

**DEFENDANT'S MOTION FOR CHANGE OF VENUE - Page 1**

Oppression. *See* Cause Numbers F202500751, F202500752, F2202500753. Sheriff King was arrested on that same date. On October 1, 2025, Sheriff King was indicted for Aggravated Perjury. *See* Cause Number F202500866. On October 2, 2025, this Court held a hearing on Sheriff King's motion to modify bond conditions. At the conclusion of the hearing, the Court ordered that Sheriff King could appear at his own office on Monday, Wednesday, and Friday between the hours of 10:00 am and 4:00 pm. On December 17, 2025, the Court dismissed the Aggravated Perjury indictment. On March 26, 2026, the Defendant was indicted again for Aggravated Perjury, stemming from the same allegation that was previously dismissed. *See* Cause Number F202600200. On May 14, 2026, a hearing was held on the Defendant's Motion to Suppress and the State's Motion for Continuance. The Defendant's Motion was denied, and the State's Motion was granted.

Trial commenced on Cause Number F202500752 on June 22, 2026. On July 7, 2026, a mistrial was declared as the jury was unable to reach a unanimous verdict. On July 29, 2026, the Defendant was re-indicted on the retaliation charge that proceeded to trial. Sheriff King was also indicted for Tampering with Evidence which was alleged to have occurred on July 17, 2025. Both cases were filed under cause number F202600727. Sheriff King was arrested on these new charges on July 31, 2026. **Each event described above has received extensive coverage by every news outlet and social media source available to the Johnson County populace.**

In addition to the traditional media outlets, a local "journalist", Megan Reep, who has fashioned an alias of "Crime With Megs," has provided the most extensive, distorted and misleading coverage of Sheriff King and the criminal cases mentioned above. Reep has developed a massive social media presence and following in Johnson County. Reep seems to have also developed a deep seeded personal vendetta against Sheriff King, doing everything conceivable to

prejudice the Johnson County community and prospective jury pool against Sheriff King by providing inflammatory, biased, and prejudicial coverage on Sheriff King and his cases.

Accurate reporting of current events is to be expected and encouraged. Intentionally spreading false narratives to a population of prospective jurors on social media is highly prejudicial, unprofessional, and should establish a basis for a change a venue in this matter. Further, influential people in the Johnson County community have made public comments on Sheriff King's purported guilt. Such actions have dramatically compromised the likelihood of securing a fair and impartial jury for the trial of this matter in Johnson County. That trial is presently scheduled to commence on November 9, 2026.

## **II.**

### **JUDGE FORCED TO VIOLATE THE LAW DUE TO SHERIFF'S EMPLOYEES ACTING AS BAILIFFS, CREATING A "BAD LOOK"**

Sheriff King's trial was unprecedented for Johnson County. It is highly unusual for a District Attorney to seek to prosecute the sitting Sheriff of the very county in which the district attorney serves. Such a prosecution typically is accompanied by a voluntary recusal of the prosecuting attorney. Nevertheless, trial commenced with the elected District Attorney's office leading the prosecution. During trial, the State called as a witness Johnson County Judge Chris Boedeker—the presiding Judge over all the County's affairs, Johnson County Personnel Director Randy Gillespie, as well as a majority of the Sheriff's command staff as witnesses, including Chief Deputy David Blankenship, Chief Deputy Mark Reinhardt, former Chief Deputy James Saulter, Captain Ben Arriola, Lieutenant Keven George, Captain Danny Rogers, and Lieutenant Richard Hogan. Fourteen (14) of the sixteen (16) witnesses called at trial were employed by Johnson County. Ten (10) of these witnesses worked as deputies in the Johnson County Sheriff's office—the very office Sheriff King oversees.

The Johnson County Sheriff's Office is also charged with facilitating courthouse security at the Guinn Justice Center. Sgt. Clint McDaniel is the head deputy in charge of courthouse security at the Johnson County Guinn Justice Center. Despite being Sheriff King's employee and ultimately answering to Sheriff King, McDaniel served as head bailiff throughout Sheriff King's two (2) week trial, including supervising the jury during deliberations. Interestingly, McDaniel appears to have a close personal relationship with the complainant in this matter, former Chief Deputy James Saulter. Sgt. McDaniel's photo is prominently displayed on Saulter's Facebook profile page.



Saulter's Facebook Profile Picture displayed as late as August 31, 2026 taken at Texas Motorplex in Ennis, Texas. Saulter is third to the left. McDaniel is second to the right.

McDaniel's position as bailiff in the trial became problematic and likely prejudiced Sheriff King during jury deliberations because of his friendship with Saulter and employment under Sheriff King. On the first day of jury deliberations, the Court decided to start the reading of the

court's charge to the jury at approximately 2:00 pm. The jury did not begin deliberations until approximately 4:00 pm. After several hours of deliberations, including a note indicating the jury could not reach a unanimous decision, the jurors inquired of the Court if they could go home for the night. Counsel for Sheriff King lawfully requested the jury be sequestered during deliberations, as this is every defendant's right in the State of Texas. This was the Court's response.

18                   And I have decided I'm going to send them  
19 home for the evening over the objection of the Defendant,  
20 and there is various reasons for that. I don't have  
21 anyone up here except Clint and a couple of other people.

22                   Is that right, how many that you have here?

23                   I don't have anyone, if I try to put them in  
24 a hotel, I don't have anyone to provide security for them  
25 or watch them, and so I have to then rely upon the

1 department to do that of the -- they're -- the people who  
2 would do that are employees of the Defendant, and I don't  
3 feel comfortable doing that. Not that they would do  
4 anything, but I don't want to -- I think it's a bad look.  
5 And the Jurors have expressed this.

6                   And I understand it's over their objection,  
7 and I've never done this before over their objection, but  
8 I'm going to do it anyway. And if there is a finding of  
9 guilt, then they can have that issue on appeal, but I'm  
0 going to go forward and do it this way. Okay.

Despite this lawful request, the Court refused to sequester the jury. The law is abundantly clear on this topic. On the motion of either party, the court shall, after giving its charge to the jury, order that the jury not be allowed to separate, after which the jury shall be kept together. Tex. Code of Crim. Proc. Art. 35.23 (emphasis added). The Court indicated that it had no choice but to violate the law because of the unique circumstances of this case. The Court opined that he could not follow the law and allow the bailiffs to take the jury to a hotel as Sheriff King's very own employees would oversee the jury. The Court essentially reasoned that due to the employee/employer relationship between Sheriff and the bailiffs, the Court was caused to violate the law and deny Sheriff King his legally mandated right to a sequestered jury. **This clear violation of the law deprived Sheriff King of a fair trial and due process of law.** In light of the unprecedented publicity in this case, the opportunity for the jury to be influenced by outside sources was nearly unavoidable. The Court further reasoned it was a "bad look" to have the Sheriff's own employees oversee the jury. Sadly, it is an even worse "look for the Court to knowingly violate the law and deprive any citizen of their right to a fair trial.

The Court was placed in a difficult position: have Sheriff King's own employees take charge of the jury overnight *or* violate the law and allow the jury to separate and go home. In a second trial, the Court can eliminate this scenario altogether. Changing venue will allow deputies from another county to oversee the jury, eliminating any possible unlawful action by the trial judge. It will also allow the Court to follow the law and sequester the jury. The law allows for the Court to change venue on its own action in order to avoid such situations. Specifically, if the judge is satisfied that a fair and impartial trial cannot be held for any reason in the county in which the case is pending, the judge may on his own motion, after providing reasonable notice to the defendant and the state and hearing evidence on the motion, order a change of venue. Tex. Code

of Crim. Proc. Art. 31A.001. (Emphasis added). After the jury begins deliberations, a defendant has **the right to have the jury sequestered. Sheriff King was denied that right and therefore denied the right to a fair trial.** Sheriff King respectfully requests that the Court change venue so that he can be afforded all the due process of law guaranteed to him by law.

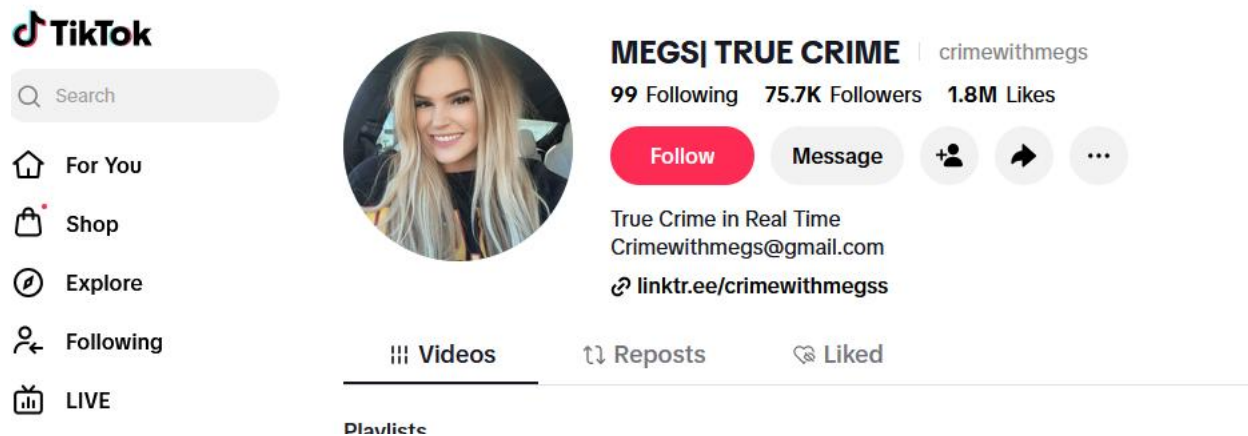
### **III. NEGATIVE AND BIASED PUBLICITY**

The negative, biased, and misleading news coverage associated with the Sheriff Adam King matters have been extensive throughout Johnson County. Selective examples are as follows:

#### **A. “Crime With Megs” and her new found fame, notoriety, and massive following.**

Meegan Reep, a self-proclaimed “journalist,” who goes by the alias of “Crime With Megs” operates accounts on Facebook, TikTok, and Instagram. Reep resides in Johnson County and owns and operates Mavwicks Fragrances in Joshua, Texas. Reep has done everything conceivable to obliterate Sheriff King’s presumption of innocence and convince prospective jurors of Johnson County that Sheriff King is guilty of the alleged crimes. Reep consistently and intentionally spreads sensationalized and false information about Sheriff King to the citizens of Johnson County. Reep has learned that biased reporting will lead to heightened attention. She capitalizes on that.

A close look at Reep’s profile pages shows that she has attained a tremendous following for a rural community like Johnson County. Reep has more than 75,000 followers. There are approximately 163,755 eligible jurors in Johnson County.



Crime With Megs TikTok Profile—75,700 followers



Crime With Megs Facebook Profile—19,000 followers.

# Instagram

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meganreep  

2,332 followers

1,022 following

**Megan Reep**

 meganreep

Entrepreneur in every aspect.

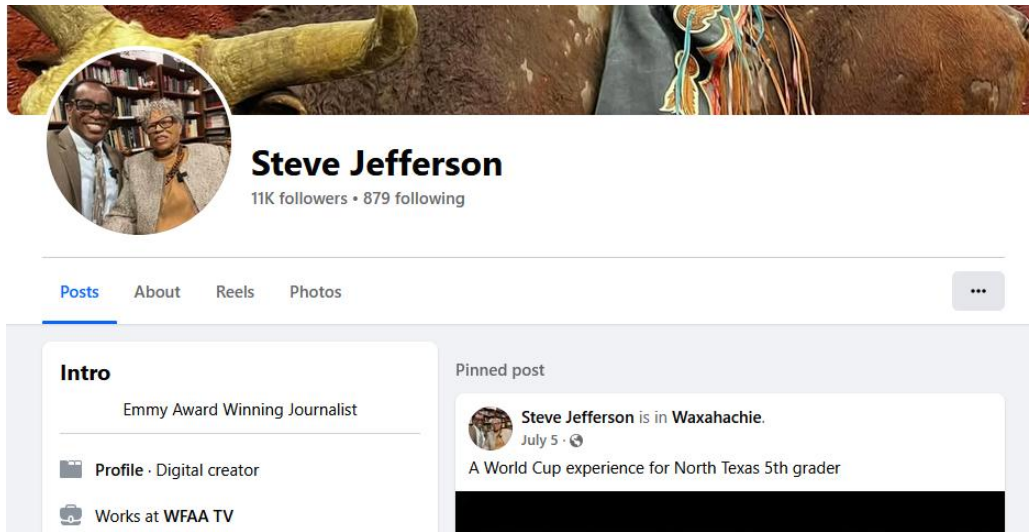
Host of @crime.with.megs

Owner of @mavwicksfragrances

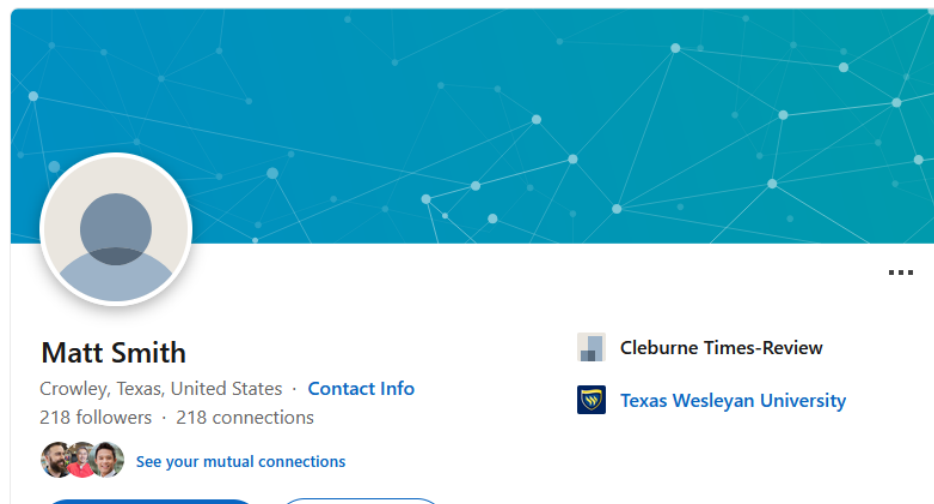
 [shopmy.us/meganreep](https://shopmy.us/meganreep)

Megan Reep's Instagram Profile.

To properly characterize Reep's following and influence, comparison should be made to Reep's following and to that of other journalists who have covered the Sheriff King's trial. Steve "Scoop" Jefferson is an EMMY Award and Edward R. Murrow Award recipient journalist at WFAA News in the DFW Metroplex who has closely followed and reported on the case. Jefferson has a mere 11,000 followers.



Matt Smith of the Cleburne Times Review has also closely followed and covered the case. He does not appear to have a presence on Facebook or Tiktok, but does appear on LinkedIn. Smith has a mere 218 followers.



Emerson Clarridge, a reporter with the Fort Worth Star Telegram, has also closely followed and covered the case. Clarridge has only 1,071 followers.



### **B. Biased and Inflammatory Reporting Aimed at Tainting the Johnson County Jury Pool**

A court may change venue on a defendant's request if the court determines that the defendant cannot obtain a fair and impartial trial in the county in which the prosecution is commenced as a result of a prejudice against the defendant in the county. Tex. Code of Crim. Proc. Art. 31A.004 (a)(1). To justify a change of venue based upon media attention, a defendant must show that the publicity was pervasive, prejudicial, and inflammatory. *Gonzales v. State*, 222 S.W.3d 446 (Tex. Crim. App. 2007). Widespread publicity itself is not considered inherently prejudicial. *Id.* In examining whether the pretrial publicity is prejudicial and inflammatory, a trial court must take into consideration the nature of the publicity. *Id.* at 451. The defendant must show actual,

identifiable prejudice attributable to pretrial publicity on part of community from which members of the jury will come. *Tracy v. State*, 597 S.W.502 (Tex. Crim. App. 2020).

Major events, such as the indictment of a Sheriff can, and should, be reported to the public. However, if a major event is reported with inaccurate information and with specific malice against the accused, the danger of unfair prejudice is unavoidable, especially when the person reporting the events has a tremendous following. In viewing Reep's posts, the number of people viewing those posts, the public's general response to those posts, it is clear that Reep has used her influence in an effort to spread false information which has inflamed the citizenry of Johnson County—creating a very clear bias against Sheriff King. These circumstances warrant a change of venue

This matter received significant media attention in Johnson County both before and during the trial. It now receives even greater attention due to the first matter ending in a mistrial on July 7, 2026 and the State deciding to “re-indict” Sheriff King within a few weeks of the mistrial. Review of Reep's posts since the mistrial demonstrates the unmistakable prejudice inflicted on the Johnson County jury pool.

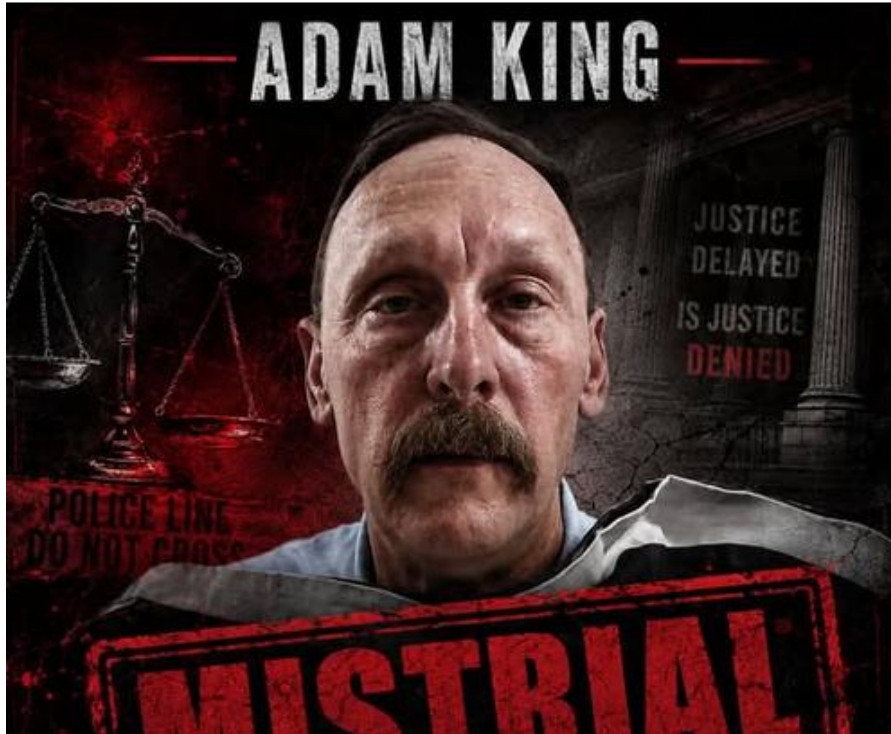
Immediately after the mistrial was declared, Reep posted Sheriff King's prior “mug-shot” declaring that “justice delayed is justice denied.”



Crime With Megs

All content · July 7 ·

A mistrial has been declared in the case of State of Texas Vs Adam King... See more



Reep received quite a reaction to this post. 523 people commented. Virtually every comment was negative towards Sheriff King. (See Exhibit A—Comments to the post from the public).



714

523 208

Like

Comment

View more comments

Comments in response to this post should be concerning for anyone with an interest in seeking a fair trial, especially the judge in a trial court. Here are a few of those comments. Many people expressed outrage and indicated a change of venue should occur.



**Christie Evans Phillips**

It literally makes me sick to see him walk. All the evidence, recordings with him talking about it, hours of videos and the large amount of people testifying against him. The defense knew they had it in the bag. The juror was either afraid of what might happen to them after hearing all the testimonies or someone he knew which would be hard since he has been sherriff so long. Now he knows he can do whatever he wants and have no consequences at all.

6w

6

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**Warren Adams**

Remember, change of venue is to protect defendants right to impartial jury...not claimants. Judge has to grant it.

5w

1



**Stormie Brooke Jones**

Reflecting on the fact that he had no evidence or witnesses, yet still rested his case, it makes complete sense. He likely knew that none of that was necessary because he probably already had the one juror he needed.

6w

36

[View all 6 replies](#)



**Ryanne Moody**

One person held out. Which means, there's too many people who know King, who have the ability to evade voir dire.

Time to move it to another county where King has no ability to reach out and touch people.

And there needs to be additional protections in place for current staff and witnesses until then.

5w



**Robin Lewis Freeman**

I think the next trial should be in a different jurisdiction.

6w

248



**Scott Bedwell**

Someone got paid!!!! 🤔🤔🤔

6w

1



**Misty Morris Nitzinger**

Is anyone really suprised?

6w

8

[View 1 reply](#)



**Rayray Young**

Someone is sucking Someone just saying

6w

17



**Donna Goodman**

I knew this would happen! Maybe I can open another can of worms!

6w

4



**Marilyn Ewell**

Thanks for providing us with so much prompt information ❤️

6w

5

[View 1 reply](#)



**Cassie K Mouser**

He will get away with it, like all of them do. They need a change of venue and maybe, just maybe...

6w

6



**Kayla N Michael Hughes**

Freaking figures!! The evidence is all there. What is there to think further about to get any other verdict but guilty?

This is just disgusting to have to be witnessing as a resident within Johnson County. What a disgrace he is.

BTW thank you for keeping up with this and keeping us informed! Truly appreciated!

6w

5

On July 9, 2026, Reep made the following post, proclaiming that she had interviewed two jurors after the trial for over two hours. It is curious (if not concerning) how Reep was able to obtain access to the jurors contact information. Sheriff King's former lawyer, Hon. Bill Mason, was denied access to the Court's jury information in order to contact the jurors.



There appeared to be a delay in posting the video. Reep attributed the delay to technical difficulties or perhaps “Adam King sending spiritual warfare my way.” Reep was making light of Sheriff King's strong Christian faith which was made known during at the trial.



Later that night, Reep posted the video.

See <https://www.facebook.com/reel/1903959353634593>

Interestingly, the video the did not depict interviews of the jurors. The video was of Reep summarizing what these jurors supposedly told her. The post begins with “Adam King, your time is up.”



Crime With Megs

July 9 · 🌐

Adam King, your time is up.

Here's why in this video.

It's also important to note: all of the witnesses in this case now have to sit in the same office as the man they just testified against.

Every eye in Johnson county NEEDS to be on Adam King.

[#CleburneTexas](#) [#JohnsonCounty](#) [#SheriffAdamKing](#) [#TrueCrimeReels](#)

PLEASE do not act, encourage, participate, or otherwise conspire to retaliate against a Juror. It is a felony: The offense occurs if someone intentionally or knowingly harms, threatens to harm, or inflicts damage on the property of a juror in retaliation for or on account of their service or status Texas Penal Code - PENAL § 36.06. [See less](#)

It's clear from the post that Reep was seeking to energize the Johnson County populace against Sheriff King prior to his next trial. Reep appears to have been successful as reflected by 1,800 likes and 396 comments. The comments in response to this post were explosive, even leading to threats against any juror who voted to acquit Sheriff King. (See Exhibit B—comments to the post from the public).



Here are just a few examples of those comments.



**David Lee**

If there is a god, Adam King will hopefully get in a car wreck and die, or hopefully someone will take one for the team and take him off the board themselves.

7w



**Cindy Hall Fowler**

I think they may have known they had a hanger on the jury and that's why the defense called no witnesses because they knew they didn't have to. Just my thoughts. So the stunned reactions may have all been for show. They need to move the next trial out of this county to somewhere else.

5w

99  

[View all 12 replies](#)



**Randy Nub Oliver**

They are definitely going to have to make a change of venue in this deal. When the news of all this leaks out, no one in Johnson County will be able to walk into that courtroom, without a pre-conceived idea. They are going to have to go somewhere where nobody knows anybody.

5w



Reep did not disclose the names of the jurors she interviewed. **However, she did disclose the name of a juror who voted to acquit Sheriff King.** Reep even disclosed that the juror had his own construction business. This was done for one reason—to send a message to the community and future prospective jurors that if they were to vote to acquit Sheriff King, they will be made an example. Reep's followers responded to her vicious lead in an effort to intimidate any juror who might dare vote to acquit Sheriff King in the future.



**Nicole Scurlock**

So lets get on with the retrial! So will that juror be investigated cuz it sure seems someone got to them. Check accounts from Kings whole posse and that juror. Didnt his wife get some money from gofundme? Id start with her.



**Renda Smith**

so will the DA file perjury on the juror?

5w



**RW Morgan**

I would get a warrant for his phone check his text & calls

5w





**Ann Herrington**

He's was bought off. Nobody acts like that right out the gate. A normal person would walk thru and discuss their own reasons. They wrote him a check or threatened him.

5w

5



**Astevon Anthony Vargas**

Bro got paid and it showed it crazy if king gets away with it .also any one got thay ai imagine I want see it ? Lol

5w

10

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**Rhonda Strean**

Crime With Megs i think someone needs to check his bank account

5w

2



**Subscriber**

**Kathy Flores Schisler**

I'm wondering what dirt they threatened Yarborough with exposing. It sure seems like someone got to him from the defense team.

5w

10



**Tierney Christine**

So he was either being bribed or threatened... or lied about being connected to king. This whole thing is super fishy

5w

13



**Raymond Wade**

Sounds like he was paid off

5w

2



**Sharon Blaylock**

I believe a jury duty person has been paid for hanging he's guilty as sin

5w

2



**Michael Scot Young**  
They juror def got paid off

5w



**Shannon Rae**  
2 words.... Jury Tampering

5w



**Stacy GiGi**  
Sounds like 1 Jury was paid off

5w



**Mark Sellers**  
That single juror was paid HANDSOMELY. Check any & all bank records tied to ANY person directly related to that juror & you will find the rat

5w

Sadly, it appears Reep either materially misrepresented what these jurors told her or completely fabricated what was stated in the interviews. According to Reep, these purported interviews occurred on that day and all the information from the post came “directly from their (the jurors’) mouths.” However, Reep provides all this information without referring to a single note. The first representation Reep made in this post could not have come from a juror and is categorically false. At the beginning of the interview Reep declared “*They told me that when the prosecution and defense table learned the real break down, the defense table was stunned. Not relieved, stunned!*” In her use of the term “break down,” Reep is referring to a polling of the jury. It is unfortunate that someone who purports to be a journalist would intentionally provide false information. For starters, immediately after the Court declared a mistrial, the jury was ushered out of the courtroom and the lawyers were not permitted to communicate with the jury. At no time would any person have witnessed the lawyers discovering the jury vote or “break down” because

such did not occur. In fact, the defense has never been officially informed of the numerical split in the jury deliberations and voting. The only public report of the “break down” comes from the untruthful and biased reporting by Reep

Further, as Reep summarized what the jurors purportedly told her, she said a juror referenced “Dale Hanna always having his (King’s) back.” There was no reference or testimony at the earlier trial regarding Dale Hanna protecting or supporting Sheriff King, making Reep’s version of the interview even more suspect.

Reep also falsely claimed the jurors later learned that Sheriff King’s attorneys took advantage of the holiday weekend, specifically, that “they took that time so that the defense could talk King out of testifying and they believe that because of how narcissistic King is.” This is patently false. No such conversation ever occurred between Sheriff King and his counsel. Moreover, if such a conversation were to have occurred, how would these two jurors conceivably know about it? This further establishes that these interviews were fabricated or Reep grossly misrepresented what the jurors told her.

During Reep’s “reporting,” she also falsely announced to her followers that the \$25 million that former Chief Deputy Saulter was asking for in his civil suit will not be paid by the taxpayers. “It will be paid by an insurance policy.” Johnson County’s policy limits are three \$3 million dollars. Reep’s statement is not only false but a clear attempt to eliminate any potential animus between the Johnson County community and Saulter for his extortion in demanding such an outrageous sum of money from Johnson County.

After the explosive reaction to Reep’s posts in early July 2026, Reep decided to capitalize on her new found fame and grow her following. On July 10, 2026, Reep announced she has “lots of eyes” on her page and therefore she was starting her own podcast. This podcast is “for Johnson

County” and anyone can subscribe for \$2.99 a month. This podcast allowed Reep to further prejudice the community against Sheriff King with her false and biased reporting while profiting herself.



**Crime With Megs** ✓

July 10 · 🌐

There's a lot of eyes on my page right now!

I plan to start a podcast in the next week for Johnson county.

With that comes renting out a space and equipment to make sure it's high quality and enjoyable to watch!

I wanted to point to my subscription service.

This will help me fund this massive project.

The subscription is \$2.99 a month, and with that you will receive deeper case dive content, my detailed trial notes, access to my investigations, and even more!

I just started this last week, so I'm in the process of getting things uploaded for all subscribers.

There is no pressure to subscribe at all, and I want to be clear about that.

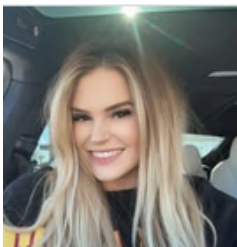
But for the people that want to support me and help bring Johnson county even more news that our local news refuses to touch, this is your way to help make this happen!

My goal here at Crime with Megs is to break down what is happening in this area and make it easy for everyone to understand and be able to digest the news.

Thank you for your support, and even if you can't support monetarily, please know I am still so grateful for your support. Sharing and interacting with my videos is enough!

-Megs ❤️

<https://www.facebook.com/100086522321352/subscribe/> See less



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Subscribe to Crime With Megs and get exclusive benefits



68



15

With a new trial scheduled in November of 2026, Reep has sought to do everything she could to persuade Johnson County citizens that Sheriff King is guilty and not entitled to the presumption of innocence. On July 18, 2026, Reep posted a video containing patently false information.

See <https://www.facebook.com/reel/4619004685000739>

Reep told her Johnson County followers that Sheriff King “days after his mistrial” created a “brand new” policy which stated “before any outside agency can investigate one of his employees, they have to submit a written request to Adam King.” She said the new policy also forbids Johnson County Sheriff’s Office employees from “discussing an outside investigation with anyone.” Reep falsely told her followers that this meant employees were not allowed to talk to law enforcement about potential misconduct in Sheriff’s Office without the Sheriff King’s approval.

The policy Reep is referring to is “Subject 803” of the Johnson County Sheriff’s Office Policies and Procedures Manual. Contrary to what Reep told her followers, this policy has been in existence since July 20, 2023. (*See Exhibit C*). In fact, this policy was the topic of extensive discussion during Sheriff King’s trial—with Reep in the courtroom during the testimony. Reep’s inflammatory post contains several misrepresentations. For starters, this policy is not in any way a new occurrence. **Every word** of the policy that Reep cited to in her post has been in place for several years and was the subject of detailed testimony at trial. Further, Reep falsely gave the impression this policy is in reference to potential criminal investigations, such as a Texas Ranger investigation. The simple truth is that this policy is strictly limited to **internal affairs** investigations where the Johnson County Sheriff’s Office refers the matter to an external agency for investigation. In other words, it would only apply when the Sheriff specifically requests that

another agency conduct the investigation. The Sheriff himself selects that agency. In that situation, even though the Sheriff's Office has an external agency conduct the investigation, the Sheriff will make the ultimate decision in how discipline will be handled, if any. This same procedure has been in place in the Johnson County Sheriff's Office for many years and is widely accepted in the law enforcement community. Reep's assertion that this policy allows the Sheriff to meddle in law enforcement criminal investigations is patently false and highly prejudicial to Sheriff King, especially in light of the allegations against him. This slanderous post was clearly made to further energize the Johnson County community against Sheriff King and erode his presumption of innocence in the Johnson County community.

The simple truth is that one small amendment was made to this policy in July 2026, and it was a deletion. (*See Exhibit D*). The following language was deleted from the policy:

“Contacts between representatives of the investigating agency or entity and the Office member (or other representatives of the Office) are coordinated by the Legal Advisor to the Sheriff.”

Contrary to Reep's post, the deletion of this language actually gives the external agency *more* autonomy to conduct their investigations. It allows the agency to contact the investigated employee directly, and not through a legal advisor to Sheriff King. **This was the only change to that policy.**

Reep's goal in posting this message was to further infuriate the Johnson County jury pool against Sheriff King. To her credit, her efforts were highly successful. Reep's post sparked public outrage against Sheriff King and resulted in reactions from 1,300 people, including 423 comments, most of which were explosive and aggressively criticizing Sheriff King. (*See Exhibit E—* comments to the post from the public). 345 people shared this post, further spreading this false and prejudicial information throughout the Johnson County community.



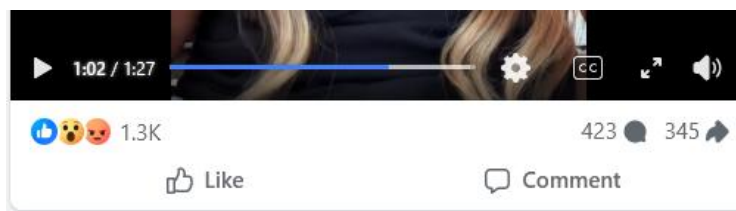
**Crime With Megs** is in Cleburne.

July 18 at 11:22 AM · 🌐

A quick little Adam king update.. cause he just signed in a new policy  
DAYS after his mistrial.

And this is why i say... every eye needs to be on the sheriffs office right  
now.

[#adamking](#) [#JohnsonCounty](#) [#CleburneTexas](#) See less



**Charles Lewis**  
Let's hang his ass

5w



**Rosie Chrz Garcia**  
F THAT AND F HIM

5w



**Jaye Porter**  
"Sheriff" King is a shitbag.  
as always **Crime With Megs** THANK YOU for keeping us informed of what's going on  
in this cockeyed county!

6w





**Josh Cary**

His arrogance and narcissism is what got him in this mess. Clearly he hasn't learned a single thing. Guess he will rot in jail for a bit.

4w

16



**Shirley Bauman Wanner**

He shouldn't even be aloud to return to his office until he goes back to court!! He has no right making up rules. That should go before the county commissioner's.

4w

10



**Jim Patty**

I'm really disappointed to hear and read all of this. I worked at the jail for 2 1/2 years and always liked and respected him. He was a man of god and I know a lot of folks out there are not surprised but I certainly was to hear all of this.

4w

1



**Brandie Salter**

Sounds like it another part of the Good Ol Boy system? The fact that he is even allowed to keep being sheriff is unsettling but at the same time it definitely shows that the ones who wear the badge don't only think they are above the law ,they know they are ,no I am not saying every one that wears a badge is a corrupt officer but I am saying the ones that actually want to do their job are few and far between and the corrupt ones make it even harder for them

4w

7



**Randall Jacks**

He can't keep anyone from talking and filing a complaint. This is another form of retaliation against his employees

4w

3

[View 1 reply](#)



**Quana Revis**

Where do we the people have a protest

4w

3



**Tyler Goff**

Yeah, doesn't that screams corruption

4w

2



**Lana M Hubbard**

This is so crooked!!!!!!

4w

2

A few examples of the comments to this particular post.

Five days later—July 23, 2026—Reep felt compelled to report “big news” to Johnson County regarding Sheriff King.

See <https://www.facebook.com/reel/844173585297537>

This self-proclaimed “journalist” started her post by stating, “Adam King, hey buddy, your life is imploding right now.” Reep falsely stated, “the court is putting three of the four charges all into one for this next trial.” She further stated, “they will all be heard at the same time now” and “this jury will be able to see the full picture, instead of just pieces of it like the last jury, that is more of a complete case for the State to make.” Reep then said the jury that the trial was set for the holiday season and gleefully sang “It’s a holly jolly Christmas.”

Sadly, Reep’s journalism skills fell short once again. These matters will not be heard at the same time, as the indictments have not been joined. Reep did however succeed in spreading a false narrative to the people of Johnson County to further bias them against Sheriff King—that this next trial will be bigger and better, ensuring a conviction this time around.

Reep continued to spread false information, claiming again that Sheriff King enacted a “new policy” recounting the “big news” she previously reported on July 18, 2026. Reep stated “Every single eyeball needs to be on the Johnson County Sheriff’s Office. Days after mistrial, King signed in a new policy. He has put that control in writing and called it a policy.” Reep then continued to rail against the “new policy” that she had already described on July 18, 2026 further spreading the same false details she previously reported. Reep added more emphasis this time stating “I highly doubt any outside agency is going to give a fuck about this policy. You mean to tell me that if the FBI had to come in and do some sort of investigation, that they would go through the process of going to King first before talking to people who were involved? No! It’s not going to happen.”

During this same Facebook post, Reep falsely claimed that this very policy violates the Texas Whistleblower Act. Reep stated that this new policy would prevent employees from reporting violations of the law to law enforcement agencies. As stated above, this policy is limited to external investigations of internal affairs matters referred to for investigation by an external agency by Sheriff King himself. Notably, the Texas Whistleblower Act just so happens to be the civil cause of action that is being used to prosecute Sheriff King in criminal court as the alleged “unlawful act.”

Like her prior posts, this post was aimed at angering Johnson County citizens against Sheriff King. As seen in the public reaction to Reep’s post, she was again successful in this endeavor. These false inflammatory comments garnered reactions from another 1,300 citizens, including 209 comments—the overwhelming majority of which were strongly against Sheriff King. (See Exhibit F—comments to the post from the public). 202 people shared this post, further spreading this false and prejudicial information throughout the community.



  1.3K

209  202 

 Like

 Comment

View more comments



 Subscriber

**Dianna Morris**

Loved the "Holly Jolly Christmas " thrown in

3w

49  

 View 1 reply

Here are just a few examples of the comments to this post.



**Rosa Borges**



4w 1 



**Brandy Reeves**  
Karma at its finest..

3w



**Carol Mccarley**  
Great job Meg, thank you!!

3w

2



Subscriber

**Becky Sims**  
Megs you amazing. My husband loves your attitude. Keep up the amazing work.

3w

1



**Jerry Stringer**  
Soooo . . . in reference to the new policy, if a Fort Worth police officer is working one night and stops a Johnson County SO employee for driving while intoxicated, does that officer have to write a memo and send it to Adam King at 3 am, from the traffic stop on the side of the road, to get permission from King to investigate that person for DWI? That just shows how manipulative King wants to be.

3w

41

[View all 7 replies](#)



**Jim Aiken**  
Thank you for your unbiased opinion!

3w

1



**Chuck Easley**  
Guilty or not. King needs to go. Its a HUGE distraction to honorable Law Enforcement in JoCo. It's time to move on. Get a new Sherriff. Rebuild integrity and transparency in JoCo Sherriff dept. Do it NOW.

3w

27

[View all 5 replies](#)



**Lisa Thompson**

Geeze so King can tell them no! What a TOOL

3w



**Rebecka Lee Ann Chance**

how do I sign the petition?

3w



**Ron Duke**

lol I think that law is illegal and he better get ready for the Fall out of it

3w



**Paula Burgess**

Can they PLEASE get it moved out of Johnson's County!!!! ❤️

3w



**Scott Terry**

Why in Johnson County? Need another country

3w



**Cathy West**

Please carry on, you know the King thinks he is a King & he is NOT! This is exactly why people lose faith in our officers! 👍

3w



**Rebecca Brooks**

Keep it up, Megs!!!

3w



**Patience Hendrix**

How did this clown get elected in the first place? 🤡

3w



**Chelsea Edwards**

Whoo hoo see ya sucka

3w

Reep's coverage took a disturbing turn on July 30, 2026. On July 29, 2026 the District Attorney's Office presented and obtained a "re-indictment" from a Johnson County Grand Jury. Count One of the new indictment is simply a re-indictment of the case that was tried to a jury. This matter was seemingly re-indicted to correct errors or omissions in the prior indictment. Nothing new was alleged. Count Two references an incident which allegedly took place July 17, 2025, specifically, that Sheriff King allegedly made his laptop unavailable. On July 21, 2026, the Johnson County IT Department for the first time requested the same laptop. Sheriff King provided his laptop to the IT Department. Prior to July 21, 2026, no one from Johnson County or law enforcement asked for, or expressed interest, in collecting or even seeing Sheriff King's Laptop.

This indictment was **sealed and prohibited from public view,** as all indictments are until the person accused in the indictment was been arrested on the charge. Any record of this indictment would not have been accessible to the public until the arrest. The Defendant surrendered on the pending warrant on July 31, 2026. Reep inexplicably became aware of this indictment on July 30, 2026, announcing the charges to the public at 11:00 am. Incredulously, Reep learned about the re-indictment before Sheriff King and his counsel. They were not informed that a Grand Jury was even considering new charges.

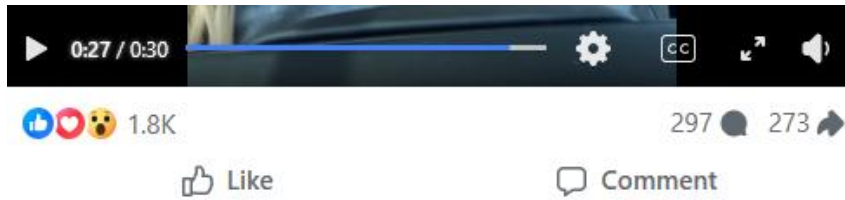
See <https://www.facebook.com/reel/4507233962847762>

It appears someone affiliated with Johnson County disclosed this confidential information to Reep, allowing "Crime With Megs" to be the first media participant to report the charges. Reep's acquisition of this information is disturbing and shows that someone within the government is "feeding" Reep information, likely knowing that Reep is the catalyst for prejudicing the citizens of Johnson County against Sheriff King.

Reep proudly announced the charges by stating “I have breaking news for Johnson County right now, *it hasn’t even been released yet.*” She then details that there were two new indictments against Sheriff King, one for retaliation “against James” and one for tampering with evidence. Reep then proudly announces “we can expect more mug shots today.”

Due to the information not being accessible to the public, including Sheriff King’s counsel, Reep was the first media outlet to convey this information. The reaction was explosive and overwhelmingly negative obtaining reactions from at least 1,800 people. (See Exhibit G— comments to the post from the public). 273 people shared this post, further spreading this prejudicial information throughout the community.





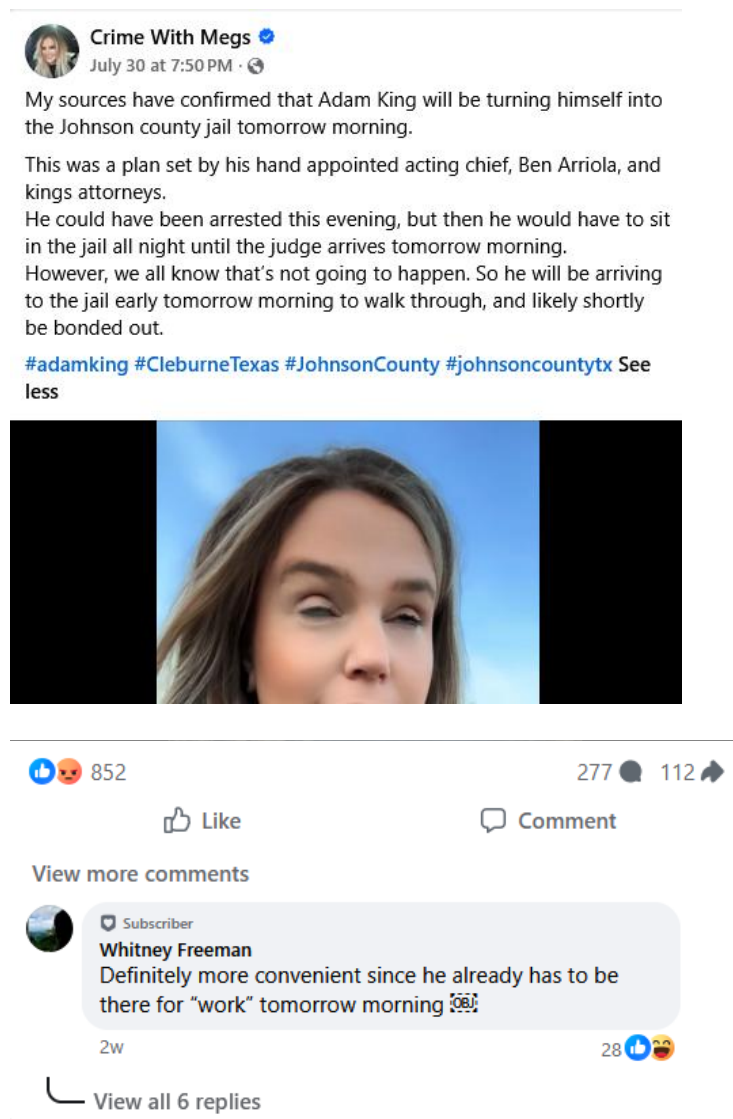
Reep's July 30, 2026 post and reactions to the post.

Reep's next post on July 30, 2026 all but confirmed that she was inappropriately fed information from a government official. In the early afternoon of July 30, 2026, counsel for Sheriff King informed Texas Ranger Patrick Garcia that Sheriff King would be turning himself at the Johnson County Jail early in the morning on July 31, 2026. This was after Garcia told counsel he did "not care" when Sheriff King turned himself in as he knew "he wasn't going anywhere." No one else was informed of this information.

At 7:50 pm that same day, Reep made another video post, announcing "My sources have confirmed.....his (Sheriff King's) appointed sheriff and attorneys have come up with this plan so they can walk him through, otherwise he would have to stay in the jail that night, and obviously that's not going to happen" (Reep rolled her eyes as she finished this sentence). She even provided an exact time, seemingly so the public could come watch this event, stating "he will be turing himself in at 7:30 at the Johnson County jail." Reep went out of her way to anger the public by making them think Sheriff King and his "appointed Sheriff and his attorneys" created a special circumstance so that Sheriff King could turn himself in the following morning. The truth, which Reep seems to have a difficult time gathering and reporting, was that Ranger Garcia told Sheriff King's lawyers he could turn himself in the next morning, as he did "not care."

See <https://www.facebook.com/reel/1870694257669824>

Reep again scored major points with the public by posting patently false information. Her post sparked outrage. (See Exhibit H—comments to the post from the public).



Here are a few examples of the public's comments to this post.



**Dwayne Sybesma**  
Put him here



3w



**Kammy Blankenship-Rogers**  
Funny how he gets to pick when he's going to be arrested. The average citizens don't get to do that !

2w

84

[View all 13 replies](#)



**Alejandro Valentino Rueda**  
I was excited about being picked for jury duty. I was in awe that I was not one of the 120+ chosen. And then I see all this news and the timing of it... Man did I miss out 😊

2w

6



**Reba Collins**  
How can he hand pick and appoint a sheriff??

2w

4

[View all 4 replies](#)

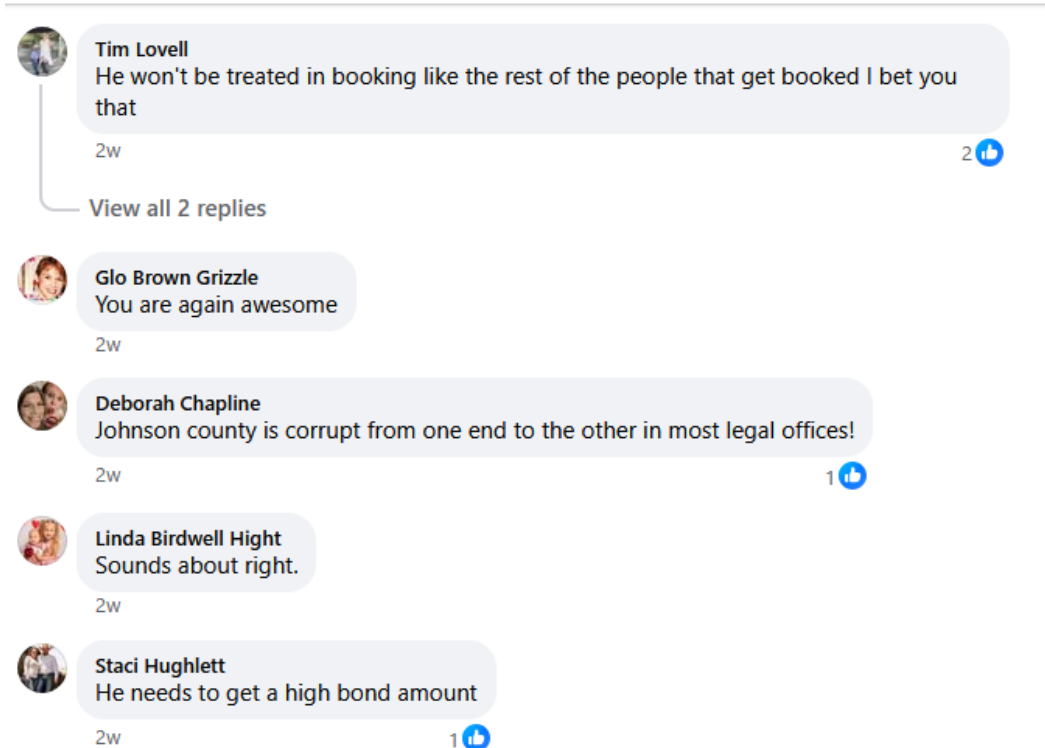


**David Prewitt**  
lol what if the judge decides to take the day off. Would be priceless.

2w

11

[View all 6 replies](#)



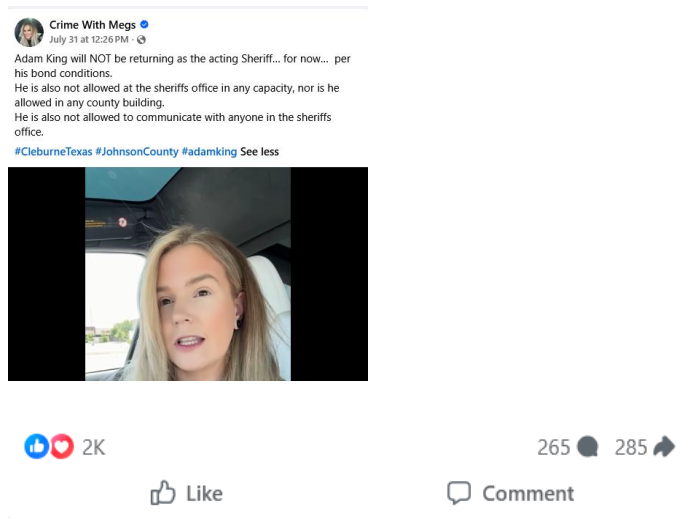
The following day Reep could not help but to provide her followers with more false information in an effort to further bias the public against Sheriff King. On July 31, 2026 at 12:26 p.m., Reep announced “she confirmed with one her sources” more information. Specifically, that Sheriff King would not be “returning as acting Sheriff” and he would not be “allowed to communicate with anyone in the Sheriff’s office.”

See <https://www.facebook.com/reel/2125251005090742>

Once again, Reep misrepresented the facts to the public and her followers. Sheriff King’s bond conditions—set by a Justice of the Peace—and not yet confirmed by this Court, included a condition that Sheriff King could not go inside his own office. There is no condition stating he cannot act as Sheriff or that he is forbidden from communicating with “anyone” at the office.

By representing that Sheriff King had, in effect, been removed as Sheriff, Reep’s post caused great excitement and further prejudice against Sheriff King. (See Exhibit I—comments to

this post from the public). Over 2,000 people reacted to this misleading post and 265 people commented. 285 people shared this post, further spreading Reep's false and prejudicial information throughout the Johnson County community.



Here are a few examples of comments of the post from the public.

30



**David Mcpherson**  
About damn time !

2w

11

[View 1 reply](#)



**Rick Sikes**  
Good job meg. Thank you for all that you do!

2w

12



**Peter Mullen**  
Prayers are answered.

2w

7



**Carol Mccarley**  
About time! God bless those victims!!!

2w

6



**Kathy Wylie**  
Megs you are doing the most! TY

2w

8



**Cindy Scott Key**  
This is awesome news!

2w

11



**Brandy Keck King**  
These should have been his bond conditions from the start even if it was just suspended until after trial

2w

2



**McKenzie Westbury**  
FINALLY

2w

8

On August 24, 2026, several Johnson County concerned citizens appeared at the Johnson County Commissioner's Court to show support for Sheriff King and voice their frustrations with how Sheriff King's case was being handled by the District Attorney's Office. This was during the public comment portion of the session. This personally offended Reep and she could not help but to respond with malice and anger—erasing any semblance of Reep being an unbiased “journalist.” On August 25, 2026 at 6:48 pm, Reep proclaimed “I didn’t get invited to this shit show” (referring to the commissioner’s court session). “The only people who were made privy to that this has happening was Adam King’s little cult who follows him around everywhere.” Reep continued, saying “Adam King rallied his little group to speak the most amazing things about him and how unfairly he was treated during this trial.” Reep then became visably angered and ranted “he (Sheriff King) spent his entire career treating the people of Johnson County unfairly.”

See <https://www.facebook.com/reel/1578435180682016>



Referring to King’s supporters as a “cult” and telling her followers that Sheriff King treated Johnson County citizens unfailry “his entire career” uncovered her deep seated disdain for Sheriff King. This was clearly done to further fan the flames of hatred against Sheriff King in Johnson County. As expected Reep got a significant reaction from her false and prejudicial comments. Including 796 reactions and 162 comments.



Reep got exactly what she wanted. More Johnson County citizens angry at Sheriff King. (See Exhibit J—comments to the post from the public). Here are a few examples of the comments to her post.





**David Churchman II**

King is nothing but a POS, and the cronies that follow him and kiss his ass!

1d



**Rosalie McLeod**

A cult. They must be maga. Not willing to see thru BS. Is a guy on the court agent hottest able to call one of these meetings?. yes! Megs, you should have been informed.

1d



**Neal Martinez**

That's what happens when you speak the truth, dirty law enforcement try to protect each other

1d

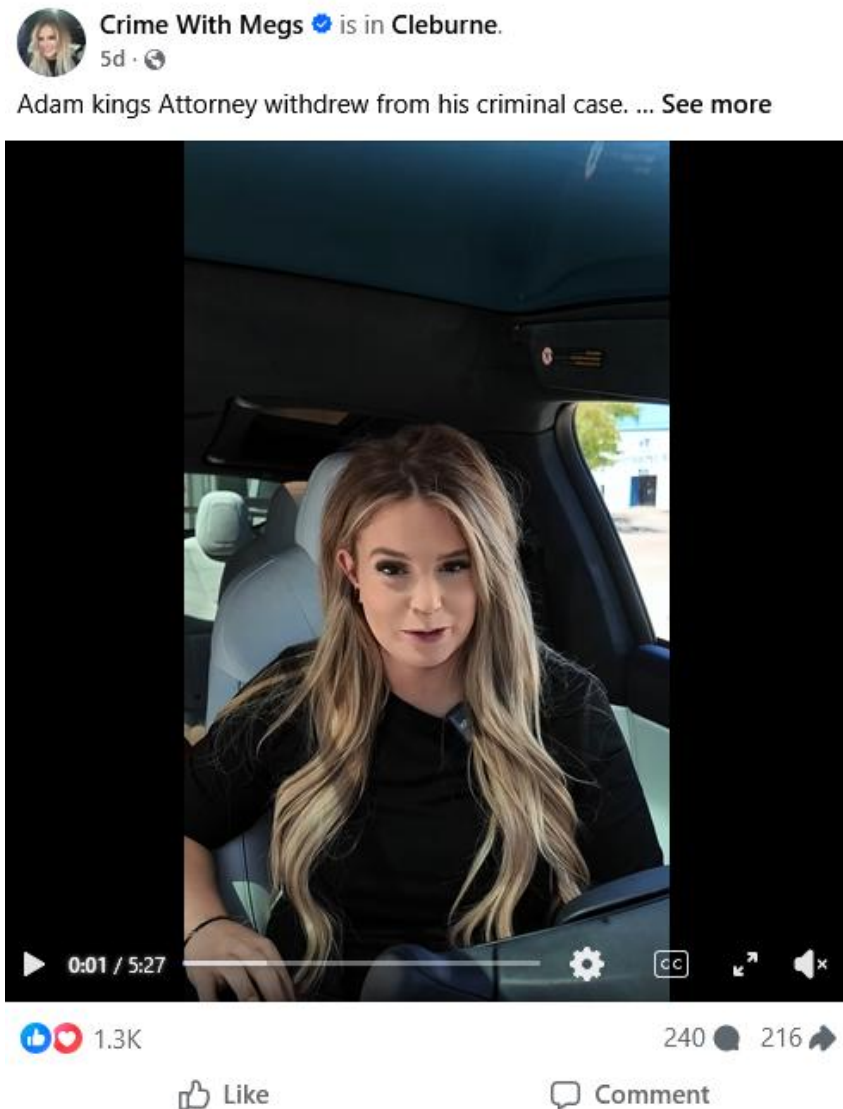


On September 2, 2026 at 1:44 pm, Reep announced she had more news on Sheriff King's case. Reep claimed this news "directly affects the community you live in and that you raise your families in." Reep told her viewers that Bill Mason withdrew as one of Sheriff King's lawyers. Reep then falsely stated "sources very close to Adam King have indicated that Mark Daniel's team is also expected to withdraw pretty soon too. And here is the reason that is being cited. King is allegedly running out of money to fund his defense." Reep then emphasized "sources extremely close to his (Sheriff King's) situation" provided Reep with this information. Reep then gleefully stated "the November 9<sup>th</sup> retrial is coming, whether he has attorneys or not....If the money is gone, this a real crisis for his defense."

<https://www.facebook.com/reel/1594708452053616>

Once again, Reep posted materially false information for purposes of prejudicing the citizens of Johnson County against Sheriff King. Although Mr. Mason has withdrawn, Mark Daniel and Matt Smid *remain on the case and have no intentions of withdrawing*. Daniel and Smid *never intended on withdrawing*. Further, the assertion that Sheriff King is "running out of

money” is patently false.



Reep’s sensationalized post got her exactly what she wanted. Clicks and views. Reep obtained reactions for 1,300 people and 240 comments. (See Exhibit Q—comments to the post from the public).

Here are a few examples of the comments to her post.



Reep has obtained a large following from within Johnson County. Reep has maliciously gone out of her way to convince Johnson County citizens that Sheriff King is guilty. She has done this by spreading false and highly prejudicial information. Sadly, it appears that someone from within the government is feeding Reep information about the case that is not available to the general public. Reep's mass dissemination of false and inflammatory information should be a basis for a change of venue to a county where prospective jurors have not and would not be exposed to misleading and false propaganda.

#### **IV.** **DANGEROUS COMBINATION BY INFLUENTIAL** **PEOPLE IN JOHNSON COUNTY, TEXAS**

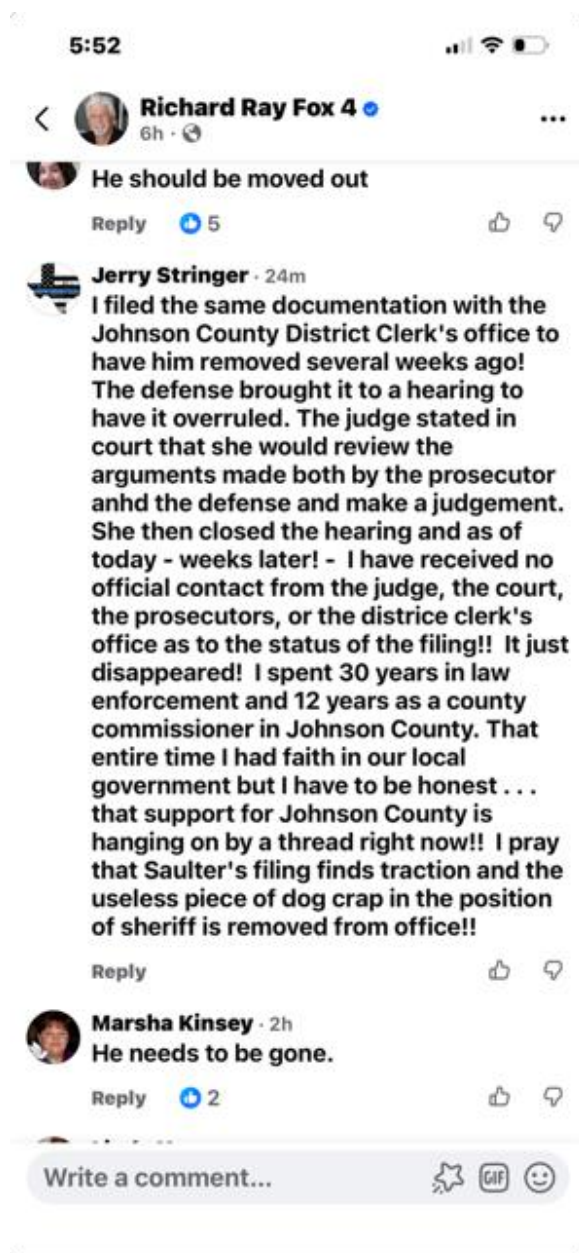
A court may change venue at a defendant's request if the court determines that the defendant cannot obtain a fair and impartial trial due to a dangerous combination against the

defendant in the county instigated by influential persons. Tex. Code of Crim. Proc. Art. 31A.004 (a)(2). Former Johnson County Commissioner Jerry Stringer, former Chief Deputy and candidate for Sheriff, James Saulter, and local TikTok influencer and self-proclaimed journalist, Megan Reep, are all influential people in Johnson County who have established a dangerous combination against Sheriff King in Johnson County.

#### **A. Jerry Stringer**

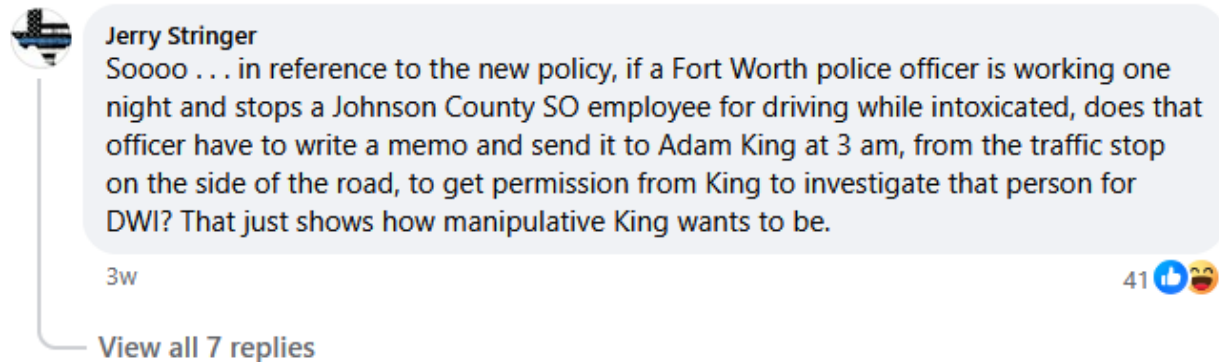
Jerry Stringer served as a commissioner for the Johnson County Commissioners' Court from 2009 to 2021. Stringer filed a civil petition to remove Sheriff King on October 3, 2025 in the 413<sup>th</sup> District Court of Johnson County. (*See* Exhibit K). Stringer opined that Sheriff King needed to be removed due to “multiple acts of incompetency and official misconduct.” Sheriff King’s civil counsel filed a motion to dismiss this petition on the grounds that the petition is insufficient on its face. Stringer’s petition is still pending.

In light of Stringer’s long-standing service as a County Commissioner and prestige he gained during that service, Stringer’s petition sends a dangerously misleading message to the citizens of Johnson County: that the Commissioners Court wants Sheriff Adam King removed. This misleading message is further established by the fact that Johnson County Judge Chris Boedeker testified against Sheriff King at his trial. In addition to his filed petition, Stringer has been an outward critic of Sheriff King with his public comments, announcing to the public on Facebook that he believed Sheriff King is a “useless piece of dog crap.”



Stringer would also express his displeasure with Sheriff King by posting comments to the “Crime With Megs” Facebook posts. Adding fuel to the fire, Megan Reep started with her inflammatory posts. In one such example, Stringer commented on Reep’s false post about Sheriff King’s “new policy” in which she falsely claimed prohibited employees from talking to law enforcement. Stringer ranted against Sheriff King for his supposed “new policy.” Stringer spread

the same false narrative that Reep did, even referring to Sheriff King as being “manipulative” due to this policy.



Stringer expressed great pleasure after viewing Reep’s post about Sheriff King being banned from his own office following the July 29, 2026 indictment. Here is an exchange with Stringer and Reep in the comments section of Reep’s post.



Stringer was in attendance for the entire trial, ensuring that the jury noticed his presence. Through the petition, posts, and comments, Stringer (with the assistance of Reep) created a

dangerous combination against Sheriff King, preventing him from receiving a trial before an unbiased jury.

### **B. Former Chief Deputy James Saulter**

James Saulter has been a public figure in Johnson County, Texas since 2016 when he campaigned to be the Sheriff of Johnson County. After coming in third place, Sheriff King gave Saulter a second chance and hired him to be his Chief Deputy. Since that time, Saulter became the face of Sheriff King's office as its Public Information Officer. In that position, Saulter controlled the content of information released to the public from the Johnson County Sheriff's Office Facebook page. Saulter personally made Facebook posts on the Sheriff's Office page about the office, including posts about recent cases and arrests.

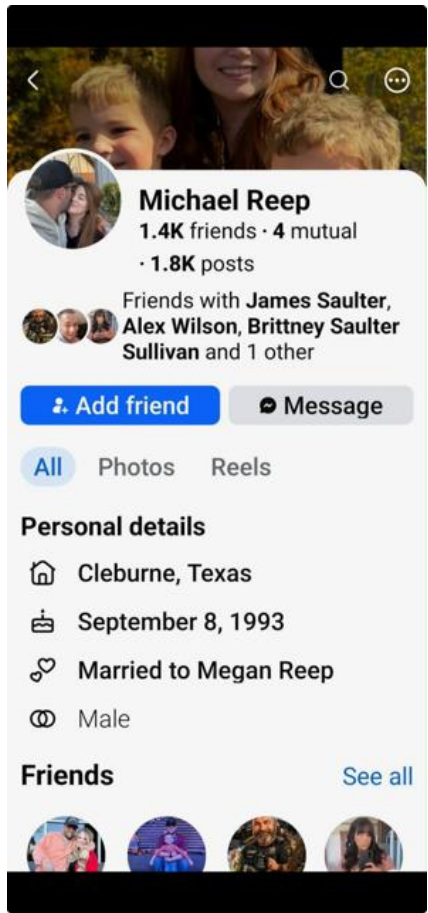
Saulter is the complainant in the case that was tried to a jury. Saulter complains that he was retaliated against by Sheriff King in August of 2025 when he was placed on paid administrative leave. Saulter was terminated from the Johnson County Sheriff's Office in May 2026, for intentionally failing to show up to his *Garrity* interview in connection with an internal investigation concerning his felony theft and habitual double dipping. Saulter has been a staunch critic of Sheriff King during the pendency of this case. On June 18, 2026, four days before Sheriff King's criminal trial commenced, Saulter filed a lawsuit in the 18<sup>th</sup> District Court of Johnson County against Johnson County and Sheriff King, asking for \$25 million dollars in damages. (See Exhibit L). At the trial, Saulter testified that he is entitled to every penny of that twenty five million (\$25,000,000.00). On July 20, 2026, less than two weeks after the State's failed attempt to convict Sheriff King, Saulter personally filed a petition to remove Sheriff King in the 249<sup>th</sup> District Court of Johnson County. (See Exhibit M). In this public filing, Saulter announced that he felt Sheriff King was "incompetent" and had committed "official misconduct."

Interestingly, despite his termination, **Saulter still held himself** out to the public as the “Current Chief Deputy at the Johnson County Sheriff’s Office” amassing over 1,400 friends on Facebook. As late as August 31, 2026, Saulter misrepresented to the public that he is still employed as the “Chief Deputy.”



Although Saulter clearly misrepresents who he is and his employment position, he remains an influential person in Johnson County and his actions constitute public comments on Sheriff King’s guilt.

Further, Saulter is connected to Reep. *Both Saulter, and Saulter’s daughter, are Facebook Friends with Reep’s husband, Michael Reep*. Clearly, this might cause a person of ordinary sensibilities to suspect Saulter is one of Reep’s “inside sources” to the case.



### C. Megan Reep

As detailed above, Reep has meticulously worked at creating a bias against Sheriff King among the citizens of Johnson County. She has worked tirelessly at this by spreading false and prejudicial information to the community through her massive social media campaign. In present day, someone with more than 75,000 followers on TikTok and more than 19,000 followers on Facebook most certainly constitutes an influential person. This is especially true in a rural community, such as Johnson County.

Stringer, Saulter, and Reep's actions and comments have created a dangerous combination against Sheriff King. These actions and comments compromise the likelihood of securing a fair and impartial jury in Johnson County

V.

**CONSTITUTIONAL AND STATUTORY BASIS FOR CHANGE OF VENUE**

The accused in a criminal accusation is guaranteed the right to a fair trial by an impartial jury under the federal and state constitutions and the Texas Code of Criminal Procedure, U.S. Const., Amend. VI; Tex. Const. Art. I § 10; C.C.P. Art. 1.05. The minimal constitutional standard of fairness requires that a defendant, his case and his defense be judged by a panel of impartial and indifferent jurors. *Murphy v. Florida*, 421 U.S. 794, 95 S. Ct. 2031 (1975); *Irwin v. Dowd*, 366 U.S. 717, 81 S.Ct. 1639 (1961) have held that the entire atmosphere in which the trial is conducted must be impartial. *Pamplin v. Mason*, 364 F.2d 1 (5<sup>th</sup> Cir. 1966). Depriving the defendant of this right to an impartial jury and fair trial violates the defendant's right to due process guaranteed by the Fourteenth Amendment. A defendant's right to seek a change of venue is an issue of constitutional dimension. *Bridges v. State*, 471 S.W.2d 827 (Tex.Crim.App. 1971); *Enriquez v. State*, 429 S.W.2d 141 (Tex.Crim.App. 1968).

An impartial jury is defined as one which does not favor a party or an individual because of the emotions of the human mind, heart, or affections. It means that the defendant, the cause, and the issues involved in the cause must not be prejudiced. *Durrough v. State*, 562 S.W.2d 488 (Tex.Crim.App., 1978).

Therefore, Sheriff King's right to a fair and impartial trial, as guaranteed by the Sixth Amendment of the United States Constitution, Article I, §10 of the Texas Constitution, and Article 1.05 of the Texas Code of Criminal Procedure has been denied and the Defendant is entitled to

have his trial moved to a venue that can provide him a fair and impartial trial before a jury. This right to a fair and impartial jury to hear and decide this case and accusations is also guaranteed by Due Process afforded the Defendant through the 5<sup>th</sup> and 14<sup>th</sup> Amendments to the United States Constitution and Article 1, Section 19 of the Texas Constitution.

VI.  
**SUPPORTING AFFIDAVITS**

In accordance with Article 31A.004 C.C.P., this Motion for Change of Venue is supported by the affidavits of two credible persons, who are residents of Johnson County, Texas. The affidavits of Tom Morgan and Vance Castles are attached hereto as Exhibits “N” and “O” and are incorporated by reference to this Motion for all purposes.

Additionally, this Motion for Change of Venue is also supported by the Affidavit of Sheriff Adam Riley King attached hereto as Exhibit “P” and incorporated by reference to this Motion for all purposes.

WHEREFORE, PREMISES CONSIDERED, the Defendant respectfully prays that this Honorable Court will change venue on its own motion, or in the alternative, consider the Defendant’s Motion for Change of Venue in all things, schedule this matter for a hearing prior to trial on the merits and that at such hearing this Motion will be in all things granted.

Respectfully submitted,

/s/Matthew J. Smid  
MATTHEW J. SMID, SBN 24063541  
City Center | Tower II  
301 Commerce Street, Suite 2001  
Fort Worth, Texas 76102  
(817) 332-3822  
Email: [Matt@MattSmidLaw.com](mailto:Matt@MattSmidLaw.com)

/s/Mark G. Daniel

MARK G. DANIEL, SBN 05360050

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301 Commerce Street, Suite 2001

Fort Worth, Texas 76102

(817) 332-3822

Email: [Mark.Daniel@MarkDanielLaw.com](mailto:Mark.Daniel@MarkDanielLaw.com)

ATTORNEYS FOR DEFENDANT

**CERTIFICATE OF SERVICE**

This is to certify that the foregoing Motion has been delivered to the Johnson County District Attorney's Office on this the 14<sup>th</sup> day of October, 2026.

/s/Matthew J. Smid

MATTHEW J. SMID

### **Automated Certificate of eService**

This automated certificate of service was created by the eFiling system. The filer served this document via email generated by the eFiling system on the date and to the persons listed below. The rules governing certificates of service have not changed. Filers must still provide a certificate of service that complies with all applicable rules.

Matt Smid on behalf of Matt Smid

Bar No. 24063541

matt@mattsmidlaw.com

Envelope ID: 121155983

Filing Code Description: Motion

Filing Description: Request to the Court for the Court to Change Venue on its own Motion Pursuant to Article 31.01 C.C.P. and Defendant's Motion for Change of Venue Pursuant to Article 31.01 C.C.P. and Supported by the Affidavits of the Defendant and Two Other Credible Persons/Residents of Johnson County

Status as of 10/15/2026 3:34 PM CST

Associated Case Party: State of Texas

| Name     | BarNumber | Email                          | TimestampSubmitted    | Status |
|----------|-----------|--------------------------------|-----------------------|--------|
| Tim Good | 24051053  | efileda@johnsoncountytexas.org | 10/14/2026 9:38:46 AM | SENT   |

Associated Case Party: Adam King

| Name          | BarNumber | Email                         | TimestampSubmitted    | Status |
|---------------|-----------|-------------------------------|-----------------------|--------|
| Matthew JSmid | 24063541  | Matt@MattSmidLaw.com          | 10/14/2026 9:38:46 AM | SENT   |
| Teri Peets    |           | Teri.Peets@MarkDaniellLaw.com | 10/14/2026 9:38:46 AM | SENT   |