

Tibor Gyula Balogh
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Livingston, Texas 77399 USA

3:04-CV-1506-14

General Counsel
Texas Department of Public Safety
Post Office Box 4087
Austin, Texas 78773

25.JUN.2004

Dear General Counsel for (Texas DPS)

I am writing to inform General Counsel for Texas DPS of my intention to litigate for the Illegal Search of my motor home on 04.MAR.2001 by Texas DPS Officer Coronado and his team of K-9 search dog handlers where they did not have a search warrant to proceed with the search of my motor home and proceeded anyway. I believe that the fourth amendment of the constitution specifically protects a person's right to be secure in their papers things and effects and that right shall not be violated without the due process of the law, without a **search warrant** issued by a judge based on probable cause of a crime in progress supported by sworn testimony of witnesses under the penalty of perjury. In my case the Texas DPS officer and his team did not have my permission or a search warrant to proceed with the interior search of my motor home, I informed him that without proper search warrant anything he found would not be admissible in court, he understood and went ahead anyway, after several hours of search with four different K-9 search dogs there was nothing illegal found in my motor home and I was free to go on my way.

In my previous letter exchange with General Counsel for Texas DPS Pamela Smith Assistant General Counsel informed me that the police car video and audio evidence of the search was not available to me, it was exempt from public disclosure based on expected litigation from plaintiff (me) for the warrant less police search of my motor home.

With this letter I would like to inform the General Counsel for Texas DPS that I intend to litigate for damages in the amount of 20 Million US dollars against Texas DPS for violating my fourth amendment US Constitutional civil rights on 04.MAR.2001 with the warrant less illegal search of my motor home.

Sincerely,



Tibor G. Balogh

CC: Lieutenant Chris Mashburn, Texas DPS, 1617 E. Crest st, Waco Texas, 76705