

SUPREME COURT OF GEORGIA

Hamilton v. The State

Hamilton v. State, S26A0435 · No. S26A0435 · Decided March 3, 2026

SUMMARY

The Supreme Court of Georgia affirmed Rodriquez Lamont Hamilton’s convictions for felony murder, aggravated assault, and firearm possession arising from the fatal shooting of Jamarius Cowart and the non-fatal shooting of Allysia Bryant. The court held that the trial court did not abuse its discretion in denying mistrial motions based on a courtroom outburst and an officer’s reference to Hamilton’s silence. It further held that evidence of prior difficulties between Hamilton and the victims was at least partly admissible as intrinsic evidence and that any error in admitting the remaining evidence was harmless.

CASE DETAILS

COURT	Supreme Court of Georgia
WRITING FOR THE COURT	Peterson, Chief Justice
JURISDICTION	Supreme Court of Georgia
DECIDED	March 3, 2026
DOCKET	S26A0435
DISPOSITION	affirmed
PROCEDURAL POSTURE	Hamilton appealed his convictions for felony murder, aggravated assault, and two counts of possession of a firearm during the commission of a felony after the trial court denied his motion for new trial.
STANDARD OF REVIEW	The court reviewed mistrial rulings and rulings admitting intrinsic evidence for abuse of discretion. It reviewed the nonconstitutional harmlesslessness of evidentiary error de novo, asking whether it was highly probable that the error did not contribute to the verdict.
PRECEDENTIAL VALUE	published
PARTIES	Rodriquez Lamont Hamilton v. The State

TOPICS

- criminal procedure
- evidence
- appellate procedure
- harmless error

PRACTICE AREAS

criminal law

criminal procedure

evidence

appellate procedure

QUESTIONS PRESENTED

1. Whether the trial court abused its discretion by denying a mistrial after an emotional outburst by Cowart's family in the courtroom.
2. Whether the trial court abused its discretion by denying a mistrial after a detective made an unsolicited reference to Hamilton's refusal to make a statement to law enforcement.
3. Whether evidence of prior difficulties and prior acts between Hamilton and the victims was improperly admitted as intrinsic evidence or under OCGA § 24-4-404(b), and whether any error required reversal under OCGA § 24-4-403.
4. Whether cumulative trial errors required reversal.

HOLDINGS

1. The trial court did not abuse its discretion by denying a mistrial after the victim's family made an emotional courtroom outburst because the court took prompt curative measures, including admonishing the family and instructing the jury to disregard the outburst, and Hamilton failed to show that a fair trial was impossible or that the jury disregarded the instruction.
2. Even assuming the detective's unsolicited statement that Hamilton was unwilling to make a statement was an impermissible comment on his silence, the trial court acted within its discretion in denying a mistrial because the remark was brief and nonresponsive and the court instructed the jury to disregard it.
3. The trial court did not abuse its discretion by admitting evidence of Hamilton's actions toward Bryant and Cowart after Bryant began dating Cowart as intrinsic evidence because the evidence explained Hamilton's anger over the relationship, the context and motive for the shootings, and the defense theory that another perpetrator committed the crimes.
4. The trial court did not abuse its discretion under Rule 403 in admitting the post-relationship evidence because its probative value in explaining the charged crimes and identifying Hamilton as the shooter was not substantially outweighed by unfair prejudice, confusion, or misleading the jury.
5. The court did not decide whether admitting evidence of Hamilton's acts before Bryant began dating Cowart was an abuse of discretion; assuming error, any error was harmless because the evidence was cumulative and it was highly probable that it did not contribute to the verdict.
6. Hamilton was not entitled to reversal based on cumulative error because the court assumed only one evidentiary error and determined that it was harmless.

KEY QUOTATIONS

“Evidence is intrinsic when it pertains to the chain of events explaining the context, motive, and set-up of the crime, and is admissible so long as it is linked in time and circumstances with the charged crime, forms an integral and natural part of an account of the crime, or is necessary to complete the story of the crime for the jury.” (20)

“The test for determining nonconstitutional harmless error is whether it is highly probable that the error did not contribute to the verdict.” (26)

FACTUAL BACKGROUND

Hamilton and Allysia Bryant had been in a tumultuous romantic relationship and were sharing a home in Brunswick when Bryant began dating Jamarius Cowart. On November 2, 2022, Bryant testified that Hamilton followed her and Cowart in his truck and fired several shots into their vehicle at an intersection; Cowart died and Bryant was wounded. The shooting was corroborated by eyewitness, surveillance, ballistic, and vehicle evidence, and Hamilton later left his truck at an acquaintance's house and surrendered with counsel. The defense challenged Bryant's identification and argued that another perpetrator may have been responsible.

PROCEDURAL HISTORY

A Glynn County grand jury indicted Hamilton for malice murder, felony murder, aggravated assault, and two firearm-possession counts. After a December 2023 jury trial, Hamilton was acquitted of malice murder and convicted of the remaining counts. The trial court imposed a life sentence without parole for felony murder and consecutive prison terms for the other offenses, then denied Hamilton's amended motion for new trial on October 1, 2025. The Supreme Court of Georgia considered the appeal on the briefs and affirmed.

DISPOSITION

affirmed

CASES CITED

- Thomas v. State, 311 Ga. 573, 576-77 (2021)
- Jivens v. State, 317 Ga. 859, 866 (2023)
- Thompson v. State, 304 Ga. 146, 154-55 (2018)
- Messer v. State, 247 Ga. 316, 323-25 (1981)
- Parker v. State, 309 Ga. 736, 738-39 (2020)
- Bradley v. State, 234 Ga. 664, 668 (1975)
- Adkins v. State, 301 Ga. 153, 156 (2017)
- Hughes v. State, 312 Ga. 149, 152-53 (2021)
- United States v. Edouard, 485 F.3d 1324, 1344 (11th Cir. 2007)
- Clark v. State, 306 Ga. 367, 373-75 (2019)
- Williams v. State, 302 Ga. 474, 486-87 (2017)
- Harris v. State, 321 Ga. 87, 95-101 (2025)
- Sims v. State, 321 Ga. 627, 634-35 (2025)
- Flowers v. State, 307 Ga. 618, 622-23 (2020)
- Tarver v. State, 319 Ga. 165, 169 (2024)
- Kirby v. State, 304 Ga. 472, 478, 487 (2018)

- Flood v. State, Flood v. State, 311 Ga. 800, 808-09 (2021)
- Lowe v. State, 314 Ga. 788, 793 (2022)
- Payne v. State, 313 Ga. 218, 222 (2022)
- Heade v. State, 312 Ga. 19, 25 (2021)
- United States v. Weeks, 716 F.2d 830, 832 (11th Cir. 1983)
- Felton v. State, 920 S.E.2d 667, 677 (2025)

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