

FIFTH DISTRICT COURT OF APPEAL OF FLORIDA

Nathaniel Brown v. State of Florida

Brown · No. 5D2025-3682 · Decided January 23, 2026

SUMMARY

The Fifth District Court of Appeal of Florida prohibited Nathaniel Brown from making further pro se filings concerning his Duval County conviction and sentence. The court concluded that Brown had abused the judicial process through repetitive and frivolous filings and directed the clerk to reject future filings in the case unless signed by a Florida-licensed attorney.

CASE DETAILS

COURT	Fifth District Court of Appeal of Florida
WRITING FOR THE COURT	Per Curiam; Wallis, J.; Lambert, J.; Boatwright, J.
JURISDICTION	Fifth District Court of Appeal of Florida
DECIDED	January 23, 2026
DOCKET	5D2025-3682
DISPOSITION	other
PROCEDURAL POSTURE	Brown filed a petition for writ of habeas corpus invoking the court's original jurisdiction. After previously denying what amounted to the petition, the court ordered Brown to show cause why he should not be barred from further pro se filings concerning his 2005 conviction and sentence.
PRECEDENTIAL VALUE	Published opinion
PARTIES	Nathaniel Brown v. State of Florida

TOPICS

- appellate procedure
- writ of certiorari
- state post-conviction relief
- post-conviction relief
- criminal procedure

PRACTICE AREAS

- appellate procedure
- state post-conviction relief
- criminal procedure

QUESTIONS PRESENTED

1. Whether Brown's repetitive and frivolous pro se filings attacking his conviction and sentence constituted an abuse of the judicial process warranting a bar on further pro se filings in the case.
2. Whether the clerk should be directed to reject future pro se filings concerning the case unless filed by a Florida Bar member in good standing.

HOLDINGS

1. Brown abused the judicial process through repetitive and frivolous pro se filings concerning his conviction and sentence, and the court therefore prohibited him from making further pro se filings in that case.
2. The clerk was directed not to accept future pro se filings concerning Duval County Circuit Court Case No. 16-2005-CF-001831-A and to summarily reject such filings unless they were filed by a member in good standing of The Florida Bar.

KEY QUOTATIONS

“The Clerk will summarily reject any future filings regarding the referenced case unless filed by a member in good standing of The Florida Bar.”

FACTUAL BACKGROUND

Brown repeatedly filed pro se appeals, petitions, pleadings, or motions attacking his 2005 conviction and sentence in Duval County Circuit Court case number 16-2005-CF-001831-A. The appellate court characterized the filings as repetitive and frivolous and determined that they constituted an abuse of the judicial process. Brown was given an opportunity to show cause why filing sanctions should not be imposed, but the court found his response inadequate.

PROCEDURAL HISTORY

The Fifth District Court of Appeal previously denied Brown's habeas-related filing and issued a December 11, 2025 show-cause order based on his repetitive and frivolous filings attacking his conviction and sentence. After considering Brown's response, the court found that he had failed to show cause and prohibited further pro se filings concerning the identified Duval County Circuit Court case. The clerk was directed to reject future filings concerning that case unless submitted by a member in good standing of The Florida Bar.

DISPOSITION

other

CASES CITED

- Isley v. State, 652 So. 2d 409, 411 (Fla. 5th DCA 1995)
- Brown v. Bondi, 240 So. 3d 902 (Fla. 1st DCA 2018)
- Brown v. State, 35 So. 3d 72 (Fla. 1st DCA 2010)

OPINION

PER CURIAM.

FIFTH DISTRICT COURT OF APPEAL STATE OF FLORIDA
_____ Case No. 5D2025-3682 LT Case No. 2005-CF-001831-A
_____ NATHANIEL BROWN, Petitioner, v. STATE OF FLORIDA,
Respondent. _____ Petition for Writ of Habeas Corpus, A Case of
Original Jurisdiction. Nathaniel Brown, Raiford, pro se. No Appearance for Respondent.

January 23, 2026 PER CURIAM. This court previously entered an order denying what amounted to Nathaniel Brown's petition for writ of habeas corpus. Due to Brown's apparent abuse of the legal process by his repetitive and frivolous pro se filings attacking his conviction and sentence entered in 2005 in Duval County Circuit Court case number 16-2005-CF-001831-A, 1 we issued an order dated December 11, 2025, directing Brown to show cause why he should not be barred from filing in this court any appeal, petition, pleading, or motion pertaining to his conviction and sentence rendered in Duval County Circuit Court case number 16-2005-CF- 001831-A unless reviewed and signed by an attorney licensed to practice law in the State of Florida.

Having carefully considered Brown's response and finding that it fails to show cause why sanctions should not be imposed, we conclude that Brown is abusing the judicial process and should be barred from further pro se filings in this case.

Therefore, in order to conserve judicial resources, Nathaniel Brown is prohibited from filing with this Court any further pro se filings concerning Duval County Circuit Court Case No. 16-2005-CF-001831-A. The Clerk of this Court is directed not to accept any further pro se filings concerning the referenced case.

The Clerk will summarily reject any future filings regarding the referenced case unless filed by a member in good standing of The Florida Bar. See *Isley v. State*, 652 So. 2d 409, 411 (Fla. 5th DCA 1995) ("Enough is enough."). PETITIONER, NATHANIEL BROWN, PROHIBITED FROM FUTURE PRO SE FILINGS. WALLIS, LAMBERT, and BOATWRIGHT, JJ., concur.
_____ Not final until disposition of any timely and authorized motion under Fla. R. App.

P. 9.330 or 9.331. _____ 1 See *Brown v. Bondi*, 240 So. 3d 902 (Fla. 1st DCA 2018); *Brown v. State*, 35 So. 3d 72 (Fla. 1st DCA 2010). 2