

COURT OF APPEALS OF THE STATE OF MISSISSIPPI

Adrian Tamilrah Moore a/k/a Adrian Moore a/k/a Adrin Moore v.
State of Mississippi

Moore v. State · No. 2024-KA-00507-COA · Decided February 3, 2026

SUMMARY

The Mississippi Court of Appeals affirmed Adrian Moore’s convictions for heroin trafficking, methamphetamine possession, and PCP possession. The court held that the stipulated forensic laboratory report and evidence concerning homogeneous pills were sufficient to support the heroin and methamphetamine convictions, despite testing only some dosage units. The court also held that the indictment and evidence sufficiently established possession of ten or more dosage units of PCP because Mississippi law defines one milliliter of liquid solution as one dosage unit.

CASE DETAILS

COURT	Court of Appeals of the State of Mississippi
WRITING FOR THE COURT	Wilson, P.J.; Barnes, C.J.; Carlton, P.J.; Westbrook, J.; McDonald, J.; Lawrence, J.; McCarty, J.; Emfinger, J.; Weddle, J.; Lassitter St. Pé, J.
JURISDICTION	Mississippi Court of Appeals
DECIDED	February 3, 2026
DOCKET	2024-KA-00507-COA
DISPOSITION	affirmed
PROCEDURAL POSTURE	Direct criminal appeal from jury convictions for heroin trafficking, possession of methamphetamine, and possession of phencyclidine (PCP), challenging the sufficiency of the evidence supporting all three convictions.
STANDARD OF REVIEW	Sufficiency-of-the-evidence challenges are reviewed de novo. The evidence is viewed in the light most favorable to the prosecution, accepting credible evidence supporting guilt as true and drawing favorable inferences for the prosecution; the conviction is affirmed if rational, reasonable, fair-minded jurors could find every essential element beyond a reasonable doubt.
PRECEDENTIAL VALUE	published

PARTIES

Adrian Tamilrah Moore a/k/a Adrian Moore a/k/a Adrin Moore v. State of Mississippi

TOPICS

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QUESTIONS PRESENTED

1. Whether sufficient evidence supported Moore's heroin-trafficking conviction when only three of 43 heroin dosage units were tested.
2. Whether sufficient evidence supported Moore's methamphetamine-possession conviction when only three of 28 methamphetamine dosage units were tested.
3. Whether sufficient evidence supported Moore's PCP-possession conviction when the PCP was liquid and the indictment alleged possession of ten or more dosage units.
4. Whether Moore's challenges to the laboratory report and testing procedures were waived, procedurally barred, or subject to plain-error review.

HOLDINGS

1. Moore's challenge was waived and independently barred by the invited-error doctrine; no plain error occurred because no legal rule barred a defendant from stipulating to the admissibility of a drug-analysis report.
2. The evidence was sufficient for a rational juror to find beyond a reasonable doubt that Moore possessed 40 or more dosage units of heroin.
3. The evidence was sufficient for a rational juror to find beyond a reasonable doubt that Moore possessed at least 20 dosage units of methamphetamine.
4. The evidence supported Moore's PCP conviction because Mississippi law defines one dosage unit of a liquid solution as one milliliter; 13 milliliters therefore constituted at least ten dosage units.

KEY QUOTATIONS

"We review challenges to the sufficiency of the evidence de novo." (§9)

"Rather, random testing is permissible when the seized samples are sufficiently homogeneous so that one may infer beyond a reasonable doubt that the untested samples contain the same substance as those that are conclusively tested." (§14)

"Dosage unit . . . means a tablet or capsule, or in the case of a liquid solution, one (1) milliliter." (§20)

FACTUAL BACKGROUND

Deputies stopped Moore's vehicle after observing it swerving and traveling at high speed. During the stop, officers smelled marijuana and searched the vehicle, finding pills, a bottle of brown liquid, and other suspected drugs in a purse associated with Moore. Laboratory testing identified 43 dosage units of heroin, 28 dosage units of methamphetamine, and 13 milliliters of PCP, although only three heroin units and three methamphetamine units were tested. Moore stipulated to admission of the laboratory report, but at trial claimed the purse and drugs belonged to the passenger; body-camera footage and Moore's statements contradicted portions of that account.

PROCEDURAL HISTORY

Following a jury trial in the Newton County Circuit Court, Moore was convicted of trafficking heroin, possessing methamphetamine, and possessing PCP. The circuit court imposed an eight-year sentence for heroin trafficking, a concurrent five-year sentence for methamphetamine possession, and a consecutive five-year suspended sentence with five years of post-release supervision for PCP possession. Moore moved for a directed verdict at trial but did not file a motion for a new trial or judgment notwithstanding the verdict; after changes in appellate representation, she filed a supplemental brief challenging the sufficiency of the evidence. The Mississippi Court of Appeals affirmed.

DISPOSITION

affirmed

CASES CITED

- Lindsey v. State, 939 So. 2d 743 (Miss. 2005)
- Sanford v. State, 247 So. 3d 1242, 1244 (¶10) (Miss. 2018)
- Poole v. State, 46 So. 3d 290, 293-94 (¶20) (Miss. 2010)
- Johnson v. State, 904 So. 2d 162, 166 (¶7) (Miss. 2005)
- Williamson v. State, 375 So. 3d 1158, 1167 (¶19) (Miss. Ct. App. 2023)
- Keys v. State, 33 So. 3d 1143, 1149-50 (¶22) (Miss. Ct. App. 2009)
- Bogan v. State, 754 So. 2d 1289, 1294 (¶19) (Miss. 2000)
- Green v. State, 183 So. 3d 28, 31 (¶6) (Miss. 2016)
- Wells v. State, 396 So. 3d 1084, 1086 (¶9) (Miss. 2024)
- Thomas v. State, 249 So. 3d 331, 347 (¶55) (Miss. 2018)
- O'Kelly v. State, 267 So. 3d 282, 289-90 (¶¶26-28) (Miss. Ct. App. 2018)
- Fay v. State, 133 So. 3d 841, 844-45 (¶¶7-11) (Miss. 2013)
- Alford v. State, 367 So. 3d 1013, 1020-21 (¶¶26-31) (Miss. Ct. App. 2023)