

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
FLORIDA, OCALA DIVISION

Marrio Williams v. Secretary, Department of Corrections

Williams v. Secretary · No. 5:23-cv-544-KKM-PRL · Decided January 22, 2026

SUMMARY

The United States District Court for the Middle District of Florida denies Marrio Williams’s petition for a writ of habeas corpus under 28 U.S.C. § 2254, challenging his Florida first-degree murder conviction and life sentence. The order concludes that the petition was timely and rejects claims concerning DNA testing, competency to stand trial, and counsel’s motion for judgment of acquittal, applying AEDPA and Strickland standards. The court also denies a certificate of appealability.

CASE DETAILS

COURT	United States District Court for the Middle District of Florida, Ocala Division
WRITING FOR THE COURT	Kathryn Kimball Mizelle
JURISDICTION	United States District Court for the Middle District of Florida, Ocala Division
DECIDED	January 22, 2026
DOCKET	5:23-cv-544-KKM-PRL
DISPOSITION	dismissed
PROCEDURAL POSTURE	A Florida state prisoner filed a timely petition for a writ of habeas corpus under 28 U.S.C. § 2254 challenging his first-degree-murder conviction and life sentence. The federal district court denied all seven grounds for relief and denied a certificate of appealability.
STANDARD OF REVIEW	Under AEDPA, relief on a claim adjudicated on the merits in state court is unavailable unless the state decision was contrary to, or involved an unreasonable application of, clearly established Supreme Court law, or was based on an unreasonable determination of the facts under 28 U.S.C. § 2254(d). State factual findings are presumed correct under § 2254(e)(1), subject to rebuttal by clear and convincing evidence. Ineffective-assistance claims are governed by Strickland and reviewed through AEDPA's doubly deferential lens. Constitutional trial error is harmless on collateral review unless it had a substantial and injurious effect or influence on the verdict under Brecht.

PRECEDENTIAL VALUE	unpublished district court order; persuasive only
PARTIES	Marrio Williams v. Secretary, Department of Corrections

TOPICS

federal habeas corpus post-conviction relief ineffective assistance sixth amendment due process

PRACTICE AREAS

federal habeas corpus post-conviction relief criminal procedure ineffective assistance of counsel

QUESTIONS PRESENTED

1. Whether the state trial court's denial of Williams's request for DNA testing of cigarette butts found near the murder scene violated due process or caused actual prejudice.
2. Whether trial counsel was ineffective for failing to investigate and request a competency determination before trial.
3. Whether trial counsel was ineffective for failing to make an adequate motion for judgment of acquittal.
4. Whether trial counsel was ineffective for failing to request a jury instruction on manslaughter by culpable negligence.
5. Whether trial counsel was ineffective for filing an allegedly underdeveloped motion for new trial.
6. Whether trial counsel was ineffective for failing to initiate plea negotiations before trial.
7. Whether trial counsel was ineffective for failing to investigate or obtain surveillance footage from a nearby bank.

HOLDINGS

1. Williams was not entitled to habeas relief because he failed to demonstrate actual prejudice from the denial of DNA testing of cigarette butts found near the murder scene.
2. The state court reasonably rejected Williams's claim that counsel was ineffective for failing to investigate competency or request a competency determination.
3. Williams failed to show that counsel was ineffective in moving for judgment of acquittal because counsel reasonably argued that the State had not established a prima facie case.
4. Williams could not establish Strickland prejudice from counsel's failure to request an instruction on manslaughter by culpable negligence.
5. Williams failed to show ineffective assistance based on counsel's allegedly underdeveloped motion for new trial.
6. Williams failed to establish prejudice from counsel's alleged failure to initiate plea negotiations because the prosecution made no plea offer.
7. Williams failed to establish prejudice from counsel's failure to investigate or obtain surveillance footage from a nearby bank.

KEY QUOTATIONS

“The power of the federal courts to grant a writ of habeas corpus setting aside a state prisoner’s conviction on a claim that his conviction was obtained in violation of the United States Constitution is strictly circumscribed.”

“The focus . . . is on whether the state court’s application of clearly established federal law is objectively unreasonable, and . . . an unreasonable application is different from an incorrect one.”

“The standards created by Strickland and § 2254(d) are both highly deferential, and when the two apply in tandem, review is doubly so.”

FACTUAL BACKGROUND

Williams and two co-defendants murdered Jamie Seeger, a confidential informant who had purchased crack cocaine from Williams and Vickers. Seeger arranged to meet Williams on the night of July 24, 2012, and was later found shot nine times in her vehicle. Evidence relied on by the court included Williams's statements to his girlfriend and a jail cellmate, testimony connecting him to the victim, and a handgun recovered from Tampa Bay that matched shell casings from the crime scene. Williams was convicted of first-degree murder and received a mandatory life sentence.

PROCEDURAL HISTORY

Williams was convicted in Florida state court of first-degree murder and sentenced to mandatory life imprisonment after the trial court found him ineligible for the death penalty because he was intellectually disabled. His direct appeal and state post-conviction proceedings were unsuccessful. The federal court determined that the § 2254 petition was timely, but denied relief on claims concerning DNA testing, competency, ineffective assistance during the motion for judgment of acquittal, lesser-included-offense instructions, the motion for new trial, plea negotiations, and surveillance footage. The court also denied a certificate of appealability and directed the clerk to enter judgment and close the case.

DISPOSITION

dismissed

CASES CITED

- Bond v. Moore, 309 F.3d 770, 774 (11th Cir. 2002)
- Carroll v. Secretary, DOC, 574 F.3d 1354, 1364 (11th Cir. 2009)
- Williams v. Taylor, 529 U.S. 362, 404, 412-13 (2000)
- Bell v. Cone, 535 U.S. 685, 693-94 (2002)
- Harrington v. Richter, 562 U.S. 86, 101, 103, 105 (2011)
- Wilson v. Sellers, 584 U.S. 122, 125 (2018)
- Jennings v. Secretary, Florida Department of Corrections, 55 F.4th 1277, 1292 (11th Cir. 2022)
- Brown v. Davenport, 142 S. Ct. 1510, 1525 (2022)

- *Teasley v. Warden, Macon State Prison*, 978 F.3d 1349, 1355 (11th Cir. 2020)
- *Pye v. Warden, Georgia Diagnostic Prison*, 50 F.4th 1025, 1035 (11th Cir. 2022)
- *Hayes v. Secretary, Florida Department of Corrections*, 10 F.4th 1203, 1224-25 (11th Cir. 2021) (Newsom, J., concurring)
- *Strickland v. Washington*, 466 U.S. 668 (1984)
- *Knowles v. Mirzayance*, 556 U.S. 111, 123 (2009)
- *Schiro v. Landrigan*, 550 U.S. 465, 473 (2007)
- *Brecht v. Abrahamson*, 507 U.S. 619 (1993)
- *Mansfield v. Secretary, Department of Corrections*, 679 F.3d 1301, 1307, 1313 (11th Cir. 2012)
- *Mason v. Allen*, 605 F.3d 1114, 1123 (11th Cir. 2010)
- *Davis v. Ayala*, 576 U.S. 257, 268 (2015)
- *Gore v. State*, 32 So. 3d 614, 620 (Fla. 2010)
- *Galloway v. State*, 802 So. 2d 1173, 1175 (Fla. 1st DCA 2001)
- *Drope v. Missouri*, 420 U.S. 162, 171 (1975)
- *Oats v. Singletary*, 141 F.3d 1018, 1025 (11th Cir. 1998)
- *Lawrence v. Secretary, Florida Department of Corrections*, 700 F.3d 464, 480 (11th Cir. 2012)
- *United States v. Greene*, 767 F. App'x 793, 797 (11th Cir. 2019)
- *Chandler v. United States*, 218 F.3d 1305, 1314 (11th Cir. 2000)
- *State v. Lee*, 230 So. 3d 886, 888 (Fla. 4th DCA 2017)
- *Franks v. GDCP Warden*, 975 F.3d 1165, 1176 (11th Cir. 2020)
- *Sanders v. State*, 946 So. 2d 953, 958 (Fla. 2006)
- *Crapser v. Secretary, Department of Corrections*, 855 F. App'x 626, 628 (11th Cir. 2021)
- *Thornton v. Secretary, Florida Department of Corrections*, 2021 WL 2073685, at *9 (M.D. Fla. May 24, 2021)
- *Santiago v. Secretary, Florida Department of Corrections*, 472 F. App'x 888, 889 (11th Cir. 2012)
- *Pinkney v. Secretary, DOC*, 876 F.3d 1290, 1295 (11th Cir. 2017)
- *Herring v. Secretary, Department of Corrections*, 397 F.3d 1338, 1354-55 (11th Cir. 2005)
- *Calhoun v. Warden, Baldwin State Prison*, 92 F.4th 1338, 1351 (11th Cir. 2024)
- *Wilson v. United States*, 962 F.2d 996, 998 (11th Cir. 1992)
- *Ramos v. Department of Corrections*, 575 F. App'x 845, 846 (11th Cir. 2014)
- *Purvis v. Crosby*, 451 F.3d 734, 739 (11th Cir. 2006)
- *Carratelli v. Stepp*, 382 F. App'x 829, 832 (11th Cir. 2010)
- *Lafler v. Cooper*, 566 U.S. 156, 168 (2012)
- *Weatherford v. Bursey*, 429 U.S. 545, 561 (1977)
- *Davis v. United States*, 2022 WL 402915, at *2 (11th Cir. Feb. 10, 2022)
- *United States v. Washington*, 619 F.3d 1252, 1256-57 (10th Cir. 2010)
- *Kingsberry v. United States*, 202 F.3d 1030, 1032 (8th Cir. 2000)

- Reed v. Secretary, Florida Department of Corrections, 767 F.3d 1252, 1261 (11th Cir. 2014)
- Mungin v. Secretary, Florida Department of Corrections, 89 F.4th 1308, 1317 (11th Cir. 2024)
- Hill v. Humphrey, 662 F.3d 1335, 1346 (11th Cir. 2011)
- Heady v. State, 215 So. 3d 164, 165-66 (Fla. 1st DCA 2017)
- State v. Paille, 601 So. 2d 1321, 1323 (Fla. 2d DCA 1992)
- Hittson v. GDCP Warden, 759 F.3d 1210, 1265 (11th Cir. 2014)
- Slack v. McDaniel, 529 U.S. 473, 484 (2000)

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