

ARKANSAS COURT OF APPEALS, DIVISION IV

Rickey Howard, Jr. v. State of Arkansas

2026 Ark. App. 215 · No. CR-25-358 · Decided April 8, 2026

SUMMARY

The Arkansas Court of Appeals affirmed Rickey Howard Jr.'s convictions for first-degree murder, aggravated robbery, committing terrorist acts, and firearm enhancements. The court held that evidence independent of accomplice testimony sufficiently corroborated Howard's connection to the crimes, including a cell-phone video, his statements, associations, and flight. The court also held that Howard failed to preserve his challenge to the video's authentication because he did not raise that specific objection at trial.

CASE DETAILS

COURT	Arkansas Court of Appeals, Division IV
WRITING FOR THE COURT	N. Mark Klappenbach, Chief Judge; Barrett, J.; Brown, J.
JURISDICTION	Arkansas Court of Appeals, Division IV
DECIDED	April 8, 2026
DOCKET	CR-25-358
DISPOSITION	affirmed
PROCEDURAL POSTURE	Howard appealed his convictions and consecutive sentences after the Jefferson County Circuit Court denied his motion for directed verdict and admitted a cell-phone video into evidence.
STANDARD OF REVIEW	The appellate court reviews a denial of a motion for directed verdict as a challenge to the sufficiency of the evidence and considers whether the verdict is supported by substantial evidence, viewing the evidence in the light most favorable to the State. Evidentiary rulings are generally reviewed for abuse of discretion, but an evidentiary argument not preserved by a specific objection is not reached on appeal.
PRECEDENTIAL VALUE	published
PARTIES	Rickey Howard, Jr. v. State of Arkansas

TOPICS

criminal procedure

evidence

appellate procedure

preservation of error

standard of review

PRACTICE AREAS

criminal procedure

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appellate procedure

QUESTIONS PRESENTED

1. Whether evidence independent of accomplice testimony sufficiently tended to connect Howard to the crimes to corroborate that testimony.
2. Whether the appellate court could consider Howard's challenge to authentication of the cell-phone video when he did not make a specific authentication objection at trial.

HOLDINGS

1. The evidence sufficiently corroborated the accomplice testimony because, even excluding statements attributed to accomplices, Howard's own statements, the cell-phone video, evidence of his association with the participants, and his flight tended in some degree to connect him with the crimes.
2. The authentication challenge was not preserved for appellate review because Howard did not make a specific authentication objection in the circuit court and could not change the grounds of his objection on appeal.

KEY QUOTATIONS

"The test for corroborating evidence is whether, if the testimony of the accomplice were totally eliminated from the case, the other evidence independently establishes the crime and tends to connect the accused with its commission." (4)

"This evidence "tended to connect" Howard with the crimes that night." (6)

"A specific evidentiary objection is necessary to preserve an issue for appeal." (7)

FACTUAL BACKGROUND

Calvin Kirklin was shot and killed while sitting in his vehicle at an apartment complex in Pine Bluff. A cell-phone video recorded from inside a Chrysler 200 depicted three men near Kirklin's vehicle before the shooting and included voices referring to a robbery and calling for "Rickey" immediately afterward. Accomplices Marks and Stennis identified Howard as one of the participants, while Howard's own statements placed him near the scene and inside the Chrysler shortly after the shooting; he then left Arkansas after learning police were looking for him.

PROCEDURAL HISTORY

Howard was convicted by a jury of first-degree murder, aggravated robbery, committing terroristic acts, and firearm enhancements. The Jefferson County Circuit Court imposed consecutive sentences, including forty years for murder and ten years for aggravated robbery and each terroristic-act count. On appeal, Howard challenged

the sufficiency of corroboration of accomplice testimony and the admission of the cell-phone video based on authentication; the court affirmed.

DISPOSITION

affirmed

CASES CITED

- Williams v. State, 351 Ark. 215, 91 S.W.3d 54
- MacKool v. State, 365 Ark. 416, 231 S.W.3d 676
- Procella v. State, 2016 Ark. App. 515, 504 S.W.3d 686
- Smith v. State, 2012 Ark. App. 534, 423 S.W.3d 624
- Willis v. State, 2018 Ark. App. 199, 546 S.W.3d 550
- Cuevas-Flores v. State, 2024 Ark. App. 451, 699 S.W.3d 156
- Steward v. State, 2026 Ark. App. 1, 729 S.W.3d 170
- Beltran v. State, 2025 Ark. 167

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