

COURT OF APPEALS OF GEORGIA

Jackson v. The State

A25A1537 (Ga. Ct. App. Feb. 26, 2026) · No. A25A1537 · Decided February 26, 2026

SUMMARY

The Georgia Court of Appeals dismissed Quantavious Jackson’s appeal from the denial of his motion to inspect grand jury minutes. The court held that federal provisions concerning disclosure of grand jury materials were not binding on Georgia courts and that Georgia law maintains grand jury secrecy absent a compelling necessity. The court further concluded that Jackson’s allegations effectively challenged the validity of his convictions outside an authorized procedural vehicle.

CASE DETAILS

COURT	Court of Appeals of Georgia
WRITING FOR THE COURT	Barnes, Presiding Judge; Brown, Chief Judge; Watkins, Judge
JURISDICTION	Court of Appeals of Georgia
DECIDED	February 26, 2026
DOCKET	A25A1537
DISPOSITION	dismissed
PROCEDURAL POSTURE	Jackson appealed pro se from the denial of his motion to inspect grand jury minutes. The Court of Appeals dismissed the appeal because the motion substantively challenged the validity of his criminal convictions through a procedure not authorized for that purpose.
STANDARD OF REVIEW	The Court of Appeals reviewed the trial court's denial of the motion and the appeal's legal authorization and jurisdictional basis de novo.
PRECEDENTIAL VALUE	precedential
PARTIES	Quantavious Jackson v. The State

TOPICS

- grand jury
- criminal procedure
- appellate procedure
- post-conviction relief
- preservation of error

PRACTICE AREAS

- Criminal procedure
- Appellate procedure
- Post-conviction relief
- Grand jury secrecy

QUESTIONS PRESENTED

1. Whether Jackson was entitled to inspect or obtain grand jury minutes and related materials under Federal Rule of Criminal Procedure 6(e)(3)(E)(ii).
2. Whether Jackson demonstrated the compelling necessity required under Georgia law to overcome grand jury secrecy.
3. Whether a motion to inspect grand jury minutes could be used to challenge the validity of Jackson's criminal convictions outside the established statutory procedures for criminal post-conviction relief.
4. Whether the appeal should be dismissed because there was no authorized relief for the Court of Appeals to review.

HOLDINGS

1. Federal procedural provisions, including Federal Rule of Criminal Procedure 6(e)(3)(E)(ii), are not binding on Georgia courts and did not establish Jackson's right to inspect the grand jury materials.
2. Georgia law maintains grand jury secrecy absent a compelling necessity, and Jackson's allegations did not demonstrate such a necessity.
3. A motion to inspect grand jury minutes is not an established procedure for challenging the validity of a criminal judgment, and Jackson was not authorized to seek relief from his convictions through that motion.

KEY QUOTATIONS

“Georgia precedent confirms the absolute secrecy of grand jury proceedings absent a “compelling necessity.”” (at 4)

“Thus, as Jackson was not authorized to seek relief from his criminal convictions outside of the statutorily established procedures, there is nothing for this Court to review and his direct appeal is subject to dismissal.” (at 5)

FACTUAL BACKGROUND

Following a 2016 jury trial, Quantavious Jackson was convicted of four counts of trafficking of persons for sexual servitude. In 2024 and 2025, he sought copies of his arrest warrant, affidavit, police report, indictment, and grand jury materials. The trial court denied his motion to inspect the grand jury minutes, and Jackson argued on appeal that federal law authorized access and that the materials would support claims involving perjury, fabricated evidence, grand jury composition, the indictment, jurisdiction, and his innocence.

PROCEDURAL HISTORY

Jackson was indicted and convicted by a jury in 2016 of four counts of trafficking of persons for sexual servitude. His later notice of appeal from the denial of a motion for new trial was untimely and was dismissed for lack of jurisdiction. In November 2024, he requested grand jury-related materials, and on February 13, 2025, he filed a motion to inspect grand jury minutes. The superior court denied the motion, and the Court of Appeals dismissed his appeal.

DISPOSITION

dismissed

CASES CITED

- In re Gwinnett County Grand Jury, 284 Ga. 510, 513 (668 SE2d 682) (2008)
- Kesler v. State, 249 Ga. 462, 474 (10) (291 SE2d 497) (1982)
- Marshall v. State, 229 Ga. 841, 841 (1) (195 SE2d 12) (1972)
- Sledge v. State, 312 Ga. App. 97, 98 (1) (717 SE2d 682) (2011)
- Roberts v. State, 286 Ga. 532, 532 (690 SE2d 150) (2010)
- von Thomas v. State, 293 Ga. 569, 572 (2) (748 SE2d 446) (2013)
- Harper v. State, 286 Ga. 216, 217 (1) (686 SE2d 786) (2009)
- Garza v. State, 325 Ga. App. 505, 507 (1) (753 SE2d 651) (2014)
- Hambrick v. Brannen, 289 Ga. 682 (715 SE2d 89) (2011)

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