

SUPREME COURT OF GEORGIA

Brown v. State

274 Ga. 202 (2001) · Decided September 17, 2001

SUMMARY

The Georgia Supreme Court affirmed James Eugene Brown’s convictions for malice murder, armed robbery, hijacking a motor vehicle, firearm possession during a felony, theft of services, and possession of a pistol by a person under 18. The court held that the evidence was sufficient to support the convictions and that the trial court properly denied a mistrial motion because Brown had not formally opted into Georgia’s reciprocal discovery provisions.

CASE DETAILS

COURT	Supreme Court of Georgia
WRITING FOR THE COURT	Benham, Justice
JURISDICTION	Georgia
DECIDED	September 17, 2001
DISPOSITION	affirmed
PROCEDURAL POSTURE	Direct appeal from convictions for malice murder, armed robbery, hijacking a motor vehicle, possession of a firearm during the commission of a felony, theft of services, and possession of a pistol by a person under 18.
STANDARD OF REVIEW	The sufficiency of the evidence is reviewed under whether any rational trier of fact could have found the defendant guilty beyond a reasonable doubt. The trial court's discovery ruling and denial of a mistrial were reviewed for legal error.
PRECEDENTIAL VALUE	Published opinion of the Supreme Court of Georgia; precedential.
PARTIES	James Eugene Brown v. State

TOPICS

- discovery criminal
- evidence
- criminal procedure
- appellate procedure
- burden of proof

PRACTICE AREAS

- Criminal law
- Criminal procedure
- Appellate practice

QUESTIONS PRESENTED

1. Whether the evidence was sufficient to support Brown's convictions beyond a reasonable doubt despite the absence of an eyewitness to the homicide.
2. Whether the trial court erred in denying Brown's motion for a mistrial based on the State's failure to provide a witness's statement under Georgia's reciprocal discovery provisions when Brown had not formally opted into those provisions.

HOLDINGS

1. The evidence was sufficient to authorize a rational trier of fact to find Brown guilty beyond a reasonable doubt of the crimes for which he was convicted; an eyewitness to the homicide was not required.
2. The trial court did not err in denying Brown's motion for a mistrial because Brown had not given the written notice required to opt into Georgia's reciprocal discovery provisions and therefore was not entitled to the statutory discovery sanctions.

KEY QUOTATIONS

"The State was not required to present the testimony of an eyewitness to the homicide in order to prove beyond a reasonable doubt that the defendant murdered the victim." (274 Ga. at 203)

"Having chosen not to provide the written notice required by OCGA § 17-16-2 (a), Brown was not entitled to have the other provisions of the reciprocal discovery process applied to his case." (274 Ga. at 204)

FACTUAL BACKGROUND

A taxi driver was found dead from gunshot wounds after picking up Brown, who was 16, near a hospital. Police later found Brown in the victim's taxi with two handguns, including the murder weapon and the victim's gun, as well as ammunition and items connected to the taxi. Brown admitted that he shot the driver, took the vehicle, and had planned to obtain transportation to meet his girlfriend.

PROCEDURAL HISTORY

Brown was indicted in the trial court after the victim was killed and Brown was arrested on April 30, 1997. Following a jury trial held October 20–22, 1997, he was convicted on six counts and sentenced on October 31, 1997; several additional counts were merged. The trial court denied Brown's motion and amended motion for a new trial, and Brown appealed. The appeal was docketed in the Supreme Court of Georgia and submitted on the briefs.

DISPOSITION

affirmed

CASES CITED

- Jackson v. Virginia, 443 U.S. 307 (1979)
- Corza v. State, 273 Ga. 164 (1), 539 S.E.2d 149 (2000)

- Turner v. State, 273 Ga. 340 (1), 541 S.E.2d 641 (2001)
- Wright v. State, 226 Ga. App. 848 (4), 487 S.E.2d 405 (1997)
- State v. Lucious, 271 Ga. 361 (4), 518 S.E.2d 677 (1999)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/state/georgia-supreme-court-of-georgia/2001/brown-v-state-0y8pkoxf>