

COURT OF APPEALS OF IOWA

State of Iowa v. Christopher Wortham Abram

No. 24-0662 · No. 24-0662 · Decided December 3, 2025

SUMMARY

The Iowa Court of Appeals affirmed Christopher Wortham Abram’s convictions for willful injury causing serious injury and possession of a firearm as a felon. The court held that Abram failed to preserve his specific foundation objection to surveillance footage, did not establish prejudice from the denial of his motion to strike a juror for cause, and failed to show that the verdicts were against the weight of the evidence.

CASE DETAILS

COURT	Court of Appeals of Iowa
WRITING FOR THE COURT	Potterfield, Senior Judge; Tabor, C.J.; Buller, J.; Potterfield, S.J.
JURISDICTION	Iowa Court of Appeals
DECIDED	December 3, 2025
DOCKET	24-0662
DISPOSITION	affirmed
PROCEDURAL POSTURE	Abram appealed his convictions for willful injury causing serious injury and possession of a firearm as a felon, challenging the denial of his motion for new trial based on the weight of the evidence, the admission of Ring surveillance footage for lack of foundation, and the denial of his motion to strike a juror for cause.
STANDARD OF REVIEW	Denial of a motion for new trial based on the weight of the evidence and rulings on motions to strike jurors for cause are reviewed for abuse of discretion. An evidentiary challenge is reviewable only if error was preserved under Iowa Rule of Evidence 5.103(a)(1)(b).
PRECEDENTIAL VALUE	published and precedential
PARTIES	Christopher Wortham Abram v. State of Iowa

TOPICS

- criminal procedure
- evidence
- preservation of error
- appellate procedure
- standard of review

PRACTICE AREAS

criminal procedure

evidence

appellate procedure

QUESTIONS PRESENTED

1. Whether the district court abused its discretion by denying Abram's motion for a new trial on the ground that the verdict was contrary to the weight of the evidence.
2. Whether the district court abused its discretion by denying Abram's motion to strike Juror 266 for cause based on the juror's friendship with a State witness.
3. Whether Abram preserved his challenge to the admission of the Ring surveillance footage based on a lack of foundation.

HOLDINGS

1. Abram failed to preserve his evidentiary challenge because he made only a general foundation objection at trial and did not identify the specific argument that a Ring records custodian was required to authenticate the exhibit.
2. The district court's denial of the motion to strike Juror 266 did not warrant reversal because Abram did not establish prejudice. The juror did not express unequivocal bias and ultimately indicated an ability to evaluate the evidence under the court's instructions.
3. The district court did not abuse its discretion by denying Abram's motion for a new trial because the credible evidence supporting the verdict outweighed the evidence favoring an alternative verdict.

KEY QUOTATIONS

"We review denials of a motion for new trial on the weight of the evidence for an abuse of discretion and will only reverse "in the extraordinary case where the evidence preponderates heavily against the verdict." (at 6)

"The juror did not express unequivocal bias against Abram. Rather, the juror quite openly equivocated, expressing a desire to give Abram a fair trial and uncertainty over the effect, if any, his relationship with a witness would have on his decision-making as a juror." (at 9)

"Based on the weight of the evidence in this case, I find that . . . the greater weight of the evidence, . . . there is credible evidence to support the jury verdict in this case." (at 11)

FACTUAL BACKGROUND

A surveillance video showed a smaller man approach the victim on South Street in Waterloo, exchange words with him, and fire at least three shots; the victim was wounded and the shooter fled. Police recovered two 9mm shell casings, and firearms testing indicated that the casings were fired from a Tanfoglio FAB 92 handgun found in Abram's residence. Abram's DNA matched DNA recovered from the handgun, and other evidence connected him to the bedroom where the firearm and magazines were found. The victim identified Abram as the shooter but expressed some uncertainty, and the jury convicted Abram of willful injury causing serious injury and possession of a firearm as a felon.

PROCEDURAL HISTORY

The State charged Abram by trial information with willful injury causing serious injury and two counts of possession of a firearm as a felon, with habitual-offender enhancements. After a jury trial, Abram was convicted on the willful-injury count and one firearm-possession count and acquitted on the other firearm-possession count. The Iowa District Court for Black Hawk County denied his motion for a new trial and motion to strike a juror for cause, and the Court of Appeals affirmed.

DISPOSITION

affirmed

CASES CITED

- Thompson v. Bohlken, 312 N.W.2d 501, 509 (Iowa 1981)
- State v. Shanahan, 712 N.W.2d 121, 135 (Iowa 2006)
- State v. Jonas, 904 N.W.2d 566, 570-71, 583 (Iowa 2017)
- State v. Neuendorf, 509 N.W.2d 743, 746 (Iowa 1993)
- State v. Ary, 877 N.W.2d 686, 706-07 (Iowa 2016)
- State v. Reeves, 670 N.W.2d 199, 209 (Iowa 2003)

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