

SUPREME COURT OF GEORGIA

Dixon v. The State

S26A0052 · No. S26A0052 · Decided December 9, 2025

SUMMARY

The Supreme Court of Georgia affirmed Brandi Dixon’s felony-murder conviction arising from the stabbing death of Ebony Smith. The court held that the evidence was sufficient to support the verdict and to reject Dixon’s self-defense claim, and that the trial court properly denied her motion for a directed verdict. The court also rejected Dixon’s ineffective-assistance claim and concluded that any error concerning redirect examination testimony was harmless and that disclosure of the medical examiner’s general wound testimony was not required under OCGA § 17-16-4(a)(4).

CASE DETAILS

COURT	Supreme Court of Georgia
JURISDICTION	Supreme Court of Georgia
DECIDED	December 9, 2025
DOCKET	S26A0052
DISPOSITION	affirmed
PROCEDURAL POSTURE	Dixon appealed from the denial of her amended motion for new trial following her conviction for felony murder.
STANDARD OF REVIEW	Under Jackson v. Virginia, the court viewed the evidence in the light most favorable to the verdict and considered whether any rational juror could have found Dixon guilty beyond a reasonable doubt. The denial of a directed verdict was reviewed under the same sufficiency standard. Ineffective-assistance claims were evaluated under Strickland v. Washington. Evidentiary rulings were reviewed for abuse of discretion, and any nonconstitutional error was reviewed for harmlessness under the highly-probable-that-the-error-did-not-contribute-to-the-verdict standard.
PRECEDENTIAL VALUE	published
PARTIES	Brandi Dixon v. The State

TOPICS

- criminal procedure
- self defense
- ineffective assistance
- harmless error
- evidence

PRACTICE AREAS

criminal law

criminal procedure

appellate practice

QUESTIONS PRESENTED

1. Whether the evidence was constitutionally sufficient to support Dixon's felony-murder conviction based on aggravated assault, including whether the State disproved her claim of self-defense.
2. Whether the trial court erred by denying Dixon's motion for a directed verdict of acquittal.
3. Whether trial counsel provided ineffective assistance by advising Dixon not to testify.
4. Whether the trial court abused its discretion by overruling Dixon's objection during redirect examination of Smith's sister, and, if so, whether the error was harmless.
5. Whether the trial court erred by declining to strike medical-examiner testimony allegedly subject to disclosure under OCGA § 17-16-4(a)(4).

HOLDINGS

1. The evidence was sufficient for a rational jury to find Dixon guilty beyond a reasonable doubt of felony murder based on aggravated assault and to reject her claim of self-defense.
2. The trial court did not err by denying Dixon's motion for a directed verdict of acquittal.
3. Dixon failed to establish deficient performance because the record did not show that counsel's advice not to testify was patently unreasonable.
4. Assuming without deciding that the trial court abused its discretion by overruling Dixon's objection to redirect testimony from Smith's sister, any error was harmless.
5. The trial court did not abuse its discretion by declining to strike the medical examiner's general testimony about the characteristics of stab wounds and gunshot wounds because that testimony was not a report of a physical or mental examination, scientific test, or experiment subject to disclosure under OCGA § 17-16-4(a)(4).

KEY QUOTATIONS

“In sum, the evidence presented at trial and recounted above was sufficient to authorize a rational jury to reject Dixon’s claim of self-defense and to find her guilty beyond a reasonable doubt of felony murder based on aggravated assault, and the trial court did not err by denying her motion for a directed verdict.” (at 7)

“Whether to testify in one’s own defense is a tactical choice to be made by the defendant after consultation with h[er] lawyer, and trial counsel’s advice to a defendant not to testify is a strategic decision.” (at 10)

“A non-constitutional error is harmless if it is highly probable that the error did not contribute to the verdict.” (at 13)

FACTUAL BACKGROUND

Dixon and the victim, Ebony Smith, were both dating George Duehart. At a party attended by both women, witnesses described Dixon as aggressively confronting Smith about Duehart, displaying or threatening with a

knife, and later stabbing Smith in the chest after Smith fired a pistol into the air. Smith died from the stab wound, while Dixon sustained a minor forehead injury. Dixon did not testify at trial and relied on self-defense.

PROCEDURAL HISTORY

A Bibb County grand jury indicted Dixon for malice murder and felony murder based on aggravated assault. After a March 2022 jury trial, Dixon was acquitted of malice murder but convicted of felony murder and sentenced to life in prison. The trial court denied her amended motion for new trial in June 2025, and the Supreme Court of Georgia affirmed.

DISPOSITION

affirmed

CASES CITED

- Jackson v. Virginia, 443 U.S. 307 (1979)
- Rooks v. State, 317 Ga. 743, 750-51 (2023)
- Gibbs v. State, 309 Ga. 562, 564 (2020)
- Carter v. State, 310 Ga. 559, 562 (2020)
- Strickland v. Washington, 466 U.S. 668, 687-91, 694, 697 (1984)
- Woods v. State, 322 Ga. 365, 367, 369 (2025)
- Warren v. State, 314 Ga. 598, 602 (2022)
- Morgan v. State, 321 Ga. 495, 504 (2025)
- Newman v. State, 309 Ga. 171, 175-76 (2020)
- Scott v. State, Scott v. State, 317 Ga. 799, 806 (2023)
- Monroe v. State, 315 Ga. 767, 779 (2023)
- Green v. State, 307 Ga. 171, 176-77 (2019)
- Byrd v. State, 321 Ga. 222, 225-27 (2025)