

THIRD DISTRICT COURT OF APPEAL OF FLORIDA

Crisoforo Estrada, Jr. v. Ana Luz Garcia

No. 3D25-0101 · No. No. 3D25-0101 · Decided February 18, 2026

SUMMARY

The Third District Court of Appeal of Florida reversed and remanded an amended final judgment of dissolution of marriage. The court held that the trial court failed to make the specific statutory findings required for an unequal distribution of marital assets and liabilities and an alimony award under sections 61.075 and 61.08, Florida Statutes.

CASE DETAILS

COURT	Third District Court of Appeal of Florida
WRITING FOR THE COURT	Bokor, J.; Emas, J.; Gordo, J.
JURISDICTION	Florida Third District Court of Appeal
DECIDED	February 18, 2026
DOCKET	No. 3D25-0101
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Former husband appealed an amended final judgment of dissolution of marriage, asserting errors and omissions concerning unequal distribution of marital assets and liabilities and an alimony award.
PRECEDENTIAL VALUE	Published opinion
PARTIES	Crisoforo Estrada, Jr. v. Ana Luz Garcia

TOPICS

- dissolution of marriage
- equitable distribution
- alimony
- appellate procedure
- family law procedure

PRACTICE AREAS

- family law
- dissolution of marriage
- equitable distribution
- alimony
- appellate procedure

QUESTIONS PRESENTED

1. Whether the amended final judgment was reversible because it failed to include the specific statutory findings required to support an unequal distribution of marital assets and liabilities.

2. Whether the amended final judgment was reversible because it failed to include written findings addressing the statutory factors supporting the alimony award.

HOLDINGS

1. A dissolution judgment that awards an unequal distribution of marital assets or liabilities or awards alimony must include the specific written findings required by sections 61.075 and 61.08, Florida Statutes; failure to make those statutory findings is reversible error.

KEY QUOTATIONS

“Failure to make statutory findings is reversible error.” (2)

“Thus, we reverse and remand for the trial court to make specific findings in accordance with sections 61.075 and 61.08.” (2)

FACTUAL BACKGROUND

The former husband challenged an amended final judgment of dissolution that awarded an unequal distribution of marital assets and liabilities and alimony. His unopposed appellate brief identified the absence of findings addressing all factors required by Florida's equitable-distribution and alimony statutes.

PROCEDURAL HISTORY

The Circuit Court for Miami-Dade County entered an amended final judgment of dissolution. Estrada appealed; the appellee did not appear, and the Third District Court of Appeal reversed and remanded for specific statutory findings.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The trial court must make specific findings in accordance with sections 61.075 and 61.08, Florida Statutes.

CASES CITED

- Rojas v. Otero, 399 So. 3d 1160, 1163 (Fla. 3d DCA 2024)

OPINION

Crisoforo Estrada, Jr. v. Ana Luz Garcia

PER CURIAM.

Third District Court of Appeal State of Florida Opinion filed February 18, 2026. Not final until disposition of timely filed motion for rehearing. _____ No. 3D25-0101 Lower Tribunal No. 21-24496 FC 02 _____ Crisoforo Estrada, Jr., Appellant, vs. Ana Luz

Garcia, Appellee. An Appeal from the Circuit Court for Miami-Dade County, Stacy D. Glick, Judge. Sandy T. Fox, P.A., and Sandy T. Fox, for appellant. No appearance, for appellee. Before EMAS, GORDO and BOKOR, JJ. BOKOR, J. Crisoforo Estrada, the former husband, appeals an amended final judgment of dissolution. His unopposed brief highlights several errors and omissions in the judgment, including a failure to consider all required factors before rendering an unequal distribution and alimony award. See § 61.075(3), Fla. Stat. (“[A]ny distribution of marital assets or marital liabilities shall be supported by factual findings in the judgment or order based on competent substantial evidence with reference to the factors enumerated in subsection (1). The distribution of all marital assets and marital liabilities, whether equal or unequal, shall include specific written findings of fact as to the following”); § 61.08(2)(b), Fla. Stat. (“When determining a support, maintenance, or alimony claim, the court shall include written findings of fact relative to the factors provided in subsection (3) supporting an award or denial of support, maintenance, or alimony”). “Failure to make statutory findings is reversible error.” *Rojas v. Otero*, 399 So. 3d 1160, 1163 (Fla. 3d DCA 2024). Thus, we reverse and remand for the trial court to make specific findings in accordance with sections 61.075 and 61.08. Reversed and remanded. 2