

FIRST DISTRICT COURT OF APPEAL OF FLORIDA

Randy Michael Williams v. State of Florida

No. 1D2024-1628 · No. 1D2024-1628 · Decided August 6, 2025

SUMMARY

The First District Court of Appeal affirmed Randy Michael Williams's convictions and sentences after concluding that hotel staff lawfully ejected him under section 509.141, Florida Statutes. The court held that Williams no longer had a protected privacy interest in his hotel room when deputies searched it after hotel staff invited them inside. The court alternatively held that the good-faith exception to the exclusionary rule applied.

CASE DETAILS

COURT	First District Court of Appeal of Florida
WRITING FOR THE COURT	Rowe, J.; Lewis, J.; Bilbrey, J.
JURISDICTION	Florida First District Court of Appeal
DECIDED	August 6, 2025
DOCKET	1D2024-1628
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from convictions and sentences entered after Williams pleaded nolo contendere while reserving the right to appeal the denial of his dispositive motion to suppress evidence seized from his hotel room.
STANDARD OF REVIEW	The appellate court defers to the trial court's factual findings if supported by competent, substantial evidence, but reviews de novo the application of law to those facts.
PRECEDENTIAL VALUE	published and precedential
PARTIES	Randy Michael Williams v. State of Florida

TOPICS

- suppression of evidence
- fourth amendment
- search and seizure
- exclusionary rule
- appellate procedure

PRACTICE AREAS

- criminal law
- criminal procedure
- constitutional law
- evidence
- appellate practice

QUESTIONS PRESENTED

1. Whether hotel staff lawfully ejected Williams under section 509.141, Florida Statutes, so that he no longer retained a Fourth Amendment privacy interest in his hotel room.
2. Whether the deputies violated the Fourth Amendment by searching Williams's hotel room after hotel staff invited them inside.
3. Whether the good-faith exception to the exclusionary rule independently barred suppression of the evidence.

HOLDINGS

1. The hotel lawfully ejected Williams because competent, substantial evidence established statutory grounds for removal, including conduct disturbing the peace and comfort of other guests, conduct injuring the establishment's reputation or dignity, the hotel's determination that his continued entertainment would be detrimental, and apparent intoxication. The evidence also established that hotel staff notified Williams that he needed to leave.
2. The deputies did not violate Williams's Fourth Amendment rights by searching the hotel room after hotel staff lawfully ejected him and invited the deputies into the room, because the room was no longer treated as Williams's private dwelling for Fourth Amendment purposes.
3. Even if the hotel had not complied with the statutory ejection procedure, the good-faith exception to the exclusionary rule would have prevented suppression because the deputies reasonably relied on information that hotel staff had told Williams to leave and on binding appellate precedent that a hotel room loses Fourth Amendment protection when its occupant has been told to leave.

KEY QUOTATIONS

“In reviewing a trial court’s ruling on a motion to suppress, we defer to the trial court’s findings of fact if supported by competent, substantial evidence, but review de novo the application of the law to those facts.”
(at 3)

“But even if the hotel had not followed the statutory procedures to legally eject Williams from his hotel room, the good faith exception to the exclusionary rule shields the evidence found in Williams’ room from suppression.” (at 6)

FACTUAL BACKGROUND

Williams was staying at a Best Western hotel and behaved erratically, appeared intoxicated or disoriented, disturbed other guests, damaged and smoked in his room, and was asked by hotel staff to leave. After staff called 911, deputies were told that hotel personnel had asked Williams to leave and were invited by hotel staff into his room, where they observed cocaine and other contraband in plain view. The trial court denied suppression, and Williams challenged the search on the ground that he had not been lawfully ejected from the hotel.

PROCEDURAL HISTORY

The State charged Williams with trafficking in cocaine, undesirable guest refuses to leave public lodging, and possession of drug paraphernalia. After an evidentiary hearing, the circuit court denied Williams's motion to suppress evidence found in his hotel room. Williams entered a negotiated nolo contendere plea, received sentences of eight years in prison, sixty days in jail, and 364 days in jail, respectively, and appealed the suppression ruling.

DISPOSITION

affirmed

CASES CITED

- Channell v. State, 257 So. 3d 1228, 1232 (Fla. 1st DCA 2018)
- Kyllo v. United States, 533 U.S. 27, 31 (2001)
- Silverman v. United States, 365 U.S. 505, 511 (1961)
- Illinois v. Rodriguez, 497 U.S. 177 (1990)
- Green v. State, 824 So. 2d 311, 314 (Fla. 1st DCA 2002)
- United States v. Martinez-Fuerte, 428 U.S. 543, 561 (1976)
- Sheff v. State, 301 So. 2d 13, 16 (Fla. 1st DCA 1974)
- Davis v. United States, 564 U.S. 229, 232 (2011)

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