

SUPREME COURT OF GEORGIA

Jackson v. The State

S25A1498 (Ga. Mar. 3, 2026) · No. S25A1498 · Decided March 3, 2026

SUMMARY

The Supreme Court of Georgia affirmed Quintavious Jackson’s convictions for felony murder and related offenses arising from the shooting death of Sulaiman Jalloh. The court held that the evidence was sufficient to establish Jackson’s participation as a party to the crimes, rejected his evidentiary and ineffective-assistance claims, and upheld the discretionary life-without-parole sentence. However, it vacated the sentences imposed on both felony-murder counts and remanded for resentencing because only one felony-murder sentence may be imposed for a single homicide.

CASE DETAILS

COURT	Supreme Court of Georgia
WRITING FOR THE COURT	Ellington, Justice; All Justices concurring
JURISDICTION	Supreme Court of Georgia
DECIDED	March 3, 2026
DOCKET	S25A1498
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Jackson appealed the denial of his motion for new trial following convictions for felony murder and related offenses. The Supreme Court of Georgia affirmed the judgment in part, vacated the sentences in part, and remanded for resentencing.
STANDARD OF REVIEW	Constitutional sufficiency of the evidence is reviewed by viewing the evidence in the light most favorable to the verdict and asking whether any rational trier of fact could have found guilt beyond a reasonable doubt. The court defers to the jury on conflicts in evidence, witness credibility, and reasonable inferences. A trial court's ruling on the general grounds for a new trial is not subject to appellate review when the trial court exercised its thirteenth-juror discretion. Evidentiary rulings are reviewed for abuse of discretion, but an unpreserved evidentiary claim is reviewed for plain error. Ineffective-assistance claims are governed by Strickland's deficiency-and-prejudice test. Sentencing issues are reviewed for legal error, with a presumption that

	the trial court understood and exercised its sentencing discretion absent contrary record evidence.
PRECEDENTIAL VALUE	published
PARTIES	Quintavious Jackson v. The State

TOPICS

criminal procedure sentencing evidence appellate procedure standard of review

PRACTICE AREAS

criminal law criminal procedure evidence sentencing appellate procedure

QUESTIONS PRESENTED

1. Whether the evidence was constitutionally sufficient to prove that Jackson was a party to the felony murders, armed robbery, aggravated assault, and firearm offense.
2. Whether the trial court erred by denying Jackson's motion for a new trial on the statutory general grounds that the verdict was contrary to the evidence, justice, and equity or was strongly against the weight of the evidence.
3. Whether the trial court plainly erred by admitting a detective's lay identification of Jackson and his conduct in surveillance video.
4. Whether the trial court erroneously believed that life without parole was mandatory for Jackson's felony-murder convictions under the recidivist statute.
5. Whether trial counsel provided ineffective assistance by failing to object to the life-without-parole sentence and agreeing that the court was required to impose it.
6. Whether the trial court erred by imposing sentences on both felony-murder counts arising from a single homicide and by failing to resentence the related predicate and firearm offenses.

HOLDINGS

1. The evidence was constitutionally sufficient for a rational jury to find beyond a reasonable doubt that Jackson was an active participant and party to the felony murders and related offenses, even though Dorsey was the shooter.
2. The Supreme Court could not review the merits of Jackson's claim that the verdict was contrary to the evidence, justice, and equity or strongly against the weight of the evidence because the trial court properly exercised its thirteenth-juror discretion.
3. The trial court did not plainly err by admitting the detective's testimony identifying Jackson and describing his conduct in the surveillance video.
4. The trial court did not err by sentencing Jackson to life without the possibility of parole because the record showed that the court understood the sentence was discretionary and exercised that discretion.

5. Jackson failed to establish ineffective assistance because, even assuming counsel performed deficiently by believing life without parole was mandatory, Jackson did not show a reasonable probability that the sentence would have been different.
6. When multiple felony-murder verdicts arise from a single homicide, all but one felony-murder count are surplusage and must be vacated; the sentences for the felony-murder counts and related predicate offenses must be vacated and the case remanded for resentencing.

KEY QUOTATIONS

“a person’s mere presence at the scene of the crime and mere approval of the criminal act are insufficient to establish that [he] was a party to the crime” (8)

“the merits of the trial court’s decision on the general grounds are not subject to our review, and the decision to grant a new trial on the general grounds is vested solely in the trial court.” (10-11)

“When a defendant is found guilty on multiple counts of murder for a single homicide, all additional counts beyond one for which the defendant is sentenced are surplusage and must be vacated.” (20)

FACTUAL BACKGROUND

Jackson and co-defendant Cordarius Dorsey spent approximately thirty minutes together at a DeKalb County gas station before Dorsey approached Sulaiman Jalloh’s vehicle with a handgun. Jackson moved behind the vehicle as if acting as a lookout, joined Dorsey during the struggle, took a blue bag from Jalloh, and fled while Dorsey shot Jalloh in the chest. Surveillance footage, witness testimony, identification evidence, social-media and driver’s-license images, and DNA evidence connecting Jackson and Dorsey to a hat supported the State’s case. The bags taken from Jalloh’s vehicle contained more than \$30,000 in cash.

PROCEDURAL HISTORY

A DeKalb County jury acquitted Jackson of malice murder but convicted him of two counts of felony murder, armed robbery, aggravated assault, and possession of a firearm during the commission of a felony. The trial court imposed concurrent life-without-parole sentences on both felony-murder counts and a consecutive five-year sentence for the firearm conviction, merging the predicate offenses into the felony-murder counts. The trial court denied Jackson’s motion for new trial, and Jackson timely appealed. The Supreme Court affirmed the convictions and most sentencing rulings but vacated the sentences affected by the duplicative felony-murder convictions and remanded for resentencing.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Vacate the sentences for the duplicative felony-murder convictions and the predicate felony sentences affected by that error. Resentence Jackson on a single felony-murder conviction, determine which felony-murder verdict is vacated, reconsider the remaining predicate felony and whether remaining non-murder felonies merge as a

matter of fact, and resentence the firearm-possession conviction because its consecutive sentence was linked to the vacated felony-murder sentences.

CASES CITED

- McGruder v. State, 303 Ga. 588, 591 (2018)
- Felts v. State, 311 Ga. 547, 552 (2021)
- Williams v. State, 304 Ga. 658, 662 (2018)
- Moore v. State, 311 Ga. 506, 509 (2021)
- Butler v. State, 313 Ga. 675, 679 (2022)
- Shellman v. State, 318 Ga. 71, 74 (2024)
- Hooks v. State, 318 Ga. 850, 852 (2024)
- Ridley v. State, 315 Ga. 452, 455 (2023)
- Grant v. State, 298 Ga. 835, 837 (2016)
- Mohamed v. State, 307 Ga. 90 (2020)
- Frazier v. State, 308 Ga. 450, 453-454 (2020)
- King v. State, 316 Ga. 611, 616 (2023)
- Holmes v. State, 306 Ga. 524, 528 (2019)
- Gates v. State, 298 Ga. 324, 327 (2016)
- Lee v. State, 322 Ga. 44, 59 (2025)
- Glenn v. State, 302 Ga. 276, 279 (2017)
- Bullard v. State, 307 Ga. 482, 493 (2019)
- Lewis v. State, 311 Ga. 650, 664-665 (2021)
- Wilson v. State, Wilson v. State, 302 Ga. 106, 108
- Williams v. State, 316 Ga. 147, 152-153 (2023)
- Dozier v. State, 306 Ga. 29, 31-32 (2019)
- Strickland v. Washington, 466 U.S. 668, 687 (1984)
- Burke v. State, 320 Ga. 706, 708 (2025)
- Starks v. State, 320 Ga. 300, 304 (2024)
- Walton v. State, 303 Ga. 11, 17 (2018)
- Noel v. State, 297 Ga. 698, 700 (2015)
- Cowart v. State, 294 Ga. 333, 336 (2) (2013)