

SUPREME COURT OF GEORGIA

Williams v. State

S25A1014 · No. S25A1014 · Decided January 21, 2026

SUMMARY

The Supreme Court of Georgia affirmed Qamar Williams’s convictions for malice murder and related firearms offenses arising from the shooting death of Calvin Chappell. The court held that Williams failed to satisfy the requirements for a new trial based on newly discovered evidence, that the trial court did not plainly err by declining to instruct the jury on involuntary intoxication, and that his ineffective-assistance claims failed for lack of demonstrated prejudice.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | Supreme Court of Georgia                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| WRITING FOR THE COURT | Land, Justice                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| JURISDICTION          | Supreme Court of Georgia                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| DECIDED               | January 21, 2026                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| DOCKET                | S25A1014                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| DISPOSITION           | affirmed                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| PROCEDURAL POSTURE    | Appeal from the denial of an amended motion for new trial following convictions for malice murder and related offenses.                                                                                                                                                                                                                                                                                                                                                    |
| STANDARD OF REVIEW    | The denial of a motion for new trial based on newly discovered evidence is reviewed for abuse of discretion. The sufficiency of evidence supporting a requested jury instruction is generally reviewed de novo, but because trial counsel did not object to the failure to give the involuntary-intoxication instruction, the court applied plain-error review. Ineffective-assistance claims are governed by the Strickland deficient-performance and prejudice standard. |
| PRECEDENTIAL VALUE    | Published precedential opinion of the Supreme Court of Georgia                                                                                                                                                                                                                                                                                                                                                                                                             |
| PARTIES               | Qamar Williams v. The State                                                                                                                                                                                                                                                                                                                                                                                                                                                |

TOPICS

- criminal procedure
- post-conviction relief
- ineffective assistance
- jury instructions
- preservation of error

## PRACTICE AREAS

criminal law   criminal procedure   appellate procedure   post-conviction relief  
ineffective assistance of counsel

## QUESTIONS PRESENTED

1. Whether newly discovered testimony that an unknown substance may have been placed in champagne consumed by Williams warranted a new trial.
2. Whether the trial court plainly erred by failing to instruct the jury on involuntary intoxication.
3. Whether trial counsel was ineffective for failing to obtain surveillance footage from Club One Fifty-One and Waffle House.
4. Whether trial counsel was ineffective for failing to present expert testimony concerning involuntary intoxication.
5. Whether the alleged deficiencies of counsel produced cumulative prejudice.

## HOLDINGS

1. The trial court did not abuse its discretion in denying Williams's motion for new trial based on newly discovered evidence because Williams failed to show both that the evidence could not have been discovered earlier through due diligence and that it was sufficiently material to probably produce a different verdict.
2. The trial court did not plainly err by refusing to instruct the jury on involuntary intoxication because the trial evidence did not show that Williams involuntarily consumed an intoxicating substance or lacked the mental capacity to distinguish right from wrong.
3. Williams failed to establish ineffective assistance based on counsel's failure to obtain surveillance footage from Club One Fifty-One and Waffle House because he did not demonstrate resulting prejudice.
4. Williams failed to establish ineffective assistance based on counsel's failure to call an expert concerning involuntary intoxication because he did not present or proffer evidence of what the expert would have said.
5. Williams was not entitled to relief based on cumulative prejudice because the record showed no prejudicial effect from any of counsel's alleged deficiencies.

## KEY QUOTATIONS

*“A defendant’s failure to show that even one of these requirements is met is sufficient to deny a motion for new trial.” (7)*

*“speculation provides no basis for granting a new trial.” (10)*

*“A defendant claiming ineffective assistance of counsel must prove deficient performance by his counsel and resulting prejudice.” (15)*

*“A defendant cannot demonstrate prejudice with “mere ‘speculation.’” (16)*

## FACTUAL BACKGROUND

Williams and Calvin Chappell went to several nightclubs with friends before returning to a residence in Decatur. In the early morning hours, Williams shot a security camera and then shot Chappell several times while Chappell was sleeping. Security footage captured the shooting, and witnesses testified that Williams appeared to be functioning normally and did not appear intoxicated. After trial, Williams presented testimony that an unknown substance may have been placed in champagne he drank, but the witnesses could not identify the substance, establish that Williams unknowingly consumed it, or show how it affected his conduct.

## PROCEDURAL HISTORY

A DeKalb County grand jury indicted Williams on murder, aggravated assault, and firearm charges. A jury convicted him after a September 2022 trial, and the trial court imposed a life sentence without parole for malice murder plus consecutive firearm-related sentences. The trial court denied Williams's amended motion for new trial after an evidentiary hearing. The Supreme Court of Georgia previously remanded the case to supplement the record and then considered the appeal on the briefs.

## DISPOSITION

affirmed

## CASES CITED

- Williams v. State, No. S25A0393 (Jan. 23, 2025)
- Timberlake v. State, 246 Ga. 488, 491-92 (1980)
- Patterson v. State, 314 Ga. 167, 181 (2022)
- Dick v. State, 248 Ga. 898, 900 (1982)
- McClure v. State, 306 Ga. 856, 863 (2019)
- State v. Alvarez, 299 Ga. 213, 214 (2016)
- State v. Johnson, 305 Ga. 237, 239 (2019)
- State v. Kelly, 290 Ga. 29, 33 (2011)
- Redding v. State, 311 Ga. 757, 760-61 (2021)
- Munn v. State, 313 Ga. 719, 723 (2022)
- Strickland v. Washington, 466 U.S. 668, 687, 694 (1984)
- Eaker v. State, 315 Ga. 202, 206 (2022)
- Palmer v. State, 303 Ga. 810, 816 (2018)
- Arnold v. State, 321 Ga. 434, 449-50 (2025)
- Martin v. McLaughlin, 298 Ga. 44, 47 (2015)
- McClarin v. State, 289 Ga. 180, 182 (2011)
- Woods v. State, 275 Ga. 844, 849-50 (2002)
- Pauldo v. State, 317 Ga. 433, 437 (2023)
- Lofton v. State, 309 Ga. 349, 360 (2020)

- Scott v. State, Scott v. State, 317 Ga. 218, 226 n.5 (2023)

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