

COURT OF APPEALS FOR THE SIXTH APPELLATE DISTRICT OF TEXAS AT
TEXARKANA

Felisha Lynn Scroggins v. The State of Texas

No. 06-24-00235-CR · No. No. 06-24-00235-CR · Decided December 8, 2025

SUMMARY

The Texas Sixth Court of Appeals at Texarkana affirmed Felisha Lynn Scroggins’s conviction for reckless injury to a child and twenty-year sentence. The court held that the evidence was legally sufficient to show that Scroggins recklessly caused her daughter’s serious bodily injury through inadequate nutrition and related omissions. The opinion addresses the legal-sufficiency standard, recklessness, statutory parental duties, and serious bodily injury under Texas law.

CASE DETAILS

COURT	Court of Appeals for the Sixth Appellate District of Texas at Texarkana
WRITING FOR THE COURT	Jeff Rambin; Chief Justice Stevens; Justice van Cleef; Justice Rambin
JURISDICTION	Texas Court of Appeals, Sixth Appellate District at Texarkana
DECIDED	December 8, 2025
DOCKET	No. 06-24-00235-CR
DISPOSITION	affirmed
PROCEDURAL POSTURE	Scroggins appealed her Lamar County jury conviction for reckless injury to a child by act or omission, challenging the legal sufficiency of the evidence supporting the recklessness and serious-bodily-injury elements.
STANDARD OF REVIEW	The court reviewed legal sufficiency by viewing the evidence in the light most favorable to the verdict and asking whether any rational factfinder could have found the essential elements beyond a reasonable doubt under a hypothetically correct jury charge. The court deferred to the jury's determinations concerning witness credibility, evidentiary weight, and conflicting reasonable inferences, and considered all admitted evidence regardless of admissibility.
PRECEDENTIAL VALUE	Nonprecedential memorandum opinion; the opinion states 'Do Not Publish.'
PARTIES	Felisha Lynn Scroggins v. The State of Texas

TOPICS

criminal procedure

standard of review

evidence

appellate procedure

PRACTICE AREAS

criminal law

criminal procedure

child abuse and neglect

QUESTIONS PRESENTED

1. Whether legally sufficient evidence supported the jury's finding that Scroggins recklessly caused serious bodily injury to the child by act or omission.
2. Whether legally sufficient evidence supported the jury's finding that the child suffered serious bodily injury.

HOLDINGS

1. The evidence was legally sufficient for a rational jury to find that Scroggins recklessly caused the child's injury through acts or omissions, including failing to provide adequate nutrition and medical care despite her statutory parental duty.
2. The evidence was legally sufficient for the jury to find that the child suffered serious bodily injury because malnutrition caused permanently stunted growth and associated physical and cognitive impairment, constituting serious permanent disfigurement or protracted impairment.

KEY QUOTATIONS

"We assess legal sufficiency by viewing the evidence in the light most favorable to the verdict and asking whether any rational trier of fact could have found the essential elements of the crime beyond a reasonable doubt." (p. 2)

"We conclude that, from the evidence produced at trial, including Scroggins's actions that could be interpreted as evidence of consciousness of guilt, the jury could rationally conclude that Scroggins recklessly committed an act or omission." (p. 18)

"That testimony is sufficient to establish that Alice suffered from a serious permanent disfigurement." (p. 19)

FACTUAL BACKGROUND

Scroggins and her daughter lived with another adult in a van for approximately seven years. The evidence showed that the child received a severely limited diet, was not regularly taken for medical care, had little opportunity for outdoor activity or social interaction, and was kept in cramped and unsanitary conditions. After removal, medical and caregiver testimony described the child as below the first percentile in height and weight, with stunted growth, weakness, difficulty walking, and cognitive and developmental delays.

PROCEDURAL HISTORY

A Lamar County jury convicted Scroggins of the lesser included offense of recklessly causing serious bodily injury to a child and assessed twenty years' incarceration. The Sixth Court of Appeals reviewed the sufficiency

of the evidence and affirmed the trial court's judgment.

DISPOSITION

affirmed

CASES CITED

- Braughton v. State, 569 S.W.3d 592, 607-08 (Tex. Crim. App. 2018)
- Jackson v. Virginia, 443 U.S. 307, 315-16, 319 (1979)
- Bittick v. State, 707 S.W.3d 366, 368-69 (Tex. Crim. App. 2024)
- Zuniga v. State, 551 S.W.3d 729, 733 (Tex. Crim. App. 2018)
- Adames v. State, 353 S.W.3d 854, 860 (Tex. Crim. App. 2011)
- Brooks v. State, 323 S.W.3d 893, 899 (Tex. Crim. App. 2010)
- Hooper v. State, 214 S.W.3d 9, 13, 15 (Tex. Crim. App. 2007)
- Hammack v. State, 622 S.W.3d 910, 914 (Tex. Crim. App. 2021)
- Walker v. State, 594 S.W.3d 330, 335 (Tex. Crim. App. 2020)
- Ramsey v. State, 473 S.W.3d 805, 809 (Tex. Crim. App. 2015)
- Stahmann v. State, 602 S.W.3d 573, 577 (Tex. Crim. App. 2020)
- Williams v. State, 235 S.W.3d 742, 750-51, 755-56 (Tex. Crim. App. 2007)
- Cyr v. State, 665 S.W.3d 551, 556 (Tex. Crim. App. 2022)
- King v. State, 29 S.W.3d 556, 565 (Tex. Crim. App. 2000)
- Wade v. State, 663 S.W.3d 175, 184 (Tex. Crim. App. 2022)
- Bleimeyer v. State, 616 S.W.3d 234, 242 (Tex. App.—Houston [14th Dist.] 2021, no pet.)
- Adams v. State, No. 06-13-00016-CR, 2013 WL 4858774, at *4 (Tex. App.—Texarkana Sept. 11, 2013, pet. ref'd) (mem. op., not designated for publication)
- Taylor v. State, No. 06-09-00128-CR, 2010 WL 2802455, at *4 (Tex. App.—Texarkana July 16, 2010, no pet.) (mem. op., not designated for publication)
- Campos v. State, 473 S.W.3d 907, 916 (Tex. App.—Amarillo 2015, no pet.)
- People v. Carlson, 26 N.Y.S.2d 1003, 1005 (N.Y. Cnty. Ct. 1941)