

Geesa v. State

The defendant was convicted of a crime based entirely upon circumstantial evidence. After the court of appeals reversed the conviction based upon insufficient evidence, the State petitioned for discretionary review. Prior to this case, a “reasonable-hypothesis-of-innocence analytical construct” applied in reviewing circumstantial evidence cases. In light of recent decisions, the court determined that this construct was no longer valid and expressly adopted a definition of reasonable doubt to be included in jury instructions for all future criminal cases. The case was then remanded for a new trial using the jury instructions provided by the court.

In *Paulson v. State*, the Court of Criminal Appeals overruled the portion of *Geesa* that required a trial court to instruct the jury on the definition of “beyond a reasonable doubt.” The United States Supreme Court held in *Victor v. Nebraska* that “the Constitution neither prohibits trial courts from defining reasonable doubt nor requires them to do so as a matter of course.” The Court of Criminal Appeals stated that “the better practice is to give no definition of reasonable doubt at all to the jury.”