

SUPREME COURT OF GEORGIA

Compton v. State

Compton v. State · No. S26A0227 · Decided June 2, 2026

SUMMARY

The Supreme Court of Georgia affirmed Javaris Compton’s malice-murder conviction arising from the stabbing death of a fellow inmate. The court held that Compton failed to preserve his mistrial claim because trial counsel did not object or move for a mistrial contemporaneously when testimony revealed that Compton had refused to speak with an investigator after receiving Miranda warnings.

CASE DETAILS

COURT	Supreme Court of Georgia
JURISDICTION	Supreme Court of Georgia
DECIDED	June 2, 2026
DOCKET	S26A0227
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from a criminal conviction and denial of a motion for new trial. The appellant challenged the denial of a mistrial motion based on testimony that he refused to speak to an investigator after receiving Miranda warnings.
STANDARD OF REVIEW	A trial court's ruling on a motion for mistrial is reviewed for abuse of discretion, but appellate review requires a contemporaneous mistrial motion made at the earliest opportunity after the grounds for the motion become apparent.
PRECEDENTIAL VALUE	Published
PARTIES	Javaris Compton v. The State

TOPICS

- criminal procedure
- preservation of error
- appellate procedure
- miranda rights
- fifth amendment

PRACTICE AREAS

- criminal law
- criminal procedure
- appellate procedure

QUESTIONS PRESENTED

1. Whether the trial court abused its discretion by denying Compton's motion for a mistrial after a State investigator testified that Compton refused to speak after being advised of his Miranda rights.
2. Whether Compton preserved the mistrial issue for appellate review by making a contemporaneous objection and mistrial motion when the allegedly improper testimony was elicited.

HOLDINGS

1. A claim that the trial court abused its discretion in denying a mistrial is not preserved for appellate review when the defendant does not move for a mistrial at the earliest opportunity, contemporaneously with the testimony or event giving rise to the motion.
2. The court did not decide the merits of whether testimony about Compton's refusal to speak after Miranda warnings was improper because the related mistrial claim was not preserved.

KEY QUOTATIONS

“Because Compton did not move for a mistrial “at the earliest opportunity in the trial court,” Moss v. State, 322 Ga. 757, 762 (2025) (quotation marks omitted), his claim that the trial court abused its discretion by denying his mistrial motion is not preserved for appeal.” (4)

“Because Compton did not preserve his sole enumeration of error for appellate review, we affirm.” (6)

FACTUAL BACKGROUND

Compton and Rashad Bolton were incarcerated together in a cell at Hancock State Prison on January 4, 2021. Correctional officers found Bolton injured and later discovered that Compton had moved his handcuffs and possessed a shank; Bolton had no weapon, and no weapon was found in the cell. At trial, a State investigator testified that, after reading Compton his Miranda rights, Compton refused to speak with him. Compton was convicted of malice murder and related offenses.

PROCEDURAL HISTORY

A Hancock County grand jury indicted Compton for malice murder, felony murder predicated on aggravated assault, and aggravated assault. After a jury trial, Compton was found guilty on all counts, and the trial court sentenced him to life without parole for malice murder; the remaining counts merged or were vacated by operation of law. The trial court denied Compton's amended motion for new trial, and the Supreme Court of Georgia affirmed because the mistrial issue was not preserved for appellate review.

DISPOSITION

affirmed

CASES CITED

- Miranda v. Arizona, 384 U.S. 436 (1966)
- Moss v. State, 322 Ga. 757, 761-762 (2025)

- Smith v. State, 323 Ga. 246, 253 (2026)
- Glover v. State, 309 Ga. 102, 106 (2020)
- Pittman v. State, 318 Ga. 819, 828-829 (2024)
- Kilpatrick v. State, 308 Ga. 194, 199-200 (2020)
- Thaxton v. State, 260 Ga. 141, 143 (1990)
- St. Romaine v. State, 251 Ga. App. 212, 213 (2001)
- Jackson v. State, 306 Ga. 266, 270-272 (2019)
- Bates v. State, 317 Ga. 809, 819 (2023)
- Johnson v. State, 292 Ga. 785, 787 (2013)