

SUPREME COURT OF GEORGIA

Woodard v. State, 277 Ga. 49

586 S.E.2d 330 (2003) · No. No. S03A0767 · Decided September 15, 2003

SUMMARY

The Supreme Court of Georgia affirmed James Woodard's convictions for murder and felony murder arising from the shooting death of Max Rister. The court held that Woodard's custodial statement was voluntarily given and properly admitted despite his age and the absence of a parent or guardian. It also held that a detective's nonresponsive testimony did not improperly place Woodard's character in issue and did not require a mistrial.

CASE DETAILS

COURT	Supreme Court of Georgia
WRITING FOR THE COURT	Hunstein, Justice
JURISDICTION	Georgia
DECIDED	September 15, 2003
DOCKET	No. S03A0767
DISPOSITION	affirmed
PROCEDURAL POSTURE	Defendant appealed the denial of his motion for new trial following convictions for murder and felony murder and a life sentence.
STANDARD OF REVIEW	The trial court's factual determinations and credibility findings concerning the admissibility of a custodial statement are upheld unless clearly erroneous. The trial court has broad discretion in ruling on motions for mistrial.
PRECEDENTIAL VALUE	Published Georgia Supreme Court opinion; precedential.
PARTIES	James Woodard v. The State

TOPICS

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

PRACTICE AREAS

- criminal law
- criminal procedure
- evidence
- appellate practice

QUESTIONS PRESENTED

1. Whether the evidence was sufficient to support Woodard's murder and felony-murder convictions.
2. Whether Woodard's custodial statement was admissible because it was freely and voluntarily given despite his age, the absence of a parent or guardian, and the circumstances of his detention.
3. Whether the trial court erred by denying a motion for mistrial after a nonresponsive answer by a State witness allegedly placed Woodard's character in evidence.

HOLDINGS

1. The evidence was sufficient to enable a rational trier of fact to find Woodard guilty beyond a reasonable doubt of the charged crimes.
2. The statement was admissible because Woodard, who had reached age 17, was not treated as a juvenile for purposes of the Riley factors, and the statement was made voluntarily, without hope of benefit or coercion by threats.
3. The trial court did not abuse its discretion by denying the motion for mistrial because a nonresponsive answer that negatively affects a defendant's character does not improperly place the defendant's character in issue.

KEY QUOTATIONS

“Thus, Woodard's statement was admissible if made voluntarily, without being induced by hope of benefit or coerced by threats.” (332)

“Under the totality of the circumstances, the trial court did not err by finding that Woodard freely, knowingly, and voluntarily waived his rights and that his custodial statement was admissible into evidence.” (332)

FACTUAL BACKGROUND

Max Rister was confronted at a Dublin hotel by Carnell Agnew and a masked man later identified as Woodard. During an attempted robbery, Rister was shot twice and later died from complications related to the wounds; Agnew identified Woodard as the shooter. After his arrest, Woodard, who was 17 years and 10 months old, received Miranda warnings, signed a waiver, and gave a statement denying involvement in the shooting but admitting he was present at the hotel.

PROCEDURAL HISTORY

Woodard was indicted in Laurens County on murder and felony-murder charges, convicted on May 1, 1996, and sentenced to life imprisonment. The trial court denied his motion for new trial on December 5, 2002. The appeal was initially docketed in the Georgia Court of Appeals and was transferred to the Supreme Court of Georgia, which affirmed.

DISPOSITION

affirmed

CASES CITED

- Jackson v. Virginia, 443 U.S. 307, 99 S. Ct. 2781, 61 L. Ed. 2d 560 (1979)
- Riley v. State, 237 Ga. 124, 128, 226 S.E.2d 922 (1976)
- Reynolds v. State, 275 Ga. 548, 569 S.E.2d 847 (2002)
- Atkins v. State, 274 Ga. 103, 105(4), 549 S.E.2d 356 (2001)
- Hansley v. State, 267 Ga. 48, 49(3), 472 S.E.2d 305 (1996)
- Jackson v. Denno, 378 U.S. 368, 84 S. Ct. 1774, 12 L. Ed. 2d 908 (1964)
- Miranda v. Arizona, 384 U.S. 436, 86 S. Ct. 1602, 16 L. Ed. 2d 694 (1966)

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