

SUPREME COURT OF GEORGIA

Rainey v. The State

S26A0399 · No. S26A0399 · Decided March 17, 2026

SUMMARY

The Supreme Court of Georgia affirmed Shadreen Rainey’s convictions for felony murder, aggravated assault, first-degree home invasion, false statement, and possession of a firearm during the commission of a felony. The court held that the evidence was constitutionally sufficient to establish that Rainey was a party to entering the victim’s bedroom without authority, that voice identifications were adequately authenticated, and that the failure to give an unrequested conspiracy instruction did not constitute plain error.

CASE DETAILS

COURT	Supreme Court of Georgia
WRITING FOR THE COURT	Colvin, Justice
JURISDICTION	Supreme Court of Georgia
DECIDED	March 17, 2026
DOCKET	S26A0399
DISPOSITION	affirmed
PROCEDURAL POSTURE	Direct appeal from convictions for felony murder, home invasion in the first degree, aggravated assault with a deadly weapon, false statement, and possession of a firearm during the commission of a felony, following denial of an amended motion for new trial.
STANDARD OF REVIEW	Constitutional sufficiency of the evidence is reviewed under whether a rational trier of fact could have found the defendant guilty beyond a reasonable doubt, viewing the evidence in the light most favorable to the verdict and deferring to the jury’s assessment of weight and credibility. Unpreserved evidentiary and jury-instruction claims are reviewed for plain error.
PRECEDENTIAL VALUE	Published
PARTIES	Shadreen Rainey v. The State

TOPICS

criminal procedure

evidence

authentication

standard of review

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the evidence was constitutionally sufficient to prove that Rainey, as a party to the crime, entered or aided the entry into Medina's bedroom without authority for purposes of first-degree home invasion.
2. Whether the trial court plainly erred by admitting testimony identifying Rainey's voice without sufficient authentication under OCGA § 24-9-901.
3. Whether the trial court plainly erred by failing to instruct the jury that conspiracy was a lesser-included offense when Rainey was charged as a party to a crime.

HOLDINGS

1. The evidence was constitutionally sufficient to support Rainey's first-degree home-invasion conviction because, although she had authority to enter the rooming house generally, the evidence showed that she was a party to the entry into Medina's separately rented bedroom, which she and the armed man lacked authority to enter.
2. The trial court did not plainly err by admitting testimony identifying Rainey's voice because testimony from witnesses who had frequent prior interactions with her was sufficient to authenticate the voice under OCGA § 24-9-901.
3. The failure to give a conspiracy instruction was not plain error because Rainey did not request the instruction in writing.

KEY QUOTATIONS

“the failure to charge on a lesser crime than the crime included in the indictment, without a written request by the State or the accused, is not error.” (at 15)

“When authenticating evidence, the proponent must present sufficient evidence to make out a prima facie case that the proffered evidence is what it purports to be. Once that prima facie case is established, the evidence is admitted, and the ultimate question of authenticity is decided by the jury.” (at 14)

FACTUAL BACKGROUND

Rainey lived in a rooming house with the victims, who rented separate bedrooms, and tensions had developed between Rainey and two residents. During the early-morning shooting, witnesses testified that Rainey accompanied armed individuals into the house and directed them to the bedrooms of Kinsey and Medina; both men were shot, and Rainey's former boyfriend, Joshua Ellison, died from a gunshot wound. Evidence also included witness identifications of Rainey's voice, statements attributed to Rainey after the shooting, cell-phone-location records, and ballistic evidence involving three firearms.

PROCEDURAL HISTORY

A Fulton County grand jury indicted Rainey on multiple felony charges. A jury found her guilty after a November 15-18, 2022 trial, and the trial court imposed the stated prison sentences; one felony-murder count was vacated by operation of law. The trial court denied Rainey's amended motion for new trial on July 14, 2025, and Rainey timely appealed to the Supreme Court of Georgia, which decided the appeal on the briefs.

DISPOSITION

affirmed

CASES CITED

- Pierce v. State, 319 Ga. 846, 849-50 (2024)
- Charles v. State, 315 Ga. 651, 653 (2023)
- Render v. State, 320 Ga. 890, 899 (2025)
- Edwards v. State, 308 Ga. 176, 182 (2020)
- Henderson v. State, 317 Ga. 66, 87 (2023)
- Lewis v. State, 322 Ga. 683, 687 (2025)
- Wipfel v. State, 320 Ga. 84, 91 (2024)
- Hardy v. State, 317 Ga. 736, 741 n.10 (2023)