

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
BROWNSVILLE DIVISION

UNITED STATES OF AMERICA)	Civil No.
)	
Plaintiff,)	
)	
v.)	COMPLAINT IN CONDEMNATION
)	[With Declaration of Taking]
1.04 ACRES OF LAND, more or less,)	[40 U.S.C. §3114]
situate in CAMERON COUNTY, STATE)	
OF TEXAS; and ELOISA G. TAMEZ,)	
ET AL.)	
)	
Defendants)	
_____)	

1. This is an action of a civil nature brought by the United States of America at the request of the Secretary of the Department of Homeland Security, through the Acting Executive Director, Asset Management, of U.S. Customs and Border Protection, for the taking of property, under the power of eminent domain through a Declaration of Taking, and for the determination and award of just compensation to the owners and parties in interest.

2. The Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1358.

3. The authority for the taking of the land is under and in accordance with the authorities set forth in Schedule “A” attached hereto and made a part hereof.

4. The public purpose for which said property is taken is set forth in Schedule “B” attached hereto and made a part hereof.

5. A general description of the land being taken is set forth in Schedule "C" attached hereto and made a part hereof. A plan showing the property being taken is shown on Schedule "D" attached hereto and made a part hereof.

6. The interest(s) being acquired in the property is described in Schedule "E" attached hereto and made a part hereof.

7. The names and addresses of known parties having or claiming an interest in said property are set forth in Schedule "G" attached hereto and made a part hereof.

8. Local and state taxing authorities may have or claim an interest in the property by reason of taxes and assessments due and exigible.

9. In addition to those persons named, there are or may be others who have or may have some interest in the property or interests to be taken, whose names are unknown to the Plaintiff, and such persons are made parties in the action under the designation "Other Interested Parties."

WHEREFORE, Plaintiff demands judgment that the property and interests be condemned, and that just compensation for the taking be ascertained and awarded, and such other relief as may be lawful and proper.

Respectfully submitted,

DONALD J. DeGABRIELLE, JR.

United States Attorney

By: s/ Charles Wendlandt

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