

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.

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