

United States Court of Appeals for the Fifth Circuit

No. 25-40117

United States Court of Appeals
Fifth Circuit

FILED

September 1, 2026

MICHAEL KEVIN ADAMS,

Lyle W. Cayce
Clerk

Petitioner—Appellant,

versus

ERIC GUERRERO, *Director, Texas Department of Criminal Justice,
Correctional Institutions Division,*

Respondent—Appellee.

Appeal from the United States District Court
for the Eastern District of Texas
USDC No. 4:21-CV-207

Before DUNCAN, OLDHAM, and WILSON, *Circuit Judges.*

ANDREW S. OLDHAM, *Circuit Judge:*

Michael Kevin Adams was convicted of capital murder and sentenced to life in prison. After exhausting his state-court remedies, Adams sought federal postconviction relief on the grounds that insufficient evidence supported his conviction. The district court denied relief. We affirm.

I

A

In March 2013, Michael Kevin Adams drugged and sexually assaulted his former fiancée, N.L. *Adams v. State*, No. 05-16-01361-CR, 2018 WL 2355280, at *2 (Tex. App. May 24, 2018).¹ Adams then handcuffed her, hogtied her with a rope, and left her naked for hours on a blue tarp in his garage. *Ibid.* N.L. passed out several times. *Ibid.* At one point, she managed to escape, naked, to a neighbor's house. *Ibid.* Before anyone answered the door, however, Adams caught N.L. and again restrained her. *Ibid.* The next day, N.L. convinced Adams to free her, and she reported the assault to local law enforcement. *Ibid.* Adams was arrested the following day. *Id.* at *3. A search of his home and vehicle uncovered evidence consistent with N.L.'s description of the assault. *Ibid.*

N.L. got an emergency protective order prohibiting Adams from contacting her. *Ibid.* But the next month, N.L. reported to police that Adams had stolen her mail and left a hand-written letter at her home in Frisco, Texas. *Ibid.* Adams had signed the letter and sprayed it with his cologne. *Ibid.* N.L. informed police that she felt "terrified and harassed by the letter" and that she and her son were trying to "find shelter elsewhere." *Ibid.* They then moved to Melissa, Texas. *Ibid.* According to N.L.'s son, the move was "mostly to escape" from Adams. *Id.* at *4.

Shortly thereafter, N.L. and her son visited her father in Florida. *Id.* at *8. During the visit, N.L. was "concerned" about the State's upcoming sexual assault case against Adams. *Ibid.* N.L. had received numerous threats from Adams, including: "You better not testify or I'll kill you, bitch," "You

¹ Following the state court's lead, this opinion uses the victim's initials rather than her full name.

won't live," "they [the police] can't do sh*t." *Ibid.* N.L.'s son also had discovered a blue tarp and handcuffs on the front porch of their home—reminiscent of the items Adams had used in the sexual assault. *Id.* at *4. N.L. and her son were terrified. *Ibid.* According to N.L.'s son, his mother eventually "gave up" and "was resigned" to the fact that Adams was going to kill her. *Ibid.*

On September 9, 2013, six months after the sexual assault, N.L.'s son left for school at around eight in the morning. *Ibid.* Before departing, he saw his mother sleeping in her bedroom, kissed her on the forehead, and said, "Love you. See you when I get home." *Ibid.* But when he returned that afternoon, he found the front door unlocked, called for his mother, and received no response. *Ibid.* He went to her bedroom, where he found his mother's lifeless body. *Ibid.* He immediately called the police. *Ibid.*

Law enforcement arrived and discovered that N.L. had been shot twice in the head. *Id.* at *3. She was naked from the waist down, and her shirt had been pulled up to expose her chest. *Ibid.* In N.L.'s bathroom, police found two condom wrappers, as well as a green condom in the wastebasket. *Ibid.* In her bedroom, they located a yellow condom found wrapped in a towel and two spent .22-caliber cartridge casings. *Ibid.* Officers sent this evidence to a Texas Department of Public Safety ("DPS") lab for testing.

Adams was arrested the next day. *Id.* at *1. He stated that he had woken up at 9:15 a.m. on the day of the murder, went for a walk, and then returned home to shower and trim his bushes. *Id.* at *5. He then described his afternoon activities in comparatively "vivid detail[]." *Ibid.* Police could not corroborate anything that Adams said about his morning activities. *Ibid.*

Officers then searched Adams' house and vehicle. *Ibid.* While Adams had been required to surrender his firearms pursuant to the protective order, the search of his house revealed several empty gun cases and a photograph of

two .22-caliber firearms equipped with suppressors. *Id.* at *5. Officers also searched a storage unit belonging to Adams' ex-wife. *Ibid.* There, they found a silver gun case that "resembled" the case in the photograph, as well as a suppressor. *Ibid.* (quotation omitted). Officers never found the .22-caliber firearms or the other suppressor. But they did find a small silver screw in Adams's vehicle that "appeared to be a grip panel screw" from the handle of a handgun. *Id.* at *1.

Soon after the murder, the lead detective investigating N.L.'s sexual assault case, Scott Greer, resigned. *Id.* at *3. Greer had engaged in numerous inappropriate relationships with women connected to cases he was investigating. *Ibid.* He later testified that he exchanged sexually explicit emails with N.L., but he said they never had a physical relationship. *Ibid.*

In May 2014, Texas charged Adams with capital murder for intentionally causing N.L.'s death "in the course of committing or attempting to commit the offense of retaliation." *Id.* at *1; *see* TEX. PENAL CODE § 19.03(a)(2). The State declined to seek the death penalty, and Adams pleaded not guilty.

B

Adams's trial lasted more than six days. *Adams*, 2018 WL 2355280, at *2. Numerous witnesses testified to the facts recounted above, including various enforcement officers, N.L.'s son, her father, and Greer. *Id.* at *2-10. Greer also testified about his inappropriate relationship with N.L. and why he resigned. *Id.* at *3.

The State introduced the results of the forensic testing that DPS had conducted. *Id.* at *6. Two swabbings from N.L.'s body and another from the yellow condom each contained DNA from an unknown male. *Ibid.* The exterior surface of the green condom contained epithelial cells, or "touch DNA," belonging to Adams, as well as DNA belonging to N.L. and at least

one other unknown male. *Id.* at *6, *11. The interior surface contained DNA belonging to N.L. and two unidentified males. *Id.* at *6. A DPS employee testified that Adams's DNA "would put [Adams] at the crime scene" because he had lived apart from N.L. for so long, and the wastebasket "had what appeared to be fresh trash in it." *Ibid.*

The jury also heard two potential limitations on this DNA analysis. First, two experts testified that touch DNA can be transferred from place to place over time, so the presence of Adams's DNA did not necessarily mean he had been at the crime scene. *Id.* at *7, *9. The lead investigator in Adams's case also recognized that Adams's DNA could have ended up on the condom "in a lot of different ways," but the green condom was found atop "fresh trash," and its nearby wrapper indicated that it had been there for "not long." *Id.* at *9 (quotation omitted). Second, the jury heard that an incident at the DPS laboratory had caused the destruction of samples taken from N.L.'s residence. *Id.* at *7. But a DPS supervisor testified that she was "confident" that the remaining samples were not contaminated. *Ibid.* She also recounted that the same forensic biologist examined the evidence from the murder and N.L.'s assault case. *Ibid.* That biologist, in turn, testified that she followed protocols meant to avoid contamination "a hundred percent of the time." *Ibid.*

Further, the jury heard testimony on Adams's cellphone use. On the day of the murder, Adams made six phone calls, all after 11 a.m. *Id.* at *4. None of those calls pinged off the cell towers closest to N.L.'s home. *Ibid.* He testified that Adams had used his cellphone only nine times in the previous eleven days, which led him to think that Adams could have a second cellphone. *Ibid.* Adams also did not use his phone in the two days before the murder. *Id.* at *8. But another witness testified that Adams often made no phone calls before 11 a.m. or no calls whatsoever. *Ibid.*

Further, a computer forensics specialist testified that in the days preceding the murder, Adams conducted multiple searches on his workplace computer for GPS coordinates near N.L.'s home. *Ibid.* One of Adams's co-workers testified that she saw him looking at a photograph of N.L.'s face on his phone in the days leading up to the murder. *Id.* at *5.

Finally, the jury heard testimony from N.L.'s neighbors. One neighbor testified that, on the morning of the murder, he spotted an unfamiliar truck with a "red over/white under paint job." *Id.* at *8. He saw a person in the driver's seat who "appeared to be trying to recline or slink down" to "keep from being seen." *Ibid.* This description did not match Adams's white truck. But it did resemble Greer's truck, which was maroon and beige, with beige on the bottom. *Id.* at *1, *3. Greer's timesheets, however, showed that he was working at a school in Frisco. *Id.* at *6. Another neighbor testified that heard two loud "boom sounds" later that afternoon. *Id.* at *9. While the neighbor thought they "sounded like a gun," he had assumed the booms came from nearby construction. *Ibid.* Later testimony revealed that gunshots from nearby hunters also would have been audible. *Id.* at *9.

C

The jury convicted Adams of capital murder. *Id.* at *1; *see* TEX. PENAL CODE § 19.03(a)(2). The state court sentenced him to mandatory life in prison without parole. *Adams*, 2018 WL 2355280, at *1.

On direct appeal, Adams argued, among other things, that there was insufficient evidence to support his conviction. *Ibid.* Applying the standard set forth in *Jackson v. Virginia*, 443 U.S. 307 (1979), Texas's Fifth Court of Appeals rejected his argument. *Id.* at *10–15. One judge dissented. *Id.* at *17 (WHITEHILL, J., dissenting). The Texas Court of Criminal Appeals ("TCCA") refused Adams's petition for discretionary review, *id.* at *1, and

the Supreme Court denied his petition for a writ of certiorari, *Adams v. Texas*, 586 U.S. 1248 (2019).

Adams then sought state habeas relief. Adams did not challenge the sufficiency of the State's evidence. The state habeas court recommended that the TCCA deny relief, which it did.

Adams filed a federal habeas petition. Relevant here, he argued that the evidence supporting his conviction was insufficient and, in concluding otherwise, Texas's Fifth Court of Appeals unreasonably applied *Jackson v. Virginia*. The district court denied Adams's petition and denied a certificate of appealability ("COA"). But this court granted a COA with respect to Adams's sufficiency-of-the-evidence claim.

II

Now the merits. We (A) explain the governing legal rules and (B) apply them to this case. Then we (C) confront Adams's counterarguments.

A

Adams's sufficiency-of-the-evidence claim faces an exceedingly high hurdle. We discuss (1) the Antiterrorism and Effective Death Penalty Act; (2) *Jackson v. Virginia*; and (3) the combination of the two.

1

Start with the Antiterrorism and Effective Death Penalty Act ("AEDPA"). AEDPA "sharply limits" collateral review of federal habeas claims raised by state prisoners. *Klein v. Martin*, 607 U.S. 213, 220 (2026) (per curiam). The statute "stops short of imposing a *complete* bar on federal-court relitigation of claims already rejected in state proceedings." *Harrington v. Richter*, 562 U.S. 86, 102 (2011) (emphasis added). But just short.

As relevant here, AEDPA prohibits a federal court from granting relief unless the state court’s merits decision “involved an unreasonable application of [] clearly established Federal law, as determined by the Supreme Court of the United States.” 28 U.S.C. § 2254(d)(1).² A state court unreasonably applies Supreme Court precedent only if “the state court was *so* wrong that the error was ‘well understood and comprehended in existing law beyond any possibility for fairminded disagreement.’” *Langley v. Prince*, 926 F.3d 145, 156 (5th Cir. 2019) (en banc) (quoting *Shoop v. Hill*, 586 U.S. 45, 48 (2019) (per curiam)). “In other words, the unreasonable-application exception asks whether it is ‘beyond the realm of possibility that a fairminded jurist could’ agree with the state court.” *Ibid.* (quoting *Woods v. Etherton*, 578 U.S. 113, 118–19 (2016) (per curiam)). The difficulty of meeting this burden can hardly be overstated: “[E]ven a strong case for relief does not mean the state court’s contrary conclusion was unreasonable.” *Richter*, 562 U.S. at 102.

The Supreme Court recently explained the rule this way:

[I]n order to obtain federal habeas relief, a state prisoner must show far more than clear error. The habeas claimant must instead establish that the state court blundered so badly that every fairminded jurist would disagree with the decision. Only then is a decision so lacking in justification that its error precludes even the possibility for fairminded dispute.

Martin, 607 U.S. at 220–21 (quotations omitted); *see also Holberg v. Guerrero*, --- F.4th ---, ---, 2026 WL 2364671, at *4–5 (5th Cir. Aug. 14, 2026) (en banc)

² AEDPA also contemplates relief if the state-court decision was “contrary to” clearly established federal law or “was based on an unreasonable determination of the facts in light of the evidence presented in the State court proceeding.” 28 U.S.C. § 2254(d)(1)–(2). Adams makes no argument on either of these grounds.

(plurality opinion) (same). “If this standard is difficult to meet, that is because it was meant to be.” *Richter*, 562 U.S. at 102.

2

Moving onto the next hurdle: *Jackson*’s sufficiency-of-the-evidence standard. The sufficiency of the evidence underlying a conviction depends on “whether, after viewing the evidence in the light most favorable to the prosecution, *any* rational trier of fact could have found the essential elements of the crime beyond a reasonable doubt.” 443 U.S. at 319. The *Jackson* Court “emphasized repeatedly the deference owed to the trier of fact and, correspondingly, the sharply limited nature of constitutional sufficiency review.” *Wright v. West*, 505 U.S. 277, 296 (1992) (plurality opinion). An appellate court may not “reevaluate the weight of the evidence or the credibility of the witnesses,” and we leave it to the jury to “resolve conflicts in the testimony, to weigh the evidence, and to draw reasonable inferences.” *Terry v. Hooper*, 85 F.4th 750, 754 (5th Cir. 2023) (quotations omitted). When faced with a record that supports conflicting inferences, the reviewing court “must presume—even if it does not affirmatively appear in the record—that the trier of fact resolved any such conflicts in favor of the prosecution, and must defer to that resolution.” *Cavazos v. Smith*, 565 U.S. 1, 7 (2011) (per curiam) (quotation omitted).

All said, the *Jackson* standard is “so demanding” that a defendant who seeks to overturn his conviction on sufficiency grounds “faces a nearly insurmountable hurdle.” *Davis v. Lafler*, 658 F.3d 525, 534 (6th Cir. 2011) (en banc) (quotation omitted).

3

Any habeas petitioner who collaterally attacks his conviction for insufficient factual support must confront both AEDPA’s “sharp[] limit[at]ions[]” and *Jackson*’s “nearly insurmountable” burden. *Martin*, 607

U.S. at 220; *Davis*, 658 F.3d at 534. Adding the two standards together, a petitioner must show that every rational jurist would agree that every rational juror would not have found him guilty. Put differently, if a single reasonable jurist would think that a reasonable juror could have convicted the petitioner, then relief is foreclosed.

As to factual sufficiency claims,³ it is difficult to imagine how a prisoner could clear these twin tandem hurdles. The Supreme Court has made clear that circumstantial evidence alone can sustain a conviction. *See e.g., Ruan v. United States*, 597 U.S. 450, 467 (2022) (“The Government, of course, can prove [the disputed element] through circumstantial evidence.”); *Desert Palace, Inc. v. Costa*, 539 U.S. 90, 100 (2003) (emphasizing that the Court has “never questioned the sufficiency of circumstantial evidence in support of a criminal conviction, even though proof beyond a reasonable doubt is required”); *Holland v. United States*, 348 U.S. 121, 140 (1954) (“Circumstantial evidence in this respect is intrinsically no different from testimonial evidence.”). So it’s beyond cavil that a state court can lawfully affirm a defendant’s conviction that rests solely on circumstantial evidence. A federal judge reviewing the conviction de novo might think the jury’s inferences were irrational. But because a state court can lawfully affirm a conviction that rests on circumstantial evidence, and

³ Legal sufficiency claims are different. For example, in *Fiore v. White*, the petitioner was convicted under Pennsylvania law of operating a hazardous waste facility “without a permit.” 531 U.S. 225, 226 (2001) (per curiam). But after the petitioner’s conviction, the Pennsylvania Supreme Court interpreted the relevant statute for the first time and made clear that the petitioner did in fact have a permit. *Ibid.* The state court also stated that its interpretation of the statute was the law at the time of the petitioner’s conviction. *Ibid.* So, all parties agreed that the petitioner’s conduct was not criminal under the statute. *Id.* at 229. In other words, the State’s evidence was legally insufficient to convict the petitioner.

because of the twin hurdles posed by AEDPA and *Jackson*, the federal court must deny relief—*regardless* of what it thinks of the evidence.

The generality of the *Jackson* rule further compounds the difficulty of obtaining factual-insufficiency relief under AEDPA. The reasonability *vel non* of a state court’s decision “requires considering the rule’s specificity.” *Yarborough v. Alvarado*, 541 U.S. 652, 664 (2004). The “more general the rule, the more leeway courts have in reaching outcomes in case-by-case determinations.” *Ibid.*

Jackson’s any-rational-juror standard is as general as they come. Compared to the standard for ineffective assistance of counsel, for example, the sufficiency-of-the-evidence test is far more case-dependent. In the ineffective-assistance context, the Court commonly looks to certain facts to determine whether the defendant received constitutionally sufficient representation—including whether counsel performed reasonable investigations and made informed decisions. *See, e.g., Terry Williams v. Taylor*, 529 U.S. 362, 395 (2000); *Wiggins v. Smith*, 539 U.S. 510, 521 (2003); *Rompilla v. Beard*, 545 U.S. 374, 383, 390 (2005); *Andrus v. Texas*, 590 U.S. 806, 814 (2020) (per curiam). When it comes to factual sufficiency claims, by contrast, there are no such commonalities. “By its very terms,” *Jackson* “provides a general standard which calls for some examination of the facts.” *West*, 505 U.S. at 308 (KENNEDY, J., concurring the judgment). What’s more, even within the *Jackson* standard, the jury enjoys “broad discretion in deciding what inferences to draw from the evidence presented at trial.” *Coleman v. Johnson*, 566 U.S. 650, 655 (2012) (per curiam). Piling case-specific discretion upon case-specific discretion, AEDPA requires that federal courts give their state counterparts maximum leeway in applying *Jackson*.

B

Faced with the AEDPA-*Jackson* standard, Adams is not entitled to relief in federal court. Under Texas law, a person commits murder if he “intentionally or knowingly causes the death of an individual.” TEX. PENAL CODE § 19.02(b)(1). Adams argues that no reasonable jurist would agree with the state court’s conclusion that sufficient evidence demonstrated that he caused N.L.’s death.

Adams’s claim fails. As a preliminary matter, his briefing does not seriously engage with the governing standard. He spills much ink focusing on individual pieces of evidence and explaining why, in his view, none is sufficient to show beyond a reasonable doubt that he caused N.L.’s murder. But he never explains why, in light of clearly established federal law, no reasonable jurist would agree with the state court’s holding that a rational juror could have found him guilty. 28 U.S.C. § 2254(d)(1). Adams recognizes that he had a “motive” and “small window of opportunity,” and that his DNA was found in N.L.’s trash can. Blue Br. at 29. But he points to no Supreme Court precedent (or even a circuit court case) making it obvious beyond any fairminded disagreement that such evidence is insufficient to support a murder conviction. Indeed, the Supreme Court has “never questioned the sufficiency of circumstantial evidence in support of a criminal conviction, even though proof beyond a reasonable doubt is required.” *Desert Palace*, 539 U.S. at 100; see *Holland*, 348 U.S. at 140. That alone is fatal to Adams’s attempt to show the state court unreasonably applied clearly established law.

What’s more, the state court of appeals conducted a thorough analysis of the trial evidence and reasonably concluded that a rational juror could have found Adams guilty. The state court cited fifteen pieces of evidence pointing to Adams’s guilt. *Adams*, 2018 WL 2355280, at *15. That evidence included

DNA that placed Adams at the crime scene; Adams's repeated death threats; Adams's continued stalking of N.L.; the fact that shortly before the murder, items appeared on N.L.'s porch similar to those used during Adams's sexual assault; Adams's erratic phone use; Adams's lack of a confirmed alibi; Adams's photographs of firearms similar to the one used to murder N.L.; and a screw that could have come from a firearm found in Adams's truck. *Ibid.*

True, the State had no direct evidence of guilt, like a confession or a video. But under *Jackson*, "it is not necessary that every fact and circumstance point directly and independently to the defendant's guilt; it is enough if the conclusion is warranted by the combined and cumulative force of all the incriminating circumstances." *Temple v. State*, 390 S.W.3d 341, 359 (Tex. Crim. App. 2013) (quotation omitted); accord *Desert Palace*, 539 U.S. at 100. And here, the circumstantial evidence supporting the jury's verdict means that the state court's decision was not objectively unreasonable, let alone "so lacking in justification that there was an error well understood and comprehended in existing law beyond any possibility for fairminded disagreement." *Woods*, 578 U.S. at 117 (quotation omitted).

C

In response, Adams offers two categories of argument: one factual, and the other legal. We address each in turn.

1

Facts first. Adams's principal contentions sound in evidentiary quibbles: they second-guess the jury's inferences and are unavailing under *Jackson*. As to the touch DNA evidence, Adams posits that it could have come from transfer or contamination, and no one could say for sure when it was deposited. As to the photograph, he claims that it is consistent with the fact that he was a gun collector and licensed firearms dealer, and no murder

weapon was ever found. He also argues that the screw found in his truck did not necessarily come from a gun grip, and the State's witnesses could not prove otherwise. As to his cellphone use, he rehashes the testimony suggesting his cellphone use on the day of the murder was consistent with his regular habits.

All these arguments relate to the jury's weighing of the evidence and the inferences that the jury drew. Under *Jackson*, it is the sole province of the jury "to resolve conflicts in the testimony, to weigh the evidence, and to draw reasonable inferences from basic facts to ultimate facts." 443 U.S. at 319. Adams's factual arguments therefore fail.

2

Now law. Rather than confronting the interaction of AEDPA and *Jackson*, Adams argues AEDPA *never* applies to *Jackson* claims. *See* Tr. of Oral Arg. at 6:05–30, 8:13, 8:50–9:50, 11:00–15, 12:00–30. To counsel, a state court's affirmation of an "irrational" jury verdict can never be reasonable. *Id.* at 6:10–30.

That argument fails. If a prisoner's claim was "adjudicated on the merits in State court proceedings," then a federal court must confront AEDPA's relitigation bar. 28 U.S.C. § 2254(d). Nothing in AEDPA's text excepts sufficiency-of-the-evidence claims. So even if a panel of federal judges thinks the state court committed "clear error" in its application of sufficiency standard, AEDPA requires "far more than clear error." *Martin*, 607 U.S. at 220 (quotation omitted). And the relevant question is *never* whether federal judges think sufficient evidence supported the conviction. *See Smith*, 565 U.S. at 2 ("[T]he inevitable consequence of this settled law [*Jackson* and AEDPA] is that judges will sometimes encounter convictions that they believe to be mistaken, but that they must nonetheless uphold."); *Richter*, 562 U.S. at 102 ("It bears repeating that even a strong case for relief

does not mean the state court’s contrary conclusion was unreasonable.”). *Contra* Tr. of Oral Arg. at 8:50–9:35.

Finally, counsel’s argument flies in the face of numerous Supreme Court decisions—all of which reversed the courts of appeals for failing to give proper deference to state-court decisions in factual-sufficiency challenges. *See Johnson*, 566 U.S. at 651 (“Because the Court of Appeals failed to afford due respect to the role of the jury and the state courts of Pennsylvania, we now grant certiorari and reverse the judgment below.”); *Smith*, 565 U.S. at 7 (“When the deference to state court decisions required by § 2254(d) is applied to the state court’s already deferential review, there can be no doubt of the Ninth Circuit’s error below.”) (citation omitted); *McDaniel v. Brown*, 558 U.S. 120, 131 (2010) (per curiam) (“[T]he [Ninth Circuit] made an egregious error in concluding the Nevada Supreme Court’s rejection of respondent’s insufficiency-of-the-evidence claim ‘involved an unreasonable application of . . . clearly established Federal law.’” (citation omitted)). Indeed, counsel points to no Supreme Court decision that has ever granted habeas relief on a factual-sufficiency claim under AEDPA.⁴

⁴ Counsel cited two Fifth Circuit cases granting relief on sufficiency challenges purportedly under AEDPA. Tr. of Oral Arg. at 29:55–30:10. Neither case helps petitioner’s cause. One of the cases does not engage with AEDPA’s standard; pre-dates much of the Court’s explication of that standard; and does not cite the Court’s first explanation of the standard in *Terry Williams*. *See Donahue v. Cain*, 231 F.3d 1000, 1005 (5th Cir. 2000) (“We therefore conclude and hold that the evidence was insufficient to support Donahue’s conviction for attempted first-degree murder of a peace officer. The writ of habeas corpus must issue on this basis.”). The other case considered whether the petitioner had met his burden in state court to show he was legally insane. *Perez v. Cain*, 529 F.3d 588, 594 (5th Cir. 2008). That inquiry involved a host of different standards than a run-of-the-mill factual-sufficiency challenge. *See id.* at 595.

*

Adams cannot surmount the twin hurdles posed by *Jackson* and AEDPA's relitigation bar. Therefore the judgment of the district court is AFFIRMED, and habeas relief is DENIED.