

FLORIDA THIRD DISTRICT COURT OF APPEAL

Juan Leal Esquivel v. State of Florida

61 So. 3d 399 (Fla. 3d DCA 2026) · No. 3D25-2365 · Decided June 18, 2026

SUMMARY

The Florida Third District Court of Appeal affirmed the denial of Juan Leal Esquivel's post-conviction claim under Florida Rule of Appellate Procedure 9.141(b)(2). The court held, relying on Apprendi, Blakely, and related Florida precedent, that the challenged sentence did not constitute an illegal sentence cognizable under Florida Rule of Criminal Procedure 3.800(a).

CASE DETAILS

COURT	Florida Third District Court of Appeal
WRITING FOR THE COURT	Lindsey; Miller; Bokor
JURISDICTION	Florida Third District Court of Appeal
DECIDED	June 18, 2026
DOCKET	3D25-2365
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal under Florida Rule of Appellate Procedure 9.141(b)(2) from the Circuit Court for Miami-Dade County; the appellate court affirmed.
PRECEDENTIAL VALUE	Published
PARTIES	Juan Leal Esquivel v. State of Florida

TOPICS

- sentencing
- post-conviction relief
- appellate procedure
- criminal procedure
- harmless error

PRACTICE AREAS

- criminal procedure
- sentencing
- post-conviction relief
- appellate procedure
- constitutional law

QUESTIONS PRESENTED

- Whether the appellant's Apprendi-based sentencing claim was cognizable as an illegal-sentence claim under Florida Rule of Criminal Procedure 3.800(a).
- Whether a sentence that does not exceed the statutory maximum is invalid under Apprendi.

HOLDINGS

1. Because Apprendi claims are subject to harmless-error review, they are not the type of illegal-sentence claim cognizable in a Rule 3.800(a) motion.
2. A sentence does not implicate Apprendi when it does not exceed the statutory maximum applicable to the specific offense; the relevant statutory maximum is the maximum sentence authorized solely by the jury verdict or the defendant's admissions.

KEY QUOTATIONS

“Because Apprendi claims are subject to harmless error review, they are not the type of ‘illegal sentence’ claim cognizable in a rule 3.800(a) motion.” (at 2)

“[T]he ‘statutory maximum’ for Apprendi purposes is the maximum sentence a judge may impose solely on the basis of the facts reflected in the jury verdict or admitted by the defendant. In other words, the relevant ‘statutory maximum’ is not the maximum sentence a judge may impose after finding additional facts, but the maximum he may impose without any additional findings.” (303-04)

FACTUAL BACKGROUND

The opinion contains no substantive factual discussion concerning the underlying offense or sentence. The court addressed an Apprendi-related sentencing claim presented through a post-conviction appeal under Florida Rule of Appellate Procedure 9.141(b)(2) and affirmed the circuit court.

PROCEDURAL HISTORY

Esquivel appealed a circuit-court ruling involving a sentencing claim under Florida Rule of Criminal Procedure 3.800(a). The Third District Court of Appeal affirmed by per curiam opinion, relying on Florida and federal precedent concerning Apprendi-based sentencing claims and the cognizability of such claims as illegal-sentence claims.

DISPOSITION

affirmed

CASES CITED

- State v. Fleming, 61 So. 3d 399, 402 (Fla. 2011)
- Hall v. State, 823 So. 2d 757, 764 (Fla. 2002)
- Blakely v. Washington, 542 U.S. 296, 303-04 (2004)
- Maye v. State, No. SC2023-1184, 2026 WL 1346031, at *4 (Fla. May 14, 2026)
- Apprendi v. New Jersey, 530 U.S. 466 (2000)