

CAUSE NO. 175980201010

THE STATE OF TEXAS                   §       IN THE 263RD DISTRICT COURT  
  §  
VS.   §       OF  
  §  
LEHMAN, ANDREW PETER               §       HARRIS COUNTY, TEXAS

**STATE’S MOTION TO REVOKE BOND AND DENY BAIL  
PURSUANT TO ARTICLE I, SECTION 11B OF THE TEXAS CONSTITUTION**

The State of Texas, moves the Court to hold the required hearing pursuant to Code of Criminal Procedure Article 17.40(b) (West 2022) so the State may seek revocation of the defendant’s bond for violating a condition related to victim or community safety. *See* Tex. Code Crim. Proc. Ann. art. 17.40(b) (West 2022) (ordering a hearing limited to determining whether the defendant violated a bond condition imposed under this section and mandating revocation when the State proves by a preponderance of the evidence that the violation related to safety occurred). The State further moves this Court to deny the Defendant any further bail, pursuant to Article I, Section 11b of the Texas Constitution, for the following reasons:

I.

This Court released the Defendant on bond in the above listed cause number. As part of the defendant’s release the Court ordered the defendant to abide by bond conditions pursuant to Article 17.40(a) of the Texas Code of Criminal Procedure related to the safety of the victim or the safety of the community while released on bond.

The defendant has violated one or more of those conditions by:

Committed a new law violation On our about February 17, 2023, in cause number 1807640, the Defendant was charge with the new law violation of Possession of a Controlled Substance over 4 grams but less than 200 grams.;

II.

The State hereby respectfully requests that this Court:

- (1) Conduct the required hearing pursuant to Article 17.40, at the earliest opportunity;

- (2) Upon finding by a preponderance of the evidence that the defendant violated a lawful bond condition related to the safety of the victim or the community grant the State's motion to revoke the defendant's bond; and,
- (3) Deny the defendant any further bail in the above case in accordance with Texas Constitution Article 1, Section 11b because the defendant violated a past bond condition related to the safety of the victim and/or to the safety of the community.

Respectfully Submitted,



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**CERTIFICATE OF SERVICE**

I, the undersigned attorney, hereby certify that a true and correct copy of this instrument was e-mailed to counsel for the Defendant on this date by electronic service using his State Bar of Texas official address for electronic service.



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PENCE, JESSE  
Assistant District Attorney  
Harris County District Attorney's Office  
TBC No. 24104067



