

SUPREME COURT OF FLORIDA

Jesse Bell v. State of Florida

No. SC20-472 · No. SC20-472 · Decided February 3, 2022

SUMMARY

The Florida Supreme Court reviewed Jesse Bell’s first-degree murder conviction and death sentence following his no contest plea. The court held that procedures requiring a comprehensive presentence investigation and additional mitigation investigation did not apply because Bell had not waived the presentation of mitigation evidence. The court also rejected his challenge to the sentencing findings and concluded that his plea was knowing, voluntary, and supported by an adequate factual basis, affirming in all respects.

CASE DETAILS

COURT	Supreme Court of Florida
WRITING FOR THE COURT	Per Curiam; Canady, C.J.; Polston, J.; Lawson, J.; Muñoz, J.; Couriel, J.; Grosshans, J.; Labarga, J.
JURISDICTION	Florida
DECIDED	February 3, 2022
DOCKET	SC20-472
DISPOSITION	affirmed
PROCEDURAL POSTURE	Direct appeal from a judgment of conviction for first-degree murder and a sentence of death following Bell's no contest plea and a bench-conducted penalty phase.
STANDARD OF REVIEW	The court reviews a trial court's consideration of mitigation evidence for abuse of discretion. Unpreserved claims are reviewed for fundamental error. In a death-penalty case, the court independently scrutinizes the no contest plea for voluntariness, understanding of consequences, waiver of constitutional rights, and an adequate factual basis.
PRECEDENTIAL VALUE	Published Florida Supreme Court opinion; precedential.
PARTIES	Jesse Bell v. State of Florida

TOPICS

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the trial court abused its discretion by failing to employ the mitigation-investigation procedures required by Muhammad and Marquardt, including preparation of a comprehensive presentence investigation, presentation of available mitigation, and appointment of special counsel.
2. Whether the trial court committed fundamental error by failing to determine beyond a reasonable doubt that the aggravating factors were sufficient to warrant death and outweighed the mitigating circumstances.
3. Whether Bell knowingly, intelligently, and voluntarily entered his no contest plea and whether the plea had an adequate factual basis.

HOLDINGS

1. The trial court did not abuse its discretion by declining to employ the mitigation-investigation procedures required when a capital defendant completely waives mitigation because Bell did not waive his right to present mitigating evidence.
2. The trial court was not required to determine beyond a reasonable doubt that the aggravating factors were sufficient to warrant death or that they outweighed the mitigating circumstances.
3. Bell knowingly, intelligently, and voluntarily entered his no contest plea, and the plea had an adequate factual basis.

KEY QUOTATIONS

“Thus, Bell did not waive his right to present mitigation and Muhammad does not apply.” (14)

“Therefore, we find that Bell voluntarily and knowingly entered his no contest plea.” (17)

“Accordingly, we affirm Bell’s first-degree murder conviction and sentence of death.” (17)

FACTUAL BACKGROUND

While incarcerated at Mayo Correctional Institution, Bell and codefendant Barry A. Noetzel formulated a plan to kill correctional officer James Newman and an inmate. They lured inmate Donald H. Eastwood Jr. to their cell, stabbed him in both eyes, repeatedly strangled him, and pushed his face into his blood to ensure his death. They then attacked Newman with a homemade knife, but other officers intervened and Newman survived; Bell later confessed to the crimes.

PROCEDURAL HISTORY

A Lafayette County circuit court accepted Bell's no contest plea to first-degree murder and related offenses after finding him competent to proceed pro se. Bell waived a penalty-phase jury, the court conducted a consolidated penalty phase and Spencer hearing, imposed a death sentence, and entered a detailed sentencing order. Bell directly appealed to the Supreme Court of Florida, which affirmed the conviction and sentence.

DISPOSITION

affirmed

CASES CITED

- *Faretta v. California*, 422 U.S. 806 (1975)
- *Spencer v. State*, 615 So. 2d 688 (Fla. 1993)
- *Muhammad v. State*, 782 So. 2d 343 (Fla. 2001)
- *Marquardt v. State*, 156 So. 3d 490 (Fla. 2015)
- *Foster v. State*, 679 So. 2d 747, 755 (Fla. 1996)
- *Hopkins v. State*, 632 So. 2d 1372, 1374 (Fla. 1994)
- *Boyd v. State*, 910 So. 2d 167, 189-90 (Fla. 2005)
- *Sparre v. State*, 164 So. 3d 1183, 1196 (Fla. 2015)
- *Eaglin v. State*, 19 So. 3d 935, 945-46 (Fla. 2009)
- *McCray v. State*, 71 So. 3d 848, 880 (Fla. 2011)
- *Craft v. State*, 312 So. 3d 45, 53-54, 57 (Fla. 2020)
- *Kansas v. Marsh*, 548 U.S. 163, 173-74 (2006)
- *Rogers v. State*, 285 So. 3d 872, 885 (Fla. 2019)
- *Lawrence v. State*, 308 So. 3d 544, 552 n.8 (Fla. 2020)
- *Santiago-Gonzalez v. State*, 301 So. 3d 157, 177 (Fla. 2020)
- *Bright v. State*, 299 So. 3d 985, 998 (Fla. 2020)
- *Davidson v. State*, 323 So. 3d 1241, 1247-48 (Fla. 2021)
- *Doty v. State*, 170 So. 3d 731, 738-39 (Fla. 2015)
- *Ocha v. State*, 826 So. 2d 956, 965 (Fla. 2002)
- *Covington v. State*, 228 So. 3d 49, 67 (Fla. 2017)