

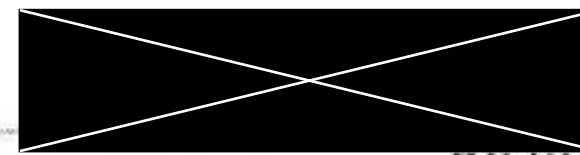
IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS

PETITION FOR WRIT OF HABEAS CORPUS
UNDER 28 U.S.C. § 2241

Lorenzo Lechuga
PETITIONER
(Full name of Petitioner)

Wallace Unit 1615 S. FM 3525 Colorado
CURRENT PLACE OF CONFINEMENT
City, Texas 79512

vs.



PRISONER ID NUMBER

State of Texas
RESPONDENT
(Name of TDCJ Director, Warden, Jailor, or
authorized person having custody of Petitioner)

NO. 125-CV-00075-H
CASE NUMBER
(Supplied by the District Court Clerk)

INSTRUCTIONS - READ CAREFULLY

1. The petition must be legibly handwritten or typewritten, and signed and dated by the Petitioner, under penalty of perjury. Any false statement of an important fact may lead to prosecution for perjury. Answer all questions in the proper space on the form.
2. Additional pages are not allowed except that ONE separate additional page is permitted in answering question 10.
3. Receipt of the \$5.00 filing fee or a grant of permission to proceed *in forma pauperis* must occur before the court will consider your petition.
4. If you do not have the necessary filing fee, you may ask permission to proceed *in forma pauperis*. To proceed *in forma pauperis*, (1) you must sign the declaration provided with this petition to show

that you cannot prepay the fees and costs, and (2) if you are confined in TDCJ-CID, you must send in a certified *In Forma Pauperis* Data Sheet form from the institution in which you are confined. If you are in an institution other than TDCJ-CID, you must send in a certificate completed by an authorized officer at your institution certifying the amount of money you have on deposit at that institution. If you have access or have had access to enough funds to pay the filing fee, then you must pay the filing fee.

5. Only one sentence, conviction, disciplinary proceeding, or parole matter may be challenged in a single petition. If you challenge more than one, you must do so by separate petition(s).
6. Mail the completed petition and one copy to the U. S. District Clerk. The "Venue List" in your unit law library lists all of the federal courts in Texas, their divisions, and the addresses for the clerk's offices.
7. It is your responsibility to immediately notify the court in writing of any change of address. Failure to notify the court of your change of address could result in the dismissal of your case.

PETITION

PLEASE COMPLETE THE FOLLOWING: (check the appropriate number)

This petition concerns:

1. ☐ pretrial detention;
2. ☐ a conviction;
3. ☐ a sentence;
4. ☒ jail or prison conditions;
5. ☐ a prison disciplinary proceeding;
6. ☒ parole or mandatory supervision;
7. ☒ time credits;
8. ☒ other (specify): Deportation

Have you pursued to completion all relevant state and/or prison administrative remedies relevant to your complaint(s) before filing this petition. Yes No If yes, what was the date of the result and the result of any such proceeding. If no, explain why you have not pursued all such remedies.

yes

Motion for bond hearing

1. Place of detention: WALLACE Unit 16765.FM 3525
COLORADO CITY, TEXAS 79512
2. State the offense with which you have been charged and whether you have been convicted of the charged offense(s) or whether you are still awaiting trial: MURDER UNDER
Tex. Pen. Code 19.02(b)(1) 35 YEARS
3. Name and location of court in which your case is pending or in which you were convicted: 171st DISTRICT COURT EL PASO, TEXAS
4. The criminal docket or case number and the offense(s) for which you have been charged or convicted: CAUSE NO. 2010005084
5. If you have been convicted of the charged offense(s), the date upon which sentence was imposed and the length of the sentence: 02/09/2011 35 YEARS
6. Check whether a finding of guilty was made:

a.	after a plea of guilty	—	—
☒ b.	after a plea of not guilty	—	—
c.	after a plea of nolo contendere	—	—
7. If you were found guilty, check whether that finding was made by:

☒ a.	a jury	—	—
b.	a judge without a jury	—	—
8. Did you appeal from the judgment of conviction or the imposition of sentence?

Yes	No
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9. If you did appeal, give the following information for each appeal:

a. (1) Name of court and docket or case number:

U.S. Northern District 1:25-cv-00075

(2) Result and date of result: June 02, 2025
Notice of deficiency order and filing fee

(3) Grounds raised (list each):

(a) Petitioner seeks release from state custody while he aw-
ait completion of removal proceeding under 8 U.S.C. §
1231(a)(b) See Dkt No. 1

(b) 8 U.S.C. § 1182(d)(5), 8 C.F.R. § 212.5

Removal proceedings - Homeland Secretary

(c) 90 day period 8 U.S.C. 1231 (a)(1) (A).

inadmissible - removable 8 U.S.C. § 1231 (a)(6)

(d) prolonged immigration detention

8 U.S.C. § 1231 (a)(6) bond hearing

b. (1) Name of court and docket or case number:

Motion for personal Restraint 18 U.S.C. § 3624

(a), (b), (c). 28 U.S.C. § 2106, 28 U.S.C. 1361, 1391, 2201

(2) Result and date of result: request 7241

(3) Grounds raised (list each):

(a) Due process § 1231 (a)(6), deportation
as final order 533 U.S. 689, 150 L. ed 2d 653, 121 S.Ct. 2491

(b) no room for ambiguity 13 121 S.Ct. 2271, 150
L. ed 2d 847.

(c) Jurisdiction 8 U.S.C. § 1252 (a)(2)(C). committed
Covered Criminal offenses - (Criminal alien bar)

(d) Deportation & removal Judicial Review. 8 U.S.C.
§ 1252, (a)(1), (b)(1).

10. State concisely every ground on which you claim that you are held unlawfully. Summarize briefly the facts supporting each ground. If necessary, attach a single page only behind page 6.

CAUTION: If you fail to set forth all grounds in this petition, you may be barred from presenting additional grounds at a later date. You must state facts, not conclusions, in support of your grounds. Do not argue or cite law. Just state the specific facts that support your claim. Legal arguments and citation to cases or law should be presented in a separate memorandum.

a. **GROUND ONE:** Constitutional Amendment Fourteen - Due Process, Equal Protection
Applicant contends that the Texas Govt Code 508.141 governing

the Authority to consider and release on Parole a incarcerated
offender as applied to me violates the due process under the 8 U.S.C.
§ 1231(a)(6) sentencing Deportation & Removal administrative proceedings

Supporting facts: Petitioner was convicted and sentenced on 02/09/2011 under
cause no. 20100005084 in style State v Lechuga Lorenzo for murder and 35 yrs
in TDCJ-ID Petitioner was brought up on review by a Texas Parole panel on or about
11/2024 under guide of the Texas Govt Code 508.141.1 which denied parole & set
Parole setting his next review date at 11/29 for reasons set out under (a) which
Petitioner contends that such denial is a complete denial of due process
because the Tex Govt Code does not apply to him or his class of people who
are subject to the sentencing, Deportation & Removal under terms 8 U.S.C.
1231(a)(6) which require removal of said Aliens under any of the three
categories otherwise release them on a conditional bond release

if not a effectuate removal is warranted within six months if bond
conditional release is denied as set out under 8 U.S.C. 1231

Constitutional Amendment Fourteen - Due Process
b. **GROUND TWO:** The Texas Board of Pardons and Parole's Govt
code 508.141 governing the Authority to consider and release
on Parole a incarcerated offender as applied to me violates
the equal protection clause under the 8 U.S.C. § 1231(a)(6) sentencing
Deportation & Removal administrative proceedings

Supporting facts: Petitioner was convicted of murder and sentenced to
35 yrs in TDCJ-ID in style State v Lechuga Lorenzo cause no. 20100005084
on or about 11/24 Petitioner was reviewed by a Texas Parole's Panel under the
guide of 508.141.1 and 508.149(a) + (b) due to the classification of his
1st degree murder offense under Texas Pen. Code 19.02 which after such review
the parole panel set Petitioner's next review date after said denial at 11/29

which Petitioner contends is a equal protection of the Law because Petitioner was already a Alien subject to Administrative Proceedings Bond Custody & Detention under 8 USC 1231(A)(b) requiring at the maximum effectuated removal by deportation no longer than six months if conditional bond release is denied.

Constitutional Amendment Fourteen - Due Process
c. GROUND THREE: The Texas Govt Code 508.141 governing the Authority to consider and release on Parole a incarcerated offender, is applied to me violates the Ex Post Facto Clause under the 8 USC 1231(A)(b) sentencing deportation removal administrative proceedings.

Supporting facts: Petitioner was convicted and sentenced on 02/09/2011 under CAUSE NO. 20100205084 in style STATE VS LECHUGA, LORENZO FOR MURDER AND 35 YRS in TDCJ-ID. Petitioner was brought and reviewed by a Tex. Parole panel on or about 11/24 under the guide of The Texas Govt Code 508.141.1 which denied parolee parole setting his next review date at 11/29. For reasons set out under 2d, which Petitioner contends is a complete Ex post Facto as applied to his class of people that is subjected sentencing, Deportation by its terms 8 USC 1231(A)(6) applies to three categories of Aliens: 1) Those ordered removed who are inadmissible under 8 U.S.C. 1182, (2) Those ordered removal who are removable under 8 U.S.C. 1227(A)(1)(C)(A)(2) OR (A)(4) AND (3) those ordered removal whom the Secretary of Homeland Security determines to either a risk to community or flight risk. This provision to authorize effective removal within six month, which the next review date of 11/29 exceeds

d. GROUND FOUR: Constitutional Amendment Fourteen - 14C

Due Process, Equal Protection. Rein Statement of removal orders.

Supporting facts: Rein Statement of removal order against aliens reentering U.S. If the Attorney General finds that an alien has reentered U.S. illegally after being removed or having departed voluntarily. The prior order of removal is reinstated from the original date and is not subject to being § 1252(a)(1), (a)(2)(C), 1252(9). Look at - memorandum.

11. Relief sought in this petition: deported immediately

12. Have you filed a previous application or petition for habeas corpus or any other application, petition or motion with respect to the grounds raised in this petition?

Yes

No

13. If your answer to Question No. 12 is yes, give the following information as to each previous application, petition, or motion:

a. (1) Name of court and docket or case number: N/A

N/A

(2) Result and date of result: N/A

(3) Grounds raised (list each):

(a) N/A

N/A

(b) N/A

N/A

(c) N/A

N/A

(d) N/A

N/A

b. (1) Name of court and docket or case number: N/A

(2) Result and date of result:

(3) Grounds raised (list each):

(a) N/A

(b)

(c)

(d)

N/A

14. If applicable, state whether you have filed a motion under 28 U.S.C. § 2255, and if you filed such a motion and it was denied, state why your remedy by way of such motion is inadequate or ineffective to test the legality of your detention.

N/A

15. Are you presently represented by counsel? Yes

☒ No

If so, name, address and telephone number of attorney:

N/A

16. If you are seeking leave to proceed *in forma pauperis*, have you completed an application setting forth required information? Yes

☒ No

Wherefore, Petitioner prays that the Court grant him the relief to which he may be entitled.

Signature of Attorney (if any)

I declare (or certify, verify, or state) under penalty of perjury that the foregoing is true and correct
and that this Petition for a Writ of Habeas Corpus was placed in the prison mailing system on _____
(month, day, year).

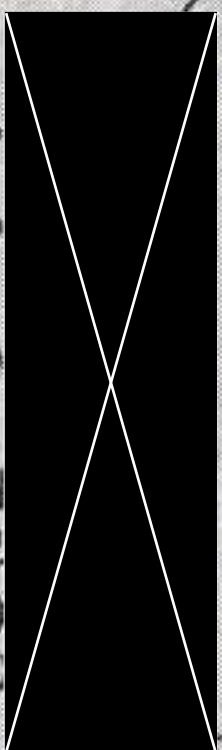
Executed (signed) on 6-19-25 (date).

LORENZO LECHUGA
Signature of Petitioner (required)

Petitioner's current address:

Lorenzo Lechuga
TDCJ-ID # [REDACTED]
Wallace Unit [REDACTED] S. FM 3525
Colorado City, Texas 79512

LORENZO LECHE



UNIT

FM 3525 S-
COLORADO CITY TX 79512

RECEIVED

JUN 23 2025

CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF TEXAS

To the Clerk
United States District Court
P.O. Box 1218
Abilene, TX 79604



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