

SUPREME COURT OF FLORIDA

Jeffrey G. Hutchinson v. State of Florida

No. SC2025-0590 (Fla. Apr. 30, 2025) · No. SC2025-0590 · Decided April 30, 2025

SUMMARY

The Supreme Court of Florida affirmed the circuit court’s determination that Jeffrey Glenn Hutchinson was competent to be executed under state and federal law. The court held that competent, substantial evidence supported the finding that Hutchinson understood the nature of his execution and its relationship to the murders for which he was sentenced. The court also affirmed the denial of Hutchinson’s motions for a continuance, stay, and additional discovery, and ordered that the mandate issue immediately.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                |
|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | Supreme Court of Florida                                                                                                                                                                                                                                                       |
| WRITING FOR THE COURT | Per Curiam; Chief Justice Muñoz; Justice Canady; Justice Curiel; Justice Grosshans; Justice Francis; Justice Sasso; Justice Labarga                                                                                                                                            |
| JURISDICTION          | Supreme Court of Florida                                                                                                                                                                                                                                                       |
| DECIDED               | April 30, 2025                                                                                                                                                                                                                                                                 |
| DOCKET                | SC2025-0590                                                                                                                                                                                                                                                                    |
| DISPOSITION           | affirmed                                                                                                                                                                                                                                                                       |
| PROCEDURAL POSTURE    | Hutchinson appealed a circuit court order finding him competent to be executed and challenged related orders denying continuances, a stay, and additional discovery.                                                                                                           |
| STANDARD OF REVIEW    | Legal issues are reviewed de novo. Absent legal error, the competency determination is affirmed if supported by competent, substantial evidence or legally sufficient evidence. Rulings on continuances, stays, and additional discovery are reviewed for abuse of discretion. |
| PRECEDENTIAL VALUE    | Published opinion; binding precedent of the Supreme Court of Florida.                                                                                                                                                                                                          |
| PARTIES               | Jeffrey G. Hutchinson v. State of Florida                                                                                                                                                                                                                                      |

TOPICS

- criminal procedure
- post-conviction relief
- appellate procedure
- standard of review
- constitutional law

## PRACTICE AREAS

constitutional law

criminal procedure

capital punishment

post-conviction relief

appellate procedure

## QUESTIONS PRESENTED

1. Whether the circuit court correctly found that Hutchinson was competent to be executed under the Eighth Amendment and Florida Rules of Criminal Procedure 3.811 and 3.812.
2. Whether the circuit court abused its discretion by denying Hutchinson's motions for a continuance, a stay of execution, and additional discovery.

## HOLDINGS

1. A prisoner is incompetent to be executed only when mental illness or impairment prevents a rational understanding of the fact of the execution and the reason for it, including the link between the crime and the punishment. Hutchinson understood that he was being executed for the murders, that he would die if the execution occurred, and why the State sought the punishment; therefore, the circuit court correctly found him competent to be executed.
2. The circuit court's competency determination must be affirmed when supported by competent, substantial evidence or legally sufficient evidence, and an appellate court may not reweigh the evidence or second-guess witness credibility. The record satisfied that standard.
3. The circuit court did not abuse its discretion by denying Hutchinson's motions for a continuance, a stay, and additional discovery.

## KEY QUOTATIONS

*“This prohibition, the Supreme Court tells us, means that it is unconstitutional for a state to execute someone ‘whose mental illness makes him unable to ‘reach a rational understanding of the reason for [his] execution.’ ” (at 8)*

*“What matters is whether a person has the ‘rational understanding’ of why the State seeks to execute him, not whether he has any particular memory or any particular mental illness.” (at 13)*

*“But our job is not to reassess the credibility of witnesses or reweigh the evidence.” (at 12)*

## FACTUAL BACKGROUND

In 1998, Hutchinson entered a Crestview, Florida, home armed with a shotgun and killed his former girlfriend and her three children. He was convicted of four counts of first-degree murder, sentenced to death for the children's murders, and sentenced to life for the former girlfriend's murder. Before the scheduled 2025 execution, Hutchinson asserted that government-connected intruders or other individuals committed the murders and argued that delusions prevented him from rationally understanding why the State sought to execute him. The circuit court credited the State's experts, who concluded that Hutchinson understood the murders, his death sentence, and the reason for the execution.

## PROCEDURAL HISTORY

Hutchinson was convicted of four counts of first-degree murder after killing his former girlfriend and her three children in 1998. He received three death sentences and one life sentence, and the Supreme Court of Florida previously affirmed his direct appeal. After a 2025 death warrant issued, a Governor-appointed commission and the Governor found him sane to be executed. The circuit court then conducted an evidentiary hearing under Florida Rules of Criminal Procedure 3.811 and 3.812, found him competent to be executed, and denied his related motions. The Supreme Court of Florida affirmed and denied a stay.

## DISPOSITION

affirmed

## CASES CITED

- Ford v. Wainwright, 477 U.S. 399, 406, 410, 413-16 (1986)
- Dunn v. Madison, 583 U.S. 10, 13 (2017)
- Madison v. Alabama, 586 U.S. 265, 269, 274-76, 279 (2019)
- Panetti v. Quarterman, 551 U.S. 930, 958, 960 (2007)
- Davidson v. State, 323 So. 3d 1241, 1247 n.8 (Fla. 2021)
- Owen v. State, 363 So. 3d 1035, 1038-39 (Fla. 2023)
- Gore v. State, 120 So. 3d 554, 557 (Fla. 2013)
- Lambrix v. State, 39 So. 3d 260, 268 (Fla. 2010)
- Nixon v. State, 2 So. 3d 137, 141 (Fla. 2009)
- Calhoun v. State, 376 So. 3d 583, 586 (Fla. 2023)
- Ferguson v. State, 112 So. 3d 1154, 1156 (Fla. 2012)
- Hutchinson v. State, No. SC2025-0517, 2025 WL 1198037, at \*3 (Fla. Apr. 25, 2025)
- Barwick v. Governor of Florida, 66 F.4th 896, 902 (11th Cir. 2023)

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