

SUPREME COURT OF GEORGIA

Reeves v. State

443 U.S. 307 (Ga. 2014) · No. S13A1524 · Decided March 3, 2014

SUMMARY

The Supreme Court of Georgia affirmed Robert Lee Reeves Jr.'s conviction and life sentence for felony murder predicated on aggravated assault. The court held that the evidence was legally sufficient and that evidence of Reeves's prior attempted rape was properly admitted as a similar transaction.

CASE DETAILS

COURT	Supreme Court of Georgia
WRITING FOR THE COURT	Benham, Justice
JURISDICTION	Georgia
DECIDED	March 3, 2014
DOCKET	S13A1524
DISPOSITION	affirmed
PROCEDURAL POSTURE	Reeves appealed his convictions and life sentence after the trial court denied his motion for new trial, which challenged the sufficiency of the evidence and admission of prior attempted-rape evidence as a similar transaction.
STANDARD OF REVIEW	The sufficiency of the evidence is reviewed under the Jackson v. Virginia standard, viewing the evidence in the light most favorable to the prosecution. Whether circumstantial evidence excludes every other reasonable hypothesis is ordinarily a jury question, and the verdict will not be disturbed unless it is insupportable as a matter of law. Admission of similar-transaction evidence is reviewed for abuse of discretion; the trial court's factual findings concerning similarity or connection are accepted unless clearly erroneous.
PRECEDENTIAL VALUE	Published, precedential opinion of the Supreme Court of Georgia
PARTIES	Robert Lee Reeves, Jr. v. The State

TOPICS

- evidence
- criminal procedure
- standard of review
- reasonable doubt
- appellate procedure

PRACTICE AREAS

criminal law

criminal procedure

evidence

appellate litigation

QUESTIONS PRESENTED

1. Whether the evidence was legally sufficient to support Reeves's felony-murder conviction where he argued that his DNA could have resulted from consensual sex and that another person committed the killing.
2. Whether the trial court abused its discretion by admitting evidence of Reeves's prior attempted rape as a similar transaction.

HOLDINGS

1. The evidence was sufficient to authorize the jury to find that the State excluded every reasonable hypothesis except Reeves's guilt and to find him guilty beyond a reasonable doubt.
2. The trial court did not abuse its discretion by admitting evidence of Reeves's 1998 attempted rape conviction as a similar transaction.

KEY QUOTATIONS

“Further, circumstantial evidence must exclude only reasonable inferences and hypotheses and it is not necessary that such evidence be devoid of every inference or hypothesis except that of the defendant’s guilt.” (675-676)

“Before evidence of a similar transaction may be introduced, the state must make three affirmative showings: (1) it must identify a proper purpose for admitting the transaction; (2) show that the accused committed the independent offense; and (3) show a sufficient similarity between the independent offense and the crime charged so that proof of the former tends to prove the latter.” (678)

FACTUAL BACKGROUND

Crystal Morgan's body was found along a wooded path in Macon after an apparent struggle. She had injuries consistent with strangulation, evidence of sexual assault, and male DNA recovered from her body matched Reeves's DNA. The State also introduced evidence of Reeves's 1998 attempted rape conviction, involving a young woman who was choked, sexually assaulted, and attacked on a wooded path near the location of Morgan's body.

PROCEDURAL HISTORY

A Bibb County grand jury indicted Reeves for malice murder and felony murder predicated on aggravated assault. Following a December 2010 jury trial, he was convicted of felony murder and sentenced to life imprisonment; the trial court also revoked probation on four prior felony convictions. The trial court denied his amended motion for new trial on October 3, 2012, and Reeves timely appealed. The Supreme Court of Georgia affirmed.

DISPOSITION

affirmed

CASES CITED

- Owens v. State, 286 Ga. 821, 825 (1) (693 S.E.2d 490) (2010)
- White v. State, 263 Ga. 94, 97 (1) (428 S.E.2d 789) (1993)
- Jackson v. Virginia, 443 U.S. 307 (1979)
- Roper v. State, 263 Ga. 201, 202 (1) (429 S.E.2d 668) (1993)
- Clark v. State, 271 Ga. 6 (5) (515 S.E.2d 155) (1999)
- Williams v. State, 261 Ga. 640, 642 (2) (b) (409 S.E.2d 649) (1991)
- Matthews v. State, 294 Ga. 50, 52 (3) (a) (751 S.E.2d 78) (2013)
- Reed v. State, 291 Ga. 10, 13-14 (727 S.E.2d 112) (2012)
- Hinton v. State, 280 Ga. 811, 818 (6) (631 S.E.2d 365) (2006)
- Ellis v. State, 282 Ga. App. 17, 24 (3) (c) (637 S.E.2d 729) (2006)
- Wheeler v. State, 290 Ga. 817, 818 (2) (725 S.E.2d 580) (2012)
- Johnson v. State, 242 Ga. 649, 653 (3) (250 S.E.2d 394) (1978)