

SUPREME COURT OF GEORGIA

Glover v. State

No. S26A0418 (Ga. June 2, 2026) · No. S26A0418 · Decided June 2, 2026

SUMMARY

The Supreme Court of Georgia affirmed Albert Glover’s convictions and life-without-parole sentence for the malice murder of his cellmate, rejecting challenges based on sufficiency of the evidence, self-defense, evidentiary rulings, disclosure of a witness’s pecuniary interest, and ineffective assistance of counsel. The court held that the evidence was sufficient for the jury to reject self-defense, any assumed evidentiary error was harmless, the disclosure claims were waived, and counsel’s strategic decisions did not constitute deficient performance. The court also rejected Glover’s cumulative-error claim.

CASE DETAILS

COURT	Supreme Court of Georgia
WRITING FOR THE COURT	Bethel, Justice; all participating Justices
JURISDICTION	Supreme Court of Georgia
DECIDED	June 2, 2026
DOCKET	S26A0418
DISPOSITION	affirmed
PROCEDURAL POSTURE	Glover appealed his convictions for malice murder and the denial of his amended motion for new trial, raising challenges to the sufficiency of the evidence, evidentiary rulings, disclosure of a witness's pecuniary interest, plain error, ineffective assistance of counsel, and cumulative error.
STANDARD OF REVIEW	Constitutional sufficiency of the evidence is reviewed under whether, viewing the evidence in the light most favorable to the prosecution, any rational trier of fact could have found the essential elements beyond a reasonable doubt. Evidentiary rulings are reviewed for abuse of discretion, with reversal for nonconstitutional exclusionary error only if the error was harmful. Unpreserved evidentiary error is reviewed for plain error. Ineffective assistance is reviewed under the deficient-performance and prejudice requirements of Strickland.
PRECEDENTIAL VALUE	Published opinion; precedential decision of the Supreme Court of Georgia.

TOPICS

criminal procedure

self defense

evidence

ineffective assistance

appellate procedure

PRACTICE AREAS

Criminal law

Criminal procedure

Evidence

Appellate procedure

Post-conviction review

QUESTIONS PRESENTED

1. Whether the evidence was constitutionally sufficient to support Glover's malice-murder conviction despite his claim of self-defense.
2. Whether the trial court abused its discretion by excluding a certified transcript of Dawson's prior guilty-plea hearing for murder.
3. Whether the State violated *Brady v. Maryland* or Georgia's reciprocal-discovery statute by failing to disclose a witness's request for financial compensation before trial.
4. Whether the trial court plainly erred by admitting a former cellmate's statement without a sufficient foundation as a prior inconsistent statement.
5. Whether trial counsel was constitutionally ineffective for failing to object to admission of the former cellmate's statement.
6. Whether cumulative trial error required reversal.

HOLDINGS

1. The evidence was sufficient to authorize a rational jury to find Glover guilty of malice murder and reject his self-defense claim. The State disproved justification beyond a reasonable doubt through evidence that Dawson was strangled while face down, struggled during the attack, took a substantial time to die, and Glover suffered no visible injuries.
2. Even assuming the trial court abused its discretion and that Glover preserved the claim, any error in excluding the transcript was harmless because the evidence was cumulative, did not corroborate the disputed fact that Dawson told Glover about the conviction, and was highly unlikely to have contributed to the verdict.
3. Glover waived appellate review of his claims that the State violated *Brady* and OCGA § 17-16-4 by failing to disclose a witness's request for financial compensation because he did not raise either objection at trial despite having an opportunity to do so.
4. Glover could not establish plain error because trial counsel affirmatively waived any objection by withdrawing the objection and strategically using portions of the statement to support the self-defense theory.
5. Glover failed to establish ineffective assistance because he did not show deficient performance or prejudice from counsel's decision not to object to the former cellmate's statement.

6. Glover was not entitled to relief for cumulative error because he failed to establish at least two trial errors.

KEY QUOTATIONS

“When a defendant raises a justification defense at trial, the State has the burden of disproving that defense beyond a reasonable doubt.” (4)

“To show plain error, Glover must show: (1) there was a legal error that was not affirmatively waived; (2) the error was clear or obvious; (3) the error affected his substantial rights, meaning it likely affected the outcome of the proceedings; and (4) the error seriously affected the fairness, integrity, or public reputation of judicial proceedings.” (10)

“To prevail on this claim, Glover bears the burden of showing both that his counsel’s performance was professionally deficient and that he suffered prejudice as a result of that deficient performance.” (12)

FACTUAL BACKGROUND

Glover and Michael Dawson were cellmates at Baldwin State Prison. On December 25, 2019, officers found Dawson face down in the cell with strangulation marks; the medical examiner concluded that Dawson had been manually strangled and then strangled with a ligature, while Glover had no visible injuries. Glover admitted killing Dawson but claimed he acted in self-defense after Dawson made an unwanted sexual advance, although Glover declined to describe the killing itself.

PROCEDURAL HISTORY

A Baldwin County grand jury indicted Glover for malice murder, felony murder predicated on aggravated assault, and aggravated assault. After a June 2022 jury trial, he was convicted on all counts and sentenced to life without parole for malice murder; the remaining counts merged or were vacated by operation of law. The superior court denied his amended motion for new trial on September 9, 2025, and Glover timely appealed to the Supreme Court of Georgia, which affirmed.

DISPOSITION

affirmed

CASES CITED

- Jackson v. Virginia, 443 U.S. 307, 319 (1979)
- Yarn v. State, 305 Ga. 421, Yarn v. State, 305 Ga. 421, 423 (2019)
- Frison v. State, 323 Ga. 156, 160 (2025)
- Goodson v. State, 305 Ga. 246, 248 (2019)
- Gude v. State, 313 Ga. 859, 863 (2022)
- Willerson v. State, 312 Ga. 369, 373 (2021)
- Tarver v. State, 319 Ga. 165, 169-73 (2024)

- Mbungu v. State, 322 Ga. 564, 567-68 (2025)
- United States v. James, 169 F.3d 1210, 1214-15 (9th Cir. 1999) (en banc)
- Walton v. State, 322 Ga. 401, 407-08 (2025)
- Clark v. State, 321 Ga. 732, 736 n.3 (2025)
- Brady v. Maryland, 373 U.S. 83 (1963)
- Walker v. State, 288 Ga. 174, 179 (2010)
- Danenberg v. State, 291 Ga. 439, 442 (2012)
- Johnson v. State, 316 Ga. 672, 686 (2023)
- Washington v. State, 312 Ga. 495, 498-99 (2021)
- Griffin v. State, 309 Ga. 860, 865-67 (2020)
- Tyner v. State, 305 Ga. 326, 331 n.4 (2019)
- Strickland v. Washington, 466 U.S. 668, 687 (1984)
- Lee v. State, 318 Ga. 412, 420, 428-29 (2024)
- Vivian v. State, 312 Ga. 268, 273-74 (2021)
- Blalock v. State, 320 Ga. 694, 700 (2025)
- Moss v. State, 322 Ga. 757, 769 (2025)