

SUPREME COURT OF GEORGIA

Sapp v. State

300 Ga. 768 (2017) · Decided March 20, 2017

SUMMARY

The Supreme Court of Georgia affirmed Timothy Sapp’s convictions for malice murder and related firearm offenses arising from the shooting death of Christopher Smith. The court held that the trial evidence, including witness testimony, surveillance footage, firearms evidence, clothing fibers, and Sapp’s inconsistent statements, was sufficient for a rational trier of fact to find guilt beyond a reasonable doubt.

CASE DETAILS

COURT	Supreme Court of Georgia
WRITING FOR THE COURT	Hunstein, Justice
JURISDICTION	Georgia
DECIDED	March 20, 2017
DISPOSITION	affirmed
PROCEDURAL POSTURE	After a jury convicted Sapp of malice murder, felony murder predicated on aggravated assault, aggravated assault, and firearm offenses, he appealed to challenge the sufficiency of the evidence. The appeal was transferred from the Georgia Court of Appeals to the Supreme Court of Georgia.
STANDARD OF REVIEW	Whether, viewing the evidence in the light most favorable to the verdict, a rational trier of fact could have found the defendant guilty beyond a reasonable doubt. The court does not reweigh the evidence or resolve conflicts in testimony.
PRECEDENTIAL VALUE	Published precedential opinion
PARTIES	Timothy Sapp v. State

TOPICS

- criminal procedure
- evidence
- standard of review
- reasonable doubt
- appellate procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the evidence was sufficient to support Sapp's convictions when the State's case was characterized as circumstantial.
2. Whether the evidence, viewed under the applicable reasonable-doubt standard, authorized the jury to find Sapp guilty of the charged offenses.

HOLDINGS

1. The evidence was sufficient for a rational trier of fact to find Sapp guilty beyond a reasonable doubt of the offenses for which he was convicted.
2. The circumstantial evidence and evidence of Sapp's presence, companionship, and conduct before and after the offense were sufficient to support the convictions; mere presence alone is not sufficient, but criminal intent may be inferred from presence, companionship, and conduct.

KEY QUOTATIONS

"This Court does not reweigh evidence or resolve conflicts in testimony; instead, evidence is reviewed in a light most favorable to the verdict, with deference to the jury's assessment of the weight and credibility of the evidence." (769)

"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." (769)

FACTUAL BACKGROUND

Sapp and his brother went to an apartment complex where the victim, Christopher Smith, was later shot twice and died from a gunshot wound. Evidence connected Sapp to the shooting, including surveillance footage showing him dressed in black and carrying a book bag, testimony that he changed clothes shortly afterward, firearms found in the bag, shell casings, fiber evidence linking his jeans to the victim's shirt, and inconsistent statements to police. The jury convicted Sapp of murder-related and firearm offenses.

PROCEDURAL HISTORY

A Camden County grand jury indicted Sapp and his brother on murder, aggravated assault, armed robbery, and firearm charges. Sapp was tried alone from January 13 through January 16, 2014. The trial court granted a directed verdict on the armed-robbery-based felony-murder and armed-robbery counts; the jury convicted Sapp on the remaining charges. The trial court imposed life imprisonment without parole for malice murder and consecutive five-year sentences for the firearm offenses, denied Sapp's amended motion for new trial, and Sapp appealed.

DISPOSITION

affirmed

CASES CITED

- Jackson v. Virginia, 443 U.S. 307 (1979)
- Hayes v. State, 292 Ga. 506, 506 (739 S.E.2d 313) (2013)
- Belsar v. State, 276 Ga. 261, 262 (1) (577 S.E.2d 569) (2003)
- Thomas v. State, 300 Ga. 433, 436 (1) (796 S.E.2d 242) (2017)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/state/georgia-supreme-court-of-georgia/2017/sapp-v-state-n1u57uo0>