

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 Erasmo Castro, who under oath stated as follows:

1. My name is Erasmo Castro. 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, that I cannot have a fair and impartial trial in Cameron County because there exists so great a prejudice against me that a fair trial is not possible, there is a combination against myself instigated by influential persons, and an impartial trial cannot be had in Cameron County.
4. For some five years now I have had individuals stalk me to the point that I have received death threats and my family has been constantly harassed. It has been a constant violation of my privacy way before become an elected official. My family and I have been belittled by individuals posting lies, half-truths and pictures of posts taken out of context to form a narrative. During all this time these individuals who number in the thousands take pictures of me eating, leaving functions, entering and exiting my home and at any other public event I may attend. Individuals have threatened my life and encourage others to cause me harm, shoot me and or take me out. Four years ago I took these concerns for my life along with photographs and videos that clearly stated their intent of causing me harm to the Brownsville Police Department and to our then and current District Attorney Luis

Saenz. Nothing was done against these individuals despite the evidence and constant harassment.

Our Current DA and his brother, Mario Saenz, supported my campaign for Brownsville Independent School Board and I was grateful to receive DA Luis Saenz endorsement while running. I remained in good standing and communication with them till January 11, 2019 when the DA's brother attempted to coerce me to vote a certain way as a board member via text message (which I have to this day). He spoke in the "we" in the texts he sent and it is my belief that he was referring to his brother the current DA.

"Please don't deliver for Elizondo, and please vote to dismiss Zendejas. I and many others will be watching. Thank you for your consideration."

"Word is that he [Elizondo] has instructed you to vote in favor of her [Zendejas] and not against her. Please prove me wrong."

By Elizondo he was referring to Carlos Elizondo a former board member that our DA was at that time prosecuting (jury recently found him not guilty). By Zendejas he was referring to Dr Esperanza Zendejas our then Superintendent and a Carlos Elizondo supporter.

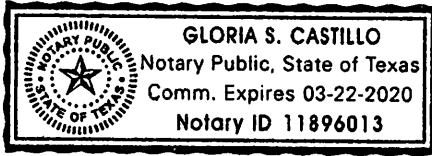
I responded to his coercion and threat (all via text messages which I to this day have) "No one controls my vote...."

I met with Attorney Ignacio Martinez, a then mutual friend, a week or so after the text message who confirmed to me that by "we" Mario Saenz was not only referring to our DA but to him as well and that they were upset that I objected to being pushed around as to how to vote while on the board. Ignacio Martinez and Mario Saenz have noticeably been very much involved as of recent with the individuals who have been stalking, harassing and posted death threats and with the individuals who filed Petition to Remove. It is clear by the live streamed video when said petition was filed that Zachary Blevins the main petitioner asked Mario Saenz for the monies to file said petition. It is my belief that they all are getting coached by our District Attorney who shared steps to follow in an article published by our local newspaper The Brownsville Herald.

I fear not only for my life but also the life of my family and friends that may be in close proximity to my being. I feel that because of the involvement of our DA, his immediate family and their acquaintances who had a part in the filing of this petition and because of the almost daily publications, TV news stories, blogs and social media posts it is impossible for me to get a fair trial here in Cameron County. I pray for transfer of venue.



Erasmo Castro



SWORN AND SUBSCRIBED TO before me on this 28 day of October, 2019.

Notary Public