

SUPREME COURT OF GEORGIA

Badie v. The State

S26A0051 · No. S26A0051 · Decided March 17, 2026

SUMMARY

The Supreme Court of Georgia affirmed Maurice Badie’s convictions for malice murder and related offenses arising from a public gunfight. The court held that the evidence was constitutionally sufficient, that a co-defendant’s subsequent guilty plea did not warrant a new trial, and that admission of the co-defendant’s statement did not establish reversible Confrontation Clause error. The court also rejected Badie’s ineffective-assistance claims and found no reviewable error in the trial court’s denial of a new trial on the general grounds.

CASE DETAILS

COURT	Supreme Court of Georgia
WRITING FOR THE COURT	Bethel, Justice
JURISDICTION	Supreme Court of Georgia
DECIDED	March 17, 2026
DOCKET	S26A0051
DISPOSITION	affirmed
PROCEDURAL POSTURE	Direct appeal from the denial of a motion for new trial following convictions for malice murder and other crimes.
STANDARD OF REVIEW	Constitutional sufficiency of the evidence is reviewed under whether any rational trier of fact could have found the defendant guilty beyond a reasonable doubt, viewing the evidence in the light most favorable to the verdict. Unpreserved Confrontation Clause claims are reviewed for plain error. Ineffective-assistance claims require proof of deficient performance and prejudice. The denial of a new trial on Georgia's general grounds is reviewed only for whether the trial court exercised its discretion.
PRECEDENTIAL VALUE	published
PARTIES	Maurice Badie v. The State

TOPICS

criminal procedure

appellate procedure

constitutional law

sixth amendment

ineffective assistance

PRACTICE AREAS

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evidence

ineffective assistance of counsel

QUESTIONS PRESENTED

1. Whether the evidence was constitutionally sufficient to support Badie's murder conviction as a party to the crime despite Benton's later reversal and guilty plea to voluntary manslaughter.
2. Whether Badie was entitled to a new trial to present evidence of Benton's post-trial guilty plea.
3. Whether admission of Benton's custodial statement violated Badie's rights under Bruton and the Confrontation Clause.
4. Whether admission of Benton's statement without a limiting instruction constituted plain error.
5. Whether trial counsel was ineffective for failing to request a limiting instruction and for failing to move for severance.
6. Whether the trial court abused its discretion by denying a new trial on Georgia's general grounds.

HOLDINGS

1. The evidence was constitutionally sufficient to support Badie's murder conviction as a party to the crime. Three eyewitnesses placed Badie at the scene, two saw him with a gun, and one saw him fire toward the victims; Benton's subsequent reversal and guilty plea did not undermine the sufficiency of the evidence presented at Badie's trial.
2. Badie was not entitled to a new trial to present evidence that Benton later pleaded guilty to voluntary manslaughter. When a defendant is simply charged with murder, the State need not prove that a particular co-defendant was guilty as the principal in order to prove the defendant's liability as a party to the crime.
3. Admission of Benton's custodial statement did not violate Bruton because the statement did not directly or facially incriminate Badie.
4. The trial court plainly erred by failing to instruct the jury to consider Benton's statement only against Benton, but the error did not warrant reversal because Badie failed to show that it likely affected the outcome of the trial.
5. Badie failed to establish ineffective assistance based either on counsel's failure to request a limiting instruction or on counsel's failure to move for severance.
6. The Supreme Court of Georgia had nothing to review because the trial court exercised its discretion in denying a new trial based on the general grounds.

KEY QUOTATIONS

“participating in a gunfight in a crowded area is enough to support a conviction for malice murder as a party to the crime.” (4)

“The constitutional sufficiency analysis considers “all the evidence presented at trial.”” (5)

“But only when a non-testifying co-defendant’s statement incriminates the defendant “on its face” is that statement “powerfully incriminating” and thus subject to Bruton’s narrow exclusionary rule.” (11)

“Demonstrating ineffective assistance of counsel requires a defendant to show both that his trial counsel performed deficiently and that said deficiency prejudiced his defense.” (16)

FACTUAL BACKGROUND

After Christopher Ramsay allegedly put a gun in the mouth of Matthew Benton's younger brother during a dispute over a four-wheeler, a group of men confronted Ramsay. Shortly before midnight, multiple gunmen fired dozens of shots at Ramsay and his friends outside an apartment; Ramsay was killed and four others were injured. Witnesses placed Badie at the scene, saw him carrying a handgun, and one witness saw him fire toward the victims. Badie and Benton were tried jointly, and Benton later obtained reversal of his convictions and pleaded guilty to voluntary manslaughter.

PROCEDURAL HISTORY

A Fulton County grand jury indicted Badie and co-defendant Matthew Benton in 2008. Badie and Benton were tried jointly in June 2010, and the jury found Badie guilty on all counts. Badie filed a motion for new trial in 2010 and amended it in 2019 and 2024. The trial court denied the motion on January 24, 2025, and the Supreme Court of Georgia affirmed.

DISPOSITION

affirmed

CASES CITED

- Owens v. State, 303 Ga. 254, 258 (2018)
- Benton v. State, 302 Ga. 570, 570 & n.1, 572, 575 n.8 (2017)
- Owens v. State, S25A1229, slip op. at 8 (Ga. Feb. 17, 2026), 2026 WL 436319
- Sims v. State, 321 Ga. 627, 629-31 (2025)
- Williams v. State, 313 Ga. 325, 327-28 (2022)
- Blackwell v. State, 302 Ga. 820, 821-22 (2018)
- Copeland v. State, 314 Ga. 44, 47 (2022)
- White v. State, 257 Ga. 236, 236 (1987)
- Davis v. State, 296 Ga. 126, 128-29 (2014)
- Henderson v. State, 317 Ga. 66, 75-80 (2023)
- Bruton v. United States, 391 U.S. 123 (1968)

- Gray v. Maryland, 532 U.S. 185, 188-89, 193-95 (2001)
- Samia v. United States, 599 U.S. 635, 648-53 (2023)
- Simpkins v. State, 303 Ga. 752, 755-56 (2018)
- James v. State, 321 Ga. 812, 818 (2025)
- Wilson v. State, 322 Ga. 76, 93 (2025)
- Morris v. State, 311 Ga. 247, 256 (2021)
- Momon v. State, 322 Ga. 848, 850 (2025)
- Clark v. State, 315 Ga. 423, 442 (2023)
- Green v. State, 302 Ga. 816, 819 (2018)
- DeLoach v. State, 308 Ga. 283, 288-90 (2020)
- Welsch v. State, 2026 WL 271367, at *4