

TEXAS COURT OF APPEALS, THIRD DISTRICT, AT AUSTIN

In re Commitment of Jasper Lee Hill v. State of Texas

No. 03-25-00138-CV · No. No. 03-25-00138-CV · Decided January 15, 2026

SUMMARY

The Texas Court of Appeals, Third District, affirmed a judgment civilly committing Jasper Lee Hill as a sexually violent predator under the Texas Civil Commitment of Sexually Violent Predators Act. The court held that legally sufficient evidence supported the jury’s finding that Hill had a behavioral abnormality making him likely to engage in a predatory act of sexual violence. The court rejected challenges concerning the expert’s testimony, the focus on sexually violent offenses, and the consideration of Hill’s age.

CASE DETAILS

COURT	Texas Court of Appeals, Third District, at Austin
WRITING FOR THE COURT	Chief Justice Byrne; Justice Crump; Justice Ellis
JURISDICTION	Texas Court of Appeals, Third District, at Austin
DECIDED	January 15, 2026
DOCKET	No. 03-25-00138-CV
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from a final judgment and order civilly committing Jasper Lee Hill as a sexually violent predator under the Texas Civil Commitment of Sexually Violent Predators Act.
STANDARD OF REVIEW	The court reviewed the evidence in the light most favorable to the verdict to determine whether a rational jury could find beyond a reasonable doubt each element necessary to support civil commitment. The court could not disregard undisputed facts that did not support the finding.
PRECEDENTIAL VALUE	Published memorandum opinion; precedential status identified as published in the provided metadata.
PARTIES	Jasper Lee Hill v. The State of Texas

TOPICS

- health law
- appellate procedure
- standard of review
- civil procedure

PRACTICE AREAS

civil commitment

mental health law

appellate litigation

evidence sufficiency

QUESTIONS PRESENTED

1. Whether the evidence was legally sufficient to support the jury's finding beyond a reasonable doubt that Hill was a sexually violent predator under the Texas Civil Commitment of Sexually Violent Predators Act.
2. Whether the State's expert testimony was legally insufficient because the expert allegedly focused on general criminal recidivism, failed to account adequately for Hill's age as a protective factor, or failed to establish a likelihood of future sexually violent offenses.

HOLDINGS

1. The evidence was legally sufficient to support the jury's finding beyond a reasonable doubt that Hill was a sexually violent predator under the Act.
2. Hill's age, even if considered a protective factor in some cases, did not eliminate the evidence of risk factors or render the expert's opinion legally insufficient.

KEY QUOTATIONS

"When reviewing a legal-sufficiency challenge to the evidence in a sexually violent predator case, we assess all of the evidence in the light most favorable to the verdict to determine whether a rational jury could find, beyond a reasonable doubt, each of the elements that the State must prove to support a judgment of civil commitment." (at 2)

FACTUAL BACKGROUND

Hill had prior convictions for sexual abuse and aggravated sexual assault, including an aggravated assault involving a stranger and substantial physical violence. The State's expert, Dr. Michael Arambula, testified that Hill suffered from sexual deviance, antisocial personality disorder, chronic paranoid schizophrenia, and an unspecified paraphilic disorder with features of sadism. Arambula opined that these conditions affected Hill's emotional and volitional capacity, predisposed him to commit predatory acts of sexual violence, and made him a menace to the health and safety of others. Hill presented no conflicting expert testimony.

PROCEDURAL HISTORY

The State petitioned the Travis County district court to civilly commit Hill as a sexually violent predator. After a jury found beyond a reasonable doubt that Hill met the statutory definition, the trial court entered a final judgment and order of commitment. Hill appealed, challenging the legal sufficiency of the evidence supporting the jury's finding.

DISPOSITION

affirmed

CASES CITED

- In re Commitment of Stoddard, 619 S.W.3d 665, 674 (Tex. 2020)
- In re J.F.C., 96 S.W.3d 256, 266 (Tex. 2002)
- In re Commitment of Day, 342 S.W.3d 193, 213 (Tex. App.—Beaumont 2011, pet. denied)

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