

FIRST DISTRICT COURT OF APPEAL OF FLORIDA

Department of Revenue, on Behalf of Madison T. Adams v. Owen Harris

No. 1D2025-0809 (Fla. 1st DCA Oct. 15, 2025) · No. 1D2025-0809 · Decided October 15, 2025

SUMMARY

The Florida First District Court of Appeal granted the Department of Revenue's petition for writ of certiorari and quashed an order compelling genetic testing to determine paternity. The court held that paternity was not properly placed in controversy, good cause for testing was not established, and the hearing officer lacked authority to address a contested paternity matter.

CASE DETAILS

COURT	First District Court of Appeal of Florida
WRITING FOR THE COURT	Per Curiam; Robert Roberts; Makar Winokur; Nordby
JURISDICTION	Florida First District Court of Appeal
DECIDED	October 15, 2025
DOCKET	1D2025-0809
DISPOSITION	writ_granted
PROCEDURAL POSTURE	The Department of Revenue petitioned for a writ of certiorari challenging a circuit court order approving a hearing officer's recommendation to compel genetic testing in child-support proceedings.
STANDARD OF REVIEW	Certiorari review
PRECEDENTIAL VALUE	Published opinion
PARTIES	Department of Revenue, on behalf of Madison T. Adams v. Owen Harris

TOPICS

- writ of certiorari
- paternity
- child support
- family law procedure
- appellate procedure

PRACTICE AREAS

- Family law
- Paternity
- Child support
- Appellate procedure

QUESTIONS PRESENTED

1. Whether the circuit court departed from the essential requirements of law by approving an order compelling genetic testing when the child-support proceedings did not properly place paternity in controversy and the respondent failed to establish good cause.
2. Whether a hearing officer had authority to address a contested paternity matter.

HOLDINGS

1. Genetic testing could not properly be compelled because the child-support proceedings did not place paternity in controversy and the respondent did not establish good cause for testing.
2. The hearing officer lacked authority to address a contested paternity matter, even if paternity had been placed in controversy and good cause for testing had been shown.

KEY QUOTATIONS

“The child support proceedings did not properly place paternity in controversy, and Respondent did not establish good cause for the testing.”

“Even if paternity was in controversy and good cause was shown, the hearing officer had no authority to address a contested paternity matter.”

“We GRANT the petition for writ of certiorari and QUASH the order compelling genetic testing.”

FACTUAL BACKGROUND

The Department of Revenue, acting on behalf of Madison T. Adams, challenged an order compelling genetic testing to determine the paternity of a minor child. The order arose in child-support proceedings. The appellate court concluded that those proceedings did not properly place paternity in controversy and that Owen Harris failed to establish good cause for genetic testing. The court further concluded that, even if those requirements had been met, the hearing officer lacked authority to address a contested paternity matter.

PROCEDURAL HISTORY

A hearing officer recommended compelling genetic testing to determine the minor child's paternity. The circuit court approved the recommendation. The Department sought certiorari review, and the First District Court of Appeal granted the petition and quashed the order.

DISPOSITION

writ_granted

REMAND INSTRUCTIONS

The order compelling genetic testing was quashed. No further remand instructions were stated.

CASES CITED

- State, Dep't of Revenue ex rel. Chambers v. Travis, 971 So. 2d 157, 162 (Fla. 1st DCA 2007)
- Florida Dep't Revenue ex rel. Corbitt v. Alletag, 156 So. 3d 1110, 1112 (Fla. 1st DCA 2015)
- Florida Dep't Revenue ex rel. Corbitt v. Alletag, 156 So. 3d 1110, 1113 n.2 (Fla. 1st DCA 2015)
- State v. Ceasar, 188 So. 3d 989, 991 n.1 (Fla. 1st DCA 2016)

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