

SUPREME COURT OF GEORGIA

Slaughter v. State

295 Ga. 298 (2014) · No. S14A0536 · Decided June 2, 2014

SUMMARY

The Supreme Court of Georgia affirmed Donna Slaughter’s convictions for malice murder, concealing the death of another, felony tampering with evidence, and possession of a firearm during the commission of a crime. The court held that the evidence was sufficient to support the convictions and that the trial court properly denied a mistrial after the jury briefly heard a reference to a polygraph examination, particularly because the court issued a curative instruction.

CASE DETAILS

COURT	Supreme Court of Georgia
WRITING FOR THE COURT	Benham, Justice
JURISDICTION	Georgia
DECIDED	June 2, 2014
DOCKET	S14A0536
DISPOSITION	affirmed
PROCEDURAL POSTURE	Donna Slaughter appealed her jury convictions and sentences for malice murder, concealing the death of another, felony tampering with evidence, and possession of a firearm during the commission of a crime.
STANDARD OF REVIEW	The evidence is viewed in the light most favorable to the verdict, and the question is whether a rational trier of fact could find the defendant guilty beyond a reasonable doubt. A trial court's decision on a motion for mistrial is reviewed for abuse of discretion and will not be disturbed unless a mistrial was essential to preserve the defendant's right to a fair trial.
PRECEDENTIAL VALUE	Published precedential opinion
PARTIES	Donna Slaughter v. The State

TOPICS

- criminal procedure
- evidence
- appellate procedure
- standard of review
- harmless error

PRACTICE AREAS

criminal law

criminal procedure

evidence

QUESTIONS PRESENTED

1. Whether the evidence was sufficient to support Slaughter's convictions.
2. Whether the trial court erred by denying Slaughter's motion for mistrial after the jury heard a reference to her having taken a polygraph test during playback of her videotaped confession.

HOLDINGS

1. The evidence was sufficient for a rational jury to find Slaughter guilty beyond a reasonable doubt of the crimes for which she was convicted.
2. The trial court did not abuse its discretion by denying a mistrial where the jury heard only that Slaughter had taken a polygraph test, heard no reference to the test results, and received an immediate curative instruction.

KEY QUOTATIONS

"The evidence as described above was sufficient for a rational jury to find appellant guilty beyond a reasonable doubt of the crimes for which she was convicted." (295 Ga. at 300)

"The decision to grant a mistrial is within the discretion of the trial court and will not be disturbed on appeal unless there is a showing that a mistrial is essential to the preservation of the right to a fair trial." (295 Ga. at 301)

FACTUAL BACKGROUND

Michael Haegle's body was found beside a road in Macon County after Slaughter and her husband reported that their missing roommate might be the victim. Police found a small red pickup truck at Slaughter's residence, letters showing a relationship between the victim and Slaughter's husband, and insurance policies naming each other as beneficiaries. After her husband's arrest, Slaughter confessed and gave a videotaped reenactment stating that she shot Haegle in the back of the head, attempted to disguise the crime, and helped dispose of the body and the weapon.

PROCEDURAL HISTORY

A Marion County grand jury indicted Slaughter on charges including malice murder, felony murder, concealing a death, felony tampering with evidence, and possession of a firearm during the commission of a crime. Following a jury trial from October 29 to November 1, 2012, she was convicted on all charges; the felony-murder conviction was vacated as a matter of law, and the trial court imposed an aggregate sentence including life imprisonment. The trial court denied her motion for new trial, and she timely appealed to the Supreme Court of Georgia, which affirmed.

DISPOSITION

affirmed

CASES CITED

- *Miranda v. Arizona*, 384 U.S. 436, 86 S.Ct. 1602, 16 L.Ed.2d 694 (1966)
- *Jackson v. Virginia*, 443 U.S. 307, 319, 99 S.Ct. 2781, 61 L.Ed.2d 560 (1979)
- *Jackson v. State*, 292 Ga. 685 (4), 740 S.E.2d 609 (2013)
- *Gulley v. State*, 271 Ga. 337 (16), 519 S.E.2d 655 (1999)
- *Durden v. State*, 274 Ga. 868 (5), 561 S.E.2d 91 (2002)

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