

FLORIDA THIRD DISTRICT COURT OF APPEAL

Juan Bridon v. The State of Florida

No. 3D24-0390 · No. 3D24-0390 · Decided April 9, 2025

SUMMARY

The Third District Court of Appeal of Florida affirmed Juan Bridon's conviction in an appeal from the Miami-Dade County Court. The court held that the motion for judgment of acquittal issue was preserved and cited authority concerning criminal intent requirements for public welfare offenses and mala prohibita crimes.

CASE DETAILS

COURT	Florida Third District Court of Appeal
WRITING FOR THE COURT	EMAS, J.; FERNANDEZ, J.; MILLER, J.
JURISDICTION	Florida Third District Court of Appeal
DECIDED	April 9, 2025
DOCKET	3D24-0390
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from the County Court for Miami-Dade County. The Third District Court of Appeal affirmed.
PRECEDENTIAL VALUE	Published opinion
PARTIES	Juan Bridon v. The State of Florida

TOPICS

- criminal procedure
- appellate procedure
- preservation of error
- mens rea

PRACTICE AREAS

- criminal procedure
- appellate procedure

QUESTIONS PRESENTED

- Whether a defendant preserves a judgment-of-acquittal issue by moving for acquittal at the close of the State's evidence without renewing the motion after presenting defense evidence.
- Whether the offense at issue required proof of criminal intent.

HOLDINGS

1. A motion for judgment of acquittal made at the close of the State's evidence preserves the issue for appeal; the defendant is not required to renew the motion after presenting evidence.
2. Certain public-welfare offenses and crimes proscribing conduct not prohibited at common law may not require proof of criminal intent.

KEY QUOTATIONS

“[C]rimes proscribing conduct not prohibited at common law or crimes ‘*mala prohibita*’, which usually result from neglect, do not require any criminal intent.” (slip op. at 2)

FACTUAL BACKGROUND

The opinion contains no substantive factual narrative. It addresses the appeal through citations concerning a motion for judgment of acquittal and whether certain public-welfare or *mala prohibita* offenses require criminal intent.

PROCEDURAL HISTORY

Juan Bridon appealed a county-court criminal judgment or ruling in Miami-Dade County. The Third District Court of Appeal issued a two-page per curiam opinion affirming, relying on authorities concerning preservation of a motion for judgment of acquittal and intent requirements for certain public-welfare or *mala prohibita* offenses.

DISPOSITION

affirmed

CASES CITED

- Morris v. State, 721 So. 2d 725, 726-27 (Fla. 1998)
- Morissette v. United States, 342 U.S. 246, 255-56 (1952)
- State v. Gruen, 586 So. 2d 1280, 1281 (Fla. 3d DCA 1991)