

SUPREME COURT OF FLORIDA

Joel Dale Wright v. State of Florida

No. SC19-2123 · No. SC19-2123 · Decided January 7, 2021

SUMMARY

The Supreme Court of Florida affirmed the denial of Joel Dale Wright’s successive postconviction motion challenging his death sentence under *Hurst v. Florida* and related Florida authorities. The court held that *Hurst* did not create a new offense or change the elements of capital first-degree murder, and that its prior decisions foreclosed retroactive relief for defendants whose sentences became final before *Ring v. Arizona*.

CASE DETAILS

COURT	Supreme Court of Florida
WRITING FOR THE COURT	Per Curiam; Chief Justice Canady; Justice Polston; Justice Labarga; Justice Lawson; Justice Muñoz; Justice Couriel; Justice Grosshans
JURISDICTION	Florida
DECIDED	January 7, 2021
DOCKET	SC19-2123
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from the denial of a successive postconviction motion filed under Florida Rule of Criminal Procedure 3.851 in a capital case.
STANDARD OF REVIEW	The opinion does not expressly identify a standard of review; the court reviewed the denial of the successive postconviction motion on appeal.
PRECEDENTIAL VALUE	published
PARTIES	Joel Dale Wright v. State of Florida

TOPICS

- state post-conviction relief
- successive petitions
- sentencing
- cruel and unusual punishment
- appellate procedure

PRACTICE AREAS

- capital postconviction
- criminal procedure
- death penalty sentencing
- appellate procedure

QUESTIONS PRESENTED

1. Whether *Hurst v. State* created an independent offense of capital first-degree murder whose jury sentencing determinations constitute elements of the offense.
2. Whether *Hurst v. Florida* and *Hurst v. State* announced a substantive rule requiring retroactive relief for a defendant whose death sentence was final before *Ring v. Arizona*.
3. Whether Wright was entitled to relief under his constitutional and statutory theories challenging the denial of his successive postconviction motion.

HOLDINGS

1. *Hurst v. State* did not create an independent offense called capital first-degree murder and did not change the elements of first-degree murder; the jury's *Hurst* sentencing determinations occur only after the jury unanimously convicts the defendant of capital first-degree murder.
2. Wright was not entitled to retroactive application of *Hurst* because his death sentence was final before *Ring*, and the Florida Supreme Court had consistently denied *Hurst*-based retroactive relief to defendants in that category.

KEY QUOTATIONS

“As we explained in Foster, there is no independent crime of “capital first-degree murder”; the crime of first-degree murder is, by definition, a capital crime, and Hurst v. State did not change the elements of that crime.”
(-2)

“But this Court has rejected such arguments, however styled.” (-3)

FACTUAL BACKGROUND

In 1983, Wright was convicted of first-degree murder, sexual battery, burglary of a dwelling, and second-degree grand theft and was sentenced to death. His death sentence became final in 1986, before the United States Supreme Court decided *Ring v. Arizona* in 2002. Wright's successive postconviction claims argued that *Hurst* created a new capital offense and substantive sentencing requirements that applied retroactively to his case.

PROCEDURAL HISTORY

Wright was convicted and sentenced to death in 1983. After his death sentence became final in 1986, the Florida Supreme Court affirmed the denial of his first three postconviction motions. Wright then filed a third successive postconviction motion in 2017 based on *Hurst v. Florida*, *Hurst v. State*, and chapter 2017-1, Laws of Florida; the circuit court denied the motion, and the Florida Supreme Court affirmed.

DISPOSITION

affirmed

CASES CITED

- *Wright v. State*, 473 So. 2d 1277 (Fla. 1985)

- Wright v. Florida, 474 U.S. 1094 (1986)
- Wright v. State, 581 So. 2d 882 (Fla. 1991)
- Wright v. State, 857 So. 2d 861 (Fla. 2003)
- Wright v. State, 995 So. 2d 324 (Fla. 2008)
- Hurst v. Florida, 577 U.S. 92 (2016)
- Hurst v. State, 202 So. 3d 40 (Fla. 2016)
- Kevin Don Foster v. State of Florida, Foster v. State, 258 So. 3d 1248, 1251-52 (Fla. 2018)
- Asay v. State, 210 So. 3d 1 (Fla. 2016)
- Hitchcock v. State, 226 So. 3d 216, 217 (Fla. 2017)
- Lambrix v. State, 227 So. 3d 112, 113 (Fla. 2017)
- Ring v. Arizona, 536 U.S. 584 (2002)
- State v. Poole, 297 So. 3d 487 (Fla. 2020)