

SUPREME COURT OF FLORIDA

Jesse Bell v. State of Florida; Jesse Bell v. Secretary, Department of Corrections

Bell · No. SC2024-1264 & SC2024-1556 · Decided August 28, 2025

SUMMARY

The Supreme Court of Florida affirmed the summary denial of Jesse Bell’s motion for postconviction relief and denied his habeas petition. The court held that Bell’s claims concerning the voluntariness of his waivers, counsel’s alleged ineffectiveness, and individualized sentencing were procedurally barred or conclusively refuted by the record. The court also held that appellate counsel was not ineffective for failing to raise Bell’s delayed first appearance as fundamental error.

CASE DETAILS

COURT	Supreme Court of Florida
WRITING FOR THE COURT	Couriel, J.; Muñoz, C.J.; Canady, J.; Labarga, J.; Grosshans, J.; Francis, J.; Sasso, J.
JURISDICTION	Supreme Court of Florida
DECIDED	August 28, 2025
DOCKET	SC2024-1264 & SC2024-1556
DISPOSITION	affirmed
PROCEDURAL POSTURE	Bell appealed the summary denial of his Florida Rule of Criminal Procedure 3.851 postconviction motion and separately petitioned the Supreme Court of Florida for a writ of habeas corpus alleging ineffective assistance of appellate counsel.
STANDARD OF REVIEW	The court reviewed the summary denial of postconviction relief de novo, accepting factual allegations as true to the extent they were not refuted by the record and affirming when the record conclusively showed that the movant was entitled to no relief. It also applied the facial-sufficiency standard for an evidentiary hearing and the Strickland standard for ineffective assistance claims.
PRECEDENTIAL VALUE	published
PARTIES	Jesse Bell v. State of Florida

TOPICS

state post-conviction relief habeas corpus ineffective assistance right to counsel appellate procedure

PRACTICE AREAS

capital postconviction relief criminal procedure habeas corpus ineffective assistance of counsel
appellate procedure

QUESTIONS PRESENTED

1. Whether the circuit court erred by summarily denying Bell's claims that his waivers of counsel and a penalty-phase jury were involuntary because of prison abuse.
2. Whether trial counsel was ineffective for failing to investigate and present evidence of alleged prison abuse to challenge the voluntariness of Bell's waivers.
3. Whether Bell was denied an individualized sentencing determination because of his allegedly involuntary waivers.
4. Whether appellate counsel was ineffective for failing to raise Bell's untimely first appearance under Florida Rule of Criminal Procedure 3.130 as unpreserved fundamental error.

HOLDINGS

1. Claims that Bell's waivers of counsel and a penalty-phase jury were involuntary because of prison abuse were procedurally barred because Bell did not raise them on direct appeal.
2. The record conclusively established that Bell's waivers of counsel and a penalty-phase jury were knowing, intelligent, and voluntary.
3. Bell was not entitled to an evidentiary hearing or postconviction relief on his claim that trial counsel ineffectively failed to investigate and present evidence of prison abuse.
4. Bell's claim that he was denied an individualized sentencing determination was procedurally barred and, alternatively, meritless.
5. Appellate counsel was not ineffective for failing to raise Bell's delayed first appearance as unpreserved fundamental error.

KEY QUOTATIONS

"Even if counsel had uncovered and presented evidence of abuse, there is no reasonable probability that the trial court would have prevented Bell from waiving counsel or a penalty-phase jury, given his unequivocal responses during the waiver colloquies." (at 16-17)

"The State's delay is regrettable, but it does not call into question the fundamental legitimacy of Bell's trial, and neither trial counsel's failure to object, nor appellate counsel's having declined to raise the delay as an unpreserved error, undermines confidence in the result of his case." (at 21-22)

FACTUAL BACKGROUND

While incarcerated on a forty-year sentence, Bell and his cellmate killed a fellow inmate and seriously injured a correctional officer during a planned attack. Bell was indicted for murder, attempted murder, conspiracy, and prison contraband offenses. Shortly after counsel was appointed and discovery was provided, Bell waived counsel, pleaded no contest, waived a penalty-phase jury, and represented himself with standby counsel. During postconviction proceedings, Bell relied on a brief recorded reference to prison abuse and affidavits from inmates to argue that the abuse rendered his waivers involuntary and that counsel should have investigated it.

PROCEDURAL HISTORY

Bell pleaded no contest to the charged offenses, waived counsel and a penalty-phase jury, and was sentenced to death for first-degree murder. The Supreme Court of Florida affirmed his conviction and sentence on direct appeal. The circuit court summarily denied Bell's initial rule 3.851 motion after a Huff hearing, ruling that his claims were procedurally barred or conclusively refuted by the record. Bell appealed that order and filed a habeas petition challenging appellate counsel's failure to raise the delayed first appearance as fundamental error.

DISPOSITION

affirmed

CASES CITED

- Bell v. State, 336 So. 3d 211, 212-18 (Fla. 2022)
- Noetzel v. State, 328 So. 3d 933, 936-37 (Fla. 2021)
- Muhammad v. State, 782 So. 2d 343, 363 (Fla. 2001)
- Marquardt v. State, 156 So. 3d 464, 490 (Fla. 2015)
- Huff v. State, 622 So. 2d 982, 983 (Fla. 1993)
- Harvey v. State, 318 So. 3d 1238, 1239 n.2 (Fla. 2021)
- Dailey v. State, 279 So. 3d 1208, 1215 (Fla. 2019)
- Rogers v. State, 327 So. 3d 784, 787 (Fla. 2021)
- Pardo v. State, 108 So. 3d 558, 560 (Fla. 2012)
- Knight v. State, 211 So. 3d 1, 17 (Fla. 2016)
- Boatman v. State, 402 So. 3d 900, 922 (Fla. 2024)
- Figueroa-Sanabria v. State, 366 So. 3d 1035, 1054 (Fla. 2023)
- United States v. Ruiz, 536 U.S. 622, 629 (2002)
- Hutchinson v. State, 243 So. 3d 880, 883 (Fla. 2018)
- Jones v. State, 998 So. 2d 573, 587 (Fla. 2008)
- Covington v. State, 348 So. 3d 456, 466 (Fla. 2022)
- Strickland v. Washington, 466 U.S. 668, 687-89, 694-95 (1984)
- Morris v. State, 931 So. 2d 821, 828 (Fla. 2006)
- King v. State, 260 So. 3d 985, 994 (Fla. 2018)
- Hayward v. State, 183 So. 3d 286, 297 (Fla. 2015)

- Caylor v. State, 407 So. 3d 379, 384 (Fla. 2025)
- Grim v. State, 841 So. 2d 455, 461 (Fla. 2003)
- Johnston v. State, 70 So. 3d 472, 477 (Fla. 2011)
- Barwick v. State, 361 So. 3d 785, 792-95 (Fla. 2023)
- Boyd v. State, 910 So. 2d 167, 189-90 (Fla. 2005)
- Davis v. State, 383 So. 3d 717, 742 (Fla. 2024)
- Wickham v. State, 124 So. 3d 841, 863 (Fla. 2013)
- Bush v. State, 295 So. 3d 179, 212 (Fla. 2020)
- Card v. State, 803 So. 2d 613, 622 (Fla. 2001)
- Globe v. State, 877 So. 2d 663, 672 (Fla. 2004)
- Chavez v. State, 832 So. 2d 730, 752, 754 (Fla. 2002)
- Keen v. State, 504 So. 2d 396, 399-400 (Fla. 1987)
- Owen v. State, 596 So. 2d 985, 990 (Fla. 1992)
- Conde v. State, 860 So. 2d 930, 951-52 (Fla. 2003)
- Freeman v. State, 761 So. 2d 1055, 1070 (Fla. 2000)

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