

NINTH DISTRICT COURT OF APPEALS OF TEXAS AT BEAUMONT

Leon Cauley Jr. v. The State of Texas

No. 09-24-00172-CR · No. 09-24-00172-CR · Decided April 1, 2026

SUMMARY

The Ninth District Court of Appeals of Texas affirmed Leon Cauley Jr.'s conviction for injury to a disabled person. The court held that the trial court did not reversibly err in admitting the challenged hearsay, extraneous-offense evidence, and criminal trespass warning, emphasizing preservation of error and cumulative evidence.

CASE DETAILS

COURT	Ninth District Court of Appeals of Texas at Beaumont
WRITING FOR THE COURT	Jay Wright; Johnson; Wright; Chambers
JURISDICTION	Ninth District Court of Appeals of Texas at Beaumont
DECIDED	April 1, 2026
DOCKET	09-24-00172-CR
DISPOSITION	affirmed
PROCEDURAL POSTURE	Cauley appealed his jury conviction for injury to a disabled individual and thirty-year prison sentence, challenging the admission of hearsay, extraneous-offense evidence, and a criminal trespass warning.
STANDARD OF REVIEW	Evidentiary rulings are reviewed for abuse of discretion and will not be reversed unless they fall outside the zone of reasonable disagreement. Preservation of evidentiary error is governed by Texas Rule of Appellate Procedure 33.1(a).
PRECEDENTIAL VALUE	Unpublished memorandum opinion; not designated for publication
PARTIES	Leon Cauley Jr. v. The State of Texas

TOPICS

- evidence
- hearsay
- impeachment
- preservation of error
- appellate procedure

PRACTICE AREAS

- criminal law
- criminal procedure
- evidence
- appellate practice

QUESTIONS PRESENTED

1. Whether the trial court reversibly erred by admitting a paramedic's testimony repeating Wendy's statements about the cause of her injuries and Cauley's conduct.
2. Whether the trial court reversibly erred by admitting a pending assault complaint and arrest warrant as hearsay and extraneous-offense evidence.
3. Whether the trial court reversibly erred by admitting evidence of the pending assault charge for impeachment.
4. Whether the trial court reversibly erred by admitting a criminal trespass warning for impeachment.

HOLDINGS

1. The testimony that Wendy's ex-boyfriend burned her with scalding water was admissible under the medical-diagnosis-or-treatment exception to the hearsay rule. Any testimony concerning additional conduct outside that exception did not warrant reversal because the objection was not preserved and the same evidence was admitted through Wendy's testimony without objection.
2. The trial court did not reversibly err by admitting the pending assault complaint and arrest warrant because the evidence was offered to refute Cauley's denial and attack his credibility, Cauley ultimately admitted the pending charge, and his hearsay objection was not preserved.
3. The trial court did not abuse its discretion by admitting evidence of the pending assault charge to contradict Cauley's testimony and address his credibility.
4. The criminal trespass warning was relevant and admissible to attack Cauley's credibility because it contradicted his testimony about the warning and his authority to return to Wendy's home. Any Rule 403 argument was forfeited because Cauley did not make that objection at trial.

KEY QUOTATIONS

"We review complaints about the admission of evidence under an abuse-of- discretion standard." (12)

"Since it is not reversible error for a trial court to either admit or exclude cumulative evidence, the trial court did not reversibly err by admitting Clark's testimony regardless of its hearsay status." (15)

"Therefore, the state's evidence about the criminal trespass warning was relevant to show Cauley's lack of credibility and was admissible under Rule 402, which states that relevant evidence is generally admissible." (20)

FACTUAL BACKGROUND

The complainant, Wendy, has limited mobility and requires round-the-clock care because of a prior gunshot injury. She testified that Cauley, her former boyfriend, entered her home, obtained scalding water, and poured it over her, causing severe burns. A paramedic testified about Wendy's statements identifying Cauley and describing the incident, while the State also introduced evidence of a pending assault complaint and a criminal trespass warning. Cauley denied intentionally burning Wendy and disputed the significance of the trespass warning and assault evidence.

PROCEDURAL HISTORY

A Jefferson County jury found Cauley guilty of intentionally and knowingly causing serious bodily injury to a disabled individual by pouring scalding water on the complainant. The trial court sentenced him to thirty years' imprisonment. The Ninth District Court of Appeals overruled all four appellate issues and affirmed the judgment.

DISPOSITION

affirmed

CASES CITED

- Smith v. State, No. 09-17-00081-CR, 2018 Tex. App. LEXIS 1874, at *1 n.1 (Tex. App.—Beaumont Mar. 14, 2018, no pet.) (mem. op., not designated for publication)
- Rhomer v. State, 569 S.W.3d 664, 669 (Tex. Crim. App. 2019)
- Dabney v. State, 492 S.W.3d 309, 318 (Tex. Crim. App. 2016)
- Compton v. State, 666 S.W.3d 685, 714 (Tex. Crim. App. 2023)
- Coble v. State, 330 S.W.3d 253, 282 (Tex. Crim. App. 2010)
- Taylor v. State, 268 S.W.3d 571, 578-79, 589-90 (Tex. Crim. App. 2008)
- Puderbaugh v. State, 31 S.W.3d 683, 685 (Tex. App.—Beaumont 2000, pet. ref'd)
- Hanke v. State, No. 09-14-00326-CR, 2015 Tex. App. LEXIS 9884, at *18 (Tex. App.—Beaumont Sept. 23, 2015, no pet.) (mem. op., not designated for publication)
- Martin v. State, 173 S.W.3d 463, 465-68 (Tex. Crim. App. 2005)
- Reyes v. State, 741 S.W.2d 414, 421 (Tex. Crim. App. 1987)
- Martinez v. State, 17 S.W.3d 677, 688 (Tex. Crim. App. 2000)