

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.

OPINION

PER CURIAM.

FIRST DISTRICT COURT OF APPEAL STATE OF FLORIDA
No. 1D2025-0809
DEPARTMENT OF REVENUE, on behalf of MADISON T. ADAMS, Petitioner, v. OWEN HARRIS, Respondent. Petition for Writ of Certiorari—Original Proceedings. October 15, 2025 PER CURIAM.

In this certiorari proceeding, the Department of Revenue, on behalf of Madison Adams, challenges an order approving the hearing officer’s recommendation to compel genetic testing to determine paternity of the minor child.

We agree with the Department that the circuit court erred in approving the hearing officer’s recommendation. The child support proceedings did not properly place paternity in controversy, and Respondent did not establish good cause for the testing. Fla. Fam. L. R. P. 12.360(a)(1), (2); Fla. R. Civ. P. 1.360(a)(1), (2); 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). Even if paternity was in controversy and good cause was shown, the hearing officer had no authority to address a contested paternity matter. Alletag, 156 So. 3d at 1113 n.2; State v. Ceasar, 188 So. 3d 989, 991 n.1 (Fla. 1st DCA 2016); Fla. Fam.

L. R. P. 12.491(e). We GRANT the petition for writ of certiorari and QUASH the order compelling genetic testing. ROBERTS, WINOKUR, and NORDBY, JJ., concur.
Not final until disposition of any timely and authorized motion under Fla. R. App. P. 9.330 or 9.331. David C.

Bearden, Department of Revenue, Crestview; James Uthmeier, Attorney General, and Toni C. Bernstein, Assistant Attorney General, Tallahassee, for Petitioner.

No appearance for Respondent. 2

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