

DISTRICT COURT OF APPEAL OF FLORIDA, THIRD DISTRICT

State of Florida v. Reginald Jackson

No. 3D22-1451 · No. No. 3D22-1451 · Decided December 22, 2025

SUMMARY

The Third District Court of Appeal of Florida affirmed a non-final order finding Reginald Jackson intellectually disabled under section 921.137(1), Florida Statutes, and Florida Rule of Criminal Procedure 3.203. The court held that competent, substantial evidence supported the trial court’s findings regarding significantly subaverage intellectual functioning, manifestation before age eighteen, and adaptive-functioning deficits. The determination barred the potential imposition of the death penalty.

CASE DETAILS

COURT	District Court of Appeal of Florida, Third District
WRITING FOR THE COURT	Lobree, J.; Emas, J.; Lindsey, J.
JURISDICTION	Florida Third District Court of Appeal
DECIDED	December 22, 2025
DOCKET	No. 3D22-1451
DISPOSITION	affirmed
PROCEDURAL POSTURE	The State appealed a non-final order of the Circuit Court for Miami-Dade County granting Jackson's motion to determine intellectual disability under section 921.137(1), Florida Statutes (2017), and Florida Rule of Criminal Procedure 3.203, thereby barring the potential imposition of the death penalty.
STANDARD OF REVIEW	The appellate court examines whether competent, substantial evidence supports the trial court's determination of intellectual disability and does not reweigh the evidence, second-guess credibility determinations, or substitute its judgment for that of the trial court.
PRECEDENTIAL VALUE	Published Florida Third District Court of Appeal opinion
PARTIES	State of Florida v. Reginald Jackson

TOPICS

- criminal procedure
- sentencing
- cruel and unusual punishment
- appellate jurisdiction
- standard of review

PRACTICE AREAS

criminal law

capital punishment

criminal appellate procedure

constitutional law

QUESTIONS PRESENTED

1. Whether the trial court's finding that Jackson had significantly subaverage general intellectual functioning was supported by competent, substantial evidence.
2. Whether the trial court's finding that Jackson's intellectual disability manifested before age eighteen was supported by competent, substantial evidence.
3. Whether the trial court properly found concurrent and current deficits in adaptive behavior sufficient to satisfy the second prong of Florida's intellectual-disability standard.
4. Whether the trial court properly applied the clear-and-convincing-evidence standard and considered both evidence of adaptive limitations and evidence offered to rebut those limitations.

HOLDINGS

1. The trial court's finding that Jackson had significantly subaverage general intellectual functioning was supported by competent, substantial evidence, including multiple low IQ scores, consideration of the standard error of measurement, and academic records showing significant deficits.
2. The trial court's finding that Jackson's intellectual disability manifested during the developmental period was supported by competent, substantial evidence; Florida law requires manifestation before age eighteen, not a formal childhood diagnosis.
3. The trial court properly found that Jackson had adaptive-functioning deficits sufficient to satisfy the second prong of the intellectual-disability standard because the evidence showed substantial deficiencies in the conceptual and practical domains and supported an ongoing impairment.
4. The trial court's finding, by clear and convincing evidence, that Jackson was intellectually disabled was supported by competent, substantial evidence, and the appellate court would not reweigh the evidence or second-guess the trial court's factual findings.

KEY QUOTATIONS

“Atkins v. Virginia, 536 U.S. 304, 317, 321 (2002), held that the Eighth and Fourteenth Amendments to the United States Constitution forbid the execution of persons with intellectual disability” (at 4)

“As the trial court’s holistic inquiry and factual findings are supported by competent, substantial evidence, we affirm its conclusion that Jackson has proved by clear and convincing evidence that he is intellectually disabled under section 921.137(1).” (at 17-18)

FACTUAL BACKGROUND

Jackson was charged in connection with the 2013 killings of Annette Anderson and her grandson Tyrone Walker. After the State sought the death penalty, Jackson presented lay, expert, school, juvenile-detention, jail, and other records to establish intellectual disability. The trial court found that he had significantly subaverage intellectual functioning, developmental-onset evidence before age eighteen, and current adaptive deficits in the conceptual

and practical domains. The appellate court concluded that competent, substantial evidence supported those findings.

PROCEDURAL HISTORY

Jackson was indicted on two counts of first-degree murder and related armed robbery, kidnapping, and burglary offenses. After the State announced its intent to seek the death penalty, Jackson moved to establish intellectual disability as a bar to capital punishment. Following a six-day evidentiary hearing and review of extensive documentary and expert evidence, the trial court found by clear and convincing evidence that Jackson was intellectually disabled. The Third District Court of Appeal affirmed the non-final order.

DISPOSITION

affirmed

CASES CITED

- State v. Victorino, 372 So. 3d 772, 776 (Fla. 5th DCA 2023)
- Haliburton v. State, 331 So. 3d 640, 646, 648, 650-51 (Fla. 2021)
- State v. Herring, 76 So. 3d 891, 895 (Fla. 2011)
- Spires v. State, 180 So. 3d 1175, 1180 (Fla. 3d DCA 2015)
- Herzog v. Herzog, 346 So. 2d 56, 57 (Fla. 1977)
- Atkins v. Virginia, 536 U.S. 304, 317, 321 (2002)
- Phillips v. State, 299 So. 3d 1013, 1018, 1024 (Fla. 2020)
- Hall v. Florida, Hall v. Florida, 572 U.S. 701, 705, 723-24 (2014)
- In re Davey, 645 So. 2d 398, 404 (Fla. 1994)
- Dufour v. State, 69 So. 3d 235, 245, 248, 250 (Fla. 2011)
- Oats v. State, 181 So. 3d 457, 469 (Fla. 2015)
- Wright v. State, 256 So. 3d 766, 773, 776 (Fla. 2018)
- Jones v. State, 966 So. 2d 319, 326 (Fla. 2007)
- Miranda v. Arizona, 384 U.S. 436 (1966)

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