

THIRD DISTRICT COURT OF APPEAL OF FLORIDA

Atoya Holmes v. The State of Florida

Holmes · No. 3D24-0174 · Decided June 11, 2025

SUMMARY

The Third District Court of Appeal of Florida reverses Atoya Holmes’s manslaughter conviction and thirteen-year sentence and remands for a new trial. The court holds that although Holmes opened the door to limited evidence concerning a prior shooting of her son, the State’s extensive questioning and use of the incident in closing argument exceeded the permissible scope and violated the evidentiary limits governing prior bad acts. The error was not harmless beyond a reasonable doubt.

CASE DETAILS

COURT	Third District Court of Appeal of Florida
WRITING FOR THE COURT	Gooden, J.; Fernandez, J.; Miller, J.
JURISDICTION	Third District Court of Appeal of Florida
DECIDED	June 11, 2025
DOCKET	3D24-0174
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Holmes appealed her conviction and sentence for the lesser-included offense of manslaughter after the trial court admitted extensive evidence concerning her prior shooting of her son.
STANDARD OF REVIEW	Admission of evidence is reviewed for abuse of discretion, although the trial court's discretion is limited by the rules of evidence. Harmfulness is assessed under the beyond-a-reasonable-doubt standard.
PRECEDENTIAL VALUE	Published opinion; precedential
PARTIES	Atoya Holmes v. The State of Florida

TOPICS

- evidence
- character evidence
- harmless error
- standard of review
- appellate procedure

PRACTICE AREAS

- Florida criminal law
- criminal evidence
- appellate criminal procedure

QUESTIONS PRESENTED

1. Whether Holmes's testimony opened the door to limited evidence that she had previously harmed someone she loved.
2. Whether the State's extensive questioning about the 2017 shooting exceeded the scope of the opened door and violated the rules governing collateral-crimes evidence and unfair prejudice.
3. Whether the erroneous admission of the prior-shooting evidence was harmless beyond a reasonable doubt.

HOLDINGS

1. Holmes's testimony opened the door to a limited inquiry concerning whether she had previously harmed someone she loved.
2. The State exceeded the scope of the opened door by eliciting extensive details of the 2017 shooting and expressly linking that incident to the charged shooting.
3. The erroneous admission of the highly inflammatory details of the prior shooting was not harmless beyond a reasonable doubt.

KEY QUOTATIONS

“Evidence of collateral crimes, wrongs, or bad acts is inadmissible when it is solely to prove bad character or propensity.” (at 5)

“Rather, the State must demonstrate a legitimate need to resort to such evidence to correct a false impression.” (at 6)

“The questioning should be narrowly tailored to just fit through that door.” (at 7)

“Otherwise, the ‘opening the door’ rule threatens to become a pretext for the illegitimate use of inadmissible evidence, and the fairness-promoting purpose of the rule is lost.” (at 7)

“Given the highly inflammatory nature of the details of the prior shooting, the State cannot establish beyond a reasonable doubt that this admission constituted harmless error.” (at 8)

FACTUAL BACKGROUND

Holmes shot Verdell Goins twice during an altercation in a vehicle after Goins allegedly attacked and choked her. Holmes testified that she had never experienced anything like killing or hurting someone she loved. The State argued that this testimony opened the door to evidence that Holmes had shot her son in 2017, and the trial court allowed extensive questioning about the prior incident, including the number and location of the shots, Holmes's reasons, and whether she claimed self-defense. The State then linked the prior shooting to the charged shooting during cross-examination and closing argument.

PROCEDURAL HISTORY

The State charged Holmes with second-degree murder arising from the shooting death of Verdell Goins. At trial, Holmes claimed self-defense. The trial court ruled that her testimony opened the door to evidence of a 2017

shooting involving her son and permitted extensive questioning about that incident. The jury found Holmes guilty of manslaughter, and the trial court sentenced her to thirteen years. Holmes appealed.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand for a new trial.

CASES CITED

- Hudson v. State, 992 So. 2d 96, 107 (Fla. 2008)
- Rodriguez v. State, 753 So. 2d 29, 42 (Fla. 2000)
- Bozeman v. State, 698 So. 2d 629, 630-631 (Fla. 4th DCA 1997)
- Robertson v. State, 829 So. 2d 901, 911 (Fla. 2002)
- Redd v. State, 49 So. 3d 329, 333 (Fla. 1st DCA 2010)
- Hill v. State, 933 So. 2d 667, 670 (Fla. 1st DCA 2006)
- Calloway v. State, 210 So. 3d 1160, 1186 (Fla. 2017)
- Pacheco v. State, 698 So. 2d 593, 595 (Fla. 2d DCA 1997)
- Melendez v. State, 135 So. 3d 456, 460 (Fla. 5th DCA 2014)
- Randolph v. State, 463 So. 2d 186, 189 (Fla. 1984)
- Czubak v. State, 570 So. 2d 925, 928 (Fla. 1990)
- Straight v. State, 397 So. 2d 903, 908 (Fla. 1981)

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