

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

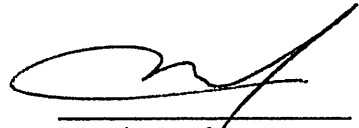
STATE OF TEXAS

COUNTY OF CAMERON

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

1. My name is Martin Leal. 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 my presence. My association with Mr. Castro has resulted in personal attacks against myself, my family and my business. I have met with bloggers and Facebook page administrators who have expressed their utmost hate for Mr. Castro in attempts to keep my business and family from being attacked because our support for Mr. Castro. They expressed that they will do whatever it takes to destroy him. It is my firm belief that Mr. Castro cannot get a fair trial in Cameron County because of the social media attacks against him and anyone associated with him.



Martin Leal

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

Roberto Galvan Garcia
Notary Public

