

SUPREME COURT OF GEORGIA

Abebe v. State

Abebe · No. S26A0240 · Decided May 19, 2026

SUMMARY

The Supreme Court of Georgia affirmed Hailu Abebe’s convictions for murder and related offenses. The court held that the trial court properly declined to instruct the jury on Miranda waiver and statement voluntariness because Abebe’s statements were spontaneous, not the product of custodial interrogation, and unsupported by evidence of police coercion or inducement. The court also held that the requested instruction was not supported by sufficient evidence under federal or Georgia law.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                      |
|-----------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | Supreme Court of Georgia                                                                                                                                                                                                                             |
| WRITING FOR THE COURT | Bethel, Justice; All the Justices, except Warren, P. J., not participating                                                                                                                                                                           |
| JURISDICTION          | Supreme Court of Georgia                                                                                                                                                                                                                             |
| DECIDED               | May 19, 2026                                                                                                                                                                                                                                         |
| DOCKET                | S26A0240                                                                                                                                                                                                                                             |
| DISPOSITION           | affirmed                                                                                                                                                                                                                                             |
| PROCEDURAL POSTURE    | Appeal from the denial of a motion for new trial following convictions for murder and other crimes. The appeal challenged the trial court's refusal to give jury instructions concerning Miranda rights and the voluntariness of Abebe's statements. |
| STANDARD OF REVIEW    | Whether the evidence was sufficient to authorize a requested jury instruction is a question of law reviewed de novo. A requested instruction must be adjusted to the evidence and supported by at least slight evidence.                             |
| PRECEDENTIAL VALUE    | Published opinion of the Supreme Court of Georgia; precedential value subject to the court's reconsideration and the final official version.                                                                                                         |
| PARTIES               | Hailu Abebe v. The State                                                                                                                                                                                                                             |

TOPICS

- jury instructions
- miranda rights
- criminal procedure
- due process
- appellate procedure

## PRACTICE AREAS

criminal procedure

constitutional criminal procedure

evidence

jury instructions

appellate procedure

## QUESTIONS PRESENTED

1. Whether the trial court was required to instruct the jury to determine whether Abebe's statements to the arresting officer and statements made in the officer's presence were obtained in violation of Miranda because they followed custodial interrogation or its functional equivalent.
2. Whether the trial court was required to instruct the jury on the voluntariness of Abebe's statements under federal due process principles.
3. Whether the trial court was required to instruct the jury on voluntariness under Georgia statutory law governing confessions induced by hope of benefit or fear of injury.

## HOLDINGS

1. A jury instruction requiring the jury to determine whether Abebe knowingly and voluntarily waived his Miranda rights was unwarranted because the challenged statements were spontaneous and unsolicited and were not made in response to police interrogation or its functional equivalent.
2. A defendant is entitled to a federal due-process voluntariness instruction only when there is at least slight evidence of police coercion. Abebe identified no such evidence, so the trial court properly refused the instruction.
3. A defendant is entitled to a Georgia statutory voluntariness instruction only when there is at least slight evidence that the confession was induced by a hope of benefit or fear of injury. Abebe showed no such evidence, so the trial court properly refused the instruction.

## KEY QUOTATIONS

*“Miranda warnings must be administered when two factors are met: the accused is in custody, and is subjected to interrogation or its functional equivalent.” (5)*

*“A statement which is spontaneous and unsolicited as not made in response to any form of custodial interrogation is not bound by the strictures of Miranda and is admissible without the warnings having been given.” (6)*

*“To demonstrate that a statement was involuntary as a matter of federal constitutional due process rights requires evidence of police coercion.” (8)*

## FACTUAL BACKGROUND

Abebe fatally shot Brian Woolridge during a domestic dispute in the presence of several eyewitnesses, against whom he also committed aggravated assaults. After police arrived, Abebe was handcuffed and repeatedly initiated statements to a neighbor and to the arresting officer about his family, his notes, and why he had acted. The officer did not interrogate Abebe, and the notes at issue were already in Abebe's pocket when he was arrested. Abebe claimed that his statements were involuntary because he appeared to have a severe head injury, but the trial court found him coherent, compliant, and responsive.

## PROCEDURAL HISTORY

A Henry County grand jury indicted Abebe in December 2020 for malice murder, felony murder, aggravated assault, and firearm-possession offenses. Following a January 2023 jury trial, Abebe was convicted on all counts except one aggravated-assault count and one firearm-possession count, and he received a life sentence plus consecutive and concurrent terms of imprisonment. He timely moved for a new trial, amended the motion, and after a September 17, 2024 hearing, the Superior Court of Henry County denied the motion on July 1, 2025. The Supreme Court of Georgia affirmed.

## DISPOSITION

affirmed

## CASES CITED

- Miranda v. Arizona, 384 U.S. 436 (1966)
- Jackson v. Denno, 378 U.S. 368 (1964)
- Morris v. State, 308 Ga. 520, 529 (2020)
- McClure v. State, 306 Ga. 856, 863 (2019)
- Gray v. State, 319 Ga. 72, 75 (2024)
- Johnson v. State, 301 Ga. 707, 711 (2017)
- State v. Pauldo, 309 Ga. 130, 134 (2020)
- Barrett v. State, 289 Ga. 197, 199 (2011)
- Volkova v. State, 311 Ga. 187, 189-92 (2021)
- Gonzalez v. State, 277 Ga. App. 362, 370 (2006)
- Austin v. State, 300 Ga. 889, 891 (2017)
- Quintanar v. State, 322 Ga. 61, 63 n.2 (2025)
- State v. Franklin, 318 Ga. 39, 43-45 (2024)
- Irby v. State, 95 Ga. 467, 467-68 (1894)
- Hayes v. State, 320 Ga. 505, 521 (2020)