

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION

ALEK SCHOTT,

Plaintiff,

v.

BEXAR COUNTY, TEXAS,

Defendant.

Civil Action No. 5:23-cv-00706-OLG-RBF

PLAINTIFF’S STATEMENT OF CLAIMS

Plaintiff Alek Schott intends to prove that the Bexar County Sheriff’s Office has a policy or custom of violating drivers’ Fourth Amendment rights in three ways: (1) stopping cars without reasonable suspicion of an actual traffic violation, (2) prolonging those stops without reasonable suspicion of another offense, and (3) searching cars without probable cause. What happened to Alek is typical of what happened to other drivers.

Alek was driving home from a business trip on Interstate 35 when a license plate reader flagged his truck and someone called his trip “suspicious” in a private WhatsApp group chat. Bexar County Deputy Joel Babb then pulled Alek over, falsely claiming he drifted over the fog line. Babb put Alek in the front seat of his patrol car, interrogated him about other crimes without reasonable suspicion rather than quickly process the traffic warning, and then asked for consent to search without probable cause. When Alek refused consent, Babb called an improperly conditioned drug dog and searched anyway based on a bogus alert. There was nothing illegal in Alek’s truck.

Alek seeks \$76—one dollar for every minute he was detained—and a court order prohibiting further abuses.

Date: September 2, 2026

Respectfully submitted,

/s/ Christen M. Hebert

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Certificate of Service

I certify that on September 2, 2026, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system, which will provide electronic service upon all attorneys of record.

/s/ Christen Mason Hebert
Christen Mason Hebert