

NO. 22 - 6789

I N T H E
S U P R E M E C O U R T O F T H E U N I T E D S T A T E S

J U A N F R A N C I S C O T U R C I O S - P E T I T I O N E R

V S.

S T A T E O F T E X A S - R E S P O N D A N T

O N P E T I T I O N F O R R E H E A R I N G F O R C E R -

Juan Francisco Turcios-Petitioner

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Richmond , TX 77406-8544

Pro Se

SUPREME COURT OF THE UNITED STATES

JUAN FRANCISCO TURCIOS
(Petitioner)

§

vs.

§

S.Ct.No.22-6789

STATE OF TEXAS
(Repondant)

§

" MOTION FOR REHEARING ON CERTIORARI UNDER THE CASE NO. ABOVE
And Under S. Ct. Rules §16, §13.3 ,Under 28U.S.C. § 1257, and
UNDER GOOD ACT AND FAITH"

COMES NOW, Juan Francisco Turcios Inmate 01790019, Proceeding
Pro Se, in Good Faith ,Files this Rehearing in "Good Faith,
Grounds Not Previously Presented which invokes a final Consi-
deration of the Supreme Court Justice(s) and the Court it
self that involves Extremely Extenuating Circumstances, that
Require this Honorable Court Attention, as such Petitioner
will show the following in support:

I.

Petitioner filed a writ of Certiorari invoking this Court
its discretion, to reviewed petitioner's final "State Review"
from the Texas Court of Criminal Appeals,, in which the Court's
decision was "Denied without Written Order" in violation of
clearly establish Supreme Court, Federal Court, and State
Court Ruling, such as label capricious, such act that if petiti-
oner was represented by liscense attorney would have got
resolution.

Petitioner Pled Guilty on the 9th day of April 2012 in excha-
nge for a capped 10 year sentence, the trial judge "Approved
and Accepted the profes plea bargain agreement drawn by
the Dallas District Attorney Ms. Hawkins. All members of the
Court signed the document on that day, (there were no disagree-
ments as to the 10 years), however, later on punishment day
Defense Counsel Mr. Johnson was upset due to the remarks
wrote by the Probation Department (petitioner was originally
set to received probation, but after the remarks it change),
petitioner was ask to tell the "Truth" for which it render
Mr. Johnson acting innefective. On April 27, 2012 petitioner

received an illegal sentence of 20 years thank's to Mr. Johnson manipulation of the case, on direct appeal petitioner was given an Honorable Appellate Counsel Mr. Matthew J. Kita, however, as good as Mr. Kita's intentions were, "criminal-law" was not his forte, and the plea bargain agreements although part of the whole record, was overlooked, case was affirmed.

II.

Petitioner revisit the Court of Criminal Appeals as to the matter of controversy, nevertheless, the Court refuse to give relief (although is not a matter of discretion but a right), the above State Proceeding took place on October 9, 2019, some two years prior finalizing petitioner "True an Original Sentence of Ten Years".

Petitioner filed a Total of 6 (six) writs of Mandamus, invoking the appeals Court and the C.C.A., but this was simply denied or treated as a civil matter, for which is NOT.

III.

Petitioner ask this Court Respectfully to review the matter at hand, as a question of "purely federal law" and to assest the C.C.A. failure to address the issue which only involves the time (the ten years) which expire on September 13, 2021, and at the same time which petitioner came up for State Parole which was also denied. Because the Court Task is to determine why the C.C.A. fail to adjudicate this already litigated issue, as the U.S. Supreme Court adjudicated the issue in LAFLER v. COOPER 566 U.S. 156 and MISSOURI v. FRYE 566 U.S. 134 as well as many STATE OF TEXAS, and even other STATES such as FLORIDA, and CALIFORNIA.

IV.

Petitioner acknowledge that the Court is not bound by local rules, however, such are the rules involve here that the similarities cannot be ignored, this possesses the "latent power" to go back and reopen or otherwise revisit the case by its entirety, thus the court may examine local rules to determine the true nature as to why the C.C.A. fail to act.

Petitioner herein includes records of his medical such is a delicate situation, as to the reason why the Court shall

exercise its discretion, as this matter is (life and death), or petitioner does not possess access to a copy machine so he relate the issue on writing for the oppose party, petitioner has D.V.T. (blood clots) in both of his lower extremities, as well as blood sugar deficiency (insulin dependant), but the most critical issue is the traverse IVC Filter install at the time of petitioner deadly motorcycle accident for which the State Of Texas was found liable for the damages, such are this issues that the State denied giving probation, but against all odds, and no medical relief by the State he still alive but not well, as to the IVC Filter is the center of a massive Litigation Law suit, see Cook Medical IVC Filter. This filter has nothing to do with neither the Court's Rulings however, the filter is the reason to ask for the rehearing, as the filter in petitioner has moved and it is "unretrievable", such if brakes is game over for petitioner, as he survive a deadly motorcycle accident in which 3 other mates died.

This Court is NOT LIMITED by the face of the judgment, it can request the whole "Trial Transcript" which would reveal if there are any inconsistencies in petitioner statement herein, and would expose what really went down.

The Court final determination in this matter would give petitioner some kind of vindication, and closure as he never got a chance to see his children grow.

Petitioner as a final thought described that how this Court possess the ability to give rehearing as a technical tool under Rule 13.3. as his opponents are very skilled Lawyers and he is not and in accordance with this rule the rehearing was filed timely, Ch. 513, Review on Certiorari: Time petitioning. Petitioner has stipulated all issues, nevertheless, "ALL STATE Appeals Courts have refused to address them or properly redressed them as the applicable law called for it, as such petitioner has gone above and beyond, all the way back to the trial court as the issue herein is not but but "ministerial, and not discretionary, for which it can be asses at any point, and back to the trial court without requiring any part from the Appellate Court or the Court of Criminal Appeals, however, when

petitioners rights are infringed, or basically revoke it requires the Court with the Most highest "power in the nation" the United States Supreme Court, for this and all the above reasons petitioner ask in "Good Faith" for a rehearing, shall be Granted, in a form of "Freedom From Illegal Incarceration Beyond his Discharged Date."

Petitioner lastly also described that one can say many medical reasons for relief, but can they prove it, any one can say my knee and ankle is fracture, but only the X Rays can disprove or prove beyond reasonable doubt, such is petitioner's situation who lived in constant "Pain in Suffering" such Cruel and Unusual Punishment. Petitioner also "Did Present" the Texas Board of Pardons and Paroles for leniency, or humanitarian "release" as described in the Federal Counterparts, however, for the Board I'm just to "number".

This Court "power to review" what the State Highest court refused to act by whatever condition that they choose, also would close the State Failure to Act, but also would give others in same situated areas to file their unconstitutional claims whatever that may be, derive by the State of Texas. However, not reviewing of petitioner's claims will give more power to denied others similarly situated, eroding and seriously undermining "Supreme Court and Federal Policy" in the other hand if this Court rule on petitioner case it will preclude the State and "Stop" the illegal influences that the State of Texas Act upon, as petitioner try all he could to pursue the Court of Appeals and the C.C.A..

Under §406.05 this Court has the obligation to review all Federal "Questions that Arise in the State Court" like Abridgment of petitioner "Constitutional Rights" those derive from all State and federal Plea Bargaining Case Law., such questions that had already been previously litigated, by this Court in *Lafler v. Cooper*, *Missouri v. Frye*, and *Kernal v. Cuero*.

The issue of the "Double Jeopardy" that petitioner was expose, Double Standard in Setting the distinction, as he had already agreed as to the Maximum possible sentence, and the unconstitutional failure from the "Trial Court and Appeals Court the C.C.A." as they refused to "Honor Petitioner's Plea."

Petitioner respectfully ask the Honorable Clerk to Forward, and present this "Motion for rehearing", it is humbly requested.

Under Rule 29.5 also the foregoing "Motion for Rehearing" is being served upon the Dallas county district Attorney. Postage Prepaid U.S. Postal Service, as require by the Court. Petitioner has presented this Court with such "Compelling Reasons" it cannot be ignored, as the failure to resolve the issues herein, is in direct conflict with the U.S. Constitution, and Supreme Court Precedent case law.

SUPREME COURT RULE 39. 1. Petitioner herein request for a form to proceed in forma pauperis, to leave as to please granted.

UNSWORN DECLARATION UNDER 28 U.S.C. § 1746

"I Declare under Penalty of Perjury" that the foregoing Motion for Rehearing is True and Correct and to the Best of my Knowledge.

Executed this 16th Day of May, 2023

Juan Francisco Turcios Petitioner

JURISDICTION AND REASONS WHY THE COURT SHALL
GRANT REHEARING IN LIGHT OF THE FOLLOWING CASES

1. Petitioner just like Cuero v. Kernan, plead guilty in exchanged "Capped plea Bargain Agreement", in petitioner it is undisputable because the capped is for 10 Years... In Cuero the State of California agreed to 172 months (14 years and, 4 months)... This Court "assume purely for argument's" sake, that the STATE violated the Constitution, when it moved to amend the complaint.

But like petitioner Cuero's case was override by the State of California... However,

The Supreme Court precedent that "clearly established federal law" demanding specific performance as a remedy. To the contrary, no "holding of this Court" requires the remedy of specific performance under the circumstances present here HARRINGTON v. RICHTER, 562 U.S. 86, 100, 131 S.Ct. 770, 178 L.Ed. 2d 624 (2011).

2. The court found in Cuero's case two precedent case, for which they "Granted relief" SANTOBELLO v. NEW YORK 404 U.S. 257, and MABRY v. JOHNSON, 467 U.S. 504.

3. This Court added that "circuit precedent does not constitute" clearly "established Federal law, as determined by the SUPREME COURT."

For these reasons, the Court conclude that the Ninth Circuit erred when it held that "Federal Law" as interpreted by this Court "clearly" establishes that specific performance is constitutionally required here... We decide no other issue in the case.

4. The Fifth Court of Appeals (in Dallas), the Texas Court of criminal Appeals, and the trial Court (the courts) acted, and erred, contrary to well established Federal, State, and Supreme Court precedent when they acted capricious, and denying petitioner's "clearly established relief under Supreme Court precedent based in light of Cuero v. Kernan.

5. Supreme Court's construction and application of Antiterrorism and Effective Death Penalty Act of 1996 (AEDPA) provision (28 U.S.C.S. § 2254(d)), restricted grant of federal habeas corpus relief to State prisoner on claim already adjudicated by State Court on merits. 154 L.Ed.2d 1147.

Supreme Court's views as to plea bargaining and its effects. 50 L.Ed.2d 876.

6. This court found in LAFLEER v. COOPER, 566 U.S. 156 (2012), same type of (misadvised, wrong advised, or unfair trial) "But for Counsel's ineffective Advice" led to an offer's rejection and where the prejudice alleged is having to stand trial, a defendant must show that but for the ineffective advice, there is a reasonable probability that the plea offer would have been presented to the court...the conviction or sentence, or both, under the offer's terms would have been accepted its terms would have been less severe than under the actual judgment, and sentence imposed. Pp. 162-170, 182 L.Ed.2d at 406-411.

Likewise in the case above petitioner's counsel fail to inform the Trial court of the correct "Possible Maximum sentence, for which the Court already previously approved and accepted", the maximum capped sentence of "ten years".

The New Trial judge even now that petitioner has presented the issue via State Habeas Corpus art. 11.07, in October 7, 2019 acknowledge, that ["THE COURT FINDS THAT CONTROVERTED, PREVIOUSLY UNRESOLVED FACTS MATERIAL TO THE LEGALITY OF THE APPLICANT'S CONFINEMENT EXIST."]

Signed October 16th, 2019 The honorable Rachel "Rocky" Jones.
Presiding judge over the 203RD J.D.C. Dallas County Texas.

7. In the above Case Lafler v. Cooper, the defendant was sentenced to 51-to-85 months-or (4 years to 7 years for intent to murder).

Petitioner's case like the one above have "aggravated assault with weapon", but there was no evidence at all but an untruthful statement of two people, that was later "inflated" by the Dallas County District Attorney, in Court terms is "Inflammatory".

which cause the trial court to alter the already agreed maximum sentence of 10 years(State of Texas second Degree Felony calls for Minimum of 2 but Maximum of 20),petitioner was sentence outside the agreed maximum,but no more than what the State stipulated as maximum.

Petitioner points out that a plea bargain for the maximum possible sentence is no plea bargain at all.

8.The court ask Petitioner "A Cause for Good Faith,or Reason to Grant Rehearing".

Petitioner response is based on his "deteriorating Medical Condition", amoug those I previously highlighted are,"petitioner" lost all left side molard tooth upper and lower,High Blood Pressure, Insulin dependent,Deep Vein thombosis,Blood Clots, in both lower extremities,Fracture ankle,Fracture Knee,Callous on bottom of his left foot/see the proof enclose. Cervical disc L3,L4pain from fractures,, all of the above which are descrived in "Cruel and Unusual punishment".

(Note) TDCJ-ID does not offer tooth replacement or filling of cavities,they only offer to pull all your teeths.

Under the U.S. Congress Act,an individual incarcerated on a U.S. Penal Institution may apply to have "Medical Release" for the following reasons:

(A) Medical Condition of the Defendant.

(i) The defendant is suffering from a terminal illness (i.e.,a serious and advance illness with an end of life trajectory)

(ii)The defendant is

(I) suffering from a serious physical or medical condition,

(II) suffering from a serious funtional or cognitive imparirment,or

(III) experiencing deteriorating physical or mental health issue,because of the aging process.

In United States v. Alam<2020 U.S.DIST.LEXIS 130118,Alam has more than likely the same or less issues than petitioner, nevertheless he is granted relief in a form of "Release from Inprisonment".

In the possibilities of the above and petitioner,the biggest differences are that petitioner has already finish his agreed maximum sentence of "TEN YEARS"back in September 13,2021.

Moreover, petitioner's biggest, and most profound reason is his traverse IVC Filter for which is impossible to retract, as U T M B does not offer any type of relief due to the fact that they said "we don't operate on other issues coming from the free world." Although petitioner is on a "Medical Facility"? the survivors rate here is less than 2%, as the personal is mostly "foreigners who are licensed by the State of Texas to work only in their penal facilities."

9. In Texas on an aggravated sentence such is the one petitioner is purging, "You must Do half of Your sentence To Be Eligible for Release on Parole".

However, being eligible and get release is two different things, as petitioner reached his half-way mark, or point on his illegal sentence back on September 13, 2021, but was given a "Further Review" or commonly known as "Set Off". An individual can have as many set off, or till he or she have less than "Six months left on their sentence" to be granted Parole, in other words Parole in Texas is for the Wealthy, and not the Poor like petitioner.

10. Petitioner ask the Clerk of the court treat his application with leniency, as he has no formal education, he learn how to read and write in (mostly Public Libraries Around Dallas Texas), he only finish the seven grade.

Petitioner only wants another chance to life, to see his grand kids, and kids as he lost their Best Teenager days because of his illegal prison sentence.

Based in light of all the above caselaw and this Honorable Court precedents, petitioner cannot see Why? this Court would denied granting.

SUPREME COURT OF THE UNITED STATES

Juan F. Turcios

§

vs.

§

No. 22-6789

State of Texas

§

MOTION FOR REHEARING ON CERTIORARI Under rule 16 and S.Ct. 15
S.Ct. Rule 22, Re-hearing Under Deathly Unpredictable Circumstances

COMES NOW, Juan Francisco Turcios Moves the Court Under Supreme Court Rules 15, 16, and 22, Prompting this court to reconsider review of the merits under deathly, extraordinary circumstances.

Petitioner filed the writ of certiorari under the acknowledgment that his "Plea Bargain Agreement" was violated, "Illegally Alter" by the Dallas County Prosecutor, or Dallas County District Attornies Office,,petitioner has supply this court with both sides of both "Plea Bargain Agreements" Clearly "Showing the Maximum Term of Sentence Ten Years", which Dallas County District Attornies Office agreed, and Dallas County District Judge Approved and Accepted the term to be set at "Ten Years".

The Judge on a later date in the month violated it by imposing an illegal term of twenty years, this sentence trigger the due course of law, and double jeopardy set by this court and followed by the States.

I.

The Court of Criminal Appeals has refuse to enforce the plea bargain agreement which is Ruled by it own TEX.Code Crim Proc.A Art.26.13(a)(2), which clearly states that ("A plae bargain agreement that has been approved, and accepted by the trial Court, must be, [a]nd CAN BE ENFORCED AT ANY TIME, IF BREACHED").

This same approached was desided by this Court on Cooper v. Lafler and Missouri v. Frye. in 2010 this court denial open up the flood-gates in Texas to keep violating every-single defendant who's Plea Bargain was violated in changed, by a corrupt defense trial counsel petitioner is under a death sentence because under his

Under petitioner's current medical conditions it makes this petition for "Writ of Certiorari" a Motion to Stay, some of petitioners medical problems are but not limited to .Deep Vain Thrombosis, Blood Clots in both lower extremities, /a Unretrivable IVC Filter manufacture by Cook Medical Inc. Diabetes/Insulin Highertentia, Fracture Ankle, Fracture Knee,,Lh knee-ulcer, which is unhealible,have it since 2016 it will not heal due to the lack of proper medical care,Lh foot Drop.

The most relevant issue is the "traverse-IVC Filter" which was placed by Jarkland Memorial Hospital while I was in the outside world,same Hospital that J.F.K.died.

The high risk that am under called by extreme measures which all are denied by TDCJ and UTMB-Medical, Law Suits Will NOT WORKED.

The Texas Board of Pardons and Paroles-although I am elecible for release the last review denied me,so parole is also a broken svstem.

Petitioner "is not a Lawver an ask this court for liniency in all his issues. after all is not what one can claim but what one can prove, as I proved bevond any reasonable doubt that I have Two Breached Plea Bargains,and all medical records that proved all Im stating in this motion is true.

UNDER RULE 16.3 the clerk can prepared ,sign and enter in notify the Justice,in my case I do not wish any Justice from the Fifth Circuit because of the lack of compassion in believing in God. If possible Justice Roberts,or Sotomayor.

The opportunity must be given to be heard,I do not Want to Died in Prison,as the denyial is proved to be unconstitutional ambiguous in regards of this court, and State Highest Criminal Court The C.C.A. of Texasdetermining that such denial would be unreasonable as shown ,consideration of statute,and,circumstances ,to allow petitoner consideration of medical conditions as a death penalty as it is imposed-since there is no reasoble likelihood that applicant's petition for rehearing will not be granted by this court,in light of all the above mitigating factors and circumstances

Because Supreme Court R.16.3 makes denial of certiorari effective upon entry on S.Ct. docket,filing petition for rehearing should have some type of effect under petitioners current

medical circumstances, as the court should consider such circumstances worth while, and .

Rule 20. Petition for Extraordinary Writ.

1. Issuance of the Court of an extraordinary writ authorized by 28 U.S.C. § 1651 as this court has the discretion, as a matter of the underlying mitigating petitioners facts, should the court exercised this action, the powers of discretionary are adequate relief as petitioner ca, as on Monday April 17, 2023 this court denied my writ of certiorari, all avenues for relief has been exhausted, and no court in Texas would issue relief.

6. If the Court orders the case set for argument, the clerk can notified the parties involved in this petition, and since a certiorari has been filed it can be forward and re-set for argument of the merits.

S.Ct. Rule 22 Application to individual justices.

1. Petitioner ask the clerk to forward or petition for the individual justices : Justice Roberts and Sotomayor, and after an individual justice had already denied writ of certiorari, under 22.6 The clerk should advise all parties concerned by appropriately speedy means.

The petition for rehearing of a "judgment or decision on the merits", is filed within the time limits set forth by this court, articulating the 25 day for rehearing. This most extraordinary relief will not be granted unless a reasonable likelihood of the court reversing its previous position and granting certiorari. [Per Roberts, Ch.J.] 550 U.S. 1301.

Petitioner sites no laws, but include Xrays, reports, showing all his claimings are true, and to the best of my knowledge.

However, in viewing the Federal Laws on compassionate release an inmate who has been convicted for far greater crimes can/get compassionate release, even for less time (" Congress carved out an exception known as compassionate release: federal courts could reduce a sentence when 'warrant[ed]' by 'extraordinary and compelling reasons[.]' " See Christie Thomson, frail, old, and Dying, but Their Only Way Out of Prison is a Coffin, N.Y. Times (MAR. 7, 2018), <https://www.nytimes.com/2018/03/07>.

In UNITED STATES v. HARRIS, 2020 U.S. Dist. LEXIS 245018. [*2]. Mr. Harris has served over twenty three years in prison. He rehabilitated through dozens of classes, regular and trusted work, and without an incident in over thirteen years.

1. Defendant's Motion (ECF Doc. No. 67) is GRANTED. 3. Mr. Harris shall be released from custody on January 5, 2021.

UNITED STATES v. FEUCHT 462 F. SUPP. 3d 1339 (FLA. STH. 2020) [*1342]. B. COMPASSIONATE RELEASE BASED ON DEFENDANT'S MEDICAL CONDITIONS. The Government agrees that "the defendant's serious medical conditions (diabetes) presents an extraordinary and compelling reason that would allow compassionate release." Conclusion. 1. Defendant's James Feucht's motion for compassionate release is GRANTED. Petitioner although already stated above the reasons for granting this motion are extraordinary and exceptional, only deep vein Thrombosis (DVT), at the stage that it includes but not limited to tenderness, red discoloration, already suffer from pulmonary embolism, the pain and nerve damage is so unbearable I have to take Ibuprofen, the difficulty walking, yes I ambulate with a rollator, due to my ankle and knee fracture, medical here reluctantly refused to order a wheel chair, or even offered it. I take Coumadin to thin my blood, but as it was the first developed anticoagulant medicine it has lost of downs, and rapidly raise to high levels of thin-blood.

Despite all adverse way to live I have managed to stay in one piece, as I saw another inmate just yesterday come back from a Hospital visit with both legs chop-off, I asked what happen, his response was, "I should have listen to You" now I have no legs. I told him I'm really sorry. But sorry would not give his legs -or feets back, that's I urged this panel reconsider even if remanded to "time served" I will not file a suit, I just want my freedom...please.

SUPREME COURT LAW

Petitioner pleaded guilty under a written plea bargain agreement with the State for two count indictment, then the written plea was approved and accepted, endorsed by the trial judge, with the option for probation or confinement. The case was then referred to the "probation Department" although this fact is was later conceal its true, the plea is for Ten Years.

THE "SIXTH AMENDMENT guarantees a defendant the right to have a counsel present at all critical stages of the criminal proceedings" instituted against him. MISSOURI v. FRYE, 566 U.S. 156, 132 S.Ct. 1399, 182 L.Ed.2d 379 (2012). (citing MONTEJO v. LOUISIANA, 566 U.S. 778, 786 (2009)). Critical stages include, not only trial but also pretrial proceedings, including the plea bargain process. See LAFLEER v. COOPER, 566 U.S. 156, 132 S.Ct. 1376, 182 L.Ed.2d 398; PADILLA v. KENTUCKY, 559 U.S. 356, 376, 130 S.Ct. 1473, 176 L.Ed.2d 284 (2010); HILL v. LOCKHART, 474 U.S. 52, 57, 106 S.Ct. 366, 88 L.Ed.2d 203 (1985).

THE DOUBLE JEOPARDY CLAUSE OF THE FIFTH AMENDMENT, protects a defendant against being placed twice in jeopardy for the same offense. U.S. Const. amend. V. cl. 2 ("nor shall any person be subject for the same offense to be twice put in jeopardy of life or limb").

WAS PETITIONER PUT INTO A DOUBLE TRIAL?....THE ANSWER IS YES. Petitioner plead guilty, signed a judicial confession, agreed to the Ten Years in the written plea agreement, which Thereafter was approved and accepted by the trial judge, it is proven beyond any reasonable doubt, time in time again, however, there has never been a hearing based on the "Plea Bargain Agreement" Why/...the prosecution with the help of appointed defense counsel would make you believe that I change my mind...Not true...if that was true...why then Page 16 of the trial transcripts show..."ALL MEMBERS OF THE COURT ...Acknowledging the "CAP PLEA FOR TEN YEARS ?".

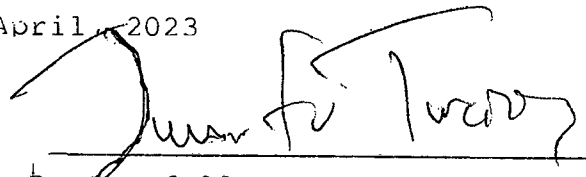
Prosecutor Ms. Hawkins, could not foretell the future, neither Mr. Johnson, IA. Defense counsel, in fact the portion deleted from the transcripts, is what matters here, as the probation agent concluded the provision before sentencing, the agent concluded that I was not guilty, and she asked...Why Did You Plead Guilty?. My Answer was Simple...Because my trial counsel did not want to help...Then the Agent answer...Well a report will be print and you counsel would be exposed...Good Luck. After that day on sentencing Johnson was furious, and coerce me to agree with all line of questioning from Ms. Hawkins that is why the Judge changed her mind, and hand it down the 20 years....Only this Court has the Power to get all corroborating evidence of this.

No one in their right state of mind will take a higher, or longer prison sentence, for an already agreed shorter sentence that is what the Dallas District Attornies Office has suggested but it is not what happen, I was there and Im telling the true.

PRAYER FOR RELIEF

Petitioner Prays to the Honorable Clerk convey this Motion for Rehearing to The Honorable Chief Justice, J. Roberts, and the Honorable Justice J. Sotomayor, and view the evidence, as it is true, I pray under God it is.

Executed this 21 day of April, 2023


Respectfully Juan Francisco Turcios

NOTICE OF MEDICAL EVIDENCE

Petitioner includes all original documents in support for this motion for re hearing, show proof all medical issues are real as the evidence at trial.