

FIRST DISTRICT COURT OF APPEAL OF FLORIDA

Medley v. State of Florida

No. 1D2024-1707 (Fla. 1st DCA Aug. 6, 2025) · No. 1D2024-1707 · Decided August 6, 2025

SUMMARY

The First District Court of Appeal held that jail credit applied to the custodial condition of Medley’s probation did not shorten the overall probationary period absent an express directive from the trial court. The court concluded that the trial court retained jurisdiction to revoke probation, affirmed the prison sentence, and certified conflict with Smith v. State.

CASE DETAILS

COURT	First District Court of Appeal of Florida
WRITING FOR THE COURT	Ray, J.; Kelsey, J.; Winokur, J.
JURISDICTION	First District Court of Appeal of Florida
DECIDED	August 6, 2025
DOCKET	1D2024-1707
DISPOSITION	affirmed
PROCEDURAL POSTURE	Medley appealed the order of the Circuit Court for Alachua County revoking his probation and sentencing him to concurrent prison terms totaling fifteen years.
STANDARD OF REVIEW	The opinion does not expressly identify a standard of review; it reviews the legal issue of the trial court's jurisdiction based on the interpretation of the probation order and governing law.
PRECEDENTIAL VALUE	Published intermediate appellate opinion; conflict certified with Smith v. State.
PARTIES	Demari Dennard Medley v. State of Florida

TOPICS

- probation
- criminal procedure
- appellate procedure
- appellate jurisdiction
- statutory interpretation

PRACTICE AREAS

- Criminal law
- Criminal procedure
- Probation
- Appellate law

QUESTIONS PRESENTED

1. Whether jail credit awarded for time served before sentencing reduced the entire 48-month probationary period, rather than only the jail condition of probation.
2. Whether the trial court retained jurisdiction to revoke probation when the violation affidavits were filed within the stated probationary period.
3. Whether the First District should follow *Smith v. State* and certify conflict with that decision.

HOLDINGS

1. Unless the trial court expressly provides otherwise, jail credit applies only to the period of incarceration imposed as a condition of probation and does not shorten the duration of the probationary term.
2. The trial court retained jurisdiction to revoke Medley's probation because the violation affidavits were filed within the 48-month probationary period.

KEY QUOTATIONS

“Unless the trial court expressly provides otherwise, jail credit applies only to the period of incarceration and does not affect the duration of probation.” (at 1)

“The credit he received for time served applied only to the custodial condition of his probation. It did not shorten the length of his probation.” (at 2)

“Jail credit applies to time spent in jail as a condition of probation because time spent in jail offsets a custodial component of the disposition—jail counts against jail.” (at 3)

“In sum, because Medley was not entitled to have his jail credit applied to the full probationary period, the trial court had jurisdiction to revoke his probation and impose a prison sentence.” (at 4)

FACTUAL BACKGROUND

Medley pleaded no contest to burglary, theft, and related offenses in two Alachua County cases. The trial court imposed 48 months of probation on the applicable counts, with a special condition requiring 120 days in jail and credit for 76 days of time served. After Medley was arrested for new burglary and grand-theft offenses in March 2024, the State filed probation-violation affidavits, and the trial court revoked probation and imposed concurrent prison terms totaling fifteen years.

PROCEDURAL HISTORY

Medley pleaded no contest to charges in two criminal cases and received concurrent probationary sentences containing a 120-day jail condition, with credit for 76 days served. After he was arrested for new offenses in March 2024, the State filed probation-violation affidavits, the trial court found violations, revoked probation, and imposed concurrent prison terms. The First District affirmed and certified conflict with *Smith v. State*.

DISPOSITION

affirmed

CASES CITED

- State v. Hall, 641 So. 2d 403, 404 (Fla. 1994)
- Smith v. State, 348 So. 3d 1208, 1210 (Fla. 5th DCA 2020)
- Van Tassel v. Coffman, 486 So. 2d 528, 528, 530 (Fla. 1986)
- Griner v. State, 523 So. 2d 789 (Fla. 5th DCA 1988)
- Greer v. State, 605 So. 2d 178 (Fla. 5th DCA 1992)
- Belt v. State, 748 So. 2d 386 (Fla. 5th DCA 2000)
- Willis v. State, 543 So. 2d 343, 343 (Fla. 1st DCA 1989)
- Triatik v. State, 267 So. 3d 535, 538 (Fla. 1st DCA 2019)
- Robinson v. State, 502 So. 2d 1306 (Fla. 1st DCA 1987)

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