

To; Jesse Pence, Assistant DA.

By email only: pence_jesse@dao.hctx.net

February 27, 2023

Joanna Burke

Email: joanna@2dobermans.com

Dear Mr Pence,

ANDREW PETER LEHMAN: CAUSE NO. 175980201010- 3

I have received papers in my mailbox from Mr Lehman whom I have never met and yet has been harassing me for weeks. Banging on my door, peering in my windows, and frightening me to death. He has pasted on my door an envelope calling me "Poor White Trash" (photo attached).

I am grieving my husband whom I was married to for 63 years and who died on 4th of September last year.

I am 84 years of age and do not need the added harassment from this evil person.

I understand you have a hearing tomorrow regarding Mr Lehman's continual violations of his bond (I believe he has 5 active criminal cases in Harris County Courts).

I also understand he has an ankle monitor where he claimed the battery died in a prior violation notice. I do not know if he is house tethered or has any other radius restrictions, but I do know he's traveled to my residence at 46 Kingwood Greens Dr., Kingwood, Texas, 77339 on Friday 17 March, 2023 where the offensive envelope was left.

I would like to offer this letter, written under the penalty of perjury as my unsworn declaration, so you can stop Mr Lehman from harrassing me and to stop him from coming to my home.

I sincerely hope you can argue successfully before the court, so Mr Lehman is revoked and jailed for his crimes, including victimizing and harassing me, an elder, law-abiding citizen of the State.

Thank you.

Sincerely

I declare under penalty of perjury that the foregoing is true and correct. This declaration under Chapter 132, Civil Practice and Remedies Code.



Joanna Burke

46 Kingwood Greens Dr.,

Kingwood, TX, 77339

Browser Web Inc

Clo - John Burke

- Joanna Burke
- Poor White Trash

46 Kingwood Greens

Kingwood TX

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,

A handwritten signature in black ink, appearing to read "Jesse Pence", is written over a horizontal line.

PENCE, JESSE
Assistant District Attorney
Harris County District Attorney's Office
TBC No. 24104067
PENCE_JESSE@DAO.HCTX.NET

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.



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

