

NO. \_\_\_\_\_

THE STATE OF TEXAS

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§

IN THE DISTRICT COURT

V.

OF HARRIS COUNTY, TEXAS

APPROXIMATELY \$41,680.00

\_\_\_\_\_ JUDICIAL DISTRICT

**PLAINTIFF'S NOTICE OF SEIZURE AND INTENDED FORFEITURE**

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, the State of Texas as Plaintiff by and through her District Attorney for Harris County, Texas, and files this Notice of Seizure and Intended Forfeiture against APPROXIMATELY \$41,680.00 and incorporates for all intents and purposes the Notice of Seizure attached to Plaintiff's Notice of Seizure and Intended Forfeiture and alleges the following:

I.

This proceeding is brought under and by virtue of Chapter 59 of the Texas Code of Criminal Procedure. Plaintiff alleges that discovery is intended to be conducted under Discovery Plan Level 2, in accordance with Rule 190, of the Texas Rules of Civil Procedure, and affirmatively pleads that this suit is not governed under the expedited-action process. Plaintiff does not seek monetary relief, rather the Plaintiff seeks a judgment that the subject property is contraband and that it be forfeited to the state.

II.

Jurisdiction is conferred upon this Court by virtue of Article V, Section 8 of the Texas Constitution and Article 59.04 of the Code of Criminal Procedure, and the occurrences recited hereinafter.

III.

Plaintiff complains of AMEAL WOODS, hereinafter referred to as RESPONDENT, as owner and possessor of the APPROXIMATELY \$41,680.00.

IV.

Plaintiff alleges that there was probable cause to seize said property and that said property is contraband as defined by Article 59.01 of the Code of Criminal Procedure and is thereby subject to forfeiture. Specifically, Plaintiff alleges that said property is either the proceeds gained from the commission of an offense, acquired with proceeds from the commission of an offense, used or intended to be used in the commission of an offense, and/or used or intended to be used to facilitate the commission of any offense enumerated under Chapter 59.01(2) of the Texas Code of Criminal Procedure, including but not limited to Sections 481.112, 481.113, 481.115, 481.116, 481.120 and 481.121 of the Texas Health and Safety Code and Chapter 34 of the Texas Penal Code, based upon the facts set forth in the attached and previously incorporated Notice of Seizure. Said property was seized on the 14<sup>th</sup> day of MAY, 2019, in Harris County, Texas.

V.

Plaintiff alleges the last known address of RESPONDENT is 22C NORTH SUNFLOWER ROAD, NATCHEZ, MS 39120 AND/OR AT ANY LOCATION WHERE RESPONDENT MAY BE FOUND.

VI.

Plaintiff alleges that the above property bears no known liens or other encumbrances by any other person or entity.

WHEREFORE, PREMISES CONSIDERED, the State of Texas prays that upon hearing, this Court enter a finding that the APPROXIMATELY \$41,680.00 is contraband and upon such finding to order the forfeiture of said property to the State of Texas with the Harris County District

Attorney's Office, acting as agent for the State, and then to be administered and disposed of by said office in compliance with Article 59.06 of the Code of Criminal Procedure.

Respectfully submitted,



ANGELA BEAVERS

Assistant District Attorney

Harris County, Texas

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Houston, Texas 77002

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Office Bar No. 99999997

Attorney Bar No. 00795243

Beavers\_angela@dao.hctx.net

Attorney for Plaintiff

Unofficial Copy Office of Marilyn Burdette Clerk

# NOTICE OF SEIZURE

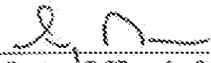
INCIDENT NO: 1905-04603

TO THE DISTRICT ATTORNEY OF HARRIS COUNTY, TEXAS:

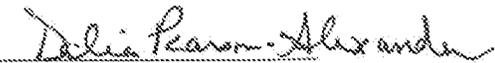
The undersigned peace officer, Gregory Nason, who is duly employed by the following law enforcement agency, Harris County Sheriff's Office, hereby notifies the Harris County District Attorney's Office that the below-listed property was seized on or about the 14th day of May, 2019 by the Harris County Sheriff's Office:

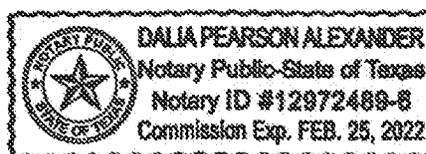
APPROXIMATELY: FOURTY ONE THOUSAND SIX HUNDRED EIGHTY DOLLARS AND NO CENTS (\$41,680.00) IN U.S. CURRENCY.

The undersigned peace officer believes that the seized property constitutes the proceeds of a felony offense and is contraband, as defined by Chapter 59 of the Texas Code of Criminal Procedure, based upon the following information, obtained in conjunction with his own investigation: On Tuesday, May 14, 2019, a sergeant with the Harris County Sheriff's Office observed a black, 2018, Nissan Sentra, bearing Mississippi plates LLA9575 traveling westbound at the 2300 block of I-10 Freeway following another vehicle at an unsafe distance. The sergeant conducted a traffic stop on the vehicle for the traffic violation. The driver of the vehicle was identified by his Mississippi driver's license as Ameal Woods-Respondent. While the sergeant was talking with Mr. Woods, he observed Mr. Woods to be very uncomfortable with labored breathing. Mr. Woods was asked to exit his vehicle and have a seat in the front passenger seat of the marked patrol vehicle so the Sergeant could issue Mr. Woods a warning for his traffic infraction. While Mr. Woods was inside the sergeant's vehicle, he observed Mr. Woods having facial tremors, shifting around in his seat, blinking, licking his lips and belching, all signs of stress. Mr. Woods informed the sergeant that he was heading to Katy, Texas to visit with his nephew then stated his wife rented him the vehicle he was driving to come to Houston to purchase a reefer trailer. Mr. Woods informed the sergeant he was traveling with approximately \$30,000.00 dollars in cash. Mr. Woods granted verbal consent for his vehicle to be searched. The sergeant discovered two bundles of U.S. Currency in the trunk of the vehicle. The first bundle of U.S. Currency was wrapped in electrical tape, vacuum-sealed four times and had transmission fluid poured between the second layer of heat seal. The second bundle was wrapped in colorful duct tape and then wrapped in Ziploc bags. Mr. Woods stated the currency was packaged that way so he wouldn't get robbed. Mr. Woods stated he obtained some of the currency from his family and from his wife's tax return. The sergeant spoke with "Jordan Davis" Mr. Woods alleged wife over the telephone and she denied having filed her taxes as of yet. Do to Mr. Woods not knowing how much money he was in possession of, the way the currency was packaged, his story of who owned, or where the currency came from, its believed the currency came from or being used for narcotics. The total of U.S. Currency in Mr. Woods possession was \$41,680.00 dollars. Mr. Woods was released with a warning citation and provided a case number of this incident. A K-9 Unit gave a positive response for the odor of narcotics on the U.S. Currency. Deputies believe that the seized currency was either used in, intended to be used in or the proceeds from the commission of the offenses of illegal activity.

  
Peace Officer's Signature

SWORN TO AND SUBSCRIBED before me on this the 4th day, June 2019.





Notary Public in and for  
Harris County, Texas