

Cause No. 2012-CVT-001496-D1

Eduardo A. Garza and	§	In the District Court
Uni-Trade Forwarding, L.C.,	§	
Plaintiffs,	§	
	§	
v.	§	49th Judicial District
	§	
Hector Farias, Voices in	§	
Democratic Action (VIDA),	§	
and Jose A. Valdez,	§	
Defendants.	§	Webb County, Texas

AFFIDAVIT OF MIKE GARZA

STATE OF TEXAS

COUNTY OF WEBB

BEFORE ME, the undersigned notary public in and for said County and State, on this day personally appeared Mike Garza, known to me, and after being duly sworn, state on oath, as follows:

1. "My name is Mike Garza. I am over the age of eighteen (18), of sound mind, and have never been convicted of a felony or crime of moral turpitude. I am in all respects competent to make this affidavit. All of the statements contained herein are true and correct within my personal knowledge.
2. I am a Laredo City Councilmember for District 1.
3. On November 28, 2011, votes were cast with respect to the refrigerated facilities contract. I voted for the bid submitted by Garros Services, LLC. Garros' bid received the best score based on an objective criteria and the city staffers who evaluated the bids recommended Garros. On my independent judgment, I assessed the bids the same way. Eduardo Garza did not ask for my vote.


*FUS
clear and precise
evidence
reasons for*

4. The City also executed leases for properties at the Laredo airport with two companies that Eduardo Garza has an interest in: Uni-Trade Forwarding, L.C., and Air Trade of Laredo, L.C. I voted to execute these leases because the city needed that land to be making money and it had not been making money for a long time. There also was no competition for these leases. Mr. Garza got no preferential treatment in being considered and the lease has no preferential terms in it for Mr. Garza. They are standard terms and comparable properties are available at the airport with comparable rent, comparable terms, and comparable quality.

5. Hector Farias is known to me. During the bidding process, Mr. Farias contacted me to encourage me to vote for the bid submitted by Laredo Facilitators, LLC, in which Jose Valdez held an interest. Mr. Farias discouraged me from voting for the bid submitted by Garros Services.

6. Eduardo Garza has never asked for me to perform any favors for him as a City official. Nor has he ever offered money or anything of value to me in exchange for me voting for or against, or for me abstaining, as a member of the City Council. I have not been paid or provided with any gifts or anything else of value by Eduardo Garza in exchange for any votes or official acts in as a City Council Member."

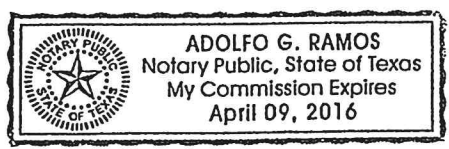
Further affiant sayeth not.



Mike Garza

STATE OF TEXAS §

COUNTY OF WEBB §

24 SWORN AND SUBSCRIBED TO before me by Mike Garza on this the 24 day of January 2013.




NOTARY PUBLIC
STATE OF TEXAS

Eduardo A. Garza and
Uni-Trade Forwarding, L.C.,
Plaintiffs,

v.

Hector Farias, Voices in
Democratic Action (VIDA),
and Jose A. Valdez,
Defendants.

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In the District Court

49th Judicial District

Webb County, Texas

AFFIDAVIT OF JORGE ALBERTO VERA

STATE OF TEXAS

COUNTY OF WEBB

BEFORE ME, the undersigned notary public in and for said County and State; on this day personally appeared Jorge Alberto Vera, known to me, and after being duly sworn, state on oath, as follows:

1. "My name is Jose Alberto Vera. I am over the age of eighteen (18), of sound mind, and have never been convicted of a felony or crime of moral turpitude. I am in all respects competent to make this affidavit. All of the statements contained herein are true and correct within my personal knowledge.
2. I am a member of the Laredo City Council. I was first sworn in on July 1, 2011.
3. Between the time that the bids were submitted for the refrigerated facilities contract on November 4, 2011 and the time that the contract was awarded to Garros Services, LLC ("Garros"), on November 28, 2011, Hector Farias called me on my cell phone numerous times. On one occasion,



Hector Farias told me that Eduardo Garza's wealth comes from drug money.
I cut him off and he never mentioned it again.

4. I did not vote for Garros for the refrigerated facilities contract. Although I believed that Garros' bid was the best one, I wanted a guaranteed minimum monthly amount for the city to receive from the successful bidder. Before Garros award, Eduardo Garza contributed to my campaign. When he gave me the contribution, he said "all I ask is that you make the best decisions for your district and for the citizens of the city." Furthermore, he never asked me for a vote for the Garros bid or asked me to vote in favor of any other proposal, project, or ordinance.

5. Eduardo Garza has never solicited favors from me in my official capacity as a City Councilman. Eduardo Garza has never offered me money or anything of value in exchange for votes in my capacity as a City Councilmember. Eduardo Garza has not paid me or provided me with any gifts of anything of value in exchange for any votes in my capacity as Councilmember."

Further affiant sayeth not.

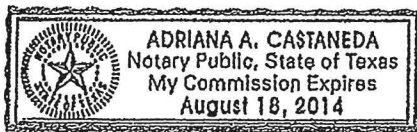


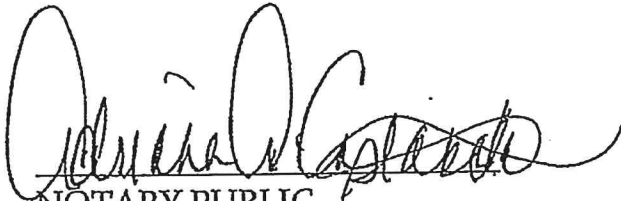
Jorge Alberto Vera

STATE OF TEXAS §

COUNTY OF WEBB §

SWORN AND SUBSCRIBED TO before me by Jorge Alberto Vera this
the 20th day of December 2012.





NOTARY PUBLIC
STATE OF TEXAS

Eduardo A. Garza and
Uni-Trade Forwarding, L.C.,
Plaintiffs,

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In the District Court

v.

49th Judicial District

Hector Farias, Voices in
Democratic Action (VIDA),
and Jose A. Valdez,
Defendants.

Webb County, Texas

AFFIDAVIT OF CARLOS "CHARLIE" SAN MIGUEL

STATE OF TEXAS

COUNTY OF WEBB

BEFORE ME, the undersigned notary public in and for said County and State, on this day personally appeared Carlos San Miguel, known to me, and after being duly sworn, state on oath, as follows:

1. "My name is Carlos "Charlie" San Miguel. I am over the age of eighteen (18), of sound mind, and have never been convicted of a felony or crime of moral turpitude. I am in all respects competent to make this affidavit. All of the statements contained herein are true and correct within my personal knowledge.
2. I am a member of the Laredo City Council. I was sworn into office on or about December 20, 2010.
3. During a City Council meeting held on or about October 17, 2011, animal rights advocacy group "Speak for Me Now" alleged instances of inhumane treatment at the animal shelter run by Laredo Animal Protective

~~Society (LAPS). During the following months, I was contacted by animal rights advocates regarding the same allegations.~~

4. On or about March 21, 2012, I visited the animal shelter facilities of LAPS at 2500 Gonzales Street with former LAPS director Lori Brizius to see firsthand the reported inhumane and unsanitary conditions, which Brizius pointed out to me. During my visit, I was spotted by LAPS employee, Eddie Perez, who appeared nervous by my presence.

5. On or about May 7, 2012, City Council terminated funding provided to LAPS for pound and euthanasia services. The City decided to take over those services.

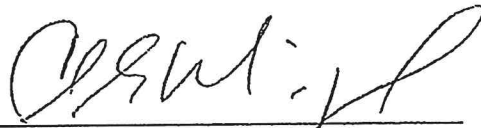
7. On or about Wednesday, July 11, 2012, at around noon, I visited Los Generales Restaurant on 3319 Santa Maria Avenue in Laredo, Texas. Dr. Hector Farias and Laredo Morning Times writer Odie Arambula were present at what appeared to be a VIDA meeting. When I approached to greet them, Dr. Farias informed me that he had a 'bone to pick' with me because of what happened with LAPS. With Mr. Arambula present, I explained to Dr. Farias that LAPS had an opportunity to keep the funding if it had only permitted the City greater oversight by allowing members of City Council to sit on the LAPS board. Dr. Farias appeared hostile and dismissive.

8. Beginning on or about August 6, 2012, Dr. Farias and VIDA's attacks on me and my actions as a Councilmember intensified. Dr. Farias and VIDA began accusing me of conflicts of interest and demanding my resignation at City Council meetings. Dr. Farias and VIDA accused me of working for Eduardo Garza and improperly voting for city contracts in his favor.

9. Eduardo Garza has never solicited favors from me in my official capacity as a City Councilman. Eduardo Garza has never offered me money or anything of value in exchange for votes in my capacity as a City Councilmember. Eduardo Garza has not paid me or provided me with any gifts of anything of value in exchange for any votes in my capacity as Councilmember. I abstained from voting on the bid contest for the management of Cold Inspection facilities at the commercial international bridges in which Garros Services, LLC, was the successful bidder.

10. Regarding the airport leases executed by the City of Laredo, as landlord, and certain businesses in which Eduardo Garza owns an interest, I voted for these leases because ^{the} ~~the~~ these tracts of airport property had been idle, the City needed revenue, and the proposed tenants were the only parties willing to lease the subject tracts. There are still comparable tracts at the airport with similar characteristics that are available at comparable rates, and I was not motivated in any way to give the proposed tenants or Eduardo Garza any preferential treatment as to the opportunity to lease or the terms of the lease, which all reflect customary business practices and fair market comparable pricing.

Further affiant sayeth not.

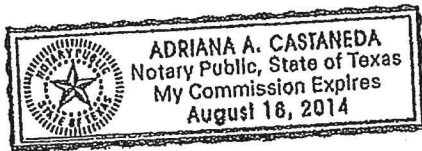


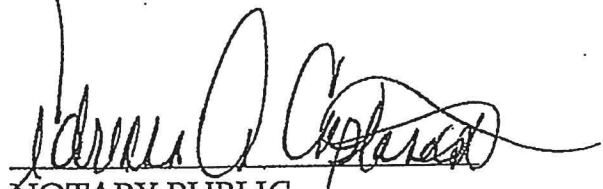
Carlos "Charlie" San Miguel

STATE OF TEXAS §

COUNTY OF WEBB §

SWORN AND SUBSCRIBED TO before me by Carlos "Charlie" San Miguel on this the 20th day of December, 2012.





NOTARY PUBLIC
STATE OF TEXAS

Eduardo A. Garza and
Uni-Trade Forwarding, L.C.,
Plaintiffs,

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In the District Court

v.

49th Judicial District

Hector Farias, Voices in
Democratic Action (VIDA),
and Jose A. Valdez,
Defendants.

Webb County, Texas

AFFIDAVIT OF CINDY LIENDO ESPINOZA

STATE OF TEXAS

COUNTY OF WEBB

BEFORE ME, the undersigned notary public in and for said County and State, on this day personally appeared Cindy Liendo Espinoza, known to me, and after being duly sworn, state on oath, as follows:

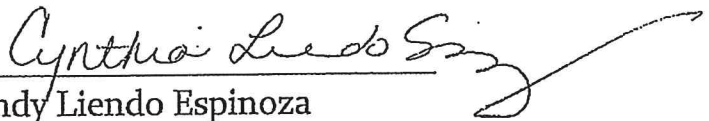
1. "My name is Cindy Liendo Espinoza. I am over the age of eighteen (18), of sound mind, and have never been convicted of a felony or crime of moral turpitude. I am in all respects competent to make this affidavit. All of the statements contained herein are true and correct within my personal knowledge.
2. I am a member of the Laredo City Council. I was first sworn on May 19, 2008.
3. I voted for the bid submitted by Garros Services, LLC, with respect to the refrigerated facilities contract. I did so because the city staff recommended it and I believed it to be the best bid, as reflected by its highest score among the three competing bids. Eduardo Garza never asked

me for a vote for the Garros bid or asked me to vote in favor of any other proposal, project, or ordinance.

4. Regarding the airport leases, I voted in favor of awarding the leases to Uni-Trade Forwarding, L.C., and Air Trade of Laredo, L.C. because those and other airport properties have been available for quite some time with no interest from potential tenants. I voted for these leases because the City needs revenue and the aforementioned companies, in which Mr. Garza owns an interest, were the only bidders after a request for bids. I was not motivated in any way to give Mr. Garza any preferential treatment as to these leases. There are other comparable properties at the airport that are available to lease at comparable rates.

5. Eduardo Garza has never solicited favors from me in my official capacity as a City Council Member. Eduardo Garza has never offered me money or anything of value in exchange for votes in my capacity as a City Council Member. Eduardo Garza has not paid me or provided me with any gifts of anything of value in exchange for any votes in my capacity as Council Member."

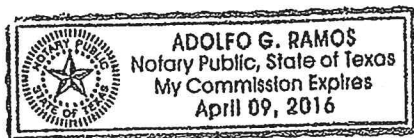
Further affiant sayeth not.

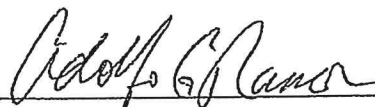

Cindy Liendo Espinoza

STATE OF TEXAS §

COUNTY OF WEBB §

SWORN AND SUBSCRIBED TO before me by Cindy Liendo Espinoza on this the 20th day of December 2012.




NOTARY PUBLIC
STATE OF TEXAS