

MISSISSIPPI COURT OF APPEALS

Samuel Lamar Taylor a/k/a Samuel Taylor v. State of Mississippi

Taylor v. State · No. 2024-KA-00280-COA · Decided March 31, 2026

SUMMARY

The Mississippi Court of Appeals affirmed Samuel Lamar Taylor’s convictions for sexual battery and gratification of lust against a minor, as well as consecutive sentences of life imprisonment and fifteen years. The court held that Taylor’s indictment provided sufficient notice despite its two-year date range and statutory language, and that challenges to the admission of the minor’s disclosures were procedurally barred or harmless.

CASE DETAILS

COURT	Mississippi Court of Appeals
WRITING FOR THE COURT	Barnes, C.J.; Carlton, P.J.; Wilson, P.J.; Westbrook, J.; McDonald, J.; Lawrence, J.; Emfinger, J.; Weddle, J.; Lassitter St. Pé, J.; McCarty, J.
JURISDICTION	Mississippi Court of Appeals
DECIDED	March 31, 2026
DOCKET	2024-KA-00280-COA
DISPOSITION	affirmed
PROCEDURAL POSTURE	Taylor appealed his jury convictions for sexual battery and gratification of lust against a minor, challenging the sufficiency of the indictment, the admission of hearsay and tender-years evidence, and alleged bolstering of the child victim's testimony.
STANDARD OF REVIEW	The legal sufficiency of an indictment is reviewed de novo. Unpreserved evidentiary and bolstering claims are generally procedurally barred; the court also applied harmless-error review to the absence of an on-the-record tender-years reliability finding.
PRECEDENTIAL VALUE	Published Mississippi Court of Appeals opinion
PARTIES	Samuel Lamar Taylor a/k/a Samuel Taylor v. State of Mississippi

TOPICS

- criminal procedure
- preservation of error
- hearsay
- evidence
- appellate procedure

PRACTICE AREAS

criminal law

criminal procedure

evidence

appellate practice

QUESTIONS PRESENTED

1. Whether the indictment was legally insufficient because the charged offenses were alleged to have occurred within a two-year date range.
2. Whether the gratification-of-lust count was insufficient because it tracked the statutory language and did not specify the particular conduct or method of touching.
3. Whether the admission of the child's disclosures through a mental-health specialist's testimony and report required reversal because the trial court did not make an on-the-record tender-years reliability finding.
4. Whether the State improperly bolstered the child's trial testimony through testimony from the mental-health specialist and forensic interviewer.

HOLDINGS

1. The indictment was not defective. In child-sexual-abuse cases, a general timeframe may be sufficient when the indictment otherwise fully and fairly advises the defendant of the charges, and Taylor did not show that the date range prejudiced his defense.
2. Count II was sufficient. The indictment's tracking of the statutory language adequately informed Taylor of the charged offense because the specific method of gratifying lust was not an essential element.
3. The claim was procedurally barred because Taylor did not contemporaneously object to the testimony, report, or note. Even absent the bar, any error was harmless because the remaining evidence overwhelmingly supported the convictions.
4. The bolstering claim was waived because Taylor did not object to the testimony of the mental-health specialist or forensic interviewer, or to admission of the related report and CAC interview.

KEY QUOTATIONS

“So long as from a fair reading of the indictment, taken as a whole, the nature and cause of the charge against the accused are clear, the indictment is legally sufficient.” (§14)

“Even though Taylor’s indictment did not allege “how” he gratified his lust, because “how” is not an essential element of the offense, the indictment’s charge in Count II was proper, giving Taylor sufficient notice of the charges against him to prepare a defense.” (§23)

“Under the harmless-error test, ‘this Court must determine whether the weight of the evidence against the defendant is sufficient to outweigh the harm done by allowing admission of the evidence.’” (§29)

FACTUAL BACKGROUND

Taylor, a pastor and former music teacher, received temporary custody of eleven-year-old Brian, who lived with Taylor for approximately two years and sometimes shared Taylor's bedroom or bed. Brian disclosed to a mental-

health specialist and later to a child-advocacy-center interviewer that Taylor had engaged in oral-genital contact and other sexual touching. The disclosures led to a search of Taylor's home and his arrest; during transport to jail, Taylor voluntarily made statements referring to a misunderstanding, Brian's sexual conduct, and incidents involving Brian's mouth and buttocks. A jury convicted Taylor of sexual battery and gratification of lust against a minor.

PROCEDURAL HISTORY

A Rankin County grand jury indicted Taylor on one count of sexual battery and one count of gratification of lust against a minor. After a jury trial in the Rankin County Circuit Court, Taylor was convicted on both counts and sentenced to life imprisonment on Count I and fifteen consecutive years on Count II. The Mississippi Court of Appeals affirmed the convictions and sentences.

DISPOSITION

affirmed

CASES CITED

- Beal v. State, 86 So. 3d 887, 891 (¶9) (Miss. 2012)
- Jones v. State, 993 So. 2d 386, 394 (¶19) (Miss. Ct. App. 2008)
- Moses v. State, 795 So. 2d 569, 571-73 (Miss. Ct. App. 2001)
- Caston v. State, 949 So. 2d 852, 858 (¶14) (Miss. Ct. App. 2006)
- Wilson v. State, 815 So. 2d 439, 443 (¶11) (Miss. 2002)
- McGilvary v. State, 290 So. 3d 1273, 1279 (¶20) (Miss. Ct. App. 2020)
- Harrison v. State, 722 So. 2d 681, 687 (¶22) (Miss. 1998)
- Maggett v. State, 230 So. 3d 722, 728 (¶16) (Miss. Ct. App. 2016)
- Bradshaw v. State, 371 So. 3d 822, 830-32 (Miss. Ct. App. 2023)
- Mendez v. State, 309 So. 3d 1109, 1117-18 (Miss. Ct. App. 2020)
- Eakes v. State, 665 So. 2d 852, 860 (Miss. 1995)
- Morris v. State, 595 So. 2d 840, 842 (Miss. 1991)
- Madden v. State, 97 So. 3d 1217, 1233 (¶78) (Miss. Ct. App. 2011)
- McBride v. State, 61 So. 3d 174, 184 (¶35) (Miss. 2010)
- Shoemaker v. State, 256 So. 3d 604, 612 (¶28) (Miss. Ct. App. 2018)
- Baker v. State, 930 So. 2d 399, 404-05 (¶¶8-10) (Miss. 2005)
- Nelson v. State, 422 So. 3d 1035, 1040 (¶13) (Miss. Ct. App. 2025)
- Graves v. State, 216 So. 3d 1152, 1158 (¶12) (Miss. 2016)
- Thompson v. State, 344 So. 3d 299, 302 (¶8) (Miss. 2022)
- Metcalf v. State, 265 So. 3d 1242, 1249 (¶29) (Miss. Ct. App. 2019)
- Lepard v. State, 394 So. 3d 1061, 1070 (¶34) (Miss. Ct. App. 2024)
- Jenkins v. State, 283 So. 3d 217, 220-21 (¶¶8, 11) (Miss. Ct. App. 2019)

- Justice v. State, 192 So. 3d 1096, 1098 (¶8) (Miss. Ct. App. 2016)
- Grayson v. State, 850 So. 2d 196, 198 (¶5) (Miss. Ct. App. 2003)
- Graham v. State, 264 So. 3d 819, 821 (¶¶7-8) (Miss. Ct. App. 2018)
- Shaheed v. State, 205 So. 3d 1105, 1112 (¶21) (Miss. Ct. App. 2016)
- Marion v. State, 281 So. 3d 174, 177 (¶13) (Miss. Ct. App. 2019)
- Veasley v. State, 735 So. 2d 432, 437 (¶17) (Miss. 1999)
- Sullivan v. State, 281 So. 3d 1146, 1160 (¶30) (Miss. Ct. App. 2019)
- Ellzey v. State, 412 So. 3d 358, 375 (¶36) (Miss. Ct. App. 2024)

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