

Deposit For Costs Not Complied With

DC-24-04823

1 CIT - PCT 4

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

STATE OF TEXAS	§	IN THE DISTRICT COURT
	§	
VS.	§	
	§	DALLAS COUNTY, TEXAS
SEVEN THOUSAND THREE	§	
HUNDRED SIXTY-NINE DOLLARS	§	192nd
AND EIGHTY CENTS IN UNITED		
STATES CURRENCY		_____ JUDICIAL DISTRICT

ORIGINAL NOTICE OF SEIZURE  
AND INTENDED FORFEITURE

COMES NOW Joon Kim #9365, an officer of the Dallas Police Department and in the name and for the State of Texas, files this Original Notice of Seizure and Intended Forfeiture of SEVEN THOUSAND THREE HUNDRED SIXTY-NINE DOLLARS AND EIGHTY CENTS (\$7,369.80) IN UNITED STATES CURRENCY, and in support of such relief would show the following:

I.

This suit is brought in accordance with Chapter 59 of the Texas Code of Criminal Procedure, is within the Court's jurisdiction, is filed as a Level One discovery case, is seeking monetary relief of \$250,000.00 or less, and is governed by the expedited actions process.

II.

Plaintiff complains of **Min Jung Kim**, DOB 12-23-1974, who may be served with process at 6740 Marbella Drive, Irving, Dallas County, Texas 75063.

III.

Plaintiff asserts that the said currency is contraband and is subject to seizure and forfeiture as provided by Chapter 59 of the Texas Code of Criminal Procedure.

IV.

Plaintiff asserts that the seizure of the aforementioned contraband occurred on the 5<sup>th</sup> day of March 2024, in Dallas County, Texas.

V.

Plaintiff alleges that the seizure of the aforementioned contraband was made pursuant to a search warrant.

VI.

Plaintiff alleges that the said currency was contraband in that it was used or intended to be used in the commission of a felony under Chapter 71 of the Texas Penal Code, Engaging in Organized Criminal Activity or Section 43.04 of the Texas Penal Code, Aggravated promotion of Prostitution; or was the proceeds gained from the commission of aggravated promotion of prostitution and money laundering.

VII.

Plaintiff alleges that on March 5, 2024, the contraband became subject to forfeiture in that Affiant executed search warrants at (1) 21 Therapy Spa, 11113 Harry Hines Blvd., #B, Dallas, Dallas County, Texas; (2) Bali Therapy Spa, 9780 Walnut St., #148, Dallas, Dallas County, Texas; (3) Phoenix Spa, 8010 N. Stemmons Fwy, #101, Dallas, Dallas County, Texas; and (4) 1851 Knightsbridge Road, #1202, Farmers Branch, Dallas County, Texas. Dallas officers learned of an illicit massage parlor being operated at 11113 Harry Hines Blvd #B, Dallas, Dallas County, Texas. On March 5, 2024, Dallas officers executed search warrants at all three spas in Dallas. During search, officers seized money from various locations inside of each spa.

Plaintiff believes that the \$7,369.80 in United States currency seized from Claimant Min Jung Kim was used, was intended to be used, or was the proceeds from the commission of the

Aggravated Promotion of Prostitution or Engaging in Organized Criminal Activity, which both are felonies in the State of Texas.

VIII.

Plaintiff, acting in compliance with Article 59.04(b), attaches the sworn statement of the seizing officer as Exhibit A.

IX.

Plaintiff would state that the said currency is more particularly described in Schedule A of the seizing officer's sworn statement.

WHEREFORE, PREMISES CONSIDERED, Plaintiff prays that this petition be considered an Original Notice of Seizure and Intended Forfeiture and that citation issue to those parties as set out in this petition; that upon hearing this Court find that said SEVEN THOUSAND THREE HUNDRED SIXTY-NINE DOLLARS AND EIGHTY CENTS (\$7,369.80) IN UNITED STATES CURRENCY is contraband as defined in the Texas Code of Criminal Procedure, Article 59.01(2) and that the Court allow forfeiture of the above described property to the State of Texas by and through the office of the Criminal District Attorney of Dallas County, Texas as agent for the State and in accordance with its local agreement with the Dallas Police Department, subject only to any interest of the bona fide holder of the perfected lien or perfected security interest on said contraband and that the property be disposed of pursuant to Article 59.06 of the Texas Code of Criminal Procedure and that all costs be taxed against the Claimant in this cause and for such other relief at law and equity as the Plaintiff shall be entitled to receive.

Respectfully submitted,

John Creuzot  
Dallas County District Attorney  
Dallas County, Texas

A handwritten signature in black ink that reads "Jason L. Mathis". The signature is written in a cursive style with a long horizontal flourish at the end.

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ATTORNEY FOR PLAINTIFF

# EXHIBIT A

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