

SUPREME COURT OF GEORGIA

Tyler v. State

Tyler v. State · No. S21A0553 · Decided June 1, 2021

SUMMARY

The Supreme Court of Georgia affirmed Charles Tyler’s convictions for felony murder predicated on aggravated assault, armed robbery, burglary, and possession of a firearm during the commission of a felony. The court held that the evidence was constitutionally sufficient and excluded every reasonable hypothesis other than Tyler’s guilt, including evidence linking him to the stolen copper, crime-scene tire and boot impressions, and equipment used in the theft.

CASE DETAILS

COURT	Supreme Court of Georgia
WRITING FOR THE COURT	Bethel, Justice; All Justices
JURISDICTION	Georgia
DECIDED	June 1, 2021
DOCKET	S21A0553
DISPOSITION	affirmed
PROCEDURAL POSTURE	Tyler appealed his convictions for felony murder, armed robbery, burglary, and possession of a firearm during the commission of a felony, challenging the sufficiency of the evidence supporting each conviction.
STANDARD OF REVIEW	Under the Fourteenth Amendment, the question is whether, viewing the evidence in the light most favorable to the verdict and deferring to the jury's assessment of weight and credibility, any rational trier of fact could have found the defendant guilty beyond a reasonable doubt. Under former OCGA § 24-4-6, a conviction based on circumstantial evidence is sustainable when the proved facts exclude every other reasonable hypothesis except the defendant's guilt; whether an alternative hypothesis is reasonable is generally for the jury unless the finding is insupportable as a matter of law.
PRECEDENTIAL VALUE	binding
PARTIES	Charles Tyler v. The State

TOPICS

criminal procedure

evidence

burden of proof

standard of review

appellate procedure

PRACTICE AREAS

criminal law

criminal procedure

appellate litigation

QUESTIONS PRESENTED

1. Whether the evidence was constitutionally sufficient to support Tyler's convictions for felony murder, armed robbery, burglary, and possession of a firearm during the commission of a felony.
2. Whether the circumstantial evidence excluded every other reasonable hypothesis except Tyler's guilt under former OCGA § 24-4-6.
3. Whether the evidence was sufficient to show that Tyler's use of a firearm occurred before or contemporaneously with the taking of the copper, as required for the armed-robbery and firearm-possession convictions.

HOLDINGS

1. The evidence was sufficient for the jury to find that Tyler shot Fulkrod during the commission of a felony and thereby support the felony-murder conviction.
2. The evidence was sufficient to support Tyler's burglary conviction.
3. The evidence was sufficient to establish that Tyler used the firearm before or contemporaneously with taking the copper, thereby supporting the armed-robbery and possession-of-a-firearm convictions.
4. The evidence, even if entirely circumstantial, was sufficient to exclude every reasonable hypothesis other than Tyler's guilt.

KEY QUOTATIONS

“When evaluating the sufficiency of evidence as a matter of federal due process under the Fourteenth Amendment of the United States Constitution, the proper standard of review is whether a rational trier of fact could have found the defendant guilty beyond a reasonable doubt.” (at 7)

“To warrant a conviction on circumstantial evidence, the proved facts shall not only be consistent with the hypothesis of guilt, but shall exclude every other reasonable hypothesis save that of the guilt of the accused.” (at 8)

FACTUAL BACKGROUND

Tyler, a former employee of CMC Recycling Augusta, rented a U-Haul truck and a storage unit shortly before a security guard, David Fulkrod, was shot and killed at the recycling facility. Copper was stolen from the facility, and investigators linked Tyler to the crimes through copper found in the U-Haul and storage unit, matching tire and boot impressions, and documents reflecting knowledge of forklifts, U-Haul rentals, and CMC Recycling locations. The evidence also supported an inference that Tyler shot Fulkrod before entering the facility and taking the copper.

PROCEDURAL HISTORY

A Richmond County jury found Tyler not guilty of malice murder and guilty of felony murder predicated on aggravated assault, armed robbery, burglary, and possession of a firearm during the commission of a felony. The trial court imposed consecutive sentences, denied Tyler's amended motion for new trial, and Tyler appealed. After an earlier remand to complete the record, the case was redocketed in the Supreme Court of Georgia and submitted for decision on the briefs.

DISPOSITION

affirmed

CASES CITED

- Jackson v. Virginia, 443 U. S. 307, 319 (III) (B) (99 SCt 2781, 61 LE2d 560) (1979)
- Hayes v. State, 292 Ga. 506, 506 (739 SE2d 313) (2013)
- Graham v. State, 301 Ga. 675, 677 (1) (804 SE2d 113) (2017)
- Johnson v. State, 307 Ga. 44, 48 (2) (834 SE2d 83) (2019)
- Bamberg v. State, 308 Ga. 340, 343 (1) (a) (839 SE2d 640) (2020)
- Gibson v. State, 300 Ga. 494, 495 (1) n.4 (796 SE2d 712) (2017)
- Blackshear v. State, 309 Ga. 479, 484 (1) (847 SE2d 317) (2020)
- Harrington v. State, 300 Ga. 574, 577 (2) (a) (797 SE2d 107) (2017)
- Hester v. State, 282 Ga. 239, 240 (2) (647 SE2d 60) (2007)
- Lumpkin v. State, 310 Ga. 139, 146 (1) (a) (849 SE2d 175, 182) (2020)
- Johnson v. State, 307 Ga. 44, 49-50 (2) (b) (834 SE2d 83) (2019)
- Vega v. State, 285 Ga. 32, 33 (673 SE2d 223) (2009)
- Miranda v. Arizona, 384 U. S. 436 (86 SCt 1602, 16 LE2d 694) (1966)