

LOUISIANA COURT OF APPEAL, FIRST CIRCUIT

State of Louisiana v. Samuel Lee Hamilton, Jr.

No. 2025 KW 1363 (La. Ct. App. 2026) · No. 2025 KW 1363 · Decided February 23, 2026

SUMMARY

The Louisiana Court of Appeal, First Circuit denied Samuel Lee Hamilton, Jr.'s application for supervisory writs. The court held that his challenge based on *Ramos v. Louisiana* was untimely because his conviction and sentence were final before *Ramos*, he had not established an exception to the post-conviction filing deadline, and the deadlines for related post-verdict motions had expired.

CASE DETAILS

COURT	Louisiana Court of Appeal, First Circuit
WRITING FOR THE COURT	Lanier, J.; Wolfe, J.; Hester, J.
JURISDICTION	Louisiana Court of Appeal, First Circuit
DECIDED	February 23, 2026
DOCKET	2025 KW 1363
DISPOSITION	writ_denied
PROCEDURAL POSTURE	Application for supervisory writs seeking post-conviction relief from the Nineteenth Judicial District Court's denial or rejection of a challenge to the conviction and sentence.
PRECEDENTIAL VALUE	unpublished
PARTIES	Samuel Lee Hamilton, Jr. v. State of Louisiana

TOPICS

- post-conviction relief
- criminal procedure
- appellate procedure
- preservation of error
- fourteenth amendment

PRACTICE AREAS

- criminal procedure
- post-conviction relief
- appellate procedure

QUESTIONS PRESENTED

- Whether Hamilton's post-conviction challenge based on the rule announced in *Ramos v. Louisiana* was timely and available when his conviction and sentence were final before *Ramos*.

2. Whether Hamilton could obtain post-conviction review of his sufficiency-of-the-evidence challenge after the deadlines for a motion for new trial and a motion for post-verdict judgment of acquittal had expired.

HOLDINGS

1. Ramos v. Louisiana is not retroactive in Louisiana, and a relator whose conviction and sentence were final before Ramos must establish a statutory exception to the post-conviction time limitation to proceed.
2. A sufficiency-of-the-evidence challenge is untimely as a request for post-conviction relief when the Article 930.8 period and the deadlines for motions for new trial and post-verdict judgment of acquittal have expired.

KEY QUOTATIONS

“If an application for postconviction relief is untimely under Article 930.8, it should not be considered on the merits.” (at 1)

FACTUAL BACKGROUND

Hamilton was convicted of attempted second-degree murder and received a sentence that was affirmed on direct appeal. His conviction and sentence were final when the United States Supreme Court decided Ramos v. Louisiana. He later challenged the sufficiency of the evidence through a post-conviction application, but the applicable post-conviction and post-verdict-motion deadlines had expired.

PROCEDURAL HISTORY

On direct appeal, the Louisiana Court of Appeal, First Circuit, affirmed Hamilton's attempted second-degree murder conviction and sentence. Hamilton later sought post-conviction relief, including an attack on the sufficiency of the evidence based on Ramos v. Louisiana. The First Circuit denied supervisory writs because the Ramos rule was not retroactive in Louisiana, the conviction and sentence were final before Ramos, no exception to the post-conviction time bar was established, and the applicable deadlines for post-verdict motions had expired.

DISPOSITION

writ_denied

CASES CITED

- State v. Hamilton, 561 So. 2d 1021 (La. App. 1st Cir. 1990) (unpublished)
- State v. Reddick, 2021-01893 (La. 10/21/22), 351 So. 3d 273, 283
- Ramos v. Louisiana, 590 U.S. 83, 140 S. Ct. 1390, 206 L. Ed. 2d 583 (2020)
- State v. LeBlanc, 2006-0169 (La. 9/15/06), 937 So. 2d 844 (per curiam)

OPINION

State Of Louisiana v. Samuel Lee Hamilton, Jr

PER CURIAM.

STATE OF LOUISIANA

COURT OF APPEAL, FIRST CIRCUIT

STATE OF LOUISIANA NO. 2025 KW 1363

VERSUS

SAMUEL LEE HAMILTON, JR. FEBRUARY 23, 2026

In Re: Samuel Lee Hamilton, Jr., applying for supervisory writs, 19th Judicial District Court, Parish of East Baton Rouge, No. 09-88-0898. BEFORE : LANIER, WOLFE, AND HESTER, JJ. WRIT DENIED. On direct appeal, this court affirmed relator's attempted second degree murder sentence and conviction. State v. Hamilton, 561 So.2d 1021 (La. App. 1st Cir. 1990) (unpublished), writ denied, 92-2929 (La. 1/13/94), 631 So.2d 1160. The new rule of criminal procedure announced in Ramos v. Louisiana, 590 U.S. 83, 140 S.Ct. 1390, 206 L.Ed.2d 583 (2020), is not retroactive in Louisiana. State v. Reddick, 2021-01893 (La. 10/21/22), 351 So.3d 273, 283. Relator's conviction and sentence were final at the time the Ramos decision was rendered, and he has not established an exception to the statutory time delay. See La. Code Crim. P. art. 930.8 (A) (1). Furthermore, the delays to file a motion for new trial and a motion for post-verdict judgment of acquittal have run. See La. Code Crim. P. arts. 821(A) & 853(A). Thus, relator's attack on the sufficiency of the evidence is untimely as a request for postconviction relief. If an application for postconviction relief is untimely under Article 930.8, it should not be considered on the merits. See State v. LeBlanc, 2006-0169 (La. 9/15/06), 937 So.2d 844 (per curiam). wi EW

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FOR THE COURT