

SUPREME COURT OF FLORIDA

State v. Huggins

788 So. 2d 238 (Fla. 2001) · No. SC96216 · Decided June 7, 2001

SUMMARY

The Supreme Court of Florida affirmed an order vacating John Steven Huggins's convictions and sentences and granting a new trial. The court held that the State violated Brady v. Maryland by suppressing a witness's favorable statement that could have impeached a key prosecution witness and undermined confidence in the verdict.

CASE DETAILS

COURT	Supreme Court of Florida
WRITING FOR THE COURT	Per Curiam; Wells, C.J.; Shaw, J.; Harding, J.; Anstead, J.; Lewis, J.; Quince, J.; Pariente, J.
JURISDICTION	Florida
DECIDED	June 7, 2001
DOCKET	SC96216
DISPOSITION	affirmed
PROCEDURAL POSTURE	The State appealed an order vacating Huggins's convictions and death sentence and granting a new trial based on a Brady violation.
STANDARD OF REVIEW	The Supreme Court defers to the trial court's factual findings when supported by competent substantial evidence but independently reviews legal questions and the legal question of prejudice or materiality under Brady.
PRECEDENTIAL VALUE	Published opinion; precedential
PARTIES	State of Florida v. John Steven Huggins

TOPICS

- criminal procedure
- post-conviction relief
- due process
- evidence
- appellate procedure

PRACTICE AREAS

- criminal procedure
- post-conviction relief
- constitutional law
- evidence
- appellate procedure

QUESTIONS PRESENTED

1. Whether the State violated Brady by suppressing Ausley's recorded statement identifying a woman resembling Angel Huggins as the driver of Larson's vehicle.
2. Whether the suppressed statement was favorable to Huggins, was unavailable to the defense despite reasonable diligence, and was material such that its suppression undermined confidence in the verdict.
3. What standard of review applies to the trial court's factual and legal determinations concerning the alleged Brady violation.

HOLDINGS

1. The recorded statement was favorable to Huggins because it could have impeached Angel Huggins, a crucial prosecution witness, and supported an alternative account of who possessed and drove Larson's vehicle.
2. The State suppressed Ausley's recorded statement, and disclosure of an earlier lead sheet identifying Ausley did not satisfy the State's obligation to disclose the materially different information obtained during trial.
3. Suppression of Ausley's statement was material because it undermined confidence in the verdict; Huggins was therefore entitled to a new trial.
4. Factual findings underlying a Brady determination are reviewed for competent substantial evidence, while legal questions and the legal component of prejudice are reviewed independently.

KEY QUOTATIONS

"A defendant must prove three elements in order to establish a Brady violation:" (788 So. 2d at 242)

"If the suppression of the favorable evidence shakes the confidence in the verdict, the defendant is entitled to relief." (788 So. 2d at 244)

FACTUAL BACKGROUND

Huggins was convicted of murdering Carla Larson and related offenses after a largely circumstantial prosecution involving Larson's stolen Ford Explorer, physical evidence, and testimony from Huggins's wife, Angel. During the trial, witness Preston Ausley gave prosecutors a recorded statement indicating that he had seen a woman resembling Angel driving a white Ford Explorer whose license plate substantially matched Larson's. The prosecution did not disclose that statement to the defense, and the trial court found that the undisclosed information could have impeached Angel and undermined the State's theory of the case.

PROCEDURAL HISTORY

Huggins was convicted in February 1999 of first-degree murder, carjacking, robbery, and kidnapping and was sentenced to death. Before the Supreme Court of Florida reviewed his direct appeal, Huggins filed a habeas petition alleging that the State had suppressed favorable evidence. The Supreme Court relinquished jurisdiction for an evidentiary hearing, after which the trial court found a Brady violation, vacated the convictions and sentences, and granted a new trial. The Supreme Court affirmed.

DISPOSITION

affirmed

REMAND INSTRUCTIONS

The trial court's order vacating the convictions and sentences and granting a new trial was affirmed.

CASES CITED

- Brady v. Maryland, 373 U.S. 83 (1963)
- United States v. Bagley, 473 U.S. 667 (1985)
- Way v. State, 760 So. 2d 903, 910 (Fla. 2000)
- Strickler v. Greene, 527 U.S. 263, 281-282, 289-290 (1999)
- Jones v. State, 709 So. 2d 512, 514-515 (Fla. 1998)
- Stephens v. State, 748 So. 2d 1028, 1034 (Fla. 1999)
- Maharaj v. State, 778 So. 2d 944, 953 (Fla. 2000)
- United States v. Agurs, 427 U.S. 97, 107 (1976)
- Kyles v. Whitley, 514 U.S. 419, 437 (1995)
- Berger v. United States, 295 U.S. 78, 88 (1935)