



City of
Corpus
Christi

ETHICS COMMISSION COMPLAINT FORM

Date Filed 5.1.26

Rebecca Huerta

Rebecca Huerta
For Official Use Only City Secretary

****NOTE:** Filing a complaint which falsely accuses someone of a violation of the City of Corpus Christi Ethics Ordinance may result in criminal prosecution of anyone who knowingly makes a false declaration. (Texas Penal Code, Title 8. Offenses Against Public Administration, Chapter 37. Perjury and Other Falsification, § 37.02) All parts of this form must be completed and then submitted to the City of Corpus Christi City Secretary.

Please PRINT or TYPE all information requested on this form.

PART A – COMPLAINANT INFORMATION (*this identifies YOU as the Complainant)

Full Name Meyer Sondra Kaye
LAST FIRST MIDDLE

Address of Residence 505 NAS Corpus Christi 78418
NUMBER STREET CITY ZIP CODE

Business Address _____
NUMBER STREET CITY ZIP CODE

Contact Phone Number 361-808-8033 (day) _____ (evening)

PART B – COMPLAINANT DECLARATION

I DECLARE I, Sondra Kaye Meyer, HAVE A COMPLAINT AGAINST:
(Print Your Full Name)

Full name of person against whom you are alleging violated the City of Corpus Christi Ethics Ordinance:

Kaylann Paxson

The above listed person is: (please check one and complete the last box)

	Position with City	Department/Office	Title of Individual
☒	Elected Official	City Council	<u>Council member</u>
☐	Appointed Official	Board or Commission	
☐	Employee	Department	

Part C – STATEMENT OF COMPLAINT

State the alleged unethical behavior or actions of the person whom this complaint is against.

According to Sec. 2-310. – Preamble: *The purpose of the code of ethics is to promote public trust by establishing rules of conduct for council members, board members and employees..... Situations with ethical implications will arise outside the prohibitions of the rules; in such situations, council members....are encouraged to keep in mind the ideal of public trust.....*

Ethics Code Section 2-311 (8)(e) states that elected city officials **may not** use their position to influence the action of a city official or city employee in the performance of their duties related to a contract or business transaction involving an individual or organization who contributed to the official's campaign contributions during the most recent election either directly, or indirectly via a third party.

Councilmember Kaylynn Paxson received multiple campaign contributions during the most recent election from Ajit David via his hotel companies, Bayfront Marina Investments and/or Shoreline Hospitality, LP dba Residence Inn:

12/18/24 -\$1,000 – Bayfront Marina Investments

2/27/2025 - \$1,000 – Shoreline Hospitality, LP dba: Residence Inn

While performing her duties as a City Councilmember, Ms. Kaylynn Paxson, used her position to:

- Request staff put items on the City Council's agenda's that pertained to Ajit David allegations, civil lawsuit and/or the Articles of Impeachment that Mr. David signed.
- Share her thoughts with other city council members with regards to Ajit David's allegations and civil lawsuit, and/or the Articles of Impeachment that Mr. David signed.
- Vote on multiple actions that pertained to Ajit David's allegations, civil lawsuit and/or the Articles of Impeachment that Mr. David signed.
- Voted on actions that related to concerns about statements made by people being deposed by Attorney Doug Allison in relation to Mr. David's civil lawsuit, as laid out in the Articles of Impeachment.

The only way for Ms Kaylynn Paxson, as a city councilmember, to have NOT used her position to influence the actions of a city official or employee in the performance of their duties would have been to refrain from participation in the official city business transactions. Had she NOT used her position, her name would NOT be on 3 signature memorandums requesting items be placed on the agenda. She would NOT have voted. At a minimum, she would have disclosed the conflict of interest, the receipt of the campaign contributions which causes Ethics code section 2-311 (8)(e) to become applicable prior to her sharing thoughts on the topic. Specifically, within the last 180 days,

- **Jan 27, 2026:** Item: 26-0137 The Corpus Christi Police Department was scheduled to give the City Council a presentation on the findings of the Homewood Suites Investigation. When it came time for their presentation, Councilman Hernandez moved to postpone the presentation until the outside attorney's report would be received in mid-February. See council meeting video

Ms. Paxson was one of five council members that voted for this postponement. 3 of those 5 did not refrain from the discussion and/or the vote despite having received campaign contributions from Mr. David.

- **Feb 17, 2026:** At the City Council meeting, both the outside attorney firm and the Corpus Christi Police department shared the results of their investigations into Mr. David's Homewood Suites Incentive allegations. Neither found sufficient evidence to warrant criminal charges.
- **Feb 25, 2026:** Ajit David submitted an affidavit, as part of his lawsuit against the city, that he owns, in part, the Holiday Inn, at 707 Shoreline Blvd, and the Residence Inn. (Other documents, such as an Internal Revenue Service form W-9, that was found online, shows The Holiday Inn Marina Downtown as operating under Bayfront Marina Investments – 707 North Shoreline Blvd.)
- **March 11, 2026:** Three council members submitted a request to have a discussion at the March 24, 2026 as to whether the city council should take action on Rachel Caballero's August 29, 2025 petition for removal of the mayor. The petition was submitted after the Auditor's August 26 memo alleging fraud had been made public. It details Ajit David's concerns included in his civil lawsuit about the Homewood Suites incentive and comments made in depositions taken by his attorney Doug Allison. Two of the three city council members that submitted this request received campaign donations between August 2024- January 2025, from Bayfront Marina Investments. Signatures included Council members Hernandez and Mr. Cantu.
- **March 18, 2026:** Councilmember Paxson was one of three council members that submitted a request to have a discussion at the March 24, 2026 City Council meeting as to whether the Legistar records that related to the 2024 Homewood Suites should reflect the modified version or the original version that was considered to be confusing. It should be noted that all three members received campaign donations between August 2024- February 2025, from Bayfront Marina Investments. Signatures included: Councilmembers Hernandez, Paxson and Cantu. <https://corpuschristi.legistar.com/LegislationDetail.aspx?ID=7954960&GUID=5ECEB468-0094-446C-A817-5946FEC38F80>
- **March 24, 2026:** This item 26-0451 pertained to concerns that Mr. David had that related to topics in this allegations and lawsuit. Mr. David's attorney spoke on this item. He was also observed trying to keep discussion of items that pertained to litigation in the public while City Attorney was trying to move the group to Executive Session for the discussion. YouTube video. <https://corpuschristi.legistar.com/LegislationDetail.aspx?ID=7954960&GUID=5ECEB468-0094-446C-A817-5946FEC38F80> Ms. Paxson discussed and voted aye.
- **March 24, 2026:** This item 26- 0419, City Council members discussed petition to remove the mayor. It was related to Mr. David's allegations and lawsuit. The city council was given four options to consider. These included having a hearing to decide the validity of the allegations and concerns. Mr. David's attorney spoke and said he wasn't trying to say that Mr. David is right and the Mayor is wrong. He realizes that most people did not listen to all the testimony that he took. He stressed the petitioners' concerns needed to be heard in a public forum rather in the ethics committee. Councilmember Hernandez made motion to go with option 2 and Councilmember Paxson seconded the motion.

<https://corpuschristi.legistar.com/LegislationDetail.aspx?ID=7954960&GUID=5ECEB468-0094-446C-A817-5946FEC38F80> Ms. Paxson discussed and voted aye on vote to April 14 procedural hearing.

- **April 14, 2026:** Agenda Item 26-0510 was to set a pre-trial hearing for impeachment of the mayor largely related to comments that were made in depositions taken as part of the Mr. David's Homewood Suites allegation. A set of Articles of Impeachment was added. This document includes Mr. Ajit David's signature and includes concerns from his initial allegations and civil lawsuit.
<https://corpuschristi.legistar.com/LegislationDetail.aspx?ID=7973096&GUID=EE0E4773-41C9-41CE-9902-9048F485F601> Ms. Paxson discussed and voted aye.

PART D – SUPPORTING FACTS (Required)

Provide a statement of the facts upon which your complaint is based. This is required because the “burden of proof” is with the Complainant. Describe the events in the order in which they occurred. Keep dates of the events in sequence. Include full name, addresses and phone numbers of all individuals involved, including any witnesses present when the alleged violations occurred. Be factual; the information you provide in this statement must be based facts and not personal conjecture. Try to answer the questions, who, what, where, and when. (Be specific when the alleged violation occurred and when you learned about it. Attach extra sheets if more space is required.

For the record, I have included information on my timeline that dates back to 2024. I found this information via online research that occurred between September 2025 to present. As a private citizen, this should not be interpreted as my having knowledge of that information at that time. I was not paying attention to city affairs, much less city council member's activities. I have included some items on the timeline to provide context even though they did not occur within the last 180 days.

On September 9, 2025, the City Auditor gave a presentation summarizing their Homewood Suites fraud investigation. It became evident during that meeting; the auditor did not publicly disclose his conflict of interest until that night. As a former Certified Internal Auditor and Certified Public Accountant, I believed his presentation was so 'atypical' that I became concerned.

I re-watched that presentation on the City's YouTube channel multiple times to see if anyone else disclosed potential conflicts of interest that night. For several months, I focused my research on the City Auditor's office activities. Auditor independence and compliance with standards is an integral component of that profession.

It was not until the March 24, 2026 City Council meeting, when I observed Ajit David and Doug Allison, his attorney, interacting with some City Council members that I, as a public citizen, was able to comprehend gravity of the ethical violations that I observed between September 9, 2025 and April 2026.

- **2021-2024:** Councilman Gil Hernandez chairs the audit committee.

- **July 16, 2024:** After Executive Session, a motion was made and passed 9:0 to place City Auditor on leave for 14 days. *(Note: The public was unaware of that an outside HR investigation report had recommended his termination. Report didn't become public until March 2025)*
- **July 30, 2024:** Council discussed the City Auditor in executive session. A motion was made and passed to place the City Auditor on paid Administrative leave from July 30 – August 13, 2024. Mr. Hernandez abstained. The other 8 members voted aye.
- **July/August 2024:** While on administrative leave, the City Auditor engaged the services of attorney Doug Allison, to assist him with this matter. (The City Auditor discloses this arrangement on Sept 9, 2025 during Homewood Suite Fraud Investigation presentation to the city council. He did not provide the specific date.)
- **August 13, 2024:** Council discussed the City Auditor in executive session. A motion was made and passed to place the City Auditor on paid leave through August 27, 2024. Mr. Hernandez voted nay. The other 8 members voted aye.
- **August 27, 2024:** Council discusses City Auditor in executive session. A motion is made to authorize the Audit Committee to establish further direction for the City auditor. It passes 9:0
- **August 28, 2024:** City Auditor returns to work.
- **August 28, 2024:** City Auditor is assigned to look into the Homewood Suites Incentive allegation(s).
- **August 29, 2024:** Gil Hernandez receives a campaign donation of \$1,500 from Bayfront Marina Investments. Multiple pieces of evidence indicate that the company is related to the hotels in which Mr. David is part owner. The address associated with the company is 707 N Shoreline Blvd. That is also the Holiday Inn Downtown Marina's address. (Per campaign finance report filed on 10/7/24) <https://www.corpuschristitx.gov/media/314lawbn/gill-hernandez.pdf>
- **September 30, 2024:** Doug Allison, the attorney that worked with the City Auditor, files a civil lawsuit against the City and the Mayor, on behalf of Ajit David, in reference to the Homewood Suites Incentive.
- **September 30, 2024:** Gil Hernandez received another campaign donation, \$1,000, from Ajit David's Bayfront Marina Investments. (Per campaign finance report filed on 10/28/24) <https://www.corpuschristitx.gov/media/wjbdutfh/ghernandez-8-day-report-2024.pdf>
- **January 2025:** Kaylann Paxson is appointed to Audit Committee. Gil Hernandez is NOT reappointed to the committee.
- **August 21, 2025:** The City Auditor released a one page memo to the Mayor and City Council regarding the Homewood Suites Allegation. According to City Ordinance 12.5 this memo should have gone through the legal department and the City manager first. In the memo, the City Auditor states they found reasonable basis that the developers committed fraud.
- **August 22, 2025:** KRIS 6 Investigates posts a report at 9:57 am "City Auditor finds 'reasonable basis' developers committed fraud for \$2M incentive."
- **August 26, 2025:** Kiii, Kris 6 and the Caller Times have all reported on the City Auditor's memo. In Katie Nickas's Caller Times article, "City Auditor finds hotel developers likely committed fraud in requesting incentive," she states that Aug. 21 memo from City Auditor George Holland was provided to the Caller Times by City Councilman Gil Hernandez.
- **August 29, 2025:** Rachael Caballero files a petition at the City Secretary's office to have the mayor removed. She attached Ajit David's lawsuit and used the complaints within as the basis for wrongdoing. Online chatter starts that the City Auditor found forgery thus supporting the complaints in her petition. This continues for through March & people start sharing that viewpoint in city council meetings. She also starts an online petition to remove the mayor.

- **September 2, 2025:** Gil Hernandez, Kaylynn Paxson and Sylvia Campos submit a request to have a discussion on the City Auditor's Aug 21 memorandum to have an outside agency investigate the Homewood Suites Fraud allegation at the Sept 9, 2025 City Council meeting.
- **Sept 9, 2025:** City Auditor makes a formal presentation to the city council about the matter. It is disclosed that the auditor's relied primarily upon depositions that were taken by Doug Allison, Mr. David's attorney. Evidence suggests that certain details/interviews with the Type B Board were not included in timelines or presentations. Those details would not necessarily support Mr. David's stance. As result, the objectivity of the auditor's report is questioned.

Upon questioning, the City Auditor discloses that Ajit David's attorney, Doug Allison, had also been his attorney. There was a significant amount of discussion relating to conflicts of interest. No potential conflicts of interest were disclosed by Kaylynn Paxson, or any other city council members who had received campaign donations within the last 12 months from Mr. David or any business related to hotels in which he was affiliated with.

Kaylynn Paxson and the majority that voted did not want to wait for a law enforcement investigation. They wanted the city to pay for an outside agency to investigate as they were concerned that they police department could be conflicted. (See YouTube Video recording of Sept 9, 2024 meeting)

- **Sept 23, 2025:** Councilmember Paxson was one of 7 persons on the City Council to authorize the execution of two professional services agreements to represent the City and the Mayor in the case of Ajit David vs City of Corpus Christi and Mayor Paulette Guajardo. The legal fees were not to exceed \$444,000.
- **Sept 25, 2025:** Kiiitv.com reports "Corpus Christi City Auditor's office failed peer review in May. The news article included a copy of the May 5, 2025 report. According to the article and supported by the attached report, "The City of Corpus Christi's Auditor's Office has failed its latest external peer review, raising serious concerns about independence, oversight and compliance with government auditing standards."
- **Oct 1, 2025:** Three council members that submitted a 3 Signature Memo request to have a discussion at the October 7 City Council meeting to retain yet another outside attorney for the internal investigation of the Homewood Suites fraud allegation.
- **Oct 4, 2025** Audit Committee Meeting. Member Kaylynn Paxson made a motion to recommend the referral to the City Council for review of the City Auditor's FY25 Performance Evaluation and Market Salary Increase to match \$168,000.
- **Oct 7, 2025:** City Council meeting, Kaylynn Paxson was 1 of 5 people who voted to retain yet another outside attorney for the internal investigation of the Homewood Suites fraud allegation. There was a significant amount of discussion relating to conflicts of interest. Ms. Paxson and the majority that voted did not want to wait for a law enforcement investigation to be completed. Once again, there were concerns the police department could be conflicted. Councilman Cantu believed this investigation could be done for approximately \$50,000. It should be noted that 3 of the 5 people that authorized contracting with an outside attorney had all received campaign donations from Bayfront Marina Investments within the last 12 months, i.e. the most recent campaign cycle.
- **Oct 11, 2025.** Audit committee meeting. They discussed city auditor's personnel matter in Executive Session from 10:10 – 11:28. When they came out, Kaylynn Paxson made a motion that the city council be presented with a motion recommending that City Auditor receive a retroactive wage increase to July 28, 2025. Seconded by Campos.

- **Nov 4, 2025:** Audit committee in Executive Session from 10:01 – 11:21 discussing city auditor personnel matters. Kaylyn Paxson makes a motion to refer to the city council the City Auditor's performance evaluation and a market salary increase to \$168,000. Seconded by Campos.
- **Nov 18, 2025:** Despite the negative publicity from the Auditor's HR investigation and the failed peer review, Eric Cantu is one of the three council members that received campaign contributions from Mr. David that voted for the City Auditor to receive a pay raise, to be retro-active to July 2025.
- **Dec 17, 2025:** Kris 6 News and Kiii both report that law enforcement agencies did not expect to file any criminal charges against the developer in relation to the Homewood Suites allegations.
- **Jan 6, 2026:** Item: 26-0061 Gil Hernandez was one of three council members that submitted a three signature memo request to have a discussion at the January 13, 2026 City Council meeting as to whether the City Council the Type B economic agreement with the Homewood Suites Developer should be withdrawn. That item was placed on the January 27 agenda but then was withdrawn that day.
<https://corpuschristi.legistar.com/LegislationDetail.aspx?ID=7794863&GUID=10DDB544-6E87-451E-B2CC-A2473B55CE4E>
- **Jan 27, 2026:** Item: 26-0137 The Corpus Christi Police Department was scheduled to give the City Council a presentation on the findings of the Homewood Suites Investigation. When it came time for their presentation, Councilman Hernandez moved to postpone the presentation until the outside attorney's report would be received in mid-February. Eric Cantu voted for this postponement.
- **Feb 17, 2026:** At the City Council meeting, both the outside attorney firm and the Corpus Christi Police department shared the results of their investigations into Mr. David's Homewood Suites Incentive allegations. Neither found sufficient evidence to warrant criminal charges.
- **Feb 25, 2026:** Ajit David submitted an affidavit, as part of his lawsuit against the city, that he owns, in part, the Holiday Inn, at 707 Shoreline Blvd, and the Residence Inn. (Other documents, such as an Internal Revenue Service form W-9, that was found online, shows The Holiday Inn Marina Downtown as operating under Bayfront Marina Investments – 707 North Shoreline Blvd.)
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- **March 18, 2026:** Eric Cantu was one of three council members that submitted a request to have a discussion at the March 24, 2026 City Council meeting as to whether the Legistar records that related to the 2024 Homewood Suites should reflect the modified version or the original version that was considered to be confusing.
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- **April 14, 2026:** Agenda Item 26-0510 Articles of Impeachment. This document includes Mr. Ajitt David's signature and includes concerns from his initial allegations and civil lawsuit. <https://corpuschristi.legistar.com/LegislationDetail.aspx?ID=7973096&GUID=EE0E4773-41C9-41CE-9902-9048F485F601> Mr. Cantu discussed and voted aye.

Part E- Ethics Ordinance Code Violations

According to Sec. 2-310. – Preamble: *The purpose of the code of ethics is to promote public trust by establishing rules of conduct for council members, board members and employees..... Situations with ethical implications will arise outside the prohibitions of the rules; in such situations, council members....are encouraged to keep in mind the ideal of public trust.....*

Ethics Code Section 2-311 (8)(e) *states that elected city officials may not use their position to influence the action of a city official or city employee in the performance of their duties related to a contract or business transaction involving an individual or organization who contributed to the official's campaign contributions during the most recent election either directly, or indirectly via a third party.*

Part F – Sources and Attachments of Evidence

<https://www.corpuschristitx.gov/media/qbalpxg2/kpaxson-jan-15-report.pdf>

<https://www.corpuschristitx.gov/media/nlfpvlqm/cfr-kaylynn-paxson.pdf>

<https://ewscripps.brightspotcdn.com/63/22/9b93d66b46e19154a35f3b233cb3/2024-09-30-ajit-david-pop.pdf>

<https://corpuschristi.legistar.com/DepartmentDetail.aspx?ID=16850&GUID=A6D0B73D-749A-4E86-8B51-441C31FAF5B1&Mode=MainBody> City Council Minutes 2024

<https://corpuschristi.legistar.com/DepartmentDetail.aspx?ID=16850&GUID=A6D0B73D-749A-4E86-8B51-441C31FAF5B1&Mode=MainBody> City Council Minutes 2025

<https://corpuschristi.legistar.com/DepartmentDetail.aspx?ID=16850&GUID=A6D0B73D-749A-4E86-8B51-441C31FAF5B1&Mode=MainBody> City Council Minutes 2026

<https://corpuschristi.legistar.com/DepartmentDetail.aspx?ID=17021&GUID=8865016E-EB42-4175-8129-B9692890ADC5&R=7e90472f-afe0-4559-b277-1807768f2f4d> Audit Committee Meeting Minutes 2025

<https://www.caller.com/story/news/local/2025/08/26/corpus-christi-fraud-homewood-suites-hilton-downtown-hotel-incentive/85816071007/?gnt-cfr=1&gca-cat=p&gca-uir=true&gca-epti=z11xx38p117050c117050e001100v11xx38b00xxxxd11xx65&gca-ft=235&gca-ds=sophi>
Caller Times Article

<https://www.kiiitv.com/article/news/local/corpus-christi-city-auditors-office-fails-review/503-717c4719-711b-44ec-9aaf-be11bedb2ff3>

<https://corpuschristi.legistar.com/LegislationDetail.aspx?ID=7718725&GUID=12C2D1F7-8300-4A2B-91E1-2843B44FE8DE> Audit Committee Meeting motion Oct 4, 2025

<https://www.kiiitv.com/article/news/local/homewood-suites-criminal-investigation/503-d9b3b98f-fd23-4046-a276-bc1d303e6e20>

<https://www.kristv.com/news/local-news/in-your-neighborhood/corpus-christi/downtown/law-enforcement-agencies-not-pursuing-criminal-charges-in-homewood-suites-case-developers-attorney-says>

<https://www.youtube.com/@CCTVCorpusChristi/streams> City of Corpus Christi YouTube channel.

PART G

My name is Sandra (First) Kaye (Middle) Meyer (Last), my date of birth is 8/29/66, and my address is 505 NAS (Street) Corpus Christi (City) TX (State) 78418 (Zip Code), and Nueces (Country). I declare under penalty of perjury that the information provided by me herein is true and correct.

Executed in Nueces County, State of TX, on the 1 day of May, 2021.

Sandra K Meyer
Declarant

Should you have any questions concerning this form or require additional information on the complaint review process, please contact the City Secretary's Office at (361) 826-3105 during regular business hours (8:30 am to 5:00 pm; Monday – Friday)

Upon completion of **ALL** sections of the Complaint Form, please either **hand-deliver** or send by **certified mail** with any attachments to:

Office of the City Secretary
City of Corpus Christi
P.O. Box 9277
Corpus Christi, TX 78469

Supporting Documents

CANDIDATE / OFFICEHOLDER CAMPAIGN FINANCE REPORT

FORM C/OH
COVER SHEET PG 2

15 C/OH NAME

Kaylynn Paxson

16 Filer ID (Ethics Commission Filers)

17 CONTRIBUTION
TOTALS

1. TOTAL UNITEMIZED POLITICAL CONTRIBUTIONS (OTHER THAN
PLEDGES, LOANS, OR GUARANTEES OF LOANS, OR
CONTRIBUTIONS MADE ELECTRONICALLY)

\$

2. TOTAL POLITICAL CONTRIBUTIONS
(OTHER THAN PLEDGES, LOANS, OR GUARANTEES OF LOANS)

\$

2,450.16

EXPENDITURE
TOTALS

3. TOTAL UNITEMIZED POLITICAL EXPENDITURE.

\$

4. TOTAL POLITICAL EXPENDITURES

\$

1,101.78

CONTRIBUTION
BALANCE

5. TOTAL POLITICAL CONTRIBUTIONS MAINTAINED AS OF THE LAST DAY
OF REPORTING PERIOD

\$

8,473.38

OUTSTANDING
LOAN TOTALS

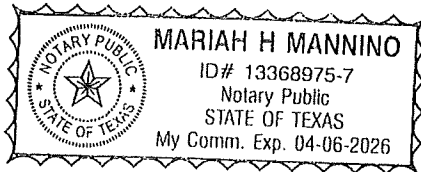
6. TOTAL PRINCIPAL AMOUNT OF ALL OUTSTANDING LOANS AS OF THE
LAST DAY OF THE REPORTING PERIOD

\$

129.58

18 SIGNATURE

I swear, or affirm, under penalty of perjury, that the accompanying report is true and correct and includes all information required to be reported by me under Title 15, Election Code.



Kaylynn Paxson
Signature of Candidate or Officeholder

Please complete either option below:

(1) Affidavit

NOTARY STAMP/SEAL

Sworn to and subscribed before me by Kaylynn Paxson this the 15th day of January, 2025, to certify which, witness my hand and seal of office.

Mariah Mannino Notary Public
Signature of officer administering oath Printed name of officer administering oath Title of officer administering oath

OR

(2) Unsworn Declaration

My name is _____, and my date of birth is _____.

My address is _____.

(street)

(city)

(state)

(zip code)

(country)

Executed in _____ County, State of _____, on the _____ day of _____, 20____.

(month)

(year)

Signature of Candidate/Officeholder (Declarant)

51/18

Schedule A1

Total	\$2,450.16
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Schedule A2

Total	\$0.00
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Schedule F1

Total	\$1,101.78
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52/16

CANDIDATE / OFFICEHOLDER CAMPAIGN FINANCE REPORT

FORM C/OH
COVER SHEET PG 1

The C/OH Instruction Guide explains how to complete this form.		1 Filer ID (Ethics Commission Filers)	2 Total pages filed: 7		
3 CANDIDATE / OFFICEHOLDER NAME	MS / MRS / MR FIRST MI Kaylynn	OFFICE USE ONLY Date Received 07/16/2025 RH/MR Date Hand-delivered or Date Postmarked Receipt # Amount \$ Date Processed Date Imaged			
	NICKNAME LAST SUFFIX Paxson				
4 CANDIDATE / OFFICEHOLDER MAILING ADDRESS Change of Address	ADDRESS / PO BOX; APT / SUITE #; CITY; STATE; ZIP CODE 16013 El Socorro Loop CC TX 78418				
5 CANDIDATE/ OFFICEHOLDER PHONE	AREA CODE PHONE NUMBER EXTENSION (361) 723-1001				
6 CAMPAIGN TREASURER NAME	MS / MRS / MR FIRST MI Kaylynn				
	NICKNAME LAST SUFFIX Paxson				
7 CAMPAIGN TREASURER ADDRESS (Residence or Business)	STREET ADDRESS (NO PO BOX PLEASE); APT / SUITE #; CITY; STATE; ZIP CODE 16013 El Socorro Loop CC TX 78418				
8 CAMPAIGN TREASURER PHONE	AREA CODE PHONE NUMBER EXTENSION (361) 723-1001				
9 REPORT TYPE	☐ January 15 ☐ 30th day before election ☐ Runoff ☐ 15th day after campaign treasurer appointment (Officeholder Only) ☒ July 15 ☐ 8th day before election ☐ Exceeded Modified Reporting Limit ☐ Final Report (Attach C/OH - FR)				
10 PERIOD COVERED	Month Day Year Month Day Year 1 / 15 / 2025 THROUGH 7 / 15 / 2025				
11 ELECTION	ELECTION DATE Month Day Year 12 / 14 / 24		ELECTION TYPE ☐ Primary ☒ Runoff ☐ Other Description ☐ General ☐ Special		
	12 OFFICE OFFICE HELD (if any) City Council District 4		13 OFFICE SOUGHT (if known)		
14 NOTICE FROM POLITICAL COMMITTEE(S) Additional Pages	THIS BOX IS FOR NOTICE OF POLITICAL CONTRIBUTIONS ACCEPTED OR POLITICAL EXPENDITURES MADE BY POLITICAL COMMITTEES TO SUPPORT THE CANDIDATE / OFFICEHOLDER. THESE EXPENDITURES MAY HAVE BEEN MADE WITHOUT THE CANDIDATE'S OR OFFICEHOLDER'S KNOWLEDGE OR CONSENT. CANDIDATES AND OFFICEHOLDERS ARE REQUIRED TO REPORT THIS INFORMATION ONLY IF THEY RECEIVE NOTICE OF SUCH EXPENDITURES.				
	COMMITTEE TYPE	COMMITTEE NAME			
	☐ GENERAL	COMMITTEE ADDRESS			
	☐ SPECIFIC	COMMITTEE CAMPAIGN TREASURER NAME			
		COMMITTEE CAMPAIGN TREASURER ADDRESS			

GO TO PAGE 2

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**CANDIDATE / OFFICEHOLDER
CAMPAIGN FINANCE REPORT**

**FORM C/OH
COVER SHEET PG 2**

15 C/OH NAME
Kaylynn Paxson

16 Filer ID (Ethics Commission Filers)

**17 CONTRIBUTION
TOTALS**

1. TOTAL UNITEMIZED POLITICAL CONTRIBUTIONS (OTHER THAN
PLEDGES, LOANS, OR GUARANTEES OF LOANS, OR
CONTRIBUTIONS MADE ELECTRONICALLY)

\$

2. TOTAL POLITICAL CONTRIBUTIONS
(OTHER THAN PLEDGES, LOANS, OR GUARANTEES OF LOANS)

\$ 8750.00

**EXPENDITURE
TOTALS**

3. TOTAL UNITEMIZED POLITICAL EXPENDITURE.

\$

4. TOTAL POLITICAL EXPENDITURES

\$ 10868.61

**CONTRIBUTION
BALANCE**

5. TOTAL POLITICAL CONTRIBUTIONS MAINTAINED AS OF THE LAST DAY
OF REPORTING PERIOD

\$ 6355.96

**OUTSTANDING
LOAN TOTALS**

6. TOTAL PRINCIPAL AMOUNT OF ALL OUTSTANDING LOANS AS OF THE
LAST DAY OF THE REPORTING PERIOD

\$ 129.58

18 SIGNATURE I swear, or affirm, under penalty of perjury, that the accompanying report is true and correct and includes all information required to be reported by me under Title 15, Election Code.

Kaylynn Paxson
Kaylynn Paxson (Jul 16, 2025 09:36 CDT)

Signature of Candidate or Officeholder

Please complete either option below:

(1) Affidavit

NOTARY STAMP/SEAL

Sworn to and subscribed before me by _____ this the _____ day of _____,
20 _____, to certify which, witness my hand and seal of office.

Signature of officer administering oath

Printed name of officer administering oath

Title of officer administering oath

OR

(2) Unsworn Declaration

My name is Kaylynn Paxson, and my date of birth is 03/29/1990.

My address is 16013 El Socorro Loop, Corpus Christi, TX, 78418, Nueces.
(street) (city) (state) (zip code) (country)

Executed in Nueces County, State of Texas, on the 16 day of 7, 2025.
(month) (year)

Kaylynn Paxson
Kaylynn Paxson (Jul 16, 2025 09:36 CDT)
Signature of Candidate/Officeholder (Declarant)

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Campaign Finance Report - Contributions

Schedule A1

Contributor	Amount	Date	Address	City	State	Zip
IOD Interest Payment	\$0.30	1/14/2025	[REDACTED]	CC	TX	78418
TREPAC-Texas REALTORS PAC	\$6,000.00	2/6/2025	[REDACTED]	Austin	TX	78766-2246
IOD Interest Payment	\$0.11	3/13/2025	[REDACTED]	CC	TX	78418
Susan De Cou Lamb	\$100.00	2/27/2025	[REDACTED]	CC	TX	78401
Rodd Village Development LLC	\$100.00	2/27/2025	[REDACTED]	CC	TX	78415
J & E Ranch Tracts, LLC	\$125.00	2/27/2025	[REDACTED]	CC	TX	78415
Terra Motors, LLC	\$125.00	2/27/2025	[REDACTED]	CC	TX	78415
Salazar Investments	\$150.00	2/27/2025	[REDACTED]	CC	TX	78415
Anna Marie Aldridge	\$250.00	2/27/2025	[REDACTED]	CC	TX	78414-3404
The Shoreline Real Estate Team Inc	\$250.00	2/27/2025	[REDACTED]	CC	TX	78418
Mossa Paymon Mostaghazi	\$500.00	2/27/2025	[REDACTED]	CC	TX	78463
Shoreline Hospitality , LP dba: Residence Inn	\$1,000.00	2/27/2025	[REDACTED]	CC	TX	78401
Mourad Hasbaoui	\$150.00	3/10/2025	[REDACTED]	CC	TX	78416
IOD Interest Payment	\$0.23	3/13/2025	[REDACTED]	CC	TX	78418
IOD Interest Payment	\$0.29	3/13/2025	[REDACTED]	CC	TX	78418
IOD Interest Payment	\$0.32	3/13/2025	[REDACTED]	CC	TX	78418
IOD Interest Payment	\$0.24	3/13/2025	[REDACTED]	CC	TX	78418
Total	\$8,751.19					

Kaylynn Paxson

Campaign Finance Report - In-Kind Contributions

Schedule A2

Contributor	Amount	Date	Description	Address		
Total	\$0.00					

Kaylynn Paxson

Campaign Finance Report - Expenses

Schedule F1

Expense	Amount	Date	Category	Description	Address
Milestone CS	\$ 7,500.00	1/21/2025	Consulting	Consulting	3522 S Alameda, CC TX 78418
PIBA	\$ 250.00	3/1/2025	Event Expense	Float	14493 S Padre Island Dr, A-313 CC TX 78418
Cloudflare	\$ 10.11	3/24/2025	Advertising Expense	Website	101 Townsend St., San Francisco, California 94107
CBRC	\$108.50	4/25/2025	Event Expense	Banquet	14641 S Padre Island Dr. CC TX 78418
Milestone CS	\$ 3,000.00	5/27/2025	Consulting	Consulting	3522 S Alameda, CC TX 78418
Total	\$10,868.61				

Maintained as of last period:	\$ 8,473.38	
Period, Report Contributions:	\$8,751.19	\$8750.00* no interest
Period, Report Expenses:	-\$10,868.61	
TOTAL:	\$ 6,355.96	

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CANDIDATE / OFFICEHOLDER CAMPAIGN FINANCE REPORT

FORM C/OH
COVER SHEET PG 1

The C/OH Instruction Guide explains how to complete this form.

1 Filer ID (Ethics Commission Filers)

2 Total pages filed: 7

3 CANDIDATE /
OFFICEHOLDER
NAME

MS / MRS / MR

FIRST

MI

Kaylynn

NICKNAME

LAST

SUFFIX

Paxson

4 CANDIDATE /
OFFICEHOLDER
MAILING
ADDRESS

ADDRESS / PO BOX;

APT / SUITE #;

CITY;

STATE; ZIP CODE

14300 SPID #203 CC TX 78418

Change of Address

5 CANDIDATE/
OFFICEHOLDER
PHONE

AREA CODE

PHONE NUMBER

EXTENSION

(361)

723-1001

6 CAMPAIGN
TREASURER
NAME

MS / MRS / MR

FIRST

MI

Kaylynn

NICKNAME

LAST

SUFFIX

Paxson

7 CAMPAIGN
TREASURER
ADDRESS

STREET ADDRESS (NO PO BOX PLEASE); APT / SUITE #;

CITY;

STATE;

ZIP CODE

14300 SPID #203 CC TX 78418

(Residence or Business)

8 CAMPAIGN
TREASURER
PHONE

AREA CODE

PHONE NUMBER

EXTENSION

(361)

723-1001

9 REPORT TYPE



January 15



30th day before election



Runoff



15th day after campaign
treasurer appointment
(Officeholder Only)



July 15



8th day before election



Exceeded Modified
Reporting Limit



Final Report (Attach C/OH - FR)

10 PERIOD
COVERED

Month

Day

Year

12

/ 5

/ 24

THROUGH

Month

Day

Year

12

/ 31

/ 24

11 ELECTION

ELECTION DATE

Month

Day

Year

12

/ 14

/ 24

ELECTION TYPE



Primary



Runoff



Other
Description



General



Special

12 OFFICE

OFFICE HELD (if any)

13 OFFICE SOUGHT (if known)

City Council District 4

14 NOTICE FROM
POLITICAL
COMMITTEE(S)

THIS BOX IS FOR NOTICE OF POLITICAL CONTRIBUTIONS ACCEPTED OR POLITICAL EXPENDITURES MADE BY POLITICAL COMMITTEES TO SUPPORT THE CANDIDATE / OFFICEHOLDER. THESE EXPENDITURES MAY HAVE BEEN MADE WITHOUT THE CANDIDATE'S OR OFFICEHOLDER'S KNOWLEDGE OR CONSENT. CANDIDATES AND OFFICEHOLDERS ARE REQUIRED TO REPORT THIS INFORMATION ONLY IF THEY RECEIVE NOTICE OF SUCH EXPENDITURES.

COMMITTEE TYPE

COMMITTEE NAME



GENERAL

COMMITTEE ADDRESS



SPECIFIC

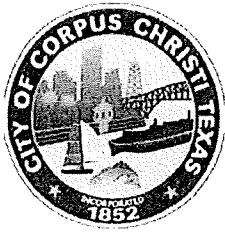
COMMITTEE CAMPAIGN TREASURER NAME

COMMITTEE CAMPAIGN TREASURER ADDRESS

Additional Pages

GO TO PAGE 2

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**CITY OF CORPUS CHRISTI
CITY SECRETARY'S OFFICE
COUNCIL ACTION REQUEST**

TO: Rebecca Huerta, City Secretary

FROM: Council Member Eric Cantu, Dist. 3
Council Member Gil Hernandez, Dist. 5
Council Member Kaylynn Paxson, Dist. 4

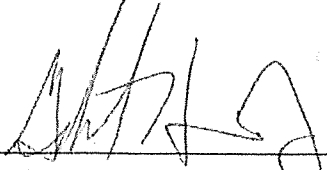
COPIES TO: Mayor & Council
Peter Zaroni, City Manager
Miles Risley, City Attorney

SUBJECT: Discussion and possible action to correct February 20, 2024 Council Meeting Agenda Item 24-0256 to original agenda memo and all associated documents as recorded in the city's official record taken from the Laserfiche archives.

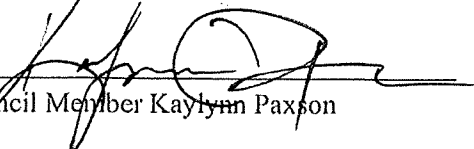
ACTION REQUEST:

Per Council Policy 16.d., we are requesting that the following item be placed on the March 24, 2026, City Council agenda for discussion and possible action to correct the February 20, 2024 Council Meeting Agenda Item 24-0256 in Legistar to original agenda memo and all associated documents as recorded in the city's official record taken from the Laserfiche archives.

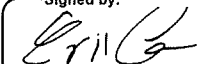
The agenda memo and all associated documents in Legistar for the February 20, 2024 City Council meeting were changed to the April 23, 2024 agenda memo, presentation, Type B agreement and other document. These documents are incorrect and do not reflect what was discussed during the February 20, 2024 meeting. Even though Legistar is not the city's official record, Legistar is the citizen website access to city council meeting information. In accordance with Texas Government Code Section 552, the information should be corrected to reflect the city's official record.



Council Member Gil Hernandez

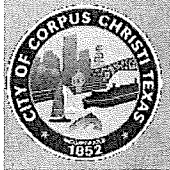


Council Member Kaylynn Paxson

Signed by:


3F202C099BF0440...
Council Member Eric Cantu

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CITY OF Corpus Christi

[City Home](#) [Legislation](#) [Calendar](#) [City Council](#)

[Details](#) [Reports](#)

File #: 26-0451 Version: 1
 Type: Motion
 File created: 3/18/2026
 On agenda: 3/24/2026
 Title: Discussion and possible action to cc recorded in the city's official record
 Sponsors: [City Secretary's Office](#)
 Attachments: 1. [Add Agenda Item Legistar.com](#)

[History \(1\)](#) [Text](#)

1 record	Group	Export
Date	Ver.	Action By
3/24/2026	1	City Council

City of Corpus Christi - Action Details

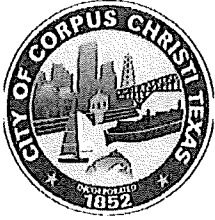
Details

File #: 260451 Version: 1
 Type: Motion
 Title: Discussion and possible action to correct February 20, 2024 Council Meeting Agenda Item 24-025 original agenda memo and all associated documents as recorded in the city's official record taken the Laserfiche archives, as requested by Council Members Eric Cantu, Gil Hernandez, and Kaylynn Paxson.
 Mover: Gilbert Hernandez Second: Sylvia Campos
 Result: Pass
 Agenda note:
 Minutes note:
 Action: passed
 Action text: City Manager Peter Zanon, Director of Information Technology Peter Collins, and City Attorney Mil Risley responded to Council questions. Mayor Pro Tem Roy called for an executive session pursuant Texas Government Code § 551.071 to consult with attorneys concerning legal issues related to the litigation matter related to City Council Agenda Item 24-0256 as stated by City Attorney Risley. Mayor Pro Tem Roy recessed the Council meeting for Executive Session at 6:17 p.m. Mayor Pro Tem Roy reconvened the meeting at 6:42 p.m. Mayor Pro Tem Roy opened public comment. Maria Teresa Cavazos Gutierrez Walker, Corpus Christi, TX, Sondra Meyer, Corpus Christi, TX, and Doug Allison, Corpus Christi, TX, spoke. Mayor Pro Tem Roy closed public comment. Council Member Hernandez moved to approve the following motion: Motion directing staff to correct February 20, 2024 Council Meeting Agenda Item 24-0256 with original documents when originally presented in Legistar, seconded by Council Member Campos. This Motion was passed and approved with the following vote:

Votes (8:1)

9 records	Group	Export
Person Name	Vote	
Roland Barrera	Aye	

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**CITY OF CORPUS CHRISTI
CITY SECRETARY'S OFFICE
COUNCIL ACTION REQUEST**

RECEIVED

MAR 11 2026

CITY SECRETARY'S OFFICE

TO: Rebecca Huerta, City Secretary

FROM: Council Member Carolyn Vaughn, At-Large
Council Member Gil Hernandez, Dist. 5
Council Member Eric Cantu, Dist. 3

COPIES TO: Mayor & Council
Peter Zaroni, City Manager
Miles Risley, City Attorney

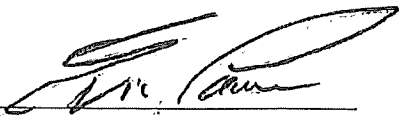
SUBJECT: Discussion and possible action on August 29, 2025 petition from Rachel Caballero for removal action against Mayor Paulette Guajardo.

ACTION REQUEST:

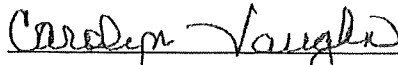
Per Council Policy 16.d., we are requesting that the following item be placed on the March 24, 2026, City Council agenda for discussion and possible action:

On the August 29, 2025, the City Council received a formal petition from Rachel Caballero for removal action against Mayor Paulette Guajardo.

Discussion and possible action on to determine if any formal proceedings should taken pursuant to Article II, Section 11 of the City Charter.



Council Member Eric Cantu



Council Member Carolyn Vaughn



Council Member Gil Hernandez

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CITY OF Corpus Christi

[City Home](#) [Legislation](#) [Calendar](#) [City Council](#)

[Details](#) [Reports](#)

File #: 26-0419 Version: 1
 Type: Motion
 File created: 3/11/2026
 On agenda: 3/24/2026
 Title: Discussion and possible action on August 29, 2025 petition from Rachel Caballero for removal acti against Mayor Paulette Guajardo, as requested by Council Members Carolyn Vaughn, Gil Herna
 Sponsors: [City Secretary's Office](#)
 Attachments: 1. [2026-03-11 Three Sig Memo - R](#)

[History \(1\)](#) [Text](#)

1 record [Group](#) [Export](#)

Date	Ver.	Action By
3/24/2026	1	City Council

City of Corpus Christi - Action Details

Details

File #: 260419 Version: 1
 Type: Motion
 Title: Discussion and possible action on August 29, 2025 petition from Rachel Caballero for removal acti against Mayor Paulette Guajardo, as requested by Council Members Carolyn Vaughn, Gil Hernande and Eric Cantu.
 Mover: [Gilbert Hernandez](#) Second: [Kaylynn Paxson](#)
 Result: Pass
 Agenda note:
 Minutes note:
 Action: passed
 Action text: City Attorney Miles Risley responded to Council questions. Mayor Pro Tem Roy opened public comment. Susie Saldana, Corpus Christi, TX, Tony Reyes, Corpus Christi, TX, Marcus Lozano, Corp Christi, TX, Sondra Meyer, Corpus Christi, TX, John Hensley, Corpus Christi, TX, Robin Cox, Corp Christi, TX, John Bell, Corpus Christi, TX, James McKibben, Corpus Christi, TX, Ajit David, Corpus Christi, TX, Matthew Rankin, Corpus Christi, TX, Doug Allison, Corpus Christi, TX, and Marshall Gardner, Corpus Christi, TX, spoke. Mayor Pro Tem Roy closed public comment. Council Member Hernandez moved to approve the following motion: Motion to set agenda item and date on prellir and procedural matters for removal hearing on April 14, 2026, seconded by Council Member Paxs This Motion was passed and approved with the following vote:

Votes (5:3)

9 records [Group](#) [Export](#)

Person Name	Vote
Roland Barrera	Nay
Carolyn Vaughn	Aye
Gilbert Hernandez	Aye



CITY OF Corpus Christi

[City Home](#) [Legislation](#) [Calendar](#) [City Council](#)

City of Corpus Christi - Action Details

Type:

Motion

Title:

Discussion and/or possible actions on preliminary and procedural matters for removal proceedings the mayor, including but not limited to potential certification of Articles of Impeachment, potential suspension, potential reprimand, potential denial of removal action, potential scheduling of pretrial hearing(s) and/or removal hearing, and/or a Resolution scheduling a pretrial hearing on May 19, 2026 to entertain motions, witness lists, requests for summonses, and all other related matters for the Removal Action of the Mayor, and adopting Rules of Procedure for City Council Hearing for Removal Action.

Details Reports

File #: 26-0510 Version: 1

Type: Motion

File created: 3/31/2026

On agenda: 4/14/2026

Mover:

Gilbert Hernandez

Seconded:

Sylvia Campos

Result:

Pass

Agenda note:

Minutes note:

Title:

Discussion and/or possible actions on certification of Articles of Impeachment and/or removal hearing, and/or a Resolution to entertain motions, witness lists, requests for summonses, and all other related matters for the Removal Action of the Mayor, and adopting Rules of Procedure for City Council Hearing for Removal Action.

Action:

passed as amended

Action text:

City Secretary Rebecca Huerta stated the purpose of this item is to discuss and act on the Preliminary & Procedural Matters for the Removal Action of the Mayor. Council Member Hernandez made the following motion: Motion to consent to Lisa Aguilar advising the City Council on procedural matter related to the Petition to Remove the Mayor pursuant to Comment 8 of Section 3.08 of the Texas Constitution of Disciplinary Conduct, seconded by Council Member Campos. This Motion was passed and approved with the following vote: Council Members Barrera, Campos, Cantu, Hernandez, Paxson, Scott, and Vaughn voting "yes," and Mayor Guajardo and Council Member Roy "abstained." (Enactment No: M2026-033) Assistant City Attorney Lisa Aguilar responded to Council questions. Council Member Hernandez moved to amend the resolution to add "five days prior to the pretrial hearing," seconded by Council Member Campos. This Motion was passed and approved with the following vote: Council Members Barrera, Campos, Cantu, Hernandez, Paxson, Scott, and Vaughn voting "yes," and Mayor Guajardo and Council Member Roy "abstained." Mayor Pro Tem Vaughn opened public comment. : Saldana, Corpus Christi, TX, Julian Hernandez, Corpus Christi, TX, Rachel Caballero, Corpus Christi, TX, and Sandy Fernandez, Corpus Christi, TX, spoke. Mayor Pro Tem Vaughn closed public comment. Council Member Hernandez moved to accept the Petitioners' Article of Impeachment, seconded by Council Member Campos. This Motion was passed and approved with the following vote: Council Members Campos, Cantu, Hernandez, Paxson, and Vaughn voting "yes" and Council Members Barrera and Scott voting "no," and Mayor Guajardo and Council Member Roy

Sponsors: [City Secretary's Office](#)

Attachments: [1. Agenda Memo - Preliminary Proc Removal Action Framework 3.24.pdf](#)

History (1) Text

1 record Group Export

Date	Ver.	Action By
4/14/2026	1	City Council

PETITIONERS'
ARTICLES OF IMPEACHMENT
OF MAYOR PAULETTE GUAJARDO

*pursuant to City of Corpus
Christi Code of Ordinances,
Part I, Charter Article II, and
other provisions therein*

CITY OF CORPUS CHRISTI

Impeaching Paulette Guajardo, Mayor of the City of Corpus Christi, as
permitted by City of Corpus Christi Charter.

Whereas, more than a sufficient number of registered voters has previously
filed with City of Corpus Christi the Registered Voters' Petition to Remove Mayor
Paulette Guajardo (subject to others joining) pursuant to provision(s) of the City of
Corpus Christi Charter;

Whereas, City of Corpus Christi Charter states:

"Sec. 10. – Rules of the council.

The city council shall determine its own rules of
procedure; may punish its members for disorderly

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conduct; may compel attendance of its members;
and may impeach a member in the manner herein
provided.”

“Sec. 11. – Removal.

(a) A council member shall be subject to removal by
the council or by any other means authorized by law
for: . . .

(3) Misconduct, malfeasance, incompetence, inability
or willful neglect in performance of official duties.”

. . .

(b) A removal action by the council may be instituted on
its own initiative, or shall be instituted upon petition
by five or more registered voters, and any final decision
to remove a member shall be by the majority vote of all
council members holding office, with the exception of
the challenged member.”¹

Whereas, more than a sufficient number of registered voters further file with
City of Corpus Christi these Articles of Impeachment of Paulette Guajardo, Mayor
of City of Corpus Christi;

Whereas, that Paulette Guajardo, Mayor of City of Corpus Christi, shall be
and is impeached by Petitioners, in the names of themselves and/or for the people
of City of Corpus Christi, and that the following articles of impeachment be

¹ For full text, see Code of Ordinances City of Corpus Christi, Texas, Part I – Charter, Article II (Sections 9,
10, and others).

exhibited and published to the City Council members of City of Corpus Christi and residents of City of Corpus Christi.

ARTICLE ONE: FRAUD; AIDING & ABETTING FRAUD

- BREACH OF PUBLIC TRUST -

The City Charter provides that the City Council “may impeach a member in the manner herein provided,” for “[m]isconduct, malfeasance, incompetence, inability or willful neglect in performance of official duties.” On or about January 14, 2025, Paulette Guajardo did solemnly swear to uphold a laws of the State of Texas and integrity of the office of Mayor of City of Corpus Christi. In her conduct of the office of Mayor of the City of Corpus Christi, and in violation of her oath to faithfully discharge her duties and responsibilities as Mayor of the City of Corpus Christi, Petitioners, for themselves and for the people of the City of Corpus Christi, show Mayor Paulette Guajardo aided and abetted the commission of a fraud against the interest of the City of Corpus Christi and its resident taxpayers, in that:

Using the powers of the office of Mayor, the Mayor committed fraud, and aided and abetted the commission of a fraud, against the interest of the City of Corpus Christi and its resident taxpayers as follows:

504/18

- There was a “crime”² (the word used by City Manager Peter Zanoni, as early as April 2024);
- Mayor Paulette Guajardo was informed of the “crime” or fraud;³
- In Texas, the elements of “fraud” are: (1) a person makes a material, false representation (the false narrative and/or false FEMA writing); (2) the person making the false representation acted knowingly or recklessly (Philip and Mayor acted knowingly or recklessly); (3) the person intended another to act in some way upon the representation (Philip and Mayor intended others to vote for Ordinance 24-0256); and (4) others

² See EXHIBIT 19 EXHIBIT 19 (portion of recorded Zanoni/David phone conversation from April 2024). Compare EXHIBIT 1 EXHIBIT 1 (collection of unaltered FEMA writings showing revised FEMA flood maps made public in 2020, 2021, and April 13, 2022); with EXHIBIT 2 EXHIBIT 2 (altered/forged slide (slide 2) created by Philip Ramirez in December 2023); see also EXHIBIT 3 EXHIBIT 3 (QOF Application falsely claiming unexpected, new FEMA requirements give rise to request for money), EXHIBIT 4 EXHIBIT 4 (QOF’s Type B Corporation presentation falsely suggesting 3-year old FEMA revised flood maps were ‘new,’ ‘not anticipated,’ ‘threw us for a bit of a loop,’ and were ‘new FEMA requirements’ (false narrative), with use of altered/forged federal FEMA presentation slide to support the false narrative COCC000514); EXHIBIT 5 EXHIBIT 5 (City Council presentation on 2/20/24 falsely suggesting 3-year old FEMA revised flood maps were recently changed (false narrative), with use of altered/forged federal FEMA presentation slide to support the false narrative COCC000525, 50:20-1:08:52). EXHIBIT 6 EXHIBIT 6 (Heather Hulbert deposition testimony: facts of case meet Texas Penal Code definition of forgery; EXHIBIT 7 EXHIBIT 7 (Peter Zanoni deposition testimony: agrees facts of case meet Texas Penal Code definition of forgery); EXHIBIT 8 EXHIBIT 8 (Philip Ramirez deposition testimony refusing to respond to Hulbert/Zanoni sworn testimony that alteration of FEMA screenshot constituted the offense of forgery as defined in the Texas Penal Code definition. EXHIBIT 9 EXHIBIT 9 (Philip Ramirez deposition testimony: confirming his alteration of federal document was regarded by City staff as the commission of a crime (in April 2024); EXHIBIT 10 EXHIBIT 10 (Deven text to Heather Hulbert (00:383) acknowledging alteration of federal document immediately treated as “crime” by City’s staff (April 2024)). Accord EXHIBIT 29 EXHIBIT 29 (phone records produced in litigation).

³ EXHIBIT 15 EXHIBIT 15 (Peter Zanoni deposition testimony); EXHIBIT 36 EXHIBIT 36 (Mayor’s plan to be executed by Leah Olivari to ‘change the narrative’ by abandoning the false narrative); EXHIBIT 37 EXHIBIT 37 (Ajit David’s public comment on 4/16/24, using QOF’s altered/forged writing to show the alteration); EXHIBIT 38 EXHIBIT 38 (email from Ajit David to Mayor advising of altered/forged federal FEMA writing); EXHIBIT 24 EXHIBIT 24 (Miles Risley’s presentation to City Council (April 16, 2024)); EXHIBIT 40 EXHIBIT 40 (Ajit David’s public comment on 4/23/24, using QOF’s altered/forged writing to show the alteration); EXHIBIT 42 EXHIBIT 42 (Peter Zanoni deposition testimony: confirms criminal jeopardy for elected official if participating/aiding and abetting underlying criminal offense; see also EXHIBIT 43 EXHIBIT 43 (Texas Penal Code statutes relating to criminal fraud/forgery and aiding and abetting); and other evidence. Accord EXHIBIT 19 EXHIBIT 19 (portion of recorded Zanoni/David phone conversation from April 2024).

Corpus Christi, to the great prejudice of the cause of law and the public's trust in government, and to the manifest of injury to the City of Corpus Christi by causing a breakdown in the public's confidence in the City of Corpus Christi.

Wherefore, Mayor Paulette Guajardo, by such conduct, has demonstrated that she will remain a threat to the City of Corpus Christi if allowed to remain in office, and has acted in a manner grossly incompatible with self-governance and the rule of law. Mayor Paulette Guajardo thus warrants impeachment and trial as "shall be instituted,"²⁴ removal from office of Mayor, and disqualification to hold office and enjoy any office of honor, trust, or profit with the City of Corpus Christi (as specifically defined in City's Charter²⁵).

The undersigned, after being sworn in accordance with law, hereby state that we are the complainants in the above-entitled complaint of impeachment; that one or more of us have caused the said complaint to be prepared and have read the contents thereof; and that the allegations therein are accurate of our own knowledge and belief on the basis of our reading and appreciation of documents and other records pertinent thereto.

(signatures on pages to follow)

²⁴ See Code of Ordinances City of Corpus Christi, Texas, Part I – Charter, Article II (Section 11(b)).

²⁵ Code of Ordinances City of Corpus Christi, Texas, Part I – Charter, Article II (Section 11(e)).

5/6/18

Rachel Caballero

Print Name: Rachel Caballero

Registered Voter DOB: [REDACTED]

Robin Cox

Print Name: Robin Cox

Registered Voter DOB: [REDACTED]

Trevor Slowik

Print Name: Trevor Slowik

Registered Voter DOB: [REDACTED]

Laramie Fain

Print Name: LARAMIE FAIN

Registered Voter DOB: [REDACTED]

Jake Hernandez

Print Name: Jake Hernandez

Registered Voter DOB: [REDACTED]

Print name: ADAM


Print name: Mark Muenster


Print name:

Print name:

Print name:

Print name:

Print Name:

Print Name:

Print Name:

Print Name:

Print Name:

Print Name: