

TEXAS COURT OF APPEALS, THIRD DISTRICT, AT AUSTIN

Emanuel Matthew Williams, Jr. v. The State of Texas

Williams v. State · No. 03-24-00699-CR · Decided March 27, 2026

SUMMARY

The Texas Court of Appeals, Third District, reviews Emanuel Matthew Williams, Jr.'s conviction for continuous sexual abuse of a child. Williams challenged the sufficiency of the evidence and the admission of extraneous-offense evidence involving his former stepdaughter, as well as the exclusion of the alleged victim's later medical records. The memorandum opinion states that the court would affirm the trial court's judgment of conviction.

CASE DETAILS

COURT	Texas Court of Appeals, Third District, at Austin
WRITING FOR THE COURT	Karin Crump; Chief Justice Byrne; Justice Crump; Justice Ellis
JURISDICTION	Texas Court of Appeals, Third District, at Austin
DECIDED	March 27, 2026
DOCKET	03-24-00699-CR
DISPOSITION	affirmed
PROCEDURAL POSTURE	Williams appealed his jury conviction and twenty-five-year prison sentence for continuous sexual abuse of a child, challenging the sufficiency of the evidence and two evidentiary rulings.
STANDARD OF REVIEW	Legal sufficiency is reviewed under Jackson v. Virginia by viewing all admitted evidence in the light most favorable to the verdict and determining whether any rational trier of fact could have found the essential elements beyond a reasonable doubt. Evidentiary rulings are reviewed for abuse of discretion and will be upheld if reasonably supported by the record and correct under any applicable legal theory.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Emanuel Matthew Williams, Jr. v. The State of Texas

TOPICS

- evidence
- hearsay
- criminal procedure
- standard of review
- statutory interpretation

PRACTICE AREAS

criminal law

criminal procedure

appellate practice

evidence

QUESTIONS PRESENTED

1. Whether the evidence was legally sufficient to prove that Williams committed at least two acts of sexual abuse against a child younger than fourteen during a period of thirty or more days, as required for continuous sexual abuse of a child.
2. Whether the trial court abused its discretion by admitting Williams's former stepdaughter's testimony concerning extraneous sexual offenses to rebut the defensive theory that K.R.'s allegations were fabricated.
3. Whether the trial court abused its discretion by excluding K.R.'s mental-health counseling and treatment records under the hearsay exception for statements made for purposes of medical diagnosis or treatment.

HOLDINGS

1. The evidence was legally sufficient to support Williams's conviction because a rational jury could infer from K.R.'s testimony and the corroborating evidence that at least two acts of sexual abuse occurred while she was younger than fourteen and over a period of thirty or more days.
2. The trial court did not abuse its discretion by admitting the former stepdaughter's testimony because Williams raised a defensive theory that K.R.'s allegations were fabricated, and the extraneous sexual abuse was sufficiently similar and relevant to rebut that theory without requiring exact similarity.
3. The trial court did not abuse its discretion by excluding K.R.'s mental-health records because Williams failed to establish that truth-telling was a vital component of the particular mental-health treatment and that K.R. was aware of that requirement; he also sought to admit a broad collection of records without establishing that all statements satisfied the hearsay exception.

KEY QUOTATIONS

“When reviewing the sufficiency of the evidence, we view all the evidence in the light most favorable to the judgment to determine whether any rational trier of fact could have found the essential elements of the offense beyond a reasonable doubt.” (12)

“Based on the evidence presented at trial, the jury could have reasonably determined that the sexual abuse occurred over a period of months and that two or more of the acts described occurred over a period of 30 or more days.” (18)

“For these reasons, we conclude that the trial court did not abuse its discretion by overruling Williams’s objection and allowing the State to present evidence pertaining to the extraneous offenses involving Stepdaughter under Rule 404.” (27)

“Accordingly, in the mental-health context, “it is incumbent upon the proponent of the hearsay exception” to establish that “1) that truth-telling was a vital component of the particular course of therapy or treatment involved, and 2) that it is readily apparent that the child-declarant was aware that this was the case.”” (31)

FACTUAL BACKGROUND

Williams and his long-term girlfriend lived next door to K.R. and her family and, while babysitting K.R. and her siblings, Williams was sometimes alone with the children. K.R. testified that Williams sexually abused her repeatedly over nearly a year, including touching her vagina and placing his penis against or partially inside her vagina; her younger sister described sounds and circumstances consistent with abuse, and Williams's former stepdaughter described similar sexual abuse by Williams when she was a child. Williams denied the abuse and argued that K.R.'s allegations had been fabricated because of conflicts between the families and an effort to protect another alleged offender.

PROCEDURAL HISTORY

Williams was charged in the 340th District Court of Tom Green County with continuous sexual abuse of a child. A jury found him guilty and recommended twenty-five years' imprisonment, and the trial court rendered judgment consistent with the verdict. The Texas Court of Appeals reviewed the conviction and overruled all three appellate issues.

DISPOSITION

affirmed

CASES CITED

- Jackson v. Virginia, 443 U.S. 307, 319 (1979)
- Stahmann v. State, 602 S.W.3d 573, 577 (Tex. Crim. App. 2020)
- Eustis v. State, 191 S.W.3d 879, 884 (Tex. App.—Houston [14th Dist.] 2006, pet. ref'd)
- Merritt v. State, 368 S.W.3d 516, 525-26 (Tex. Crim. App. 2012)
- Hooper v. State, 214 S.W.3d 9, 16-17 (Tex. Crim. App. 2007)
- Kiffe v. State, 361 S.W.3d 104, 107-08 (Tex. App.—Houston [1st Dist.] 2011, pet. ref'd)
- Johnson v. State, 419 S.W.3d 665, 671 (Tex. App.—Houston [1st Dist.] 2013, pet. ref'd)
- Dixon v. State, 201 S.W.3d 731, 737 (Tex. Crim. App. 2006) (Cochran, J., concurring)
- Sanchez v. State, 400 S.W.3d 595, 600 (Tex. Crim. App. 2013)
- Sledge v. State, 953 S.W.2d 253, 256 (Tex. Crim. App. 1997)
- Smith v. State, No. 05-03-01282-CR, 2004 WL 1089206, at *12 (Tex. App.—Dallas May 17, 2004, no pet.)
- Oliver v. State, No. 10-12-00389-CR, 2014 WL 1016244, at *11 (Tex. App.—Waco Mar. 13, 2014, no pet.)
- Casey v. State, 349 S.W.3d 825, 829 (Tex. App.—El Paso 2011, pet. ref'd)
- Williams v. State, 305 S.W.3d 886, 890 n.7 (Tex. App.—Texarkana 2010, no pet.)
- Vergara v. State, No. 04-12-00187-CR, 2013 WL 749774, at *7 (Tex. App.—San Antonio Feb. 27, 2013, pet. ref'd)
- Michell v. State, 381 S.W.3d 554, 561-64 (Tex. App.—Eastland 2012, no pet.)
- Tillman v. State, 354 S.W.3d 425, 435 (Tex. Crim. App. 2011)
- Lopez v. State, 86 S.W.3d 228, 230 (Tex. Crim. App. 2002)

- State v. Mechler, 153 S.W.3d 435, 439 (Tex. Crim. App. 2005)
- Carrasco v. State, 154 S.W.3d 127, 129 (Tex. Crim. App. 2005)
- Khoshayand v. State, 179 S.W.3d 779, 784 (Tex. App.—Dallas 2005, no pet.)
- Chaparro v. State, 505 S.W.3d 111, 115-16 (Tex. App.—Amarillo 2016, no pet.)
- Torres v. State, 543 S.W.3d 404, 420 (Tex. App.—El Paso 2018, pet. ref'd)
- Bargas v. State, 252 S.W.3d 876, 890 (Tex. App.—Houston [14th Dist.] 2008, pet. ref'd)
- De La Paz v. State, 279 S.W.3d 336, 343 (Tex. Crim. App. 2009)
- Moses v. State, 105 S.W.3d 622, 627 (Tex. Crim. App. 2003)
- Banks v. State, 494 S.W.3d 883, 893 (Tex. App.—Houston [14th Dist.] 2016, pet. ref'd)
- Wheeler v. State, 67 S.W.3d 879, 887 n.22 (Tex. Crim. App. 2002)
- Newton v. State, 301 S.W.3d 315, 318 (Tex. App.—Waco 2009, pet. ref'd)
- Deggs v. State, 646 S.W.3d 916, 926 (Tex. App.—Waco 2022, pet. ref'd)
- Webb v. State, 575 S.W.3d 905, 909-10 (Tex. App.—Waco 2019, pet. ref'd)
- Sutton v. State, 706 S.W.3d 482, 489 n.2 (Tex. App.—Austin 2024, no pet.)
- Lewis v. State, 693 S.W.3d 453, 469 (Tex. App.—Houston [14th Dist.] 2023, pet. ref'd)
- Romano v. State, 612 S.W.3d 151, 159 (Tex. App.—Houston [14th Dist.] 2020, pet. ref'd)
- Young v. State, No. 01-23-00154-CR, 2024 WL 4045783, at *9 n.17 (Tex. App.—Houston [1st Dist.] Sept. 5, 2024, pet. ref'd)
- Tear v. State, 74 S.W.3d 555, 560 (Tex. App.—Dallas 2002, pet. ref'd)
- Jones v. State, 92 S.W.3d 619, 623 (Tex. App.—Austin 2002, no pet.)
- Taylor v. State, 268 S.W.3d 571, 588-91 (Tex. Crim. App. 2008)
- Munoz v. State, 288 S.W.3d 55, 58 (Tex. App.—Houston [1st Dist.] 2009, no pet.)
- Barnes v. State, 165 S.W.3d 75, 82 (Tex. App.—Austin 2005, no pet.)
- State v. Sanchez, 722 S.W.3d 58, 70-71 (Tex. App.—Fort Worth 2025, pet. ref'd)
- Lumsden v. State, 564 S.W.3d 858, 883 (Tex. App.—Fort Worth 2018, pet. ref'd)
- Mbugua v. State, 312 S.W.3d 657, 670-71 (Tex. App.—Houston [1st Dist.] 2009, pet. ref'd)
- Stevens v. State, 234 S.W.3d 748, 784 (Tex. App.—Fort Worth 2007, no pet.)
- State v. Lasalle, 135 S.W.3d 94, 97 (Tex. App.—Corpus Christi-Edinburg 2003, pet. ref'd)