal law "has traditionally been considered best left to the expertise of the state courts as the vast majority of criminal prosecutions take place in state, rather than federal court." *See id*, ¶39. Second, interpretative differences between the state and federal constitutions are appropriate in response to "local conditions and traditions," such as "[w]hen there are 'general institutional differences between the state government and its federal counterpart' or 'distinctive state-specific factors'....") *Id*., ¶40 (citation omitted).

Distinct local factors and the science and reasoning undergirding *Roper* and its progeny compel the conclusion that Hazard's LWOP sentences are constitutionally infirm. The court imposed the sentences, as required by statute, without considering any individualized factors, including Hazard's youth and the lack of

evidence showing his involvement and foreknowledge of the shootings. § 18-1.3-401(1)(a)(V)(A), C.R.S. 2018.

Yet, Colorado has shown that it considers youth relevant to criminal culpability. To start, the state banned the execution of juveniles in 1974—long before the Supreme Court barred the execution of juveniles in 2005. *See* Ch. 52, sec. 4, § 39-11-103, 1974 Colo. Sess. Laws 252. And recently, the General Assembly stated: "More recent research about brain development demonstrates that the brain functioning that guides and aids rational decision-making does not fully develop until a person is in his or her mid- to late twenties." H.B. 21-1209, 73d Gen. Assemb., 1st Reg. Sess., 2021 Colo. Sess. Laws 448, Section 1(1)(a.5)(legislative declaration). Following its commitment to "research-based best practices," (HB 1209, Section 1(1)(d)), the General Assembly expanded a program to allow early release for individuals convicted of felonies committed under the age of 21. § 17-34-102, C.R.S. (2021).[2]

Colorado permits youthful offenders to be sentenced in the Youthful Offender System (YOS) if they were 18 or 19 at the time of the offense and sentenced before turning 21. *See* § 18-1.3-407.5(3), C.R.S. (2022). Further, a person under 24 may

[2] Those, like Hazard, who received LWOP are ineligible for this program right now. *See* § 17-34-101(1)(a)(I), (IV), C.R.S. (2024).

be transferred to YOS. § 18-1.3-407(1)(c)(II), C.R.S. Thus, under Colorado's evolving standards of decency, sentencing schemes that categorically treat youthful offenders (at least those under 21 at time of offense) the same as true adults violate the Colorado Constitution.

Here, section 18-1.3-401(1)(a)(V)(A)'s prohibition on the court considering case specific circumstances warranting a sentence of less than LWOP is contradicted by national and state evolving standards of decency and is therefore unconstitutional under the federal and Colorado Constitutions. *See* U.S. Const. amends. VIII, XIV; Colo. Const. art. II, § 20; *Parks*, 987 N.W.2d 161; *Monschke*, 482 P.3d 276; *Mattis*, supra; *Taylor*, supra.

Agreeing with Hazard and striking the automatic LWOP sentencing provisions as unconstitutional as-applied here would allow this court to remand for the court to either impose sentences of less than LWOP or, at minimum, to determine whether a LWOP sentence is appropriate (after considering Hazard's age and other mitigating factors). *See, e.g., People v. Wilder*, 371 P.3d 727, 729 (Colo. App. 2016). Should the court decide LWOP sentences are inappropriate, then it should impose a sentence of less than LWOP. *See id*.

CONCLUSION

The petition for writ of certiorari should be granted.

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CERTIFICATE OF SERVICE

I certify that, on May 29, 2025, a copy of this Petition For Writ Of Certiorari was electronically served through Colorado Courts E-Filing on Emmy Langley of the Attorney General's Office.