

CAUSE NO. 1434395

THE STATE OF TEXAS § IN THE 351ST DISTRICT COURT
VS. § OF HARRIS COUNTY, TEXAS
RONALD LEE HASKELL § JULY TERM, A. D., 2019

Members of the Jury:

The defendant, Ronald Lee Haskell, stands charged by indictment with the offense of capital murder, alleged to have been committed on or about the 9th day of July, 2014, in Harris County, Texas. The defendant has pleaded not guilty.

A person commits the offense of murder if he intentionally or knowingly causes the death of an individual.

A person commits the offense of capital murder if he commits murder, as hereinbefore defined, and the person intentionally or knowingly causes the death of more than one person during the same criminal transaction.

"Deadly weapon" means a firearm or anything manifestly designed, made, or adapted for the purpose of inflicting death or serious bodily injury; or anything that in the manner of its use or intended use is capable of causing death or serious bodily injury.

"Bodily injury" means physical pain, illness, or any impairment of physical condition.

"Serious bodily injury" means bodily injury that creates a substantial risk of death or that causes death, serious permanent

disfigurement, or protracted loss or impairment of the function of any bodily member or organ.

A person acts intentionally, or with intent, with respect to a result of his conduct when it is his conscious objective or desire to cause the result.

A person acts knowingly, or with knowledge, with respect to a result of his conduct when he is aware that his conduct is reasonably certain to cause the result.

You are instructed that it is your duty to consider the evidence of all relevant facts and circumstances surrounding the deaths and the previous relationship, if any, existing between the accused and Katie Stay and the accused and Stephen Stay together with all relevant facts and circumstances going to show the condition of the mind of the defendant at the time of the alleged offense.

Now, if you find from the evidence beyond a reasonable doubt that on or about the 9th day of July, 2014, in Harris County, Texas, the defendant, Ronald Lee Haskell, did then and there unlawfully, during the same criminal transaction, intentionally or knowingly cause the death of Katie Stay, by shooting Katie Stay with a deadly weapon, namely a firearm and intentionally or knowingly cause the death of Stephen Stay, by shooting Stephen Stay, with a deadly weapon, namely a firearm, then you will find the defendant guilty of capital murder, as charged in the indictment.

Unless you so find from the evidence beyond a reasonable doubt, or if you have a reasonable doubt thereof, you will acquit the defendant and say by your verdict "Not Guilty."

Our law provides that a defendant may testify in his own behalf if he elects to do so. This, however, is a right accorded a defendant, and in the event he elects not to testify, that fact cannot be taken as a circumstance against him.

In this case, the defendant has elected not to testify and you are instructed that you cannot and must not refer to or allude to that fact throughout your deliberations or take it into consideration for any purpose whatsoever as a circumstance against him.

There is evidence before you in this case alleging the Defendant committed an offense or offenses other than the offenses alleged against him in the indictment in this case. You are instructed that you cannot consider such evidence for any purpose unless you first find and believe beyond a reasonable doubt that the Defendant did commit such other alleged offense or offenses.

You are instructed that evidence of crimes, wrongs or acts other than what is alleged in the indictment is not admissible to prove the character of the Defendant in order to show action in conformity with that character as proof of his guilt for the offense charged in the indictment.

It may, however, be admissible for other purposes, such as proof of motive, opportunity, intent, preparation, plan, ^{or} knowledge. Even then, you may only consider the same in determining the motive, opportunity, intent, preparation, plan or knowledge, in connection with the offense charged in the indictment.

You are further instructed that if there is any evidence before you in this case regarding the defendant's committing an alleged offense other than the offense alleged against him in the indictment in this case, you cannot consider such evidence for any purpose unless you find and believe beyond a reasonable doubt that the defendant committed such other offense, if any,

and even then you may only consider the same for the purpose of refuting, if it does refute, a defensive theory of the defendant and for no other purpose.

You are further instructed that if there is evidence before you to the effect that certain witnesses for the defendant had heard about other offenses on the part of the defendant then such evidence may only be considered by you for the purpose of testing the knowledge of such witnesses as to the defendant's reputation and the weight to be given to their testimony.

You may not consider such evidence for any other purpose than the ones listed above.

You are instructed that no act done in a state of insanity can be punished as an offense. The law presumes the defendant sane. It is an affirmative defense to prosecution that, at the time of the conduct charged, the defendant, as a result of severe mental disease or defect, did not know that his conduct was wrong.

The severe mental disease or defect must have existed at the very time or times inquired about, that is, at the very time of the alleged commission of the offense.

The term "mental disease or defect" does not include an abnormality manifested only by repeated criminal or otherwise antisocial conduct.

The burden of proof, as to this affirmative defense, is upon the defendant to prove by a preponderance of the evidence.

By the term "preponderance of the evidence" is meant the greater weight and degree of the credible evidence in the case.

Now if you believe from the evidence beyond a reasonable doubt that on or about the 9th day of July, 2014, in Harris County, Texas, the defendant, Ronald Lee Haskell, did shoot Katie Stay and Stephen Stay, as alleged in the indictment, but you further believe, by a preponderance of the evidence in the case, that at the time he committed said act, if he did, the defendant, as a result of severe mental disease or defect, did not know that his conduct was wrong, then you will find the defendant "Not Guilty by Reason of Insanity," and so state in your verdict.

Under the instructions given you herein, you will state in your verdict whether you find the defendant "Guilty," or "Not Guilty," or "Not Guilty by Reason of Insanity."

A Grand Jury indictment is the means whereby a defendant is brought to trial in a felony prosecution. It is not evidence of guilt nor can it be considered by you in passing upon the question of guilt of the defendant. The burden of proof in all criminal cases rests upon the State throughout the trial and never shifts to the defendant.

All persons are presumed to be innocent and no person may be convicted of an offense unless each element of the offense is proved beyond a reasonable doubt. The fact that he has been arrested, confined, or indicted for, or otherwise charged with the offense gives rise to no inference of guilt at his trial. The law does not require a defendant to prove his innocence or produce any evidence at all. The presumption of innocence alone is sufficient to acquit the defendant, unless the jurors are satisfied beyond a reasonable doubt of the defendant's guilt after careful and impartial consideration of all the evidence in the case.

The prosecution has the burden of proving the defendant guilty and it must do so by proving each and every element of the offense charged beyond a reasonable doubt and if it fails to do so, you must acquit the defendant.

It is not required that the prosecution prove guilt beyond all possible doubt; it is required that the prosecution's proof excludes all reasonable doubt concerning the defendant's guilt.

In the event you have a reasonable doubt as to the defendant's guilt after considering all the evidence before you,

and these instructions, you will acquit him and say by your verdict "Not Guilty."

You are the exclusive judges of the facts proved, of the credibility of the witnesses and the weight to be given their testimony, but the law you shall receive in these written instructions, and you must be governed thereby.

After you retire to the jury room, you should select one of your members as your Foreman. It is his or her duty to preside at your deliberations, vote with you, and when you have unanimously agreed upon a verdict, to certify to your verdict by using the appropriate form attached hereto and signing the same as Foreman.

During your deliberations in this case, you must not consider, discuss, nor relate any matters not in evidence before you. You should not consider nor mention any personal knowledge or information you may have about any fact or person connected with this case which is not shown by the evidence.

No one has any authority to communicate with you except the officer who has you in charge. After you have retired, you may communicate with this Court in writing through this officer. Any communication relative to the cause must be written, prepared and signed by the Foreman and shall be submitted to the court through this officer. Do not attempt to talk to the officer who has you in charge, or the attorneys, or the Court, or anyone else concerning any questions you may have.

Your sole duty at this time is to determine the guilt or innocence of the defendant under the indictment in this cause

and restrict your deliberations solely to the issue of guilt or innocence of the defendant.

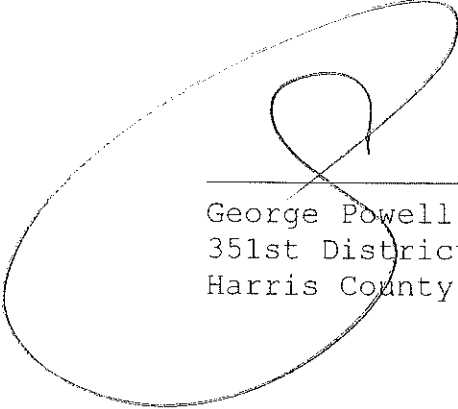
Your verdict must be by a unanimous vote of all members of the jury.

Following the arguments of counsel, you will retire to consider your verdict.

FILED
Marilyn Burgess
District Clerk

SEP 25 2019

Time: 12:38 PM
Harris County, Texas
By: E. Adams
Deputy



George Powell, Judge
351st District Court
Harris County, TEXAS

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V E R D I C T

"We, the Jury, find the defendant, Ronald Lee Haskell, not guilty."

Foreman of the Jury

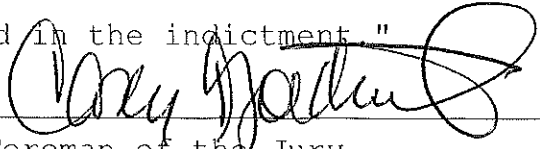
(Please Print) Foreman

"We, the Jury, find the defendant, Ronald Lee Haskell, not guilty by reason of insanity."

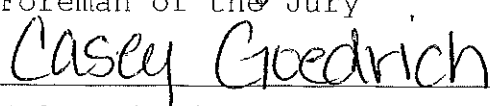
Foreman of the Jury

(Please Print) Foreman

"We, the Jury, find the defendant, Ronald Lee Haskell, guilty of capital murder, as charged in the indictment."



Foreman of the Jury



(Please Print) Foreman

FILED
Marilyn Burgess
District Clerk

SEP 26 2019

Time: 2:37 pm

Harris County, Texas

By: 
Deputy