

TEXAS COURT OF APPEALS FOR THE FIRST DISTRICT AT HOUSTON

In the Matter of L.G. v. the State of Texas

In re L.G. · No. 01-25-00622-CV · Decided January 22, 2026

SUMMARY

The First Court of Appeals of Texas affirmed a juvenile court order waiving jurisdiction over L.G. and transferring him to criminal district court for prosecution as an adult for capital murder. The court held that factually sufficient evidence supported the juvenile court’s findings concerning the seriousness of the offense, L.G.’s sophistication and maturity, his background, and the prospects for public protection and rehabilitation. The court concluded that the waiver decision was not an abuse of discretion.

CASE DETAILS

COURT	Texas Court of Appeals for the First District at Houston
WRITING FOR THE COURT	Susanna Dokupil; Justice Guerra; Justice Caughey; Justice Dokupil
JURISDICTION	Texas Court of Appeals for the First District
DECIDED	January 22, 2026
DOCKET	01-25-00622-CV
DISPOSITION	affirmed
PROCEDURAL POSTURE	L.G. appealed the juvenile court's order waiving its exclusive original jurisdiction and transferring him to the criminal district court for prosecution as an adult for capital murder.
STANDARD OF REVIEW	The court first reviews the legal and factual sufficiency of the evidence supporting the juvenile court's specific findings under Texas Family Code section 54.02(f). Legal sufficiency requires crediting evidence favorable to the findings and disregarding contrary evidence unless a reasonable factfinder could not reject it; more than a scintilla of evidence is sufficient. Factual sufficiency requires considering all the evidence and determining whether the findings are so against the great weight and preponderance of the evidence as to be clearly wrong and unjust. Review is limited to facts expressly relied on in the transfer order. If the findings are sufficiently supported, the ultimate waiver decision is reviewed for abuse of discretion, asking whether the juvenile court applied the statutory criteria in a principled manner rather than arbitrarily or without reference to those criteria.

PRECEDENTIAL VALUE	published
PARTIES	L.G. v. the State of Texas

TOPICS

criminal procedure appellate procedure standard of review evidence

PRACTICE AREAS

juvenile law criminal procedure appellate procedure

QUESTIONS PRESENTED

1. Whether the evidence was factually sufficient to support the juvenile court's findings under the four factors in Texas Family Code section 54.02(f).
2. Whether the juvenile court abused its discretion by waiving its jurisdiction and transferring L.G. to the criminal district court for adult prosecution.

HOLDINGS

1. The evidence was factually sufficient to support the juvenile court's findings that the seriousness and circumstances of the capital-murder offense, L.G.'s sophistication and maturity, and the evidence concerning public protection and rehabilitation supported transfer, notwithstanding L.G.'s lack of prior juvenile-justice involvement.
2. The juvenile court did not abuse its discretion by waiving jurisdiction and transferring L.G. to the criminal district court because it applied the statutory criteria and based its decision on factually sufficient findings.

KEY QUOTATIONS

“If there is more than a scintilla of evidence supporting a finding, then the proof is legally sufficient.” (at 8)

“Because the court’s ultimate waiver decision was made with reference to guiding rules and principles, we conclude that the juvenile court did not abuse its discretion when it waived its jurisdiction and transferred L.G.’s case to the criminal district court.” (at 13)

FACTUAL BACKGROUND

L.G. was fifteen when he allegedly killed a homeowner by stabbing her repeatedly after approaching her in her backyard hot tub. He confessed to the killing and described pursuing the victim, dragging her body into a shed, concealing blood and other evidence, and attempting to disable her cell phone. L.G. had no prior juvenile-justice history, but a psychologist testified that he demonstrated high-average intelligence, sophistication, limited empathy, and characteristics raising concern about future dangerousness and rehabilitation.

PROCEDURAL HISTORY

The State requested a waiver-of-jurisdiction and transfer hearing in the juvenile court. After receiving documentary evidence and testimony from a law-enforcement officer and psychologist, the juvenile court found the statutory transfer criteria satisfied and transferred L.G. to the criminal district court. L.G. challenged the order on factual-sufficiency grounds, and the court of appeals affirmed.

DISPOSITION

affirmed

CASES CITED

- Bell v. State, 649 S.W.3d 867, 886, 899 (Tex. App.—Houston [1st Dist.] pet. ref'd)
- In re S.G.R., 496 S.W.3d 235, 239, 243 (Tex. App.—Houston [1st Dist.] 2016, no pet.)
- In re J.B., No. 01-24-00644-CV, 2025 WL 409407, at *1 (Tex. App.—Houston [1st Dist.] Feb. 6, 2025, no pet.) (mem. op.)
- In re Z.M., No. 02-21-00213-CV, 2021 WL 4898851, at *5 (Tex. App.—Fort Worth Oct. 21, 2021, no pet.) (mem. op.)
- In re K.J., 493 S.W.3d 140, 151 (Tex. App.—Houston [1st Dist.] 2016, no pet.)
- In re K.M., No. 01-20-00121-CV, 2020 WL 4210493, at *11 (Tex. App.—Houston [1st Dist.] July 23, 2020, no pet.) (mem. op.)
- C.M. v. State, 884 S.W.2d 562, 564 (Tex. App.—San Antonio 1994, no pet.)