

THIRD DISTRICT COURT OF APPEAL OF FLORIDA

I.J., a Juvenile v. State of Florida

I.J., a Juvenile v. State of Florida · No. 3D24-0711 · Decided November 5, 2025

SUMMARY

The Third District Court of Appeal of Florida affirmed the juvenile court’s order in an appeal involving a motion to dismiss based on Stand Your Ground immunity. The court cited standards governing review of factual findings, the use of a bleach bottle as a deadly weapon, the tipsy coachman doctrine, and the statutory limitation on self-defense by an initial aggressor.

CASE DETAILS

COURT	Third District Court of Appeal of Florida
WRITING FOR THE COURT	Emas; Miller; Bokor
JURISDICTION	Florida Third District Court of Appeal
DECIDED	November 5, 2025
DOCKET	3D24-0711
DISPOSITION	affirmed
PROCEDURAL POSTURE	I.J., a juvenile, appealed from an order of the Circuit Court for Miami-Dade County concerning a motion to dismiss based on Stand Your Ground immunity.
STANDARD OF REVIEW	On review of a trial court's order on a motion to dismiss based on Stand Your Ground immunity, the trial court's factual findings are presumed correct and may be reversed only if they are not supported by competent substantial evidence.
PRECEDENTIAL VALUE	Published
PARTIES	I.J., a Juvenile v. State of Florida

TOPICS

- self defense
- criminal procedure
- standard of review
- appellate procedure
- evidence

PRACTICE AREAS

Florida criminal law

juvenile criminal procedure

self-defense and Stand Your Ground immunity

appellate review

QUESTIONS PRESENTED

1. Whether the circuit court properly ruled on the juvenile's motion to dismiss based on Stand Your Ground immunity.
2. Whether the record supported the trial court's factual findings under the competent-substantial-evidence standard.
3. Whether the statutory limitation on self-defense for an initial aggressor applied.

HOLDINGS

1. The circuit court's ruling was affirmed.

KEY QUOTATIONS

“the trial court’s factual findings are presumed correct and can be reversed only if they are not supported by competent substantial evidence” (2)

FACTUAL BACKGROUND

The opinion contains no detailed factual narrative. It indicates that the appeal involved a juvenile's claim of Stand Your Ground or self-defense immunity and the trial court's ruling on a related motion to dismiss.

PROCEDURAL HISTORY

The appeal arose from the Circuit Court for Miami-Dade County, identified as Lower Tribunal No. J23-1532. The Third District Court of Appeal affirmed the circuit court's ruling.

DISPOSITION

affirmed

CASES CITED

- State v. Quevedo, 357 So. 3d 1249, 1252 (Fla. 3d DCA 2023)
- Smith v. State, 969 So. 2d 452, 455 (Fla. 1st DCA 2007)
- Robertson v. State, 829 So. 2d 901, 906 (Fla. 2002)

OPINION

PER CURIAM.

Third District Court of Appeal State of Florida Opinion filed November 5, 2025. Not final until disposition of timely filed motion for rehearing. _____ No. 3D24-0711 Lower

Tribunal No. J23-1532 _____ I.J., a Juvenile, Appellant, vs. State of Florida, Appellee. An Appeal from the Circuit Court for Miami-Dade County, Dawn Denaro, Judge. Carlos J. Martinez, Public Defender and Andrew Stanton, Assistant Public Defender, for appellant.

James Uthmeier, Attorney General and Daniel Colmenares, Assistant Attorney General, for appellee. Before EMAS, MILLER and BOKOR, JJ. PER CURIAM. Affirmed. See *State v. Quevedo*, 357 So. 3d 1249, 1252 (Fla. 3d DCA 2023) (noting that on review of trial court's order on motion to dismiss due to Stand Your Ground immunity, "the trial court's factual findings are presumed correct and can be reversed only if they are not supported by competent substantial evidence"); *Smith v. State*, 969 So.

2d 452, 455 (Fla. 1st DCA 2007) (affirming jury finding that bottle of bleach can be used as deadly weapon); see also *Robertson v. State*, 829 So. 2d 901, 906 (Fla. 2002) (explaining tipsy coachman doctrine); § 776.041(2), Fla. Stat. (limiting use of self-defense by defendant who "[i]nitially provokes the use or threatened use of force against himself or herself").