

2019 – DCL – 5623 – C

ZACHARY A. BLEVINS, JESUS
GUEVARA, JOSE COVARRUBIAS,
AND ROCIO PATINO,
Petitioners,

vs.

ERASMO CASTRO JR. (in his
capacity as Brownsville Independent
District School Board Member)
Defendant.

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IN THE 197TH JUDICIAL
DISTRICT COURT OF
CAMERON COUNTY, TEXAS

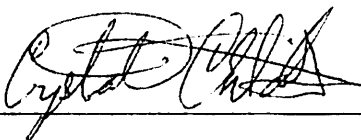
AFFIDAVIT IN SUPPORT OF MOTION TO TRANSFER VENUE

STATE OF TEXAS
COUNTY OF CAMERON

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BEFORE ME, the undersigned authority, on this day personally appeared Crystal Childs, who under oath stated as follows:

1. My name is Crystal Childs. I am over eighteen (18) years of age and am legally competent to make this Affidavit, which is true and correct, is based on my personal knowledge, and is made voluntarily and not under duress.
2. I am a resident of the county in which this suit is pending.
3. I have good reason to believe, and do believe, that Erasmo Castro cannot have a fair and impartial trial in Cameron County because there exists so great a prejudice against Mr. Castro that a fair trial is not possible, there is a combination against Mr. Castro instigated by influential persons, and an impartial trial cannot be had in Cameron County.
4. Mr. Castro has been repeatedly verbally attacked and defamed by individuals of influence in person and via social media. There have been videos threatening his life by showing guns and asking people to take matters into their own hands which was shared tens of thousands of times. Recently there was a post enticing people to attend a board meeting to call him out where they would pay people \$20 (twenty dollars each). These same individuals then posted a gun and a pig (Mr Castro is called by these people "marrano de monte" or wild pig) and that it was hunting season. I don't believe Mr Castro can get a fair trial here in Cameron County.



SWORN AND SUBSCRIBED TO before me on this 25th day of October, 2019.

Notary Public

