

SUPREME COURT OF GEORGIA

Dickey v. State

Dickey · No. S26A0046 · Decided May 5, 2026

SUMMARY

The Supreme Court of Georgia affirmed Stephan Blake Dickey’s convictions for malice murder and related crimes arising from the shooting death of Justin McKinney and the nonfatal shooting of Anna Franklin. The court held that the trial court sufficiently considered the totality of the circumstances and correctly determined that Dickey knowingly and voluntarily waived his Miranda rights during his custodial interview.

CASE DETAILS

COURT	Supreme Court of Georgia
WRITING FOR THE COURT	Ellington, Justice
JURISDICTION	Supreme Court of Georgia
DECIDED	May 5, 2026
DOCKET	S26A0046
DISPOSITION	affirmed
PROCEDURAL POSTURE	Dickey appealed his convictions for malice murder and other crimes, arguing that the trial court erred in denying his motion to suppress his confession and failed to make sufficient factual findings concerning the suppression ruling.
STANDARD OF REVIEW	The appellate court reviews factual findings and credibility determinations for clear error, applies the law de novo, construes the evidentiary record in the light most favorable to the trial court's findings and judgment, may consider undisputed facts independently, and reviews de novo the application of the facts to the law, including whether the defendant's statement was voluntary.
PRECEDENTIAL VALUE	published
PARTIES	Stephan Blake Dickey v. The State

TOPICS

- miranda rights
- fifth amendment
- suppression of evidence
- criminal procedure
- appellate procedure

PRACTICE AREAS

criminal procedure

constitutional law

appellate procedure

evidence

QUESTIONS PRESENTED

1. Whether the trial court was required to make more specific factual findings before ruling on Dickey's motion to suppress his confession.
2. Whether, under the totality of the circumstances, Dickey knowingly and voluntarily waived his Miranda rights and gave a voluntary confession.

HOLDINGS

1. The trial court was not required to make specific, on-the-record findings concerning every circumstance relevant to the totality-of-the-circumstances analysis. Its order and subsequent clarification adequately showed that it applied the proper standard and found that Dickey understood and voluntarily waived his Miranda rights.
2. The trial court did not err in finding that Dickey knowingly and voluntarily waived his Miranda rights and that his confession was voluntary under the totality of the circumstances.

KEY QUOTATIONS

“the waiver must be voluntary in the sense that it was the product of a free and deliberate choice rather than intimidation, coercion, or deception” (Slip op. at 3)

“made with a full awareness of both the nature of the right being abandoned and the consequences of the decision to abandon it.” (Slip op. at 3)

“we generally do not require trial courts to make specific, on-the-record findings about each aspect of the totality of the circumstances they evaluate or to make explicit factual findings or credibility determinations on the record.” (Slip op. at 6)

FACTUAL BACKGROUND

Dickey, who was nearly 16 years old, participated with several other juveniles in a plan to rob and kill Justin McKinney and McKinney's girlfriend, Anna Franklin. At the victims' home, Dickey shot McKinney in the back of the head with a shotgun, while a co-indictee shot Franklin. Later that day, GBI agents transported Dickey from his high school to the sheriff's office, advised him of his Miranda rights, and interviewed him; he ultimately confessed to shooting McKinney. The interview included a delayed restroom request, the absence of a parent during most of the interview, and questioning using the Reid technique, but there was no evidence of threats, physical harm, promises, or impairment.

PROCEDURAL HISTORY

A Fannin County grand jury indicted Dickey and four co-indictees for murder and related offenses. After a jury trial ending May 5, 2022, Dickey was convicted on all counts and sentenced on May 12, 2022. The trial court

denied his amended motion for new trial on February 6, 2025, and Dickey timely appealed to the Supreme Court of Georgia, which affirmed.

DISPOSITION

affirmed

CASES CITED

- Hill v. State, 322 Ga. 700 (2025)
- Miranda v. Arizona, 384 U.S. 436 (1966)
- Berghuis v. Thompkins, 560 U.S. 370, 382–83 (2010)
- Clark v. State, 315 Ga. 423, 429, 437, 439–40 (2023)
- Sinkfield v. State, 318 Ga. 531, 540 (2024)
- State v. Franklin, 318 Ga. 39, 39 (2024)
- State v. Tripp, 320 Ga. 536, 547–48 (2024)
- Quintanar v. State, 322 Ga. 61, 65–66 (2025)
- Boles v. State, 316 Ga. 209, 220 (2023)
- Francis v. State, 296 Ga. 190, 194–95 (2014)
- Love v. State, 309 Ga. 833, 838 (2020)
- Heard v. State, 287 Ga. 554, 557 (2010)