

SUPREME COURT OF GEORGIA

Jackson v. State, 289 Ga. 798

716 S.E.2d 188 (2011) · No. S11A1020 · Decided October 3, 2011

SUMMARY

The Supreme Court of Georgia affirmed Quincy Marcel Jackson’s convictions for malice murder and multiple burglary, kidnapping, false imprisonment, armed robbery, and aggravated assault offenses. The court held that accomplice testimony identifying Jackson was sufficiently corroborated by independent evidence, including the discovery of the victim’s wallet and a matching firearm at Jackson’s residence and cell phone records linking him to the crimes. The court concluded that the evidence was sufficient under the standard established in Jackson v. Virginia.

CASE DETAILS

COURT	Supreme Court of Georgia
WRITING FOR THE COURT	Carley, Presiding Justice
JURISDICTION	Georgia
DECIDED	October 3, 2011
DOCKET	S11A1020
DISPOSITION	affirmed
PROCEDURAL POSTURE	After a jury trial, Jackson was convicted of malice murder and numerous burglary, false imprisonment, kidnapping, armed robbery, and aggravated assault counts. The trial court entered an aggregate sentence of life imprisonment plus 30 years, denied Jackson's motion for new trial, and Jackson appealed to the Supreme Court of Georgia, challenging the sufficiency of the evidence.
STANDARD OF REVIEW	When reviewing the sufficiency of the evidence, the evidence is viewed in the light most favorable to the verdict, and the question is whether a rational trier of fact could have found the defendant guilty beyond a reasonable doubt.
PRECEDENTIAL VALUE	Published opinion; precedential decision of the Supreme Court of Georgia.
PARTIES	Quincy Marcel Jackson v. The State

TOPICS

criminal procedure

evidence

appellate procedure

standard of review

PRACTICE AREAS

Criminal law

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QUESTIONS PRESENTED

1. Whether the evidence was sufficient to support Jackson's convictions when the State relied in part on accomplice testimony.
2. Whether the corroborating evidence satisfied OCGA § 24-4-8 by independently connecting Jackson to the charged crimes.

HOLDINGS

1. In a felony case relying on accomplice testimony, corroborating facts or circumstances must independently connect the defendant with the crime or lead to an inference of guilt; the corroborating evidence may be circumstantial and slight and need not independently establish guilt.
2. Viewed in the light most favorable to the verdict, the evidence was sufficient for a rational trier of fact to find Jackson guilty beyond a reasonable doubt of the charged offenses.

KEY QUOTATIONS

"The additional [corroborating] evidence "may be circumstantial and it may be slight," and it "need not of itself be sufficient to warrant a conviction of the crime charged."" (716 S.E.2d at 190)

"Therefore, there was sufficient evidence to corroborate Ms. Araya's testimony directly identifying Appellant as one of the intruders, and thus the requirement in OCGA § 24-4-8 was satisfied." (716 S.E.2d at 191)

FACTUAL BACKGROUND

Jackson participated in multiple home invasions and robberies with accomplices in November and December 2007 and March 2008. During the November incident, intruders robbed and restrained the Lemma brothers; Tedla Lemma's wallet was later found in Jackson's home, and a silver gun matching witness descriptions was also found there. During the December incident, Jackson and others restrained the Mahabal family and attempted to force them to open a jewelry-store safe. In March 2008, Jackson and an accomplice returned to the Lemma residence, where Tedla Lemma was found dead after being restrained and smothered.

PROCEDURAL HISTORY

A jury found Jackson guilty on April 28, 2009, and the trial court entered judgments of conviction and sentence on April 29, 2009. Jackson's motion for new trial was filed May 7, 2009, amended November 9, 2010, and denied November 16, 2010. He filed a notice of appeal on November 30, 2010; the case was docketed for the April 2011 term and submitted on the briefs.

DISPOSITION

affirmed

CASES CITED

- Baines v. State, 276 Ga. 117, 119(1), 575 S.E.2d 495 (2003)
- Johnson v. State, 288 Ga. 803, 804(1), 805(2), 708 S.E.2d 331 (2011)
- Judkins v. State, 282 Ga. 580, 582(1), 652 S.E.2d 537 (2007)
- Simpson v. State, 278 Ga. 336, 337(1), 602 S.E.2d 617 (2004)
- Wilson v. State, 306 Ga. App. 827, 829-830(1), 703 S.E.2d 400 (2010)
- Jackson v. Virginia, 443 U.S. 307, 99 S. Ct. 2781, 61 L. Ed. 2d 560 (1979)

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