

SUPREME COURT OF GEORGIA

Williams v. The State

S25A1213 · No. S25A1213 · Decided January 21, 2026

SUMMARY

The Supreme Court of Georgia affirms the denial of Russell Williams’s motion to withdraw his guilty plea to malice murder and related offenses. The court holds that the plea was entered knowingly, intelligently, voluntarily, and without coercion, and that plea counsel was not constitutionally ineffective. The court vacates Williams’s convictions and sentences on Counts 11 and 12 because those offenses should have merged with Count 10 based on a single, uninterrupted criminal act.

CASE DETAILS

COURT	Supreme Court of Georgia
WRITING FOR THE COURT	LaGrua, Justice; All Justices
JURISDICTION	Supreme Court of Georgia
DECIDED	January 21, 2026
DOCKET	S25A1213
DISPOSITION	vacated
PROCEDURAL POSTURE	Appeal from the denial of a post-sentencing motion to withdraw a guilty plea, with the Supreme Court of Georgia also addressing unraised sentencing merger errors.
STANDARD OF REVIEW	The trial court’s factual findings and credibility determinations are reviewed for clear error; the ultimate determination whether a plea was knowing and voluntary is reviewed de novo. The denial of a post-sentencing motion to withdraw a guilty plea is otherwise reviewed for an obvious abuse of discretion. Ineffective-assistance factual findings are reviewed for clear error, while legal principles are applied de novo.
PRECEDENTIAL VALUE	Published and precedential
PARTIES	Russell Williams v. The State

TOPICS

- plea bargaining
- ineffective assistance
- sentencing
- criminal procedure
- appellate procedure

PRACTICE AREAS

criminal law

criminal procedure

appellate practice

post-conviction relief

QUESTIONS PRESENTED

1. Whether the trial court abused its discretion by denying Williams's motion to withdraw his guilty plea on the ground that he did not knowingly, voluntarily, and intentionally waive the rights identified in *Boykin*.
2. Whether plea counsel rendered constitutionally ineffective assistance by coercing Williams to enter the guilty plea.
3. Whether the trial court imposed unlawful sentences on Counts 11 and 12 when those offenses arose from the same uninterrupted criminal act as Count 10.

HOLDINGS

1. The trial court properly denied withdrawal of the plea because the record, viewed under the totality of the circumstances, affirmatively showed that Williams's plea was knowing, intelligent, and voluntary. The absence of an express response to one advisement did not require reversal where the record otherwise established the required intelligent and voluntary plea.
2. The trial court properly denied withdrawal because Williams failed to show constitutionally deficient performance by plea counsel and the record supported the implicit finding that counsel's conduct did not coerce the plea.
3. Counts 11 and 12 should have merged with Count 10 because the injuries alleged in those counts occurred during a single, uninterrupted criminal act. The convictions and sentences on Counts 11 and 12 were therefore vacated.

KEY QUOTATIONS

“Thus, although Williams may have been hesitant to enter a guilty plea, the record shows that, under the totality of the circumstances, his plea was intelligently and voluntarily entered.” (17)

“Because the injuries sustained by Fuentes—as alleged in Counts 10 through 13 of the indictment—occurred during a single, uninterrupted act, Counts 11 and 12 should have merged with Count 10.” (24)

FACTUAL BACKGROUND

Williams was charged with participating in the beating death of Marcos Guerra-Lopez and with offenses involving Simon Fuentes. During the third day of trial, after Williams's brother testified against him and another co-indictee was expected to testify, Williams entered a non-negotiated Alford plea. The plea colloquy included advisements concerning the charges, factual basis, punishments, and trial-related rights, although Williams initially failed to respond and at one point said that he was being forced to plead. The trial court later found that Williams's plea was freely, voluntarily, and intelligently entered.

PROCEDURAL HISTORY

A Gwinnett County grand jury indicted Williams and two co-indictees for malice murder and related offenses. Williams entered a non-negotiated Alford guilty plea to all counts on April 26, 2023, and was sentenced principally to life with the possibility of parole. After new counsel was appointed, Williams moved to withdraw his plea, asserting inadequate Boykin advisements, involuntariness, and ineffective assistance based on coercion. Following an evidentiary hearing, the trial court denied the motion; the Supreme Court of Georgia affirmed that ruling but vacated the convictions and sentences on Counts 11 and 12 because those offenses should have merged with Count 10.

DISPOSITION

vacated

REMAND INSTRUCTIONS

The case is remanded for correction of the sentence by merging Counts 11 and 12 with Count 10 and vacating Williams's convictions and sentences on Counts 11 and 12. The denial of the motion to withdraw the guilty plea is affirmed.

CASES CITED

- Boykin v. Alabama, 395 U.S. 238 (1969)
- North Carolina v. Alford, 400 U.S. 25 (1970)
- Hood v. State, 315 Ga. 809, 812-13 (2023)
- City of Atlanta v. Mays, 301 Ga. 367, 372 (2017)
- Williams v. State, 307 Ga. 689, 689 n.2 (2020)
- Green v. State, 318 Ga. 610, 615-16, 636-37 (2024)
- Harris v. State, 319 Ga. 133, 137 (2024)
- Wright v. State, Wright v. State, 314 Ga. 355, 357-58 (2022)
- Powell v. State, 309 Ga. 523, 524-27 (2020)
- Strickland v. Washington, 466 U.S. 668, 687 (1984)
- Goodwin v. State, 319 Ga. 842, 845 (2024)
- Davis v. State, 306 Ga. 430, 432-33 (2019)
- Moore v. State, 306 Ga. 532, 537 (2019)
- Blackshear v. State, 274 Ga. 842, 843 (2002)
- Green v. State, 299 Ga. 337, 342 (2016)
- Dixon v. State, 302 Ga. 691, 697 (2017)
- Douglas v. State, 303 Ga. 178, 183 (2018)