

SUPREME COURT OF GEORGIA

Wilson v. State

297 Ga. 86 (2015) · No. S15A0340 · Decided May 11, 2015

SUMMARY

The Supreme Court of Georgia affirmed Andrea Renee Wilson’s convictions for felony murder and cruelty to children arising from the death of a child in her care. The court held that the evidence was sufficient to establish proximate causation based on the child’s extensive injuries and Wilson’s conduct. It also rejected her ineffective-assistance claim, concluding that the challenged statements by her co-defendant were cumulative of Wilson’s own statements and testimony.

CASE DETAILS

COURT	Supreme Court of Georgia
WRITING FOR THE COURT	Benham, Justice; All the Justices
JURISDICTION	Georgia
DECIDED	May 11, 2015
DOCKET	S15A0340
DISPOSITION	affirmed
PROCEDURAL POSTURE	Wilson appealed her convictions for felony murder and first-degree cruelty to children, and the denial of her amended motion for new trial, to the Supreme Court of Georgia.
STANDARD OF REVIEW	The sufficiency of the evidence is viewed in the light most favorable to the verdict. Ineffective-assistance claims are evaluated under the two-prong performance-and-prejudice test, and failure to establish either prong defeats the claim.
PRECEDENTIAL VALUE	published precedential opinion
PARTIES	Andrea Renee Wilson v. The State

TOPICS

- criminal procedure
- evidence
- ineffective assistance
- sixth amendment
- appellate procedure

PRACTICE AREAS

- criminal law
- criminal procedure
- appellate practice

QUESTIONS PRESENTED

1. Whether the evidence was sufficient to support Wilson's felony-murder and first-degree cruelty-to-children convictions when the medical examiner could not identify one particular injury or act by Wilson as the cause of death.
2. Whether Wilson received ineffective assistance of counsel because trial counsel failed to object on hearsay and Confrontation Clause grounds to Brown's custodial statements.

HOLDINGS

1. The evidence was sufficient to support Wilson's convictions because felony-murder causation requires proximate causation, and the evidence showed that Wilson's criminal conduct was a proximate cause of the child's death even though no single injury or act was identified as the sole cause.
2. Wilson failed to establish ineffective assistance of counsel because the challenged statements by Brown were cumulative of Wilson's own properly admitted statements and testimony, and she therefore failed to show prejudice.

KEY QUOTATIONS

“Proximate causation imposes liability for the reasonably foreseeable results of criminal ... conduct if there is no sufficient, independent, and unforeseen intervening cause.” (297 Ga. at 88)

FACTUAL BACKGROUND

Wilson and her boyfriend, Corey Brown, were the only caretakers of a child who lived with them from March 2006 until his death in January 2007. The child suffered approximately 200 non-accidental injuries, including brain trauma, bruising, an immersion burn causing a necrotic toe, genital injuries, malnutrition, and starvation-related ketones. Wilson admitted that she and Brown hit the child, that she knew he was injured and ill, and that she never sought medical attention before his death. The medical examiner concluded that the totality of the injuries caused death from battered child syndrome.

PROCEDURAL HISTORY

A Liberty County grand jury indicted Wilson on two counts of malice murder, two counts of felony murder, and two counts of first-degree cruelty to children. After a jury trial, she was acquitted of malice murder but convicted of the remaining offenses and initially sentenced to concurrent terms of life without parole and twenty years. The trial court denied her amended motion for new trial and later resentenced her to life without parole on one felony-murder count, merging the remaining counts. Wilson appealed, and the Supreme Court of Georgia affirmed.

DISPOSITION

affirmed

CASES CITED

- State v. Jackson, 287 Ga. 646, 654 (697 S.E.2d 757) (2010)
- Davis v. State, 290 Ga. 757, 760 (4) (725 S.E.2d 280) (2012)
- Currier v. State, 294 Ga. 392, 394 (1) (754 S.E.2d 17) (2014)
- Cordero v. State, __ Ga. __, __ S.E.2d __, 2015 WL 1135281 (Mar. 16, 2015)
- Pruitt v. State, 282 Ga. 30, 34 (4) (644 S.E.2d 837) (2007)
- Wright v. State, 291 Ga. 869, 870 (2) (734 S.E.2d 876) (2012)
- Jackson v. State, 288 Ga. 213 (2)(e) (702 S.E.2d 201) (2010)

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