

SUPREME COURT OF FLORIDA

Ronald Palmer Heath v. State of Florida; Ronald Palmer Heath v. Secretary, Department of Corrections

Heath · No. SC2026-0112 & SC2026-0113 · Decided February 3, 2026

SUMMARY

The Florida Supreme Court affirmed the summary denial of Ronald Palmer Heath’s second successive motion for postconviction relief and post-warrant public-records requests, and denied his habeas petition and motion to stay execution. The court rejected challenges concerning Florida’s lethal-injection protocol, clemency-record confidentiality, the alleged developmental effects of traumatic incarceration, and the nonunanimous death-penalty recommendation. The court held that the claims were insufficiently pleaded, procedurally barred or untimely, speculative, or foreclosed by precedent.

CASE DETAILS

COURT	Supreme Court of Florida
WRITING FOR THE COURT	Per curiam; Chief Justice Muñoz; Justice Couriel; Justice Grosshans; Justice Francis; Justice Sasso; Justice Tanenbaum; Justice Labarga
JURISDICTION	Supreme Court of Florida
DECIDED	February 3, 2026
DOCKET	SC2026-0112 & SC2026-0113
DISPOSITION	affirmed
PROCEDURAL POSTURE	Heath appealed the summary denial of his second successive motion for postconviction relief under Florida Rule of Criminal Procedure 3.851 and post-warrant public-records requests under rule 3.852. He also filed an original petition for a writ of habeas corpus and moved to stay his scheduled execution.
STANDARD OF REVIEW	Denial of public-records requests is reviewed for abuse of discretion. The court reviewed the summary denial of postconviction claims for legal error and determined whether the claims were facially sufficient, timely, procedurally barred, or meritless.
PRECEDENTIAL VALUE	Published and precedential Supreme Court of Florida opinion
PARTIES	Ronald Palmer Heath v. State of Florida

TOPICS

state post-conviction relief successive petitions post-conviction relief habeas corpus
cruel and unusual punishment

PRACTICE AREAS

capital postconviction litigation death penalty habeas corpus criminal procedure constitutional law

QUESTIONS PRESENTED

1. Whether Heath's allegations concerning maladministration of Florida's lethal-injection protocol stated a legally sufficient method-of-execution claim.
2. Whether Heath's proposed alternative methods of execution were sufficiently pleaded as feasible, readily implemented, and significantly less painful.
3. Whether the circuit court properly denied Heath's post-warrant public-records requests relating to lethal-injection practices.
4. Whether Florida clemency records were subject to disclosure and whether Heath showed that the requested records related to a colorable postconviction claim.
5. Whether a newly discovered-evidence claim based on alleged psychological age and stunted brain development was timely and could extend *Roper v. Simmons* to an offender who was over eighteen at the time of the offense.
6. Whether Heath's challenge to his nonunanimous death recommendation was procedurally barred and meritless.
7. Whether Heath's death sentence was constitutionally disproportionate to his brother's life sentence based on alleged new information concerning relative culpability.
8. Whether Heath was entitled to a stay of execution.

HOLDINGS

1. A defendant challenging a method of execution must establish a substantial and imminent risk that the method is sure or very likely to cause serious illness and needless suffering and must identify a known and available alternative method that entails a significantly less severe risk of pain. Heath's allegations concerning inventory documentation, drug amounts, lidocaine, expired drugs, and movement during an execution were speculative and did not satisfy that standard.
2. A proposed alternative method of execution must be sufficiently detailed to be feasible and readily implemented and must significantly reduce a substantial risk of severe pain. Heath's proposals to pause executions for investigation and training and to use a firing squad were insufficiently pleaded.
3. The circuit court did not abuse its discretion in denying Heath's post-warrant public-records requests because the requests were overly broad or unduly burdensome and were not tied to a colorable method-of-execution claim.

4. Clemency files and records are confidential and exempt from disclosure, and a postconviction records request must show that the requested records relate to a colorable claim for relief or are reasonably calculated to lead to admissible evidence. Heath's generalized allegations concerning clemency secrecy, the timing of the warrant, and public or political influence did not satisfy that requirement.
5. *Roper v. Simmons* does not categorically prohibit execution of an offender who was older than eighteen at the time of the capital offense based on alleged psychological, mental, or emotional age or stunted brain development.
6. A successive death-penalty postconviction claim based on newly discovered evidence must be filed within one year after the evidence was discovered or could have been discovered through due diligence. Heath failed to establish that his psychological-age claim met that deadline.
7. Heath's challenge to his nonunanimous death recommendation was procedurally barred because it repeated claims raised in prior postconviction proceedings, and it was meritless because the Eighth Amendment does not require a unanimous jury recommendation of death.
8. Relative culpability review is not constitutionally required and was rendered obsolete as an integrated component of comparative proportionality review. Heath therefore was not entitled to reconsideration of his death sentence based on his brother's life sentence and alleged new information concerning their relative culpability.

KEY QUOTATIONS

“This means that the Supreme Court’s interpretation of the Eighth Amendment is both the floor and the ceiling for protection from cruel and unusual punishment in Florida, and this Court cannot interpret Florida’s prohibition against cruel and unusual punishment to provide protection that the Supreme Court has decided is not afforded by the Eighth Amendment.” (24-25)

“Instead, he was “seeking to discover if possible claims exist, rather than records to support a colorable claim for postconviction relief,” an objective unsupported by law.” (17-18)

FACTUAL BACKGROUND

Heath was sentenced to death for the first-degree murder of Michael Sheridan, committed during a 1989 armed robbery. Heath was twenty-seven when the murder occurred, and the jury recommended death by a vote of ten to two. The trial court found two aggravating circumstances and three mitigating circumstances before imposing the death sentence. In 2026, after a death warrant was signed, Heath challenged Florida's lethal-injection protocol, sought clemency-related and execution-related records, asserted that traumatic incarceration had stunted his brain development, challenged the nonunanimous death recommendation, and sought proportionality review based on his brother's life sentence.

PROCEDURAL HISTORY

Heath was convicted of first-degree murder and sentenced to death for the 1989 murder of Michael Sheridan. The Supreme Court of Florida affirmed his conviction and sentence in 1994, and the judgment became final after the United States Supreme Court denied certiorari in 1995. Heath's initial and first successive postconviction proceedings, as well as federal habeas proceedings, were unsuccessful. After Governor DeSantis signed a death

warrant on January 9, 2026, Heath filed a second successive postconviction motion and post-warrant public-records requests. The circuit court summarily denied the claims and requests, and the Supreme Court of Florida affirmed, denied habeas relief, and denied a stay of execution.

DISPOSITION

affirmed

REMAND INSTRUCTIONS

None. The court affirmed the circuit court's orders, denied the habeas petition and motion for a stay of execution, ordered that the mandate issue immediately, and stated that no motion for rehearing would be entertained.

CASES CITED

- Heath v. State, 648 So. 2d 660, 662-63, 666 (Fla. 1994)
- Heath v. Florida, 515 U.S. 1162 (1995)
- Heath v. State, 3 So. 3d 1017, 1021, 1035 (Fla. 2009)
- Heath v. State, 237 So. 3d 931, 931-32 (Fla. 2018)
- Heath v. Tucker, No. 1:09-cv-00148-MCR, at *62 (N.D. Fla. Aug. 20, 2012)
- Heath v. Sec’y, Fla. Dep’t of Corr., 717 F.3d 1202, 1205 (11th Cir. 2013)
- Asay v. State, 224 So. 3d 695, 700-01 (Fla. 2017)
- Glossip v. Gross, 576 U.S. 863, 877 (2015)
- Cole v. State, 392 So. 3d 1054, 1065 n.18 (Fla.), cert. denied, 145 S. Ct. 109 (2024)
- Jimenez v. State, 265 So. 3d 462, 475 (Fla. 2018)
- Tanzi v. State, 407 So. 3d 385, 393 (Fla.), cert. denied, 145 S. Ct. 1914 (2025)
- Bucklew v. Precythe, 587 U.S. 119, 120 (2019)
- Nance v. Ward, 597 U.S. 159, 169 (2022)
- McGehee v. Hutchinson, 854 F.3d 488, 493 (8th Cir. 2017)
- Arthur v. Comm’r, Ala. Dep’t of Corr., 840 F.3d 1268, 1300 (11th Cir. 2016)
- Rogers v. State, 409 So. 3d 1257, 1268 (Fla.), cert. denied, 145 S. Ct. 2695 (2025)
- Boyd v. Warden, Holman Corr. Facility, 856 F.3d 853, 859 (11th Cir. 2017)
- Valle v. State, 70 So. 3d 530, 549-52 (Fla. 2011)
- Muhammad v. State, 132 So. 3d 176, 200, 203-04 (Fla. 2013)
- Jones v. State, 419 So. 3d 619, 628 (Fla.), cert. denied, 146 S. Ct. 79 (2025)
- Dailey v. State, 283 So. 3d 782, 792 (Fla. 2019)
- Bolin v. State, 184 So. 3d 492, 503 (Fla. 2015)
- Carroll v. State, 114 So. 3d 883, 887-88 (Fla. 2013)
- Mann v. State, 112 So. 3d 1158, 1163 (Fla. 2013)
- Damas v. State, 423 So. 3d 811, 823 (Fla. 2025)

- Randolph v. State, 422 So. 3d 166, 172 (Fla.), cert. denied, No. 25-6133, 2025 WL 3236523 (U.S. Nov. 20, 2025)
- Bates v. State, 416 So. 3d 312, 320-21 (Fla.), cert. denied, 146 S. Ct. 66 (2025)
- Hutchinson v. State, 416 So. 3d 273, 279 (Fla.), cert. denied, 145 S. Ct. 1980 (2025)
- Roper v. Simmons, 543 U.S. 551, 578 (2005)
- Glock v. Moore, 776 So. 2d 243, 251 (Fla. 2001)
- Dailey v. State, 329 So. 3d 1280, 1285 (Fla. 2021)
- Mungin v. State, 320 So. 3d 624, 626 (Fla. 2020)
- Damren v. State, 397 So. 3d 607, 613 (Fla. 2023)
- Ford v. State, 402 So. 3d 973, 979 (Fla.), cert. denied, 145 S. Ct. 1161 (2025)
- Barwick v. State, 88 So. 3d 85, 106 (Fla. 2011)
- Stephens v. State, 975 So. 2d 405, 427 (Fla. 2007)
- Gudinas v. State, 412 So. 3d 701, 713 (Fla.), cert. denied, 145 S. Ct. 2833 (2025)
- Barwick v. State, 361 So. 3d 785, 794 (Fla. 2023)
- Ring v. Arizona, 536 U.S. 584 (2002)
- Hurst v. Florida, 577 U.S. 92, 103 (2016)
- Hurst v. State, 202 So. 3d 40, 53 (Fla. 2016)
- State v. Poole, 297 So. 3d 487, 504, 507 (Fla. 2020)
- Hitchcock v. State, 226 So. 3d 216, 217 (Fla. 2017)
- Dillbeck v. State, 357 So. 3d 94, 104 (Fla. 2023)
- James v. State, 404 So. 3d 317, 327 (Fla.), cert. denied, 145 S. Ct. 1351 (2025)
- Zack v. State, 371 So. 3d 335, 350 (Fla. 2023)
- Cruz v. State, 372 So. 3d 1237, 1245 (Fla. 2023), cert. denied, 144 S. Ct. 1016 (2024)
- Lawrence v. State, 308 So. 3d 544 (Fla. 2020)

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