

SUPREME COURT OF FLORIDA

Juan Javier Oquendo v. State of Florida

Oquendo · No. SC2023-0807 · Decided October 9, 2025

SUMMARY

The Supreme Court of Florida resolves a certified conflict concerning whether expert testimony about a defendant’s post-traumatic stress disorder is relevant to a self-defense theory. The court holds that Florida’s self-defense standard includes both subjective and objective components, making PTSD evidence potentially relevant to the subjective component but categorically irrelevant to the objective reasonable-person component. The court disapproves the Second District’s decision in Oquendo, approves the First District’s decision in Mizell, and nevertheless upholds Oquendo’s conviction and sentence because the trial court did not abuse its discretion in excluding the proffered testimony.

CASE DETAILS

COURT	Supreme Court of Florida
WRITING FOR THE COURT	Justice Francis; Chief Justice Muñoz; Justice Canady; Justice Labarga; Justice Couriel; Justice Grosshans; Justice Sasso
JURISDICTION	Supreme Court of Florida
DECIDED	October 9, 2025
DOCKET	SC2023-0807
DISPOSITION	affirmed
PROCEDURAL POSTURE	Oquendo sought review of the Second District Court of Appeal's decision affirming his manslaughter conviction after the Second District certified conflict with the First District's decision in State v. Mizell concerning the relevance of PTSD evidence to self-defense.
STANDARD OF REVIEW	The legal question concerning the components of Florida's self-defense standard is reviewed de novo. The trial court's evidentiary ruling concerning the admissibility of expert testimony is reviewed for abuse of discretion.
PRECEDENTIAL VALUE	published precedential opinion
PARTIES	Juan Javier Oquendo v. State of Florida

TOPICS

self defense

expert testimony

evidence

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criminal procedure

PRACTICE AREAS

criminal law

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QUESTIONS PRESENTED

1. Whether Florida's self-defense standard contains both a subjective component concerning the defendant's actual belief and an objective component concerning what a reasonably cautious and prudent person would believe.
2. Whether expert evidence concerning a defendant's post-traumatic stress disorder may be relevant to the subjective component of a self-defense claim.
3. Whether the trial court abused its discretion by excluding the proposed PTSD testimony in this case.
4. Whether the Second District's affirmance of Oquendo's conviction should be upheld.

HOLDINGS

1. Florida's self-defense standard contains both a subjective component requiring that the defendant actually believe deadly force was necessary and an objective component requiring that the belief be reasonable under the circumstances.
2. Evidence of a defendant's PTSD is categorically irrelevant to the objective reasonable-person component of self-defense but may be relevant to the subjective component if it tends to establish that the defendant actually believed he was in imminent danger.
3. PTSD evidence is not necessarily inadmissible diminished-capacity evidence; its admissibility depends on whether it is relevant to a particular defense and whether appropriate safeguards prevent the jury from using it as impermissible diminished-capacity evidence.
4. The trial court did not abuse its discretion by excluding Dr. Toomer's PTSD testimony because Oquendo testified that the gun discharged accidentally, did not admit intentionally firing it, did not lay the required predicate, and the defense's proffer indicated that the evidence was being offered to establish diminished capacity.

KEY QUOTATIONS

“self-defense legally involves both an objective component, to which the reasonable person standard applies, and a subjective component, which leaves room for the admission of other relevant evidence establishing the overall circumstances.” (2)

“As to the objective component, we agree with the Second District that evidence of PTSD is categorically irrelevant. But to the extent PTSD evidence may be relevant to the subjective component of a defendant's self-defense theory, we disapprove the Second District's decision in Oquendo and approve the First District's decision in Mizell.” (2)

“Because we agree that the test for self-defense includes both a subjective and objective component, state-of-mind evidence such as PTSD evidence can be relevant to the subjective component, even though it is irrelevant to the objective component.” (23-24)

“We approve the First District’s decision in Mizell and hold that the test for self-defense includes both a subjective and objective component.” (26)

FACTUAL BACKGROUND

In 2015, Oquendo encountered James Cason outside a bar in Pinellas County after Oquendo had been asked to leave. The men exchanged words, and Oquendo jabbed a pool stick into Cason's vehicle; a shooting followed, killing Cason. Oquendo testified that Cason produced a gun, that Oquendo obtained control of it during a struggle, and that it discharged accidentally before Oquendo fired toward the moving vehicle. Other witnesses testified that Oquendo produced the gun and intentionally shot Cason, and physical evidence showed a fatal head wound, multiple bullet holes, and twelve shell casings.

PROCEDURAL HISTORY

Oquendo was charged with first-degree murder, was acquitted of that charge, and was convicted by a jury of the lesser included offense of manslaughter with a firearm finding. The trial court excluded proposed expert testimony concerning Oquendo's PTSD. The Second District affirmed and certified conflict with Mizell. The Supreme Court of Florida approved Mizell in part, disapproved the conflicting reasoning in Oquendo, but affirmed the ultimate outcome because the exclusion of the PTSD evidence was not an abuse of discretion.

DISPOSITION

affirmed

CASES CITED

- Oquendo v. State, 357 So. 3d 214 (Fla. 2d DCA 2023)
- State v. Mizell, 773 So. 2d 618 (Fla. 1st DCA 2000)
- State v. Hickson, 630 So. 2d 172 (Fla. 1993)
- State v. Ivey, 285 So. 3d 281, 284 (Fla. 2019)
- Agatheas v. State, 77 So. 3d 1232, 1236 n.1 (Fla. 2011)
- Williams v. State, 588 So. 2d 44, 45 (Fla. 1st DCA 1991)
- State v. Storer, 920 So. 2d 754, 759 (Fla. 2d DCA 2006)
- Hawthorne v. State, 408 So. 2d 801, 806-07 (Fla. 1st DCA 1982)
- State v. Floyd, 186 So. 3d 1013, 1019 (Fla. 2016)
- Twilegar v. State, 42 So. 3d 177, 194 (Fla. 2010)
- Raneri v. State, 255 So. 2d 291, 294 (Fla. 1st DCA 1971)
- Harris v. State, 104 So. 2d 739, 743 (Fla. 2d DCA 1958)
- Filomeno v. State, 930 So. 2d 821, 822 (Fla. 5th DCA 2006)

- Phillips v. Wainwright, 624 F.2d 585, 589 (5th Cir. 1980)
- Chestnut v. State, 538 So. 2d 820, 820, 824 (Fla. 1989)
- Perry v. State, 256 So. 3d 888, 894 (Fla. 4th DCA 2018)

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