

SUPREME COURT OF GEORGIA

Edwards v. The State

S25A1298 · No. S25A1298 · Decided December 9, 2025

SUMMARY

The Supreme Court of Georgia affirmed Jalon Dante Edwards’s convictions arising from the shooting death of DeCoby Barlow. The court held that challenges to the sufficiency of evidence supporting merged or vacated counts were moot, and that the unobjected-to jury instructions on justification, transferred justification, and excessive force did not constitute plain error. The court also rejected Edwards’s claims concerning severance, juror removal, and ineffective assistance of counsel.

CASE DETAILS

COURT	Supreme Court of Georgia
WRITING FOR THE COURT	Justice Bethel
JURISDICTION	Supreme Court of Georgia
DECIDED	December 9, 2025
DOCKET	S25A1298
DISPOSITION	affirmed
PROCEDURAL POSTURE	Direct appeal from the denial of an amended motion for new trial following convictions for malice murder and other crimes.
STANDARD OF REVIEW	Sufficiency challenges to convictions on merged or vacated counts were moot. Unobjected-to jury-instruction claims were reviewed for plain error. Denial of a motion to sever was reviewed for abuse of discretion. Ineffective-assistance claims were reviewed under the deficient-performance and prejudice requirements of Strickland.
PRECEDENTIAL VALUE	Published and precedential
PARTIES	Jalon Dante Edwards v. The State

TOPICS

- criminal procedure
- appellate procedure
- jury instructions
- standard of review
- ineffective assistance

PRACTICE AREAS

- criminal law
- criminal procedure
- appellate procedure
- evidence
- constitutional law

QUESTIONS PRESENTED

1. Whether challenges to the sufficiency of the evidence supporting the felony-murder and aggravated-assault counts were moot because those counts were vacated or merged.
2. Whether the trial court plainly erred by instructing the jury on justification, transferred justification, and excessive force using the phrase 'the victim's use of unlawful force.'
3. Whether the trial court abused its discretion by denying Edwards's motion to sever his trial from those of his co-defendants.
4. Whether Edwards waived appellate review by affirmatively requesting that a juror with safety concerns remain on the jury.
5. Whether trial counsel was constitutionally ineffective for failing to seek removal of that juror and for failing to object to the excessive-force instruction.

HOLDINGS

1. Challenges to the sufficiency of evidence supporting counts that were vacated or merged into another conviction are moot.
2. The trial court did not plainly err by instructing the jury that excessive force is unjustified if it exceeded the force reasonably believed necessary to defend against the victim's unlawful force, where the charge as a whole adequately explained justification and transferred justification.
3. The trial court did not abuse its discretion in denying severance because Edwards failed to clearly show that the joint trial was so prejudicial as to deny due process.
4. Edwards waived appellate review of the trial court's failure to remove the juror because he expressly requested that the juror remain on the jury.
5. Edwards failed to establish ineffective assistance based on counsel's failure to seek removal of the juror or object to the excessive-force instruction.

KEY QUOTATIONS

“Considering the excessive force instruction in the context of the entire jury charge, as we must, we conclude that Edwards has failed to show that the alleged instructional error likely affected the outcome of the trial.”

(6)

“When, as here, a trial court makes no explicit findings in ruling on a motion that does not require such findings to be made, we presume that the trial court implicitly made all the findings in support of its ruling that the record would allow.” (12)

FACTUAL BACKGROUND

Edwards and co-defendants were involved in a dispute at a nightclub on December 8, 2018. During and after a scuffle, multiple people, including Edwards, fired weapons outside the club, resulting in DeCoby Barlow being struck and killed by a bullet fired from Edwards's Glock handgun. Surveillance footage, eyewitness testimony, and ballistics evidence supported the State's case that Edwards and others participated in the shooting.

PROCEDURAL HISTORY

A Henry County grand jury indicted Edwards and two co-defendants for malice murder, felony murder, aggravated assault, and firearm offenses. Following a jury trial in January and February 2020, Edwards was convicted on all counts and sentenced to life imprisonment for malice murder, twenty years concurrent for aggravated assault, and five years consecutive for possession of a firearm during the commission of a felony; other counts were vacated or merged. The trial court denied Edwards's amended motion for new trial, later vacated and re-entered that order, and Edwards timely appealed. The Supreme Court of Georgia affirmed.

DISPOSITION

affirmed

CASES CITED

- Sims v. State, 321 Ga. 627 (2025)
- Milton v. State, 318 Ga. 737, 742 n.5 (2024)
- Hill v. State, 310 Ga. 180, 194 (2020)
- Hill v. State, 321 Ga. 177, 181 (2025)
- Howard v. State, 307 Ga. 12, 22 (2019)
- Johnson v. State, 315 Ga. 876, 889 n.11 (2023)
- Gold v. State, 319 Ga. 149, 151 (2024)
- Allen v. State, 290 Ga. 743, 746 (2012)
- Robbins v. State, 320 Ga. 19, 25–26 (2024)
- Patel v. State, 278 Ga. 403, 405 (2004)
- Campbell v. State, 320 Ga. 333, 339 (2024)
- Saylor v. State, 316 Ga. 225, 230–31 (2023)
- Bolden v. State, 278 Ga. 459, 462 (2004)
- Chapman v. State, 322 Ga. 237, 247 (2025)
- Smith v. State, 290 Ga. 428, 430 (2012)
- Guffie v. State, 304 Ga. 352, 355 (2018)
- Tabor v. State, 315 Ga. 240, 251 (2022)
- Draughn v. State, 311 Ga. 378, 385–86 (2021)
- Strickland v. Washington, 466 U.S. 668, 687 (1984)
- Smith v. State, 315 Ga. 357, 365 (2022)
- Williams v. State, 316 Ga. 304, 314–15 (2023)
- Payne v. State, 313 Ga. 218, 223 (2022)
- Neuman v. State, 311 Ga. 83, 96–97 (2021)
- Mohamed v. State, 307 Ga. 89, 93 (2019)
- Capps v. State, 300 Ga. 6, 12–13 (2016)

- Shaw v. State, 292 Ga. 871, 876 (2013)
- Hampton v. State, 302 Ga. 166, 168–69 (2017)

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