



II.

The following persons and/or entities may be owners or interest holders of the property made the subject of this cause of action have been and/or may be served with process at the addresses provided:

RICARDO MARTINEZ-CERNA 4316 Freshfield Fort Worth, Texas 76119	BEATRIZ RUIZ TORREZ 4316 Freshfield Fort Worth, Texas 76119
HUMBERTO CUEVAS-AVALOS 4316 Freshfield Fort Worth, Texas 76119	ALEJANDRO TOMEZ-TOVAR 3420 Lynnfield Dr. Fort Worth, Texas 76103
LEVY SORIA 210 S. Bagdad Rd., Ste. 11 Grand Prairie, Texas 75050	WILLIAMS CONSTRUCTION 3849 Radford Fort Worth, Texas 76119
THE WILLIAMS BROTHERS CONSTRUCTION 3829 Ave. M Fort Worth, Texas 76105	EDUARDO PARDO 3220 Hammerly Dr. Dallas, Texas 75212
MUNOZ AUTO SALES 1109 E. LONG Fort Worth, Texas 76106	DEBBIE TORREZ 3913 Crenshaw Fort Worth, Texas 76105

III.

On or about the date and at the place below, the property described below was seized by peace officers of the State of Texas under Chapter 59, Texas Code of Criminal Procedure, as further alleged and described by the Sworn Statement of the Seizing Peace Officer, L.D. Sims, I.D. no. 2712, attached hereto and incorporated herein by reference for all purposes.

**Property A:**

Date of Seizure: March 2, 2009  
Location: 2221 Rand Street, Fort Worth, Tarrant  
County, Texas  
Description: One (1) 2005 Chrysler 300 VIN  
2C3JA43R55H559618.

Seizing Officer(s): L.D. Sims, I.D. No. 2712

Potential Owners, Lienholders, Others With Interest:

BEATRIZ RUIZ TORREZ  
4316 Freshfield  
Fort Worth, Texas 76119

Property A is contraband and is subject to forfeiture under Chapter 59 of the Texas Code of Criminal Procedure for the reason that the same was used or intended to be used in the commission of a felony under Chapter 481, Texas Health and Safety Code (Texas Controlled Substances Act).

In the alternative, Property A is contraband and is subject to forfeiture under Chapter 59 of the Texas Code of Criminal Procedure for the reason that the same is proceeds gained from the commission of a felony under Chapter 481, Texas Health and Safety Code (Texas Controlled Substances Act).

In the alternative, Property A is contraband and is subject to forfeiture under Chapter 59 of the Texas Code of Criminal Procedure for the reason that the same was acquired with proceeds

gained from the commission of a felony under Chapter 481 of the Health and Safety Code (Texas Controlled Substances Act).

**Property B:**

Date of Seizure: February 26, 2009

Location: 4200 Wilbarger, Fort Worth, Tarrant County, Texas

Description: One (1) 2004 Dodge pickup truck, bearing dealer temporary tags, VIN 1D7HU18N42S535939.

Seizing Officer(s): L.D. Sims, I.D. No. 2712

Potential Owners, Lienholders, Others With Interest:

HUMBERTO CUEVAS-AVALOS  
4316 Freshfield  
Fort Worth, Texas 76119

LEVY SORIA  
210 S. Bagdad Rd., Ste. 11  
Grand Prairie, Texas 75050

Property B is contraband and is subject to forfeiture under Chapter 59 of the Texas Code of Criminal Procedure for the reason that the same was used or intended to be used in the commission of a felony under Chapter 481, Texas Health and Safety Code (Texas Controlled Substances Act).

In the alternative, Property B is contraband and is subject to forfeiture under Chapter 59 of the Texas Code of Criminal Procedure for the reason that the same is proceeds gained from the commission of a felony under Chapter 481, Texas Health and Safety Code (Texas Controlled Substances Act).

In the alternative, Property B is contraband and is subject to forfeiture under Chapter 59 of the Texas Code of Criminal

Procedure for the reason that the same was acquired with proceeds gained from the commission of a felony under Chapter 481 of the Health and Safety Code (Texas Controlled Substances Act).

Property C:

Date of Seizure: February 26, 2009

Location: 2000 Block of East Rosedale, Fort Worth, Tarrant County, Texas

Description: One (1) 2003 Chrysler PT Cruiser, VIN 3C4FY48B33T540885.

Seizing Officer(s): L.D. Sims, I.D. No. 2712

Potential Owners, Lienholders, Others With Interest:

BEATRIZ RUIZ TORREZ  
4316 Freshfield  
Fort Worth, Texas 76119

WILLIAMS CONSTRUCTION  
3849 Radford  
Fort Worth, Texas 76119

Property C is contraband and is subject to forfeiture under Chapter 59 of the Texas Code of Criminal Procedure for the reason that the same was used or intended to be used in the commission of a felony under Chapter 481, Texas Health and Safety Code (Texas Controlled Substances Act).

In the alternative, Property C is contraband and is subject to forfeiture under Chapter 59 of the Texas Code of Criminal Procedure for the reason that the same is proceeds gained from the commission of a felony under Chapter 481, Texas Health and Safety Code (Texas Controlled Substances Act).

In the alternative, Property C is contraband and is subject to forfeiture under Chapter 59 of the Texas Code of Criminal Procedure for the reason that the same was acquired with proceeds gained from the commission of a felony under Chapter 481 of the Health and Safety Code (Texas Controlled Substances Act).

**Property D:**

Date of Seizure: February 26, 2009

Location: 4316 Freshfield, Fort Worth, Tarrant County, Texas

Description: One (1) 1999 Dodge pickup truck, VIN 1B7MC336XXJ523136.

Seizing Officer(s): L.D. Sims, I.D. No. 2712

Potential Owners, Lienholders, Others With Interest:

RICARDO MARTINEZ-CERNA  
4316 Freshfield  
Fort Worth, Texas 76119

BEATRIZ RUIZ TORREZ  
4316 Freshfield  
Fort Worth, Texas 76119

MUNOZ AUTO SALES  
1109 E. LONG  
Fort Worth, Texas 76106

DEBBIE TORREZ  
3913 Crenshaw  
Fort Worth, Texas 76105

Property D is contraband and is subject to forfeiture under Chapter 59 of the Texas Code of Criminal Procedure for the reason that the same was used or intended to be used in the commission of a felony under Chapter 481, Texas Health and Safety Code (Texas Controlled Substances Act).

In the alternative, Property D is contraband and is subject to forfeiture under Chapter 59 of the Texas Code of Criminal

Procedure for the reason that the same is proceeds gained from the commission of a felony under Chapter 481, Texas Health and Safety Code (Texas Controlled Substances Act).

In the alternative, Property D is contraband and is subject to forfeiture under Chapter 59 of the Texas Code of Criminal Procedure for the reason that the same was acquired with proceeds gained from the commission of a felony under Chapter 481 of the Health and Safety Code (Texas Controlled Substances Act).

**Property E:**

Date of Seizure: February 26, 2009  
Location: 5300 Sun Valley, Fort Worth, Tarrant County, Texas  
Description: One (1) 1996 Ford pickup truck, VIN 2FDHF36G0TCA07241.

Seizing Officer(s): L.D. Sims, I.D. No. 2712

Potential Owners, Lienholders, Others With Interest:

RICARDO MARTINEZ-CERNA	THE WILLIAMS BROTHERS CONSTRUCTION
4316 Freshfield	3829 Ave. M
Fort Worth, Texas 76119	Fort Worth, Texas 76105

Property E is contraband and is subject to forfeiture under Chapter 59 of the Texas Code of Criminal Procedure for the reason that the same was used or intended to be used in the commission of a felony under Chapter 481, Texas Health and Safety Code (Texas Controlled Substances Act).

In the alternative, Property E is contraband and is subject to forfeiture under Chapter 59 of the Texas Code of Criminal Procedure for the reason that the same is proceeds gained from the commission of a felony under Chapter 481, Texas Health and Safety Code (Texas Controlled Substances Act).

In the alternative, Property E is contraband and is subject to forfeiture under Chapter 59 of the Texas Code of Criminal Procedure for the reason that the same was acquired with proceeds gained from the commission of a felony under Chapter 481 of the Health and Safety Code (Texas Controlled Substances Act).

**Property F:**

Date of Seizure: February 26, 2009

Location: 4316 Freshfield, Fort Worth, Tarrant County, Texas

Description: One (1) 1995 Chevrolet pickup truck, VIN 1GCHC33F7SF004378.

Seizing Officer(s): L.D. Sims, I.D. No. 2712

Potential Owners, Lienholders, Others With Interest:

RICARDO MARTINEZ-CERNA  
4316 Freshfield  
Fort Worth, Texas 76119

BEATRIZ RUIZ TORREZ  
4316 Freshfield  
Fort Worth, Texas 76119

WILLIAMS CONSTRUCTION  
3849 Radford  
Fort Worth, Texas 76119

Property F is contraband and is subject to forfeiture under Chapter 59 of the Texas Code of Criminal Procedure for the reason

that the same was used or intended to be used in the commission of a felony under Chapter 481, Texas Health and Safety Code (Texas Controlled Substances Act).

In the alternative, Property F is contraband and is subject to forfeiture under Chapter 59 of the Texas Code of Criminal Procedure for the reason that the same is proceeds gained from the commission of a felony under Chapter 481, Texas Health and Safety Code (Texas Controlled Substances Act).

In the alternative, Property F is contraband and is subject to forfeiture under Chapter 59 of the Texas Code of Criminal Procedure for the reason that the same was acquired with proceeds gained from the commission of a felony under Chapter 481 of the Health and Safety Code (Texas Controlled Substances Act).

**Property G:**

Date of Seizure: February 26, 2009

Location: 3129 Rodeo, Fort Worth, Tarrant County,  
Texas

Description: One (1) 1991 Ford Explorer VIN  
1FMDU32X5MUC34145.

Seizing Officer(s): L.D. Sims, I.D. No. 2712

Potential Owners, Lienholders, Others With Interest:

ALEJANDRO TOMEZ-TOVAR  
3420 Lynnfield Dr.  
Fort Worth, Texas 76103

EDUARDO PARDO  
3220 Hammerly Dr.  
Dallas, Texas 75212

Property G is contraband and is subject to forfeiture under Chapter 59 of the Texas Code of Criminal Procedure for the reason that the same was used or intended to be used in the commission of a felony under Chapter 481, Texas Health and Safety Code (Texas Controlled Substances Act).

In the alternative, Property G is contraband and is subject to forfeiture under Chapter 59 of the Texas Code of Criminal Procedure for the reason that the same is proceeds gained from the commission of a felony under Chapter 481, Texas Health and Safety Code (Texas Controlled Substances Act).

In the alternative, Property G is contraband and is subject to forfeiture under Chapter 59 of the Texas Code of Criminal Procedure for the reason that the same was acquired with proceeds gained from the commission of a felony under Chapter 481 of the Health and Safety Code (Texas Controlled Substances Act).

#### IV.

The property described hereinabove was seized by peace officers of the State of Texas. The State of Texas is entitled to have such property forfeited and title rendered to the State of Texas or an agency of the State or a political subdivision authorized to employ peace officers.

WHEREFORE, PREMISES CONSIDERED, Petitioner respectfully prays that the persons and entities entitled to service named herein be

cited to appear and answer, that upon hearing this court enter a judgment of Forfeiture of the described property to Petitioner, that this court award possession and title to such property to the Petitioner to be administered pursuant to Chapter 59 of the Texas Code of Criminal Procedure, for interest, if any from the date of deposit in an interest bearing account, for cost of court and for such other and further relief as the Petitioner may show itself to be entitled.

Respectfully submitted,

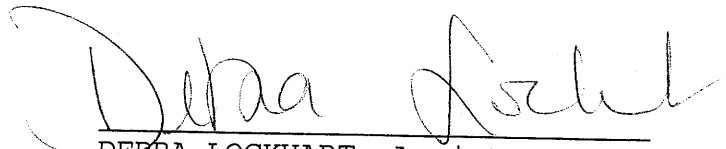
JOE SHANNON, JR.  
CRIMINAL DISTRICT ATTORNEY  
TARRANT COUNTY, TEXAS

By: 

DEBRA LOCKHART, Assistant  
Criminal District Attorney  
P.O. Box 24148  
Fort Worth, Texas 76124  
Ph. (817) 492-5222  
Fax (817) 492-5235  
State Bar No. 00791126

CERTIFICATE OF SERVICE

This is to certify that a true and correct copy of the attached Petitioner's Second Amended Notice of Seizure and Intended Forfeiture was sent by Certified Mail, Return Receipt Requested to Respondents, BEATRIZ RUIZ TORREZ and DEBBIE TORREZ, by and through their attorney of record, O. Otis Bakke, at 1272 Handkerchief Way, Haslet, Texas 76052, 18<sup>th</sup> day of September, 2009.



DEBRA LOCKHART, Assistant  
Criminal District Attorney