

SUPREME COURT OF GEORGIA

Williams v. State

300 Ga. 218 (2016) · Decided November 21, 2016

SUMMARY

The Georgia Supreme Court affirmed Anthony Lashawn Williams’s conviction and life sentence for malice murder and the denial of his amended motion for new trial. The court held that the trial court did not abuse its discretion by admitting similar-transaction evidence and that Williams waived his challenge to the prosecutor’s closing argument by failing to object at trial.

CASE DETAILS

COURT	Supreme Court of Georgia
WRITING FOR THE COURT	Hines, Presiding Justice; All the Justices
JURISDICTION	Georgia
DECIDED	November 21, 2016
DISPOSITION	affirmed
PROCEDURAL POSTURE	Williams appealed the denial of his amended motion for new trial and his conviction and life sentence for malice murder.
STANDARD OF REVIEW	The Supreme Court deferred to the trial court's factual findings regarding similar transaction evidence unless clearly erroneous and reviewed the admission of that evidence for abuse of discretion. Unobjected-to closing-argument claims were deemed waived under the law applicable at the time of trial. The court independently reviewed the record for sufficiency of the evidence under the rational-trier-of-fact standard.
PRECEDENTIAL VALUE	published and precedential
PARTIES	Anthony Lashawn Williams v. State

TOPICS

- evidence
- criminal procedure
- preservation of error
- appellate procedure
- standard of review

PRACTICE AREAS

- criminal law
- criminal procedure
- evidence
- appellate practice

QUESTIONS PRESENTED

1. Whether the trial court properly admitted evidence of three prior violent transactions as similar transaction evidence under the former Georgia Evidence Code.
2. Whether the State's closing argument improperly commented on Williams's failure to testify or his silence to investigators, and whether the issue was preserved for appellate review.
3. Whether the evidence was legally sufficient to support Williams's malice-murder conviction.

HOLDINGS

1. The trial court did not abuse its discretion by admitting evidence of Williams's three prior violent transactions because the State established an appropriate purpose, sufficient evidence that Williams committed the transactions, and sufficient connections or similarities between the transactions and Woodson's murder.
2. Williams waived appellate review of his claims that the prosecutor improperly commented on his failure to testify or his silence to law enforcement because he made no objection at trial.
3. The evidence was sufficient to enable a rational trier of fact to find Williams guilty beyond a reasonable doubt of malice murder.

KEY QUOTATIONS

“In considering this factor, the focus is properly on the similarities, not the differences, between the separate transaction and the crime or crimes to be tried.” (222)

“What is more, “a lesser degree of similarity [is] required to admit evidence of independent acts to show motive or intent than to admit such evidence to prove identity.”” (222)

FACTUAL BACKGROUND

Jeanette Woodson was fatally shot in Terrell County in November 1992 with a .25-caliber handgun, and evidence indicated that she had been searched and sexually assaulted. Years later, DNA recovered from Woodson matched Williams, who had worked with her and had been seen near the liquor store where employees commonly cashed their paychecks before the murder. At trial, the State introduced three prior violent incidents involving Williams, including two assaults with sexual or domestic overtones and a .25-caliber shooting. Williams was convicted of malice murder and challenged the admission of the prior-transaction evidence and the prosecutor's closing comments concerning his failure to testify or remain silent.

PROCEDURAL HISTORY

A Terrell County grand jury indicted Williams for malice murder in 2003. A jury convicted him in March 2004 and the trial court sentenced him to life imprisonment. The trial court denied his motion for new trial, as amended, on October 23, 2015, and Williams appealed. The Supreme Court of Georgia considered the appeal on the briefs and affirmed.

DISPOSITION

affirmed

CASES CITED

- Williams v. State, 261 Ga. 640, 642 (2) (b), 409 S.E.2d 649 (1991)
- State v. Ashley, 299 Ga. 450, 454 (2), 788 S.E.2d 796 (2016)
- Dillard v. State, 297 Ga. 756, 759 (3), 778 S.E.2d 184 (2015)
- McBee v. State, 228 Ga. App. 16, 19 (1), 491 S.E.2d 97 (1997)
- Scott v. State, 290 Ga. 883, 885 (2), 725 S.E.2d 305 (2012)
- Durham v. State, 292 Ga. 239, 240 (2), 734 S.E.2d 377 (2012)
- Jackson v. Virginia, 443 U.S. 307, 99 S. Ct. 2781, 61 L. Ed. 2d 560 (1979)
- Bharadia v. State, 297 Ga. 567, 568 n. 3, 774 S.E.2d 90 (2015)