

FIRST DISTRICT COURT OF APPEAL OF FLORIDA

Jett v. State of Florida

No. 1D2023-3158 · No. No. 1D2023-3158 · Decided December 10, 2025

SUMMARY

The First District Court of Appeal of Florida affirmed Dalton Reid Jett’s judgment and sentence for burglary of a dwelling and grand theft. The court held that any Alleyne error in determining Jett’s prison releasee reoffender status without submitting the issue to a jury was harmless beyond a reasonable doubt because uncontroverted evidence established his qualifying prior release and identity. A concurrence discussed whether the alleged sentencing error was preserved under Florida law.

CASE DETAILS

COURT	First District Court of Appeal of Florida
WRITING FOR THE COURT	Per Curiam; Rowe, J.; Ray, J.; Tanenbaum, J.
JURISDICTION	First District Court of Appeal of Florida
DECIDED	December 10, 2025
DOCKET	No. 1D2023-3158
DISPOSITION	affirmed
PROCEDURAL POSTURE	Jett appealed his judgment and sentence for burglary of a dwelling and grand theft, challenging the constitutionality of his sentence as a prison releasee reoffender.
STANDARD OF REVIEW	Harmless error is reviewed under the beyond-a-reasonable-doubt standard; reversal is warranted only upon a determination from review of the complete record that prejudicial error occurred.
PRECEDENTIAL VALUE	published
PARTIES	Dalton Reid Jett v. State of Florida

TOPICS

- sentencing
- harmless error
- sixth amendment
- criminal procedure
- preservation of error

PRACTICE AREAS

- criminal law
- sentencing
- appellate practice
- constitutional criminal procedure
- harmless error

QUESTIONS PRESENTED

1. Whether the trial court violated Alleyne by determining, rather than submitting to a jury, the fact that Jett committed the burglary within three years of release from a prior term of imprisonment for purposes of the prison releasee reoffender sentencing enhancement.
2. Whether any Alleyne error was harmless beyond a reasonable doubt.

HOLDINGS

1. Any error in failing to submit to a jury the determination that Jett committed the burglary within three years of his release from a prior term of imprisonment was harmless beyond a reasonable doubt.

KEY QUOTATIONS

“On this record, there can be no reasonable doubt that Jett qualified as a PRR.” (at 2)

“Based on the uncontroverted evidence, any error in not submitting the PRR determination to a jury was harmless beyond a reasonable doubt.” (at 2)

“The error alleged here is harmless if the record establishes beyond a reasonable doubt that “a rational jury,” if properly instructed, “would have found” the fact necessary to qualify Jett for the sentencing enhancement.” (at 2)

FACTUAL BACKGROUND

Jett was released from prison less than one month before committing the burglary at issue. The State introduced a certified Department of Corrections Crime and Time Report, referred to as a penitentiary packet, and presented fingerprint-analysis testimony matching the fingerprints on that packet to Jett. The expert's supervisor independently reviewed and verified the fingerprint match, and the evidence establishing Jett's prison-releasee-reoffender status was uncontroverted.

PROCEDURAL HISTORY

The Circuit Court for Leon County entered judgment and sentenced Jett as a prison releasee reoffender. Jett argued on appeal that the trial court violated Alleyne by finding the fact necessary to establish his prison releasee reoffender status rather than submitting that fact to a jury. The First District Court of Appeal affirmed, concluding that any error was harmless beyond a reasonable doubt.

DISPOSITION

affirmed

CASES CITED

- Alleyne v. United States, 570 U.S. 99, 114–15 (2013)
- State v. Manago, 375 So. 3d 190, 199 (Fla. 2023)
- Williams v. State, 242 So. 3d 280, 290 (Fla. 2018)

- Hicks v. State, 50 Fla. L. Weekly D2238a (Fla. 1st DCA Oct. 15, 2025)
- Dowdell v. State, 50 Fla. L. Weekly D2236c (Fla. 1st DCA Oct. 15, 2025)
- McGlaun v. State, 50 Fla. L. Weekly D2178a (Fla. 1st DCA Oct. 1, 2025)
- Neder v. United States, 527 U.S. 1, 19 (1999)
- Plott v. State, 148 So. 3d 90 (Fla. 2014)
- Jackson v. State, 983 So. 2d 562, 574 (Fla. 2008)
- Maye v. State, 368 So. 3d 531 (Fla. 6th DCA 2023), rev. granted, No. SC2023-1184, 2024 WL 1796831 (Fla. Apr. 25, 2024)
- Emerson v. State, 412 So. 3d 917, 932–36 (Fla. 1st DCA 2025) (Tanenbaum, J., concurring)

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