

SUPREME COURT OF GEORGIA

Rogers v. The State

S26A0128 · No. S26A0128 · Decided March 3, 2026

SUMMARY

The Supreme Court of Georgia affirmed Ralph Rogers’s convictions for malice murder, aggravated assault, and possession of a firearm during the commission of a felony. The court held that the evidence was constitutionally sufficient for the jury to reject Rogers’s self-defense claim and that the trial court’s denial of his motion for a new trial on the general grounds was not subject to merits review because the court applied the correct legal standard and exercised its discretion.

CASE DETAILS

COURT	Supreme Court of Georgia
WRITING FOR THE COURT	Ellington, Justice
JURISDICTION	Supreme Court of Georgia
DECIDED	March 3, 2026
DOCKET	S26A0128
DISPOSITION	affirmed
PROCEDURAL POSTURE	Rogers appealed his convictions for malice murder, aggravated assault, and possession of a firearm during the commission of a felony, challenging the constitutional sufficiency of the evidence and the denial of his motion for new trial on the general grounds.
STANDARD OF REVIEW	For constitutional sufficiency, the court viewed the evidence in the light most favorable to the verdicts and asked whether any rational trier of fact could have found guilt beyond a reasonable doubt, deferring to the jury’s assessment of witness credibility and evidentiary weight. For general grounds under OCGA §§ 5-5-20 and 5-5-21, appellate review was limited to determining whether the trial court exercised its discretion under the correct legal standard; the merits of the trial court's thirteenth-juror determination were not reviewed.
PRECEDENTIAL VALUE	published
PARTIES	Ralph Rogers v. The State

TOPICS

criminal procedure

self defense

appellate procedure

standard of review

sentencing

PRACTICE AREAS

criminal law

criminal procedure

appellate practice

QUESTIONS PRESENTED

1. Whether the evidence was constitutionally sufficient to support Rogers's convictions where he claimed that the shootings were justified by self-defense.
2. Whether the trial court abused its discretion in denying Rogers's motion for new trial on the general grounds under OCGA §§ 5-5-20 and 5-5-21.

HOLDINGS

1. The evidence was constitutionally sufficient to support Rogers's convictions because a rational trier of fact could find him guilty beyond a reasonable doubt and could reject his self-defense claim.
2. When a timely general-grounds motion is properly raised, the trial court's decision as the thirteenth juror is discretionary, and appellate review is limited to whether the trial court exercised that discretion under the correct legal standard.
3. The trial court should have merged the aggravated-assault count involving Lamaris into the malice-murder count rather than purporting to vacate it by operation of law, but the error made no practical difference to the judgment.

KEY QUOTATIONS

“When this Court evaluates a challenge to the sufficiency of the evidence, “we view all of the evidence presented at trial in the light most favorable to the verdict and ask whether any rational trier of fact could have found the defendant guilty beyond a reasonable doubt of the crimes of which he was convicted.”” (at 7)

“On appellate review, our role is limited to determining whether the trial court exercised that discretion.” (at 11-12)

FACTUAL BACKGROUND

Rogers became involved in a confrontation with family members and acquaintances outside apartments in Miller County after a dispute involving Lee. According to the State's eyewitnesses, Rogers shot Burr with a tire iron, shot Lamaris after Lamaris approached unarmed, and chased and shot Lee while Lee was fleeing and after Lee fell. Rogers testified that Burr, Lamaris, and Lee charged him, that Burr was swinging a tire iron, and that he fired in self-defense. A .40-caliber firearm found near Rogers was linked to Lamaris's fatal wounds and to nine spent shell casings at the scene.

PROCEDURAL HISTORY

A Miller County grand jury indicted Rogers in 2015 on six counts arising from the shooting death of Lamaris Miller and the shootings of Damien Lee and Levionte Trell Burr. Following a jury trial beginning April 4, 2016,

Rogers was found guilty on all counts and sentenced on June 20, 2016. The trial court denied Rogers's amended motion for new trial on July 21, 2025, and Rogers timely appealed to the Supreme Court of Georgia, which affirmed.

DISPOSITION

affirmed

CASES CITED

- McCullough v. State, 304 Ga. 290, 294 (2018)
- Jones v. State, 304 Ga. 594, 598 (2018)
- Jackson v. Virginia, 443 U.S. 307, 318-319 (1979)
- Davis v. State, 316 Ga. 418, 420 (2023)
- Mathis v. State, 309 Ga. 110, 112 (2020)
- Goodson v. State, 305 Ga. 246, 248 (2019)
- Gibbs v. State, 309 Ga. 562, 564 (2020)
- White v. State, 319 Ga. 367, 374 (2024)
- Whisnant v. State, 322 Ga. 253, 259 (2025)
- Ward v. State, 316 Ga. 295, 299 (2023)
- State v. Denson, 306 Ga. 795, 799 (2019)
- Norwood v. State, ___ Ga. ___ (2025), 924 SE2d 307 (2025)
- Welsch v. State, ___ Ga. ___ (2025), S25A1094, slip op. at 11 (Ga. Feb. 3, 2026)