

FILED  
THOMAS A WILDER, DIST. CLERK  
TARRANT COUNTY, TEXAS

A CERTIFIED COPY  
THOMAS A. WILDER  
DISTRICT CLERK  
TARRANT COUNTY, TEXAS

AUG 06 2009

AUG 06 2009

No. 10390

ATTEST:  
BY: [Signature]  
DEPUTY

TIME \_\_\_\_\_  
THE STATE OF TEXAS DEPUTY

V.

1994 CADILLAC ELDORADO

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§  
§  
§  
§

IN THE \_\_\_\_\_  
213TH DISTRICT COURT COURT  
TARRANT COUNTY, TEXAS

NOTICE OF SEIZURE AND INTENDED FORFEITURE

TO THE HONORABLE JUDGE OF SAID COURT:

COMES NOW, The State of Texas, Petitioner herein, and files this Notice of Seizure and Intended Forfeiture pursuant to Chapter 59, Texas Code of Criminal Procedure and for cause of action would show the Court as follows:

I.

The Petitioner is the State of Texas. Discovery, if any, will be conducted pursuant to level one (1), pursuant to Rule 190.2 of the Texas Rules of Civil Procedure. Petitioner affirmatively pleads she seeks only monetary relief of \$50,000.00 or less, excluding costs, pre-judgment interest and attorney's fees, if applicable and allowed by law.

II.

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

CHRISTOPHER BRANDON NORMAN  
6621 S. Hulen Street, #135  
Fort Worth, Texas 76133

NICOLE NORMAN  
6621 South Hulen Street, #135  
Fort Worth, Texas 76133

BUDDY JOHNSON  
313 Vine Street  
Euless, Texas 76040

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, H. Berry, I.D. no. 301, attached hereto and incorporated herein by reference for all purposes.

**Property A:**

Date of Seizure: July 10, 2009

Location: 6625 S. Hulen Street, Fort Worth,  
Tarrant County, Texas

Description: One (1) 1994 Cadillac El Dorado bearing  
VIN 1G6EL12Y5RU615724 and contents  
therein

Seizing Officer(s): H. Berry, I.D. No. 301

Potential Owners, Lienholders, Others With Interest:

CHRISTOPHER BRANDON NORMAN 6621 S. Hulen Street, #135 Fort Worth, Texas 76133	NICOLE NORMAN 6621 South Hulen Street, #135 Fort Worth, Texas 76133
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BUDDY JOHNSON  
313 Vine Street  
Euless, Texas 76040

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 in the commission of a felony under Chapter

30, Texas Penal Code.

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 30, Texas Penal Code.

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 30, Texas Penal Code.

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 used in the commission of a felony under Chapter 34, Texas Penal Code

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 34, Texas Penal Code.

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 34, Texas Penal Code.

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 the rightful party, that this court award possession and title to such property to the rightful party 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 parties may show themselves to be entitled.

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

By: 

ANN WRIGHT, Assistant  
Criminal District Attorney  
P.O. Box 24148  
Fort Worth, Texas 76124  
Ph. (817) 492-5222  
Fax (817) 492-5235  
State Bar No. 04999500

## SWORN STATEMENT OF SEIZING OFFICER

I, Howard Berry #301, hereinafter referred to as Affiant, am over 18, have personal knowledge of the facts asserted below and am competent to testify to those facts and state under oath that the following statements are true and correct.

I am a peace officer under the laws of the State of Texas and am employed by City of Euless, Police Department, currently assigned to the criminal investigation division, a law enforcement agency, and do hereby, acknowledge that under the authority of Chapter 59 of the Texas Code of Criminal Procedures, I seized the property listed on the attached "Schedule of Seized Property" which by this reference is made a part hereof and incorporated herein for all purposes, and I do further state under oath my factual and legal reasons for seizure of said listed property are as follows:

On 070209 at approximately 0954 hours Officer Harper #344 of the Euless Police Department, was dispatched to 313 Vine St in reference to a burglary of a residence. Dispatch advised that the caller, Buddy Johnson (w/m 112636) called to report he arrived home to find his back door forced open. He advised that he and his wife had left his home at approximately 0700 hours on 070209 and returned at approximately 0945 hours and made entry through the garage. They immediately observed their Dell laptop (\$800) was missing from a table set up near their living room. They began checking the residence and found the following items missing:

1. A grey unknown make safe (\$200) containing:
  - A. \$59,000 in cash separated into 14 envelopes containing \$4000 each in \$100 bills, and 1 envelope containing \$2700 in \$100 bills and \$300 in \$20 bills.
  - B. \$1800 in US Savings Bonds
  - C. Platinum necklace folded into a heart shape
  - D. Gold ring with garnet stone
  - E. 1960's ring
  - F. Title to the house
  - G. Title to the car
  - H. Gold rope necklace
2. A Wooden box that had been sitting atop the safe containing \$300 in quarters
3. A jewelry box containing a tear drop gold necklace (\$200)

On 07/09/09 patrol officers responded to 306 Vine St. Euless, Tarrant County, TX, Hillside Village Apartments to meet with a manager who wanted to report possible criminal activity in the neighborhood. The manager advised that she had been informed that a resident had told the maintenance man she had seen a subject she knew as "Chris" running from the residence located at 313 Vine St. Euless, Tarrant County, TX on 07/02/09 at around 0900 hours carrying a large cardboard box. Officer's contacted the source of information who advised she stepped out of her apt and observed a BM who she knew as "Chris" running from 313 Vine St carrying a large cardboard box.

Detective Brennan took a recorded statement from the source of information, who stated that she had heard from friends in the complex that Chris was bragging that he had \$59,000.00. The source of information also advised that Chris told some mutual friends he wasn't going to buy a house, just clothes with the money he stole. This lends credibility to her story because she had no knowledge of what was stolen from the complainant's residence.

In an attempt to positively identify the "Chris" subject, investigators with the Euless Police Department were asked if they had any dealings or possible information on a young black male subject named Chris who lives in the area of the Hillside Village Apartments at 306 Vine St. Euless, Tarrant County, TX. Senior Corporal Buske advised that she knew of a Christopher Norman b/m 02/18/1991 with TXID #28200201, who was a boyfriend of a victim in one of her cases who lived at 306 Vine St #210, Euless, Tarrant County, TX.

Based upon this information and the information obtained by patrol officers earlier this date, Detective Haecker put together a photo lineup containing six photographs of persons with similar characteristics, placing Norman in position #4. The photo lineup was shown to the source of information, by Detective Brennan, and the source of information immediately picked Christopher Norman out of the line up as the person she saw running from the residence. The Chris subject was positively identified as Christopher Brandon Norman BM, 02/18/1991, TX DL #28200201.

On 070909 at approximately 1130 hours Officer Harper #344, was advised by dispatch that a second source of information wanted to report new information regarding the burglary of a habitation that took place at 313 Vine St., Euless, Tarrant County, TX. This second Source of Information advised that a female subject named Brandy J Singleton (b/f 092289) lives at 306 Vine St. #210, Euless, Tarrant County, and a cousin of Brandy also lives in the apartment. The second source of information said that both the girls however have boyfriends that frequent the apartment, one named Chris and the other Keith. The second source of information informed Officer Harper that he/she had heard that Brandy has "come into a bunch of money" since the July 4<sup>th</sup> weekend and that Brandy has been wearing extravagant jewelry and that Chris recently purchased a Cadillac Eldorado, and had a large amount of cash.

A warrant was issued for Burglary of a Habitation for Norman, Christopher Brandon b/m 02/18/1991 and on 07/10/09 at about 0600 hours; your affiant was contacted by EPD dispatch who advised that Norman had been arrested in Fort Worth. On 07/09/09 Fort Worth PD officers responded to 6621 S. Hulen Street # 135 Fort Worth, Tarrant County, TX, the Vallhalo Apartments. Christopher Norman and his younger brother, Randy Banks, were involved in a shooting. Norman was with his mother Nicole, his girlfriend Brandy Singleton, his brother Randy, and his friend Keith Black. A subject came to the door and asked for Little Randy when Norman turned back to get Randy the suspect at the door pulled a ski mask down over his face yelled "you niggas give me the money" and opened fire hitting Randy in the bicep. Randy then pulled out a gun fired through the door striking the suspect who was later identified as Dontrell Larkin b/m 071083 in the rib cage. Police were called and Norman was arrested on the outstanding Euless warrant for Burglary of a Habitation.

On 07/10/09 Detective Brennan and Sergeant Landers went to 6621 S. Hulen Street # 135 Fort Worth, Tarrant County, TX due to the fact that since Norman was at his mother's residence when arrested some of the complainant's stolen property might still be there. Detectives knocked for 20 minutes and no one responded.

Christopher Norman was interviewed by Your Affiant and Sergeant Landers. Norman was read his statutory warning and waived his rights to counsel and agreed to speak to officers about the burglary. At first Norman would not admit to knowing anything about the burglaries. He did admit to being a drug dealer and selling drugs. Norman then admitted to pawning camera's, jewelry, game systems, and laptops at First Cash Pawn #14, which is located at 213 W. Euless Blvd., Euless Tarrant County, TX, and Mid-Cities Pawn located at 801 W. Euless Blvd in Euless, Tarrant County, Texas. He stated to detective's that he knew the items were stolen but pawned them anyway. He stated he wasn't working and things were hard so if he could make \$10 he would do it. Norman then admitted to kicking in the back door to the residence located at 313 Vine St, making entry and stealing the complainant's property. When asked what specific items he took Norman stated a safe, wooden box, computer laptop and other items. All of the items Norman described matched property stolen from 313 Vine Street. He initially stated that he was unable to get the safe open and had no knowledge of its contents but later stated that he had opened the safe and that he had stashed away the money that was in the safe. He stated he would not tell detectives the location of the money, but he would tell his mother, Nicole Norman.

Upon return to the PD detective Brennan called Nicole Norman from his office. Chris told his mother he had stashed the money behind a business off of Amanda St. Nicole advised she knew where the business was and took detective's Landers and Blount to the location. The money was not located. While Sergeant Landers and Detective Blount were searching for the money Your Affiant contacted Brandy Singleton b/f 09/22/89 at the Euless Police Department and she provided the following statement:

*"I moved into the apartments at 306-Vine St on April 24, 2009. Chris helped me move. Chris had been staying with me for about a month. Around the time our baby was born. My baby was born on June 17, 2009. On July 2<sup>nd</sup> I was asleep and woke up at about 12 pm or 1pm in the afternoon. Chris was gone and I didn't hear from him again until the next day. When Chris' mom (Nicole) came to pick me, my cousin (Jolisa Richardson) and the babies up. Nicole took us to her house in Fort Worth to spend the 4<sup>th</sup> of July weekend with her. Over the past week Chris has gone shopping at least four times. I have only gone with him twice. When we buy something Chris pays for it. He pulls out a lot of money. He would pay with \$100's and \$20's. He has spent about \$5000.00. He has had money in the past but not that kind of money. The Silver Saturn belongs to Nesha who lives in the bottom apartment to the right of my apartment. I don't know where he got the money and I don't ask where he gets the money. Nicole has only had the Cadillac El Dorado for about 2 or 3 days. You can talk to her about it."*

While your affiant was taking Singleton's statement, Nicole Norman had come to the Euless Police Department to talk to detectives about Christopher Norman. Your affiant contacted her and she gave the following statement:

Chris came to live with me on or about the 4<sup>th</sup> of July, because the management at Hillside Village had told Brandy and Jolisa that Chris couldn't go the apartment anymore and if they did they did see him on the property they were going to call the police. Chris had told me that the less I knew the better, because he didn't want me to get in any trouble. I didn't ask. On either the 5<sup>th</sup> or the 6<sup>th</sup> I saw Chris take a wad of cash out of his pocket that was about 2 inches tall. On the 7<sup>th</sup> we were out looking for a car and had test drove one, but it wasn't running right so we left and as we drove we found a 1994 Green Cadillac El Dorado parked in the grass. Chris went in and talked to the man and paid \$2300.00 for the car. On the 5<sup>th</sup>, 6<sup>th</sup> and 7<sup>th</sup> of July 2009 I took them to Irving Mall, Ridgemar Mall, Northeast Mall and Hulen Mall. They would bring bags and bags of clothing, jewelry and tennis shoes to put in the van. They stayed at my house up to today (07/10/09). They were planning on going to Chris's friend's (Strong) house and I was gonna drop them off and they were gonna go wherever. Strong is Nicole's boyfriend's name. Then the shooting happened. Randy (my son) was taken to the hospital. Chris went to the Fort Worth Police Department to give his statement and then he was arrested. Fort Worth detective Finder called me and told me that Chris had a warrant for Burglary of Habitation in Euless.

The interview was concluded and Nicole advised that she would give the keys to the Cadillac El Dorado to your affiant but advised that she was not in possession of the vehicle presently, but that she could take detectives to the vehicle. She handed your affiant the keys to the Cadillac. Detective Blount followed her to 6625 S Hulen St, Fort Worth, Tarrant County, TX, the Valhalla Luxury Apartments. Nicole Norman directed Detective Blount to a 1994 Cadillac El Dorado VIN# 1G6EL12Y5RU615724, paper tag 001231. B&B Wrecker also arrived on scene. Detective Blount gained entry to the vehicle by using the vehicle keys, which Nicole Norman had provided to police. A vehicle inventory was completed on the Cadillac. B&B then towed the Cadillac to their impound yard, located at 1201 W Euless Blvd. Euless, Tarrant County, Tx. A Police Hold was placed on the Cadillac.

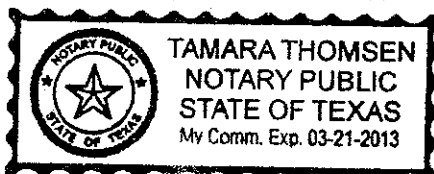
Your Affiant seized the property listed and described on the "Schedule of Seized Property" attached hereto, as Affiant contends said property was used or intended to be used in the commission of and/or, is proceeds gained from the commission of and/or, was acquired with proceeds gained from the commission of, a felony under Chapters 30 and 34, Texas Penal Code.

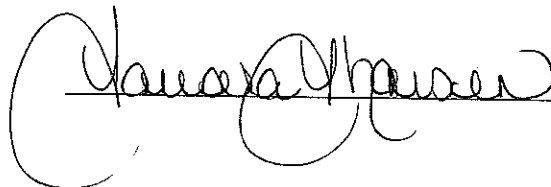
  
SEIZING OFFICER

Euless P.D.  
AGENCY

07-27-09  
DATE

SUBSCRIBED, AND SWORN to before me, the undersigned notary public, on this the 21<sup>st</sup> day of JULY, 2009.





**NOTARY PUBLIC, STATE OF  
TEXAS**

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**COMMISSION EXPIRATION**

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**TYPE/PRINT NAME OF NOTARY**

**SCHEDULE OF SEIZED PROPERTY**

- 1. 1994 / Cadillac / El Dorado / VIN1G6EL12Y5RU615724 / PAPER TAG #001231**