

NOTICE: THIS DOCUMENT CONTAINS SENSITIVE DATA

No.	Court	Parties
2026-0226	IN THE COUNTY COURT AT LAW HARRISON COUNTY, TEXAS	THE STATE OF TEXAS v. RYAN NICHOLS
		Defendant Pro Se
HEARING REQUESTED	EXPEDITED / BEFORE ANY BOND REVOCATION, PLEA SETTING, OR TRIAL	FILED: June 7, 2026

**UNSWORN DECLARATION OF RYAN NICHOLS IN SUPPORT OF DEADLY
CONDUCT PARTICULARIZATION MOTION**

My name is Ryan Nichols. My date of birth is December 6, 1990. I am the Defendant in this matter. I make this declaration under penalty of perjury pursuant to Texas Civil Practice and Remedies Code section 132.001. The following is true and correct to the best of my personal knowledge except where I identify a matter as belief, record status, public-report status, or needing authentication.

1. I am currently appearing pro se and am filing this declaration to support my separate motion to protect my liberty, right to counsel, right to notice, right to discovery, and right to defend against the exact charge.
2. I was present at church on the date of the alleged incident.
3. I was known by church leadership and family to carry concealed while assisting with church security. Craig Evers and my father, Don Nichols, knew about this arrangement. I request their witness statements and any church records or messages confirming this.
4. I did not draw a firearm.
5. I did not pull a firearm from its holster.
6. The pistol stayed holstered the entire time.
7. The pistol never even started to come out of the holster.
8. I did not point a firearm at any person.
9. I did not point a firearm at any vehicle.
10. I did not fire a firearm.
11. I did not verbally threaten to shoot, kill, injure, or harm anyone.
12. My hand went to the holstered pistol during a perceived escalation by Jon Costello.
13. I took a step back, created distance, raised my shirt, and put my hand over or on the grip while assessing what Jon was doing and whether I needed to defend myself or others.
14. I did not make that movement to scare children, threaten a vehicle, or create public alarm.
15. I disengaged and called law enforcement myself.
16. I believe the bodycam, CAD, dispatch audio, 911/non-emergency audio, church camera footage, officer notes, and witness statements will show what actually happened and whether later public statements changed.
17. I have identified a screenshot attributed to Kacie Costello stating that Jon was to the point of getting violent and that she was trying to prevent that. I need the native Facebook comment, URL, timestamp, account information, and full thread to authenticate that statement.

18. I have identified IMG_4118.jpeg as a screenshot appearing to contain a May 11, 2026 statement under Harrison County Sheriff Brandon J. Fletcher letterhead. The visible statement describes the allegation as reaching for a firearm, raising a shirt, displaying a firearm, and placing a hand upon the grip. The visible statement does not say I drew, unholstered, pointed, fired, or verbally threatened with the firearm. I need the original HCSO statement, custodian authentication, drafts, source reports, source witness statements, and publication records.
19. The same screenshot includes a public post contrasting that apparent HCSO statement with another alleged social-media version claiming I pulled out the gun and pointed it at a vehicle with children inside. I deny that allegation and need the source video, post, full context, account data, URL, timestamp, and every person who gave or repeated that version to law enforcement, Pretrial Services, or the State.
20. I have identified IMG_9175.png, Google Drive file ID 1p6gq7fqIQN1Av7vpOvmn7wnRgkeToI1m, source URL https://drive.google.com/file/d/1p6gq7fqIQN1Av7vpOvmn7wnRgkeToI1m/view?usp=drive_link, as a screenshot of a message attributed to Kacie Costello. In that message, Kacie appears to state that Lucas spoke to me, that I spoke back politely, that the situation de-escalated, that they planned to get into their vehicle and leave, and that I made the first call to 911 before Jon did the same thing. I do not agree with every statement or accusation in that screenshot. I request that this message be preserved and authenticated because it is material to the 911-call timeline, witness credibility, de-escalation, and whether the State can prove imminent danger or recklessness.
21. I have identified a May 31, 2026 MP4 video from Google Drive, file ID 1gXR1hqq-YXfmNYu6ZFimH0Upaq1j6-u2, source URL <https://drive.google.com/file/d/1gXR1hqq-YXfmNYu6ZFimH0Upaq1j6-u2/view?usp=sharing>, titled AQMVEstscz0Q-wsNlxx-yJ-5j22fD9zwHLf-wn6-bCAiJme-NuER7HqqcPAR7f7gB_AznIdeUZiKxJNoRtfYZnJR2i0x90WJltiTbobkkQ.mp4. The video appears visually to show Kacie and Jon Costello speaking in a vehicle or parking-lot setting after the incident. I state that the video contains statements about me being slapped in the face with Jesus. I request native-file preservation, full audio transcription, speaker identification, metadata preservation, and production of the full video before any person relies on the audio content.
22. I have identified church interior and scene-layout photographs showing where people may have been standing and why church camera footage is necessary. Those images need authentication and do not replace the actual church camera footage.
23. I have identified story-view screenshots showing that public posts and accusations were being viewed and circulated by non-followers, including persons whose names appear in the screenshots. These records need native platform authentication.
24. I have identified a July 13, 2025 bodycam comparison video involving hand-on-gun conduct in a related family conflict. I need the native bodycam, certified report, officer notes, dispatch, CAD, and transcript before relying on that evidence at hearing or trial.
25. I am not asking the Court to accept screenshots as final proof without authentication. I am asking the Court to preserve, produce, and require source identification so the facts can be tested honestly.
26. I request that the State be required to say exactly what conduct it claims satisfies Deadly Conduct and produce the evidence supporting that exact theory before any plea pressure, bond revocation, custody decision, evidentiary hearing, or trial.

Executed on June 7, 2026, in Harrison County, Texas.

/s/ Ryan Nichols

Ryan Nichols

Certificate of Conference

Defendant is appearing pro se and has not yet received a complete verified service list for this criminal matter. Defendant will confer where required and practicable. Because the relief sought concerns liberty, constitutional notice, discovery, bodycam/church-camera evidence, and pretrial conditions, Defendant requests prompt consideration and the earliest available hearing.

Certificate of Service

I certify that a true and correct copy of this filing was served through eFileTexas and/or by email on the State of Texas, the Harrison County Criminal District Attorney or prosecutor/counsel of record, and any other party or counsel of record on June 7, 2026.

/s/ Ryan Nichols
Ryan Nichols

Signed by:



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6/7/2026