

COURT OF APPEALS FOR THE THIRTEENTH DISTRICT OF TEXAS,
CORPUS CHRISTI–EDINBURG

Jessica Bundren v. The State of Texas

No. 13-24-00033-CR (Tex. App.—Corpus Christi–Edinburg Jan. 15, 2026) (mem. op.) · No. 13-24-00033-CR ·
Decided January 15, 2026

SUMMARY

The Thirteenth Court of Appeals of Texas considered Jessica Bundren’s appeal from her conviction for injury to a child, for which she received a life sentence. The court rejected her challenges to the sufficiency of the evidence, admission of photographs, and effectiveness of trial counsel, and affirmed the conviction.

CASE DETAILS

COURT	Court of Appeals for the Thirteenth District of Texas, Corpus Christi–Edinburg
WRITING FOR THE COURT	Jaime Tijerina; Chief Justice Jaime Tijerina; Justice Peña; Justice West
JURISDICTION	Texas Court of Appeals, Thirteenth District, Corpus Christi–Edinburg
DECIDED	January 15, 2026
DOCKET	13-24-00033-CR
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from a conviction for injury to a child and a life sentence.
STANDARD OF REVIEW	The court reviews evidentiary sufficiency in the light most favorable to the verdict and asks whether any rational factfinder could have found the essential elements beyond a reasonable doubt under a hypothetically correct jury charge. The admission of photographs is reviewed for abuse of discretion, and the trial court’s ruling is upheld if it falls within the zone of reasonable disagreement. Ineffective-assistance claims require proof of deficient performance and a reasonable probability that the result would have been different; failure to establish either prong defeats the claim.
PRECEDENTIAL VALUE	Nonprecedential memorandum opinion; designated do not publish under Texas Rule of Appellate Procedure 47.2(b).
PARTIES	Jessica Bundren v. The State of Texas

TOPICS

criminal procedure

evidence

appellate procedure

standard of review

ineffective assistance

PRACTICE AREAS

criminal law

criminal procedure

appellate evidence

ineffective assistance of counsel

QUESTIONS PRESENTED

1. Whether the evidence was sufficient to prove that Bundren intentionally or knowingly caused Amy serious bodily injury by striking her.
2. Whether the evidence was sufficient to prove that Bundren intentionally or knowingly caused Amy serious bodily injury by omission, including failure to protect her or seek prompt medical attention.
3. Whether the trial court abused its discretion by admitting multiple crime-scene and autopsy photographs under Texas Rule of Evidence 403.
4. Whether trial counsel rendered ineffective assistance by failing to object to hearsay and extraneous-offense evidence contained in text messages.

HOLDINGS

1. The evidence was sufficient for a rational factfinder to find beyond a reasonable doubt that Bundren intentionally or knowingly caused serious bodily injury to Amy by striking her with a belt.
2. The court did not decide the sufficiency of the evidence under the omission theory because the evidence was sufficient under the striking theory and the omission issue was not dispositive.
3. The trial court did not abuse its discretion by admitting the challenged crime-scene and autopsy photographs because they were relevant and probative, were not substantially outweighed by unfair prejudice, and did not depict autopsy-caused mutilation.
4. Bundren failed to establish ineffective assistance because, even assuming counsel should have objected to Dylan's text messages, the remaining evidence was sufficient and there was no reasonable probability of a different result.

KEY QUOTATIONS

“In a sufficiency review, we consider all the evidence in the light most favorable to the verdict and determine whether any rational fact finder could have found the essential elements of the crime beyond a reasonable doubt based on the evidence and reasonable inferences from that evidence.” (2)

“when the power of the visible evidence emanates from nothing more than what the defendant has himself done we cannot hold that the trial court has abused its discretion merely because it admitted the evidence.” (28)

FACTUAL BACKGROUND

Six-year-old Amy, Bundren's stepdaughter, died after suffering extensive blunt-force injuries, including severe bruising, intracranial hemorrhages, and internal injuries. Medical and law-enforcement evidence showed injuries in multiple stages of healing, patterned bruising consistent with a belt having rivets, and a cause of death of blunt trauma. Text messages and testimony showed that Bundren repeatedly struck Amy and her twin sister with a belt and continued disciplining Amy despite visible injuries and symptoms requiring medical attention.

PROCEDURAL HISTORY

Bundren was convicted in the 272nd District Court of Brazos County of intentionally or knowingly causing serious bodily injury to a child and was sentenced to life imprisonment. She appealed, challenging the sufficiency of the evidence, admission of crime-scene and autopsy photographs, and the effectiveness of trial counsel. The appeal was transferred from the Tenth Court of Appeals to the Thirteenth Court of Appeals under a docket-equalization order issued by the Supreme Court of Texas.

DISPOSITION

affirmed

CASES CITED

- Baltimore v. State, 689 S.W.3d 331, 341 (Tex. Crim. App. 2024)
- Whatley v. State, 445 S.W.3d 159, 166 (Tex. Crim. App. 2014)
- Brooks v. State, 323 S.W.3d 893, 898-99 (Tex. Crim. App. 2010) (plurality op.)
- Winfrey v. State, 393 S.W.3d 763, 767 (Tex. Crim. App. 2013)
- Edward v. State, 635 S.W.3d 649, 655 (Tex. Crim. App. 2021)
- Garcia v. State, 667 S.W.3d 756, 762 (Tex. Crim. App. 2023)
- Villarreal v. State, 286 S.W.3d 321, 327 (Tex. Crim. App. 2009)
- Malik v. State, 953 S.W.2d 234, 240 (Tex. Crim. App. 1997)
- Jefferson v. State, 189 S.W.3d 305, 312 (Tex. Crim. App. 2006)
- Williams v. State, 235 S.W.3d 742, 750 (Tex. Crim. App. 2007)
- Creel v. State, 710 S.W.2d 120, 130-31 (Tex. App.—San Antonio 1986), *aff'd*, 754 S.W.2d 205 (Tex. Crim. App. 1988)
- Dawkins v. State, 557 S.W.3d 592, 604 (Tex. App.—El Paso 2016, no pet.)
- Hill v. State, 883 S.W.2d 765, 769 (Tex. App.—Amarillo 1994, pet. *ref'd*)
- Sanchez v. State, 418 S.W.3d 302, 310-11 (Tex. App.—Fort Worth 2013, pet. *ref'd*)
- Gigliobianco v. State, 210 S.W.3d 637, 640 (Tex. Crim. App. 2006)
- Shuffield v. State, 189 S.W.3d 782, 787 (Tex. Crim. App. 2006)
- Rayford v. State, 125 S.W.3d 521, 529 (Tex. Crim. App. 2003)
- Long v. State, 823 S.W.2d 259, 273 (Tex. Crim. App. 1991)
- Woods v. State, 14 S.W.3d 445, 452-53 (Tex. App.—Fort Worth 2000, no pet.)
- Chamberlain v. State, 998 S.W.2d 230, 237 (Tex. Crim. App. 1999)

- *Rojas v. State*, 986 S.W.2d 241, 249 (1998)
- *Ripkowski v. State*, 61 S.W.3d 378, 392-93 (Tex. Crim. App. 2001)
- *Gallo v. State*, 239 S.W.3d 757, 763 (Tex. Crim. App. 2007)
- *Ex parte Martinez*, 330 S.W.3d 891, 900-02 (Tex. Crim. App. 2011)
- *Ledet v. State*, No. 02-10-00281-CR, 2013 WL 1830801, at *4 (Tex. App.—Fort Worth May 2, 2013, pet. ref'd) (mem. op., not designated for publication)
- *Ross v. State*, 154 S.W.3d 804, 812 (Tex. App.—Houston [14th Dist.] 2004, pet. ref'd)
- *King v. State*, 29 S.W.3d 556, 564-65 (Tex. Crim. App. 2000)
- *Ellis v. State*, No. 13-19-00247-CR, 2021 WL 1133610, at *6 (Tex. App.—Corpus Christi–Edinburg Mar. 25, 2021, no pet.) (mem. op., not designated for publication)