

SUPREME COURT OF FLORIDA

Reynaldo Figueroa-Sanabria v. State of Florida

No. SC2021-1070, Supreme Court of Florida (June 29, 2023)

SUMMARY

The Florida Supreme Court affirmed Figueroa-Sanabria’s first-degree murder convictions, holding that denial of his motions to substitute counsel was not an abuse of discretion and that any Fourth Amendment error in admitting historical cell site location information (CSLI) obtained without a warrant was harmless. However, the court vacated his death sentences and remanded for a new penalty phase, finding fundamental error where the trial court forced the defendant to choose between counsel who would present mitigation evidence or self-representation to avoid mitigation, rendering his waiver of the Sixth Amendment right to counsel not knowing, intelligent, or voluntary. The concurring opinion urged overruling Florida’s **Carpenter** decision to align the good-faith exception with U.S. Supreme Court precedent. Key topics: Sixth Amendment right to counsel, death penalty penalty phase, waiver of counsel, fundamental error, harmless error, Fourth Amendment CSLI.

CASE DETAILS

COURT	Supreme Court of Florida
WRITING FOR THE COURT	Couriel; Muñiz; Canady; Grosshans; Francis; Labarga
JURISDICTION	Florida
DECIDED	June 29, 2023
DOCKET	SC2021-1070
DISPOSITION	other
PROCEDURAL POSTURE	Direct appeal from convictions and death sentences after jury trial.
STANDARD OF REVIEW	Abuse of discretion for denial of motion to substitute counsel; harmless error for CSLI admission; fundamental error for waiver of counsel in penalty phase.
PRECEDENTIAL VALUE	Published
PARTIES	Reynaldo Figueroa-Sanabria v. State of Florida

TOPICS

- criminal procedure
- sixth amendment
- right to counsel
- sentencing
- harmless error

PRACTICE AREAS

Criminal Law

Death Penalty

Constitutional Law

QUESTIONS PRESENTED

1. Whether the trial court abused its discretion in denying Figueroa-Sanabria's motions to substitute counsel.
2. Whether the trial court erred in admitting historical cell site location information obtained without a warrant.
3. Whether the trial court erred in accepting Figueroa-Sanabria's waiver of counsel during the penalty phase.
4. Whether the evidence was sufficient to support the convictions.

HOLDINGS

1. The trial court did not abuse its discretion because Figueroa-Sanabria's complaints of lack of communication and lack of progress did not provide a sufficient basis for substitution, and the court conducted adequate inquiry.
2. Any error in admitting the CSLI was harmless beyond a reasonable doubt because the other evidence of guilt was overwhelming.
3. The trial court committed fundamental error because the waiver was not knowing, intelligent, and voluntary; the court misinformed Figueroa-Sanabria that if he had counsel, counsel would present mitigation against his wishes, forcing him to choose between counsel and forgoing mitigation.
4. The evidence was sufficient to support the convictions for first-degree murder.

KEY QUOTATIONS

“THE COURT: With that in mind do you want to represent yourself or do you want to let Mr. Hernandez present the mitigation against your wishes? THE DEFENDANT: I don’t want no mitigation. THE COURT: Okay. So you want to represent yourself and not put on any mitigation? THE DEFENDANT: Yes, your Honor.” (18)

“The trial court’s statements call into question Figueroa-Sanabria’s knowing, intelligent, and voluntary waiver of his right to the assistance of counsel during the penalty phase. ‘[W]aivers of counsel must not only be voluntary, but must also constitute a knowing and intelligent relinquishment or abandonment of a known right or privilege.’ Edwards v. Arizona, 451 U.S. 477, 482 (1981).” (39)

“In sum, a defendant’s choice about whether to waive the right to present all mitigating evidence ‘is not altered when the defendant has counsel.’ Boyd, 910 So. 2d at 189. The trial court’s statement of the law to the contrary, which prompted Figueroa-Sanabria to waive his right to counsel, means we cannot conclude that Figueroa-Sanabria’s waiver was knowing, intelligent, and voluntary.” (42)

FACTUAL BACKGROUND

Reynaldo Figueroa-Sanabria was convicted of first-degree murder for stabbing John Travlos and Germana Morin to death on their houseboat. The victims were found with duct tape bindings, and jewelry worth over \$80,000 was stolen. Figueroa-Sanabria, the victims' handyman, had a key and was seen at the houseboat the evening before. His DNA was found on duct tape at the scene and on the victims' blood on his discarded clothes. He sold some of the jewelry and mailed the rest to his brother, and fled to North Carolina where he was arrested.

PROCEDURAL HISTORY

Figueroa-Sanabria was indicted on two counts of first-degree murder. After a jury trial, he was convicted and sentenced to death. He appeals directly to the Florida Supreme Court.

DISPOSITION

other

REMAND INSTRUCTIONS

Remand for new penalty phase proceedings.

CASES CITED

- Carpenter v. United States, Carpenter v. United States, 138 S. Ct. 2206 (2018)
- Faretta v. California, 422 U.S. 806 (1975)
- Gideon v. Wainwright, Gideon v. Wainwright, 372 U.S. 335 (1963)
- Davis v. United States, 564 U.S. 229 (2011)
- Morris v. Slappy, 461 U.S. 1 (1983)
- Wheat v. United States, 486 U.S. 153 (1988)
- Johnson v. Zerbst, 304 U.S. 458 (1938)
- Edwards v. Arizona, 451 U.S. 477 (1981)
- United States v. Ruiz, 536 U.S. 622 (2002)
- Von Moltke v. Gillies, 332 U.S. 708 (1948)
- Brewer v. Williams, 430 U.S. 387 (1977)
- United States v. Cash, 47 F.3d 1083 (11th Cir. 1995)
- Satterwhite v. Texas, 486 U.S. 249 (1988)
- United States v. Cronin, 466 U.S. 648 (1984)
- Lawhorn v. Allen, 519 F.3d 1272 (11th Cir. 2008)
- Marshall v. Hendricks, 307 F.3d 36 (3d Cir. 2002)
- Miranda v. Arizona, 384 U.S. 436 (1966)
- Chapman v. California, 386 U.S. 18 (1967)
- Traylor v. State, 596 So. 2d 957 (Fla. 1992)
- Muehleman v. State, 3 So. 3d 1149 (Fla. 2009)

- Harris v. Dugger, 874 F.2d 756 (11th Cir. 1989)
- Hamblen v. State, 527 So. 2d 800 (Fla. 1988)
- Martinez v. Court of Appeal of Cal., 528 U.S. 152 (2000)
- United States v. Teague, 953 F.2d 1525 (11th Cir. 1992)
- Bell v. State, 336 So. 3d 211 (Fla. 2022)
- Boyd v. State, 910 So. 2d 167 (Fla. 2005)
- Hojan v. State, 3 So. 3d 1204 (Fla. 2009)
- Farr v. State, 656 So. 2d 448 (Fla. 1995)
- Grim v. State, 841 So. 2d 455 (Fla. 2003)
- Mora v. State, 814 So. 2d 322 (Fla. 2002)
- Wilson v. State, 12 So. 3d 292 (Fla. 4th DCA 2009)
- Turner v. State, 851 So. 2d 276 (Fla. 4th DCA 2003)
- Smith v. State, 521 So. 2d 106 (Fla. 1988)
- Brown v. State, 124 So. 2d 481 (Fla. 1960)
- J.B. v. State, 705 So. 2d 1376 (Fla. 1998)
- Jackson v. State, 983 So. 2d 562 (Fla. 2008)
- Gonzalez v. State, 838 So. 2d 1242 (Fla. 1st DCA 2003)
- State v. B.P., 810 So. 2d 918 (Fla. 2002)
- State v. T.G., 800 So. 2d 204 (Fla. 2001)
- J.R.V. v. State, 715 So. 2d 1135 (Fla. 5th DCA 1998)
- Brady v. State, 910 So. 2d 388 (Fla. 2d DCA 2005)
- Tyler v. State, 710 So. 2d 645 (Fla. 4th DCA 1998)
- Thompson v. State, 507 So. 2d 1074 (Fla. 1987)
- Vileenor v. State, 500 So. 2d 713 (Fla. 4th DCA 1987)
- Wilson v. State, 764 So. 2d 813 (Fla. 4th DCA 2000)
- Soca v. State, 673 So. 2d 24 (Fla. 1996)
- Crain v. State, 914 So. 2d 1015 (Fla. 5th DCA 2005)
- Carpenter v. State, 228 So. 3d 535 (Fla. 2017)
- Mitchell v. State, 25 So. 3d 632 (Fla. 4th DCA 2009)
- Johnson v. State, 110 So. 3d 954 (Fla. 4th DCA 2013)
- Smallwood v. State, 61 So. 3d 448 (Fla. 1st DCA 2011)
- Guardado v. State, 965 So. 2d 108 (Fla. 2007)
- Canakaris v. Canakaris, 382 So. 2d 1197 (Fla. 1980)
- Weaver v. State, 894 So. 2d 178 (Fla. 2004)
- Morrison v. State, 818 So. 2d 432 (Fla. 2002)
- Glover v. State, 226 So. 3d 795 (Fla. 2017)
- Davis v. State, 136 So. 3d 1169 (Fla. 2014)

- Sexton v. State, 775 So. 2d 923 (Fla. 2000)
- Nelson v. State, 274 So. 2d 256 (Fla. 4th DCA 1973)
- Aills v. Boemi, 29 So. 3d 1105 (Fla. 2010)
- Steinhorst v. State, 412 So. 2d 332 (Fla. 1982)
- Castor v. State, 365 So. 2d 701 (Fla. 1978)
- Smallwood v. State, 113 So. 3d 724 (Fla. 2013)
- State v. DiGuilio, 491 So. 2d 1129 (Fla. 1986)
- Odom v. State, 403 So. 2d 936 (Fla. 1981)
- Finney v. State, 660 So. 2d 674 (Fla. 1995)
- Jackson v. State, 347 So. 3d 292 (Fla. 2022)
- United States v. Allison, 908 F.2d 1531 (11th Cir. 1990)
- Hayward v. State, 24 So. 3d 17 (Fla. 2009)
- Hojan v. State, 3 So. 3d 1204 (Fla. 2009)
- Jeffries v. State, 797 So. 2d 573 (Fla. 2001)
- Saavedra v. State, 622 So. 2d 952 (Fla. 1993)
- Blake v. State, 972 So. 2d 839 (Fla. 2007)
- Tibbs v. State, 397 So. 2d 1120 (Fla. 1981)
- Crain v. State, 894 So. 2d 59 (Fla. 2004)
- Bradley v. State, 787 So. 2d 732 (Fla. 2001)
- Johnson v. State, 53 So. 3d 1003 (Fla. 2010)
- F.B. v. State, 852 So. 2d 226 (Fla. 2003)
- Reed v. State, 837 So. 2d 366 (Fla. 2002)
- Occhicone v. State, 570 So. 2d 902 (Fla. 1990)
- Spencer v. State, 615 So. 2d 688 (Fla. 1993)
- Steiger v. State, 328 So. 3d 926 (Fla. 2021)
- Taylor v. State, 87 So. 3d 749 (Fla. 2012)
- Rodriguez v. State, 187 So. 3d 841 (Fla. 2015)
- Ramirez v. State, 739 So. 2d 568 (Fla. 1999)
- Mason v. State, 176 So. 2d 76 (Fla. 1965)
- Elkins v. United States, 364 U.S. 206 (1960)