

COURT OF APPEALS FOR THE FIRST DISTRICT OF TEXAS

Simon Adams v. The State of Texas

No. 01-24-00680-CR · No. 01-24-00680-CR · Decided January 15, 2026

SUMMARY

The First Court of Appeals of Texas affirmed Simon Adams’s murder conviction and thirty-year prison sentence. The court held that the evidence was legally sufficient to support the mens rea element of murder and that any error in admitting autopsy photographs was harmless. The court also rejected Adams’s self-defense-related arguments.

CASE DETAILS

COURT	Court of Appeals for the First District of Texas
WRITING FOR THE COURT	Andrew Johnson; Chief Justice Adams; Justice Gunn; Justice Johnson
JURISDICTION	Court of Appeals for the First District of Texas
DECIDED	January 15, 2026
DOCKET	01-24-00680-CR
DISPOSITION	affirmed
PROCEDURAL POSTURE	Adams appealed his murder conviction and thirty-year prison sentence, raising challenges to the legal sufficiency of the evidence supporting the mens rea element and to the admission of autopsy photographs.
STANDARD OF REVIEW	The court reviewed the sufficiency of the evidence under whether any rational trier of fact could have found the essential elements beyond a reasonable doubt, viewing the evidence in the light most favorable to the verdict and deferring to the jury's credibility and weight determinations. The admission of evidence was reviewed for abuse of discretion, and any nonconstitutional error was reviewed for harm under Texas Rule of Appellate Procedure 44.2(b).
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Simon Adams v. The State of Texas

TOPICS

- criminal procedure
- mens rea
- self defense
- evidence
- harmless error

PRACTICE AREAS

Criminal law

Criminal procedure

Appellate practice

QUESTIONS PRESENTED

1. Whether the evidence was legally sufficient to support the mens rea element of Adams's murder conviction.
2. Whether the trial court reversibly erred by admitting autopsy photographs authenticated by a substitute medical examiner who did not perform the autopsy.

HOLDINGS

1. The evidence was legally sufficient for a rational jury to find beyond a reasonable doubt that Adams acted knowingly or intentionally with respect to Croom's death. The jury could conclude that Adams fired multiple shots at Croom's car with knowledge that the conduct was reasonably certain to cause death and could reject Adams's self-defense account.
2. Even assuming the trial court abused its discretion by admitting the autopsy photographs through a substitute medical examiner, any error was harmless because it did not have a substantial and injurious effect or influence on the jury's verdict.

KEY QUOTATIONS

“Murder is a “result of conduct” offense, which means that the culpable mental state relates to the result of the conduct, i.e., the causing of the death.” (7)

“If the trial court abused its discretion in admitting the evidence, the error does not warrant reversal unless it affected appellant’s substantial rights.” (10)

“In light of these factors, we conclude that any harm stemming from the admission of the photographs was slight and did not have a substantial and injurious effect or influence in determining the jury’s verdict” (14)

FACTUAL BACKGROUND

During a road-rage incident, Adams fired multiple shots from his truck toward Nicholas Croom's car, striking Croom in the head and torso and causing his death. Eyewitness testimony and a video recording showed the vehicles traveling together, Adams's truck braking and swerving during the shooting, and Croom's car losing control. Adams claimed he acted in self-defense because Croom had threatened him, but the jury had evidence that Adams did not report the shooting as self-defense, did not make that claim during a recorded jail call, and that no firearm was found in Croom's car.

PROCEDURAL HISTORY

A jury in the 248th District Court of Harris County convicted Adams of murder and sentenced him to thirty years' confinement. Adams appealed to the First Court of Appeals of Texas, which overruled both issues and affirmed the trial court's judgment.

DISPOSITION

affirmed

CASES CITED

- Dunham v. State, 666 S.W.3d 477, 482 (Tex. Crim. App. 2023)
- McPherson v. State, 677 S.W.3d 663, 664 (Tex. Crim. App. 2023)
- Mottin v. State, 634 S.W.3d 761, 765 (Tex. App.—Houston [1st Dist.] 2020, pet. ref'd)
- Schroeder v. State, 123 S.W.3d 398, 400 (Tex. Crim. App. 2003)
- Reyes v. State, 480 S.W.3d 70, 77 (Tex. App.—Fort Worth 2015, pet. ref'd)
- Laster v. State, 275 S.W.3d 512, 524 (Tex. Crim. App. 2009)
- Wharton v. State, 711 S.W.3d 92, 102 (Tex. App.—Houston [1st Dist.] 2024, pet. ref'd)
- Ramirez v. State, 229 S.W.3d 725, 730 (Tex. App.—San Antonio 2007, no pet.)
- Foster v. State, 779 S.W.2d 845, 859 (Tex. Crim. App. 1989)
- Haye v. State, No. 01-15-01057-CR, 2017 WL 444462, at *4 (Tex. App.—Houston [1st Dist.] Feb. 2, 2017, pet. ref'd) (mem. op., not designated for publication)
- Sloan v. State, 76 S.W. 922, 922–23 (Tex. Crim. App. 1903)
- Robinson v. State, 356 S.W.2d 929, 929–31 (Tex. Crim. App. 1962)
- Gonzalez v. State, 544 S.W.3d 363, 373 (Tex. Crim. App. 2018)
- Cook v. State, 665 S.W.3d 595, 599 (Tex. Crim. App. 2023)
- Loch v. State, 621 S.W.3d 279, 282 (Tex. Crim. App. 2021)
- Werner v. State, 412 S.W.3d 542, 547 (Tex. Crim. App. 2013)