

REGISTERED VOTERS' PETITION TO REMOVE MAYOR PAULETTE GUAJARDO

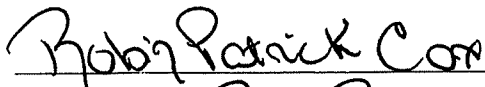
1. The undersigned registered voters file this Petition to remove Paulette Guajardo from serving as mayor for the City of Corpus Christi.
2. According to City of Corpus Christi's Code of Ordinances, Article II, City Council, Section 11(a), the mayor "shall be subject to removal by the council . . . for:"
 - (1) "Willful violation of any code of ethics or conflicts of interest provision"
 - (2) "Willful violation of any express prohibition of this Charter."
 - (3) "Misconduct, malfeasance, incompetence, inability or willful neglect in performance of official duties." . . .
3. Article II, City Council, Section 11(b) states: "A removal action . . . 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.
4. Pursuant to these and all provisions of the City of Corpus Christi's Code of Ordinances, this petition is for the removal of Paulette Guajardo as mayor (and for all appropriate forms of reprimand, censure, suspension, and sentencing).
 - Philip Ramirez (campaign contributor to Paulette Guajardo) altered a FEMA screenshot, and then used that altered federal document to solicit a \$2,000,000.00 award from the Corpus Christi Economic Development Corporation, City of Corpus Christi Type B Board, and City of Corpus Christi;

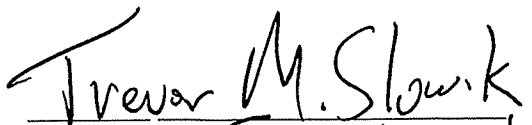
- Paulette Guajardo, prior to the 4/23/24 reading of the ordinance to approve the \$2,000,000.00 award to her campaign contributor, was told by Peter Zanoni that the FEMA/federal document had been altered;
- Paulette Guajardo, prior to the 4/23/24 reading of the ordinance to approve the \$2,000,000.00 award to her campaign contributor, was told by Ajit David (on April 16, 2024) that the FEMA/federal document had been altered;
- Paulette Guajardo, prior to the 4/23/24 reading of the ordinance to approve the \$2,000,000.00 award to her campaign contributor, was told *again* by Ajit David (on April 23, 2024) that the FEMA/federal document had been altered;
- Other information confirms that Paulette Guajardo, in advance of the 4/23/24 reading of the ordinance and vote which allowed the award of \$2,000,000.00 to Paulette Guajardo's campaign contributor, was told that the FEMA/federal document had been altered.
- With full knowledge of the wrongful acts of her campaign contributor (the altering of the FEMA/federal document), Paulette Guajardo nonetheless directed Peter Zanoni to put it on the City Council's agenda for approval (4/23/24). Paulette Guajardo participated and aided approval of the award of \$2,000,000.00 to her campaign donor while her campaign contributors' request was being considered by the CCREDC, and while it was before the City Council on first reading, and in conversations with Peter Zanoni in advance of the 4/23/24 reading, and by directing Peter Zanoni to put it on the City Council's agenda for approval, and during the 4/23/24 City Council meeting, and in other ways.

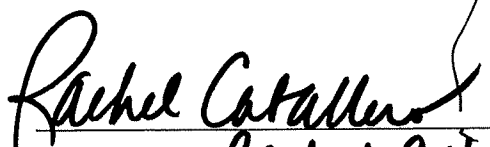
To be clear, the \$2,000,000.00 award is to Elevate QOF LLC, owned in part by Philip Ramirez and Deven Bhakta – both campaign contributors for Paulette Guajardo.

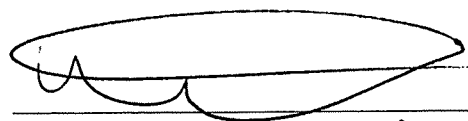
These facts and other information show that Paulette Guajardo is not fit for public service. We, the residents, voters, and taxpayers of the City of Corpus Christi, believe the facts clearly show that Paulette Guajardo pushed for approvals so that her friend / campaign contributor, by use of an altered FEMA/federal document, would get \$2,000,000.00 of taxpayer money – and Paulette Guajardo did so with full knowledge of FEMA/federal document had been altered/tampered/forged. This is “misconduct” and “malfeasance” on the part of Paulette Guajardo and thus grounds for removal. Even if it is argued that Paulette Guajardo turned a blind eye so that her campaign contributor could get the taxpayer money (\$2,000,000.00), this is “incompetence,” “inability,” and “willful neglect in performance of official duties.” The Mayor is in charge of the City of Corpus Christi, and thus responsible for the actions of the City. The Mayor had full knowledge of the scheme that was on-going (use of the altered/tampered/forged FEMA/federal document), and yet deliberately acted to make certain her friend would be allowed to get \$2,000,000.00 for his project.

Signature.s:


Print name: Robin Patrick Core
DOB: 02-02-68


Print name: Trevor M Slowik
DOB: 3/20/68


Print Name: Rachel Caballero
DOB: 11/28/75


Print Name: William Alan Rickertsen
DOB: 9/17/1949

Laramie Fain

Print name: LARAMIE FAIR
DOB: 08/04/1992

Print name: _____

Print name: _____

Print name: _____

Print name: _____

Print name: _____

Mark Muenster

Print Name: Mark Muenster
DOB: 07/28/2001

Print Name: _____

Print Name: _____

Print Name: _____

Print Name: _____

Print Name: _____

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.

BE IT RESOLVED BY THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS, THAT:

Section 1. The City Council hereby sets a pretrial hearing for the action to remove the mayor on May 19, 2026, to entertain motions, witness lists, requests for summonses, and all other related matters for this removal action. All motions, witness lists, requests for summons, and related filings must be filed with the City Secretary five days prior to the pretrial hearing.

Section 2. The City Council hereby adopts the attached **RULES OF PROCEDURE FOR CITY COUNCIL HEARING FOR REMOVAL ACTION UNDER THE CITY CHARTER.**

PASSED and APPROVED on the 14th day of April, 2026.

Paulette Guajardo, Mayor

ATTEST:

Rebecca Huerta
Rebecca Huerta, City Secretary

I, the City Secretary of Corpus Christi, Texas, certify that the Corpus Christi City Council adopted and approved Resolution No. 033904 on April 14, 2026. Pursuant to Article II, Sec. 6 of the City Charter, the resolution became effective seven days after being presented to the mayor, without her signature.

RULES OF PROCEDURE FOR CITY COUNCIL HEARING FOR REMOVAL ACTION UNDER THE CITY CHARTER

I. Parties

There shall be two parties to the proceeding: (1) Council Member subject to removal and (2) Petitioners. Each party shall be represented by no more than one person, who shall, on behalf of his/her respective party, make an opening statement, present evidence, examine witnesses, and make a final statement. The City Attorney's Office is not a party hereto, is not an advocate for either party hereto, and has no role in either prosecution or the defense of this case. The City Attorney's Office will advise the City Council in the hearing pursuant to the duties and responsibilities established by the City Charter, Article IV, Sec 10 (a). Legal advice includes, but is not limited to, advising the City Council on Charter and Ordinance requirements, procedural matters, and potential options.

II. Order of Appearance

- A. Each party will make an opening statement before any evidence is presented and may make a closing argument after all evidence has been presented.
- B. The Petitioners have the burden of proof and may make the first opening statement and the last closing argument. The Petitioners shall present their evidence prior to the presentation of evidence by the Council Member subject to removal. Rebuttal evidence by all parties shall be allowed.

III. General Rules

- A. Except for the admission of hearsay evidence, the technical rules of evidence for court proceedings shall not apply. Hearsay evidence shall not be admissible.
- B. Irrelevant, immaterial, or incompetent evidence shall not be admitted. Unduly repetitious or cumulative evidence shall not be allowed.
- C. Evidence will be admitted if it is of the type commonly relied upon by prudent persons in the conduct of their affairs.
- D. Objections to evidence may be made by any party. The presiding officer shall rule upon the admissibility of evidence, but if any other member of the Council requests with regard to particular evidence, a vote of the Council shall determine whether the evidence will be admitted.
- E. Evidence may be stipulated by agreement of all parties.
- F. The burden of proof shall be on the Petitioners.

IV. Evidence - Witnesses

- A. Oaths - All testimony shall be presented under oath. The oath may be administered by the presiding officer, or any Notary Public. Any attorney testifying

to facts shall also take the oath. An attorney representing a party who does not testify does not take the oath.

- B. "The Rule" may not be invoked and witnesses will not be excluded from the hearing room during testimony of other witnesses, unless the Council specifically orders.
- C. The witness offered by a party may be cross-examined by the other party.
- D. Following the directed cross-examination of a witness by a party, the witness may be examined by members of the Council.
- E. The presiding officer or other members of the Council, through the presiding officer, may call witnesses. All parties may cross-examine such a witness.

V. Evidence - Exhibits

- A. An exhibit shall be first marked for identification by the City Secretary or presiding officer and identified by the testimony of a witness or by affidavit. The exhibit may then be offered for admission into evidence.
- B. Every exhibit marked into evidence shall be retained by the City Secretary as a part of the record of the proceeding.
- C. A copy of any document may be used instead of the original, except where there appears to be a substantial reason to suspect the accuracy or authenticity of the copy.

VI. Record

The record of the proceedings shall consist of the minutes of the City Secretary and the exhibits admitted into evidence.

VII. Burden of Proof

The burden of proof in this case is upon the Petitioners. The standard of persuasion is a mere preponderance of the evidence.

"PREPONDERANCE OF THE EVIDENCE" means the greater weight and degree of credible testimony or evidence introduced before you and admitted in evidence in this case.

VIII. Deliberations

Following the presentation of evidence and the arguments of the parties, the Council may deliberate in public or in closed session. The Council shall adopt findings of fact regarding the charges presented by Petitioners. An affirmative vote of a majority of all Council members holding office shall be required for the removal of the Council member challenged. The council shall additionally have the authority to reprimand or suspend a member for a period of not more than thirty days if removal is not warranted.

**RULES OF PROCEDURE FOR CITY COUNCIL HEARING
FOR REMOVAL ACTION UNDER THE CITY CHARTER
(Amended June 2, 2026)**

RHuerta
Rebecca Huerta
City Secretary

I. Parties

There shall be two parties to the proceeding: (1) Council Member subject to removal and (2) Petitioners. Each party shall be represented by no more than one person, who shall, on behalf of his/her respective party, make an opening statement, present evidence, examine witnesses, and make a final statement. The City Attorney's Office is not a party hereto, is not an advocate for either party hereto, and has no role in either prosecution or the defense of this case. The City Attorney's Office will advise the City Council in the hearing pursuant to the duties and responsibilities established by the City Charter, Article IV, Sec 10 (a). Legal advice includes, but is not limited to, advising the City Council on Charter and Ordinance requirements, procedural matters, and potential options.

II. City Council Members' Roles

The Mayor Pro Tem shall serve as the presiding officer and be solely responsible for rulings upon all pre-trial matters, admissibility of evidence, and how the proceedings are conducted, subject to objections of the City Council. The Mayor Pro Tem and other City Council Members shall serve to deliberate and vote upon a final decision upon conclusion of the presentation of evidence and closing arguments. The presiding officer, who may confer with legal counsel of his/her choosing, may advise the City Council in the hearing pursuant to the duties and responsibilities established by the City Council. Legal advice includes, but is not limited to, advising the City Council on Charter and Ordinance requirements, procedural matters, and potential options. Whether such legal advice is received in public or in executive session shall be at the sole discretion of the presiding officer.

III. Order of Appearance

- A. Each party will make an opening statement before any evidence is presented and may make a closing argument after all evidence has been presented.
- B. The Petitioners have the burden of proof and may make the first opening statement and the last closing argument. The Petitioners shall present their evidence prior to the presentation of evidence by the Council Member subject to removal. Rebuttal evidence by all parties shall be allowed.

IV. General Rules

- A. Except for the admission of hearsay evidence, the Texas Rules of Evidence and Texas Rules of Civil Procedure for court proceedings shall not apply. Hearsay evidence shall not be admissible.

- B. Irrelevant, immaterial, or incompetent evidence shall not be admitted. Unduly repetitious or cumulative evidence shall not be allowed.
- C. Evidence will be admitted if it is of the type commonly relied upon by prudent persons in the conduct of their affairs, including documentary evidence and sworn deposition testimony.
- D. Objections to evidence may be made by any party. The presiding officer shall rule upon the admissibility of evidence, but if any other member of the Council requests with regard to particular evidence, a vote of the Council shall determine whether the evidence will be admitted.
- E. Evidence may be stipulated by agreement of all parties.
- F. The burden of proof shall be on the Petitioners.

V. Evidence - Witnesses

- A. Oaths - All testimony (live or by deposition) shall be presented under oath. The oath may be administered by the presiding officer, or any person qualified to administer an oath in the State of Texas. Any attorney testifying to facts shall also take the oath. An attorney representing a party who does not testify does not take the oath.
- B. "The Rule" may not be invoked and witnesses will not be excluded from the hearing room during testimony of other witnesses, unless the presiding officer specifically orders otherwise.
- C. The witness offered by a party may be cross-examined by the other party.

VI. Evidence - Exhibits

- A. An exhibit shall be first marked for identification by the City Secretary or presiding officer and identified by the testimony of a witness or by affidavit. The exhibit may then be offered for admission into evidence.
- B. Every exhibit marked into evidence shall be retained by the City Secretary as a part of the record of the proceeding.
- C. A copy of any document may be used instead of the original, except where there appears to be a substantial reason to suspect the accuracy or authenticity of the copy.

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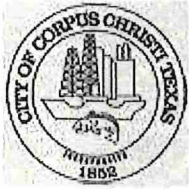
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IX. Deliberations

Following the presentation of evidence and the closing arguments of the parties, the Council may deliberate. The deliberations may be in public or in closed session at the sole discretion of the presiding officer. The Council may adopt findings of fact regarding the charges presented by Petitioners. An affirmative vote of a majority of all Council members holding office shall be required for the removal of the Council member challenged. The council shall additionally have the authority to reprimand or suspend a member for a period of not more than thirty days if removal is not warranted.



City of Corpus Christi

1201 Leopard Street
Corpus Christi, TX 78401
corpuschristitx.gov

April 14, 2026

Motion: M2026-034

File Number: 26-0510

Enactment Number: M2026-034

Motion to accept the Petitioners' Articles of Impeachment.

At a meeting of the City Council on 4/14/2026, this Motion was passed.

Aye: 5 Council Member Vaughn, Council Member Hernandez,
Council Member Campos, Council Member Paxson, and Council
Member Cantu

Nay: 2 Council Member Barrera and Council Member Scott

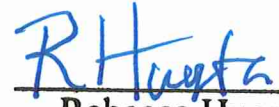
Abstained: 2 Mayor Guajardo and Council Member Roy

Paulette Guajardo, Mayor

Attest:

Rebecca Huerta
Rebecca Huerta, City Secretary

I, the City Secretary of Corpus Christi, Texas, certify that the Corpus Christi City Council adopted and approved Motion No. M2026-034 on April 14, 2026. Pursuant to Article II, Sec. 6 of the City Charter, the motion became effective seven days after being presented to the mayor, without her signature.


Rebecca Huerta
City Secretary

**MAYOR GUAJARDO'S VERIFIED MOTION FOR
RECUSAL AND DISQUALIFICATION**

NOW COMES, Paulette M. Guajardo and counsel to submit this verified motion for disqualification and recusal in this trial proceeding.

1. Under Texas Rule of Civil Procedure 18(b) a person serving as a judge “must” recuse themselves from any proceeding in which the “judge has personal knowledge of disputed evidentiary facts concerning the proceeding” and they “must” disqualify themselves in any proceeding in which “the judge knows that, individually or as a fiduciary, the judge has an interest in the subject matter in controversy.” Tex. R. Civ. P. 18b. This rule requiring disqualification or recusal applies to “any trial court other than a statutory probate court or justice court” and therefore applies to this case. Tex. R. Civ. P. 18a. The actions taken by a judge who has personal knowledge of disputed facts are void. *State v. Haworth*, 533 S.W.3d 484, 487 (Tex. App. 2017); *Kniatt v. State*, 239 S.W.3d 910, 921 (Tex. App. 2007).

2. A right to an impartial judge is a core tenant of the American judicial system, and when a conflicted judge presides over a matter it violates due process under the United States Constitution. *Commonwealth Coatings Corp. v. Cont'l Cas. Co.*, 393 U.S. 145, 150 (1968); *Tumey v. State of Ohio*, 273 U.S. 510, 535 (1927); *In re Murchison*, 349 U.S. 133, 139 (1955); *Caliste v. Cantrell*, 937 F.3d 525, 531 (5th Cir. 2019). “[A]ny tribunal permitted by law to try cases and controversies not only must be unbiased but also must avoid even the appearance of bias.”

7. In addition, each council member who voted Yay or Nay on the February 20 and April 23 items have staked an individual and official position on the appropriateness of those items. Those votes create an interest in the agenda item, and they will be individually or personally vindicated in the outcome of the impeachment vote about those agenda items. Yay voters have an interest in seeing their vote upheld while an impeachment would validate a council members Nay vote. For that reason, all council members who voted for or against the agenda items must disqualify themselves from the impeachment trial under Texas Rule of Civil Procedure 18b.

8. The same principles of fairness underly the rule prohibiting witnesses from serving as jurors. In the American legal system, parties are entitled to a fair and impartial jury. *Cortez ex rel. Est. of Puentes v. HCCI-San Antonio, Inc.*, 159 S.W.3d 87, 94 (Tex. 2005). If a juror has an interest in the matter, it can be inferred that the juror will not act with impartiality and is biased. *Id.* Under Texas Government Code § 62.105, a person is disqualified to serve as a juror in a particular case if he: “(1) is a witness in the case; (2) is interested, directly or indirectly, in the subject matter of the case...(4) has a bias or prejudice in favor or against a party in the case.” “Persons with knowledge of material facts may be disqualified as a ‘witness in the case’ ‘because they are likely to decide a case based on what they personally saw or heard rather than on what they see and hear in court.’” *Siller v. LPP Mortg., Ltd.*, 264

62.105, Texas Rule of Evidence 605, *Bradley v. State ex rel. White*, and the U.S. Constitution from serving as jurors.

In conclusion, all council members who took part in the consideration of the subject matter of the impeachment trial must recuse and/or disqualify themselves from the impeachment trial.

VERIFICATION

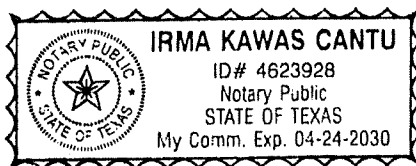
STATE OF TEXAS

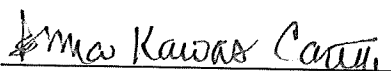
COUNTY OF NUECES

My name is John Flood. I am over eighteen years of age, of sound mind, and fully competent to make this verification. I have read the foregoing document and the facts stated within paragraphs 3, 4, 5 and 9 of this Motion for Recusal and Disqualification are within my personal knowledge and are true and correct and the facts within paragraphs 6, 7 and 10 are true and correct on information and belief based upon the reasonable factual inferences from the facts in paragraphs 3, 4 and 5.


John Flood

SUBSCRIBED AND SWORN this 5th day of May 2026, to certify which witness my hand and seal of office.




Notary Public

Fax (713) 223-8879

**ATTORNEYS FOR
PAULETTE M. GUAJARDO**

CERTIFICATE OF COMPLIANCE WITH RULE 18a

In compliance with Texas Rule of Civil Procedure 18a this recusal motion is 1) verified; 2) lists several grounds for recusal and disqualification under Rule 18b; 3) is not based solely on the judge's rulings in the case; 4) and states with detail and particularity facts that are within the affiants personal knowledge that would be admissible in evidence and if proven would be sufficient to justify a recusal or disqualification. The motion is timely filed and submitted before the tenth day before trial.

/s/ John Flood

John Flood

CERTIFICATE OF SERVICE

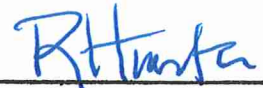
I hereby certify that on May 5, 2026, I electronically filed the foregoing document with the City Secretary via email.

/s/ John Flood

John Flood

Date Filed 5-14-26

**IN THE MATTER OF
PETITIONERS' ARTICLES OF
IMPEACHMENTS OF
MAYOR PAULETTE GUAJARDO**



**Rebecca Huerta
City Secretary**

PETITIONERS' WITNESS LIST

1. **MIKE CULBERTSON**
Corpus Christi Regional Economic Development Corporation (CCREDC)
One Shoreline Plaza
800 N. Shoreline Blvd., Suite 1300 S
Corpus Christi, Texas 78401
361-882-7448
2. **Heather Hurlbert**
Former Asst. City Manager for City of Corpus Christi
San Antonio, Texas
3. **Sony Peronel**
Assistant City Manager for City of Corpus Christi
1201 Leopard Street
Corpus Christi, Texas 78401
361-5826-2489
4. **Philip Ramirez**
Elevaate QOF, LLC
3751 S Alameda Street
Corpus Christi, Texas 78411
361-994-8900
5. **Deven Bhakta**
Elevate QOF, LLC
1410 Crescent Drive
Corpus Christi, Texas 78412
6. **Alan Wilson**
President Type A/B Boards, City of Corpus Christi
1201 Leopard Street
Corpus Christi, Texas 78401
361-5826-2489

- 7. Roland Barrera**
City of Corpus Christi Council – At Large
1201 Leopard Street
Corpus Christi, Texas 78401
361-5826-2489
- 8. Mayor Paulette Guajardo**
Mayor of City of Corpus Christi
1201 Leopard Street
Corpus Christi, Texas 78401
361-5826-2489
- 9. Everett Roy**
City of Corpus Christi Council – District One (1)
1201 Leopard Street
Corpus Christi, Texas 78401
361-5826-2489
- 10. Peter Zanoni**
City Manager for City of Corpus Christi
1201 Leopard Street
Corpus Christi, Texas 78401
361-5826-2489
- 11. Eric Tunchez**
Reporter for Social Media – Cronica
810 Morgan Ave.
Corpus Christi, Texas 78404
- 12. Elisa Silva**
Former Executive Assistant City of Corpus Christi
City of Portland (City Secretary)
1900 Bill G Webb Drive
Portland, Texas
361-777-4513
Elisa.silva@portlandtx.gov
- 13. Randy Almaguer**
Corpus Christi Regional Economic Development Corporation (CCREDC)
One Shoreline Plaza
800 N. Shoreline Blvd., Suite 1300 S
Corpus Christi, Texas 78401
361-882-7448

c/o John D. Bell
Wood, Boykin, & Wolter
555 N Carancahua Street, Suite 1510
Corpus Christi, Texas 78401

14. Leah Olivari

Former Type B Corporation Member City of Corpus Christi
3833 S Staples Street
Suite S110
Corpus Christi, Texas 78411

15. Miles Risley

Attorney City of Corpus Christi
1201 Leopard Street
Corpus Christi, Texas 78401
(361) 826-3360

16. Jimmy Granberry

Nueces County District Attorney
Nueces County Courthouse
901 Leopard Street
Corpus Christi, Texas 78401
361-888-0410

17. Gilbert Garcia

Detective Corpus Christi Police Department
321 John Sartain Street
Corpus Christi, Texas 78401

18. Chief Mike Markle

Chief of Police City of Corpus Christi Police Department
321 John Sartain Street
Corpus Christi, Texas 78401

19. Deputy Chief Billy Breedlove

Criminal Investigations Department
Corpus Christi Police Department
321 John Sartain Street
Corpus Christi, Texas 78401

20. Wayne Dolcefino

Dolcefino Consulting / Dolcefino Media
1951 Richmond Avenue,
Houston, Texas 77098
713-360-6911

Petitioners reserve the right to call as a witness in this matter individuals not included on this list for rebuttal, impeachment, or for any other proper purpose. Petitioners also reserve the right to not call the witnesses on this list. Additionally, Petitioners reserve the right to supplement and/or amend this witness list, if necessary.

/s/ Douglas A. Allison
Douglas A. Allison
LAW OFFICES OF DOUGLAS A.
ALLISON
State Bar No. 01083500
403 N. Tancagua St.
Corpus Christi, Texas 78401
T: 361/888-6002
Email: doug@dallisonlaw.com

**ATTORNEY FOR PETITIONER
AJIT DAVID**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was electronically sent to all counsel of record via e-mail with City Secretary, Rebecca Huerta, on this the 14th day of May 2026.

/s/ Douglas A. Allison
DOUGLAS A. ALLISON

Date Filed 5.14.26

**IN THE MATTER OF
PETITIONERS' ARTICLES OF
IMPEACHMENTS OF
MAYOR PAULETTE GUAJARDO**


Rebecca Huerta
City Secretary

PETITIONERS' REQUESTS FOR SUMMONS

NOW COME Petitioners, and make and file this Petitioners' Requests for Summons (the "Summons Request"), and in support would show:

Petitioners request summons be issued for the following persons/documents/records. A summons to a person is request that the person be required to appear on date of commencement of the final hearing (trial). A summons for documents/records is a request that such documents/records be produced within ten (10) days of the date of service of such summons.

Petitioners request summons of:

- a) Philip Ramirez;
- b) Deven Bhakta;
- c) Elisa Silva;
- d) Miles Risley;
- e) Paulette Guajardo;
- f) Randy Almaguer;
- g) Eric Tunchez;
- h) Wayne Dolcefino;
- i) Paulette Guajardo's cell phones for download of text messages (12/1/23 – 5/1/24);

- j) Philip Ramirez's cell phones for download of text messages (12/1/23 – 5/1/24);
- k) Deven Bhakta's cell phones for download of text messages (12/1/23 – 5/1/24);
- l) Company agreements, subscription agreements, and company books and records indicating all capital contributions and number of units held, for the following listed legal entities, and such related entities as may be required to fully identify all persons with interest (direct or indirect) in Elevate QOF LLC: Elevate QOF LLC, Jacek LLC, ZJZ Capital QOF LLC, La Mer Holdings LLC, STCC Investment Fund I LLC

WHEREFORE, PREMISES CONSIDERED, Petitioners pray for all relief requested herein, and for such other and further relief to which Petitioners may be justly entitled, both at law and in equity.

/s/ Douglas A. Allison

Douglas A. Allison

LAW OFFICES OF DOUGLAS A.
ALLISON

State Bar No. 01083500

403 N. Tancahua St.

Corpus Christi, Texas 78401

T: 361/888-6002

Email: doug@dallisonlaw.com

**ATTORNEY FOR PETITIONER
AJIT DAVID**

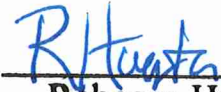
CERTIFICATE OF SERVICE

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/s/ Douglas A. Allison

DOUGLAS A. ALLISON

**IN THE MATTER OF
PETITIONERS' ARTICLES OF
IMPEACHMENTS OF
MAYOR PAULETTE GUAJARDO**


Rebecca Huerta
City Secretary

**PETITIONERS' MOTION TO MODIFY / AMEND CITY'S
RULES OF PROCEDURE FOR CITY COUNCIL HEARING
FOR REMOVAL ACTION UNDER THE CITY CHARTER**

NOW COME Petitioners, and make and file this Petitioners' Motion to Modify / Amend City's Rules of Procedure for City Council Hearing for Removal Action Under the City Charter (the "Motion"), and in support would show:

1. Petitioners are committed to assuring that Mayor Paulette Guajardo receives due process of law in all proceedings contemplated pursuant to City of Corpus Christi ("City") Charter ("Charter"), Article II sections 10 and 11 (and pursuant to all provisions of the City's Charter, Texas law, and federal law).
2. Petitioner has confidence that all the City's Rules of Procedure for City Council Hearing for Removal Action Under the City Charter ("City's Procedures") meet or exceed all due process requirements of law (both state and federal law). Notwithstanding, and only out of an abundance of precaution, Petitioners recommend modification/amendment of the City's Procedures, as follows:
 - a) Section I: delete "The City Attorney's Office will advise the City Council in the hearing pursuant to the duties and responsibilities established by the City Charter, Article IV, Sec 10(a)," and replace with "The presiding officer, who may confer with legal counsel of his/her choosing, will advise the City Council in the hearing pursuant to the duties and responsibilities established by the City Charter."

- b) Section III.D: delete “Objections to evidence may be made by any party,” and replace with “Objections to evidence may be made by any party or the party’s attorney;” and delete “but if any other member of the Council requests with regard to particular evidence, a vote of the Council shall determine whether the evidence will be admitted.”
 - c) Section IV.B: delete “Council” and replace with “presiding officer.”
 - d) Section IV.D: delete “the witness may be examined by members of the Council.”
 - e) Section IV.E: delete.
 - f) Section VI: Add “Any party may pay a court reporter to make a certified reporter’s record which shall be part of the formal record of the matter.”
3. These proposed modifications/amendments to City’s Procedures may tend to address the City Legal Department’s possible conflict of interest, and Mayor’s due process concerns; and are thus requested.

WHEREFORE, PREMISES CONSIDERED, Petitioners pray for all relief requested herein, and for such other and further relief to which Petitioners may be justly entitled, both at law and in equity.

/s/ Douglas A. Allison
Douglas A. Allison
LAW OFFICES OF DOUGLAS A.
ALLISON
State Bar No. 01083500
403 N. Tancagua St.
Corpus Christi, Texas 78401
T: 361/888-6002
Email: doug@dallisonlaw.com

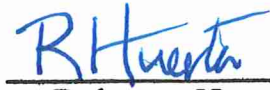
**ATTORNEY FOR PETITIONER
AJIT DAVID**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was electronically sent to all counsel of record via e-mail with City Secretary, Rebecca Huerta, on this the 14th day of May 2026.

/s/ Douglas A. Allison
DOUGLAS A. ALLISON

Date Filed 5.14.26



Rebecca Huerta
City Secretary

**IN THE MATTER OF
PETITIONERS' ARTICLES OF
IMPEACHMENTS OF
MAYOR PAULETTE GUAJARDO**

PETITIONERS' MOTION TO SCHEDULE

NOW COME Petitioners, and make and file this Petitioners' Motion to Schedule (the "Motion"), and in support would show:

1. Petitioners are committed to assuring that Mayor Paulette Guajardo receives due process of law in all proceedings contemplated pursuant to City of Corpus Christi ("City") Charter ("Charter"), Article II sections 10 and 11 (and pursuant to all provisions of the City's Charter, Texas law, and federal law).
2. In support of the orderly administration of justice, Petitioners request imposition of a schedule of pre-hearing (pre-trial) and hearing (trial) deadlines. Petitioners are flexible, but suggest the following schedule:
 - a) offering party's deadline to exchange deposition excerpts: May 26, 2026
 - b) responding party's deadline to exchange rebuttal deposition: June 2, 2026
 - c) all parties' deadline to submit final deposition excerpts: June 5, 2026
 - d) all parties' deadline to issue summons of documents/records: May 26, 2026
 - e) all parties' deadline to issue summons for witnesses to appear: May 26, 2026
 - f) all parties' deadline to submit draft of proposed "Presiding Officer's Charge to Members of the City Council:" June 15, 2026

g) Pre-hearing/pre-trial matters considered by Presiding Officer: June 15, 2026

h) date for commencement of Mayor's removal hearing/trial: June 22, 2026.

3. For scheduling purposes, Petitioners request that copies of documents/records subject to summons or subpoena shall be provided to counsel for Petitioners and counsel for Mayor within ten (10) days of date of summons or subpoena. A party may request an instruction that the opposing party's refusal to produce documents/records allows for an instruction that a negative inference may be drawn.
4. At time of pre-hearing/pre-trial hearing, Petitioners request that exhibits be considered for pre-admission into evidence.

WHEREFORE, PREMISES CONSIDERED, Petitioners pray for all relief requested herein, and for such other and further relief to which Petitioners may be justly entitled, both at law and in equity.

/s/ Douglas A. Allison
Douglas A. Allison
LAW OFFICES OF DOUGLAS A.
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403 N. Tancagua St.
Corpus Christi, Texas 78401
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Email: doug@dallisonlaw.com

**ATTORNEY FOR PETITIONER
AJIT DAVID**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was electronically sent to all counsel of record via e-mail with City Secretary, Rebecca Huerta, on this the 14th day of May 2026.

/s/ Douglas A. Allison
DOUGLAS A. ALLISON

Subject to her claims, objections and complaints that this removal proceeding is unlawful, as pleaded in Case 2:26-cv-00111 *Guajardo v. City of Corpus Christi, Texas*, in the United States District Court for the Southern District of Texas, and without waiving same,

MAYOR GUAJARDO'S MOTION TO STRIKE PLEADING

NOW COMES, Paulette M. Guajardo through counsel to submit this motion to strike the Articles of Impeachment in this action for failing to comply with due process under United States and Texas law.

A removal proceeding is required to provide both adequate notice of allegations against a party and then sufficient process to contest those allegations before a deprivation occurs. *Mathews v. Eldridge*, 424 U.S. 319, 333 (1976). Failure to provide that notice renders any deprivation a nullity for failing to respect due process of law. *See id.* Under Texas law, a civil pleading must include a statement of the cause of action that gives fair notice of the claim involved. Tex. R. Civ. P. 47. A pleading can be insufficient even when a cursory reference to a claim is made if details of that claim are not stated. *Eikon King St. Manager, L.L.C. v. LSF King St. Manager, L.L.C.*, 109 S.W.3d 762, 771 (Tex. App. – Dallas 2003, pet. denied) (finding no fair notice despite single sentence allegation). Fraud allegations are reviewed particularly closely for fair notice sufficiency. *See Freeman v. Harleton Oil & Gas, Inc.*, 528 S.W.3d 708, 736 (Tex. App. – Texarkana 2017, pet. denied). “Texas follows a ‘fair notice’ standard for pleading, which looks to whether the opposing party can ascertain from the pleading the nature and basic issues of the controversy and what testimony will be relevant.” *See id.*

Date Filed 5-14-26



Rebecca Huerta
City Secretary

The Articles of Impeachment claims against the mayor are conclusory because instead of providing fair notice of what crime or fraudulent acts were committed the document baldly asserts “There was a “crime” numerous times throughout the document without stating that crime in a meaningful way. The Articles of Impeachment then tries to bootstrap that quotation allegation with a complex maze of exhibits that were not, nor have they ever been made part of, the petition or Articles of Impeachment through attachment. Conclusory allegations with a maze of footnotes to absent exhibits does not meet the fair notice requirement under Texas law and they do not meet the standard for sufficient notice for due process under the United States Constitution. *See Mathews*, 424 U.S. at 333. Without adequate notice of the allegations a meaningful opportunity to challenge the allegations cannot be made. *See id.* Accordingly, the impeachment petition should be struck as inadequate.

Respectfully submitted,

/s/ John Flood
John Flood
819 N. Upper Broadway
Corpus Christi, Texas 78401
(361) 654-8877
(361) 654-8879 Fax
john@floodtriallawyers.com
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Ben Stephens
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Ben.Stephens@huschblackwell.com
Kate David
State Bar No. 24045749
Kate.David@huschblackwell.com
Sandy Hellums-Gomez
State Bar No. 24036750

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Fax (713) 223-8879

**ATTORNEYS FOR
PAULETTE M. GUAJARDO**

CERTIFICATE OF SERVICE

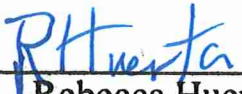
I hereby certify that on May 14, 2026, the foregoing document was emailed to the City Secretary.

/s/ John Flood
John Flood

Subject to her claims, objections and complaints that this removal proceeding is unlawful, as pleaded in Case 2:26-cv-00111 *Guajardo v. City of Corpus Christi, Texas*, in the United States District Court for the Southern District of Texas, and without waiving same,

MAYOR GUAJARDO'S WITNESS LIST
(current as of May 14, 2026)

Date Filed 5.14.26


Rebecca Huerta
City Secretary

Rachel Caballero – issuance of summons requested
Robin Patrick Cox– issuance of summons requested
Trevor M. Slowik– issuance of summons requested
Laramie Fain– issuance of summons requested
Jake Hernandez– issuance of summons requested
Mark Muenster– issuance of summons requested
Willam Alan Rickertson– issuance of summons requested
Ajit David– issuance of summons requested
Raju Bhagat– issuance of summons requested
Doug Allison– issuance of summons requested
Leah Pagan Olivarri, Chair, Corpus Christi B Corporation – issuance of summons requested
Diana Summers, Secretary, Corpus Christi B Corporation – issuance of summons requested
Alan Wilson, Board Member, Corpus Christi B Corporation – issuance of summons requested
Mark LaRue, Board Member, Corpus Christi B Corporation – issuance of summons requested

Jesus Jimenez, Board Member, Corpus Christi B Corporation – issuance of summons requested

Robert Tamez, Board Member, Corpus Christi B Corporation – issuance of summons requested

Peter Zaroni– issuance of summons requested

Randy Almaguer – issuance of summons requested

Heather Hurlbert, CPA, CGFO. Former Assistant City Manager – issuance of summons requested

Daniel Ray

George Hyde

Paulette M. Guajardo

Roland Barrera– issuance of summons requested

Everett Roy– issuance of summons requested

Sylvia Campos– issuance of summons requested

Gil Hernandez– issuance of summons requested

Carolyn Vaughn– issuance of summons requested

Kaylynn Paxson– issuance of summons requested

Eric Cantu– issuance of summons requested

Miles Risley– issuance of summons requested

Buck Brice

Sony Peronel– issuance of summons requested

Mike Culbertson, Past President & CEO, Corpus Christi Regional Economic Development Corp. – issuance of summons requested

Philip Ramirez

Deven Bhakta

Michael Hunter– issuance of summons requested

Mike Pusley– issuance of summons requested

Dan Suckley– issuance of summons requested

Joe McComb

Nelda Martinez

Melody Cooper

Alex Harris

George Holland, City Auditor – issuance of summons requested

Amr Hussein, Audit Manager – issuance of summons requested

Tiffany Cheshier, Auditor’s office, Staff Liaison

Samantha Chapa, Auditor

Whitney Winkler, Administrative Director
Corpus Christi Regional Economic Development Corporation

James “Jimmy” Granberry, Nueces County District Attorney

Mike Gordon, Nueces County Assistant District Attorney

Jose Balderas, Texas Ranger – issuance of summons requested
Texas Department of Public Safety

Misty Ham, FBI Special Agent – issuance of summons requested

Forest Johnson, FBI Agent– issuance of summons requested

Mike Markle, Chief of Police, CCPD

William Breedlove, Deputy Police Chief, CCPD – issuance of summons requested

Weldon Weber, Captain, CCPD

Marcus Garanzuay, Senior Officer, CCPD

Gilbert Garcia, Detective, CCPD – issuance of summons requested

Luis Villagomez, Detective, CCPD

Bobby Gonzalez

Anna Aldridge

Mark Meyer

Bart Braselton

Mayor Guajardo reserves the right to call as a witness in this matter, and request summons of, individuals not included on this list. Mayor Guajardo also reserves the right to not call witnesses on this list. Additionally, Mayor Guajardo reserves the right to supplement or amend this witness list and requests for summons, if necessary.

Respectfully submitted,

/s/ John Flood
John Flood
819 N. Upper Broadway
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(361) 654-8879 Fax
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Irma@floodtriallawyers.com

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Ben.Stephens@huschblackwell.com
Kate David
State Bar No. 24045749
Kate.David@huschblackwell.com
Sandy Hellums-Gomez
State Bar No. 24036750
Sandy.Gomez@huschblackwell.com
HUSCH BLACKWELL LLP

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F: 713.647.6884
F: 361.654.8879

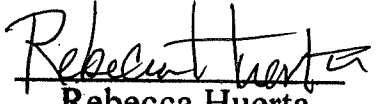
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Flood & Flood
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Houston, TX 77002
(713) 223-8877
Fax (713) 223-8879

**ATTORNEYS FOR
PAULETTE M. GUAJARDO**

CERTIFICATE OF SERVICE

I hereby certify that on May 14, 2026, the foregoing document was emailed to the City Secretary.

/s/ John Flood
John Flood


Rebecca Huerta
City Secretary

**IN THE MATTER OF
PETITIONERS' ARTICLES OF
IMPEACHMENTS OF
MAYOR PAULETTE GUAJARDO**

PETITIONERS' MOTION TO ADMIT EXHIBITS

NOW COME Petitioners, and make and file this Petitioners' Motion to Admit Exhibits, and in support would show:

1. City's Rules of Procedure allow for "Evidence – Exhibits" to be marked for identification by the City Secretary and identified by the testimony of a witness or by affidavit for "admission into evidence."
2. Attached please find Petitioners' Exhibit List identifying Exhibit nos. 1 - 45 (subject to the adding of exhibits as may be permitted in advance of or after the exhibit deadline of June 2, 2026). Subject to placement of the referenced exhibits in a Drop Box and/or hardcopy delivered to the City Secretary for review/confirmation, Petitioners request that these exhibits be marked/identified by City Secretary in such manner as corresponds with the numeric designations on Petitioners' Exhibit List.
3. Attached please find the Affidavit of Douglas Allison supporting admission of these exhibits as evidence in this matter (Exhibit nos. 1 – 45, as listed on the Petitioners' Exhibit List). Whereas City's Rules of Procedure confirm that exhibits / "[e]vidence will be admitted if it is of the type commonly relied upon by prudent persons in the conduct of their affairs," Petitioners request that Exhibit nos. 1 – 45 identified on Petitioners' Exhibit

List and supported by Affidavit of Douglas Allison be admitted as evidence for consideration in this matter.

WHEREFORE, PREMISES CONSIDERED, Petitioners pray for all relief requested herein, and for such other and further relief to which Petitioners may be justly entitled, both at law and in equity.

/s/ Douglas A. Allison

Douglas A. Allison

LAW OFFICES OF DOUGLAS A.
ALLISON

State Bar No. 01083500

403 N. Tancahua St.

Corpus Christi, Texas 78401

T: 361/888-6002

Email: doug@dallisonlaw.com

**ATTORNEY FOR PETITIONER
AJIT DAVID**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was electronically sent to all counsel of record via e-mail with City Secretary, Rebecca Huerta, on this the 26th day of May 2026.

/s/ Douglas A. Allison

DOUGLAS A. ALLISON

Date Filed 5.24.26

IN THE MATTER OF
PETITIONERS' ARTICLES OF
IMPEACHMENTS OF
MAYOR PAULETTE GUAJARDO


Rebecca Huerta
City Secretary

PETITIONERS' FIRST AMENDED MOTION TO MODIFY CITY'S
RULES OF PROCEDURE FOR CITY COUNCIL HEARING
FOR REMOVAL ACTION UNDER THE CITY CHARTER

NOW COME Petitioners, and make and file this Petitioners' First Amended Motion to Modify City's Rules of Procedure for City Council Hearing for Removal Action Under the City Charter (the "Motion"), and in support would show:

1. Petitioners are committed to assuring that Mayor Paulette Guajardo receives due process and thus proposes modification of the existing rules to address concerns raised by Mayor Paulette Guajardo in her federal lawsuit brought against the City of Corpus Christi.
2. Petitioner has confidence that all the City's Rules of Procedure for City Council Hearing for Removal Action Under the City Charter ("City's Procedures") meet or exceed all due process requirements of law (both state and federal law). Notwithstanding, and only out of an abundance of precaution, Petitioners recommend modification of the City's Procedures by approval of "Rules of Procedure for City Council Hearing for Removal Action under the City Charter – Effective: May 27, 2026)" (attached as Exhibit A). For

ease of reference, see also Exhibit B which – for the most part – highlights added language in ‘yellow’ and highlights deleted language in ‘red.’

3. These proposed modifications to City’s Procedures may tend to address the City Legal Department’s possible conflict of interest, and Mayor’s due process concerns; and are thus requested.

WHEREFORE, PREMISES CONSIDERED, Petitioners pray for all relief requested herein, and for such other and further relief to which Petitioners may be justly entitled, both at law and in equity.

Respectfully submitted,

/s/ Douglas A. Allison

Douglas A. Allison

LAW OFFICES OF DOUGLAS A.
ALLISON

State Bar No. 01083500

403 N. Tancagua St.

Corpus Christi, Texas 78401

T: 361/888-6002

Email: doug@dallisonlaw.com

**ATTORNEY FOR PETITIONER
AJIT DAVID**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was electronically sent to all counsel of record via e-mail with City Secretary, Rebecca Huerta, on this the 26th day of May 2026.

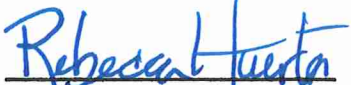
/s/ Douglas A. Allison

DOUGLAS A. ALLISON



Date Filed 5-26-26

**RULES OF PROCEDURE FOR CITY COUNCIL HEARING
FOR REMOVAL ACTION UNDER THE CITY CHARTER
(Effective: May 27, 2026)**


Rebecca Huerta
City Secretary

I. Parties:

There shall be two parties to the proceeding: (1) Council Member subject to removal and (2) Petitioners. Each party shall be represented by no more than one person, who shall, on behalf of his/her respective party, make an opening statement, present evidence, examine witnesses, and make a final statement. The City Attorney's Office is not a party hereto, is not an advocate for either party hereto, and has no role in either prosecution or the defense of this case.

II. City Council Members' Roles: The Mayor Pro Tem shall serve as the presiding officer and be solely responsible for rulings upon all pre-trial matters, admissibility of evidence, and how the proceedings are conducted. The Mayor Pro Tem and other City Council Members shall serve to deliberate and vote upon a final decision upon conclusion of the presentation of evidence and closing arguments. The presiding officer, who may confer with legal counsel of his/her choosing, may advise the City Council in the hearing pursuant to the duties and responsibilities established by the City Council. Legal advice includes, but is not limited to, advising the City Council on Charter and Ordinance requirements, procedural matters, and potential options. Whether such legal advice is received in public or in executive session shall be at the sole discretion of the presiding officer.

III. Order of Appearance

- A. Each party will make an opening statement before any evidence is presented and may make a closing argument after all evidence has been presented.
- B. The Petitioners have the burden of proof and may make the first opening statement and the last closing argument. The Petitioners shall present their evidence prior to the presentation of evidence by the Council Member subject to removal. Rebuttal evidence by all parties shall be allowed.

IV. General Rules

- A. Except for the admission of hearsay evidence, the Texas Rules of Evidence and Texas Rules of Civil Procedure for court proceedings shall not apply. Hearsay evidence shall not be admissible.

- B. Irrelevant, immaterial, or incompetent evidence shall not be admitted. Unduly repetitious or cumulative evidence shall not be allowed.
- C. Evidence will be admitted if it is of the type commonly relied upon by prudent persons in the conduct of their affairs, including documentary evidence and sworn deposition testimony.
- D. Objections to evidence may be made by any party or party's attorney. The presiding officer shall rule upon the admissibility of evidence.
- E. Evidence may be stipulated by agreement of all parties.
- F. The burden of proof shall be on the Petitioners.

V. **Evidence - Witnesses**

- A. Oaths - All testimony (live or by deposition) shall be presented under oath. The oath may be administered by the presiding officer, or any person qualified to administer an oath in the State of Texas. Any attorney testifying to facts shall also take the oath. An attorney representing a party who does not testify does not take the oath.
- B. "The Rule" may not be invoked and witnesses will not be excluded from the hearing room during testimony of other witnesses, unless the presiding officer specifically orders otherwise.
- C. The witness offered by a party may be cross-examined by the other party.

VI. **Evidence - Exhibits**

- A. An exhibit (documentary or sworn testimony) shall be first marked for identification by the City Secretary or presiding officer and identified by the testimony of a witness or by affidavit. The exhibit may then be offered for admission into evidence.
- B. Every exhibit marked into evidence shall be retained by the City Secretary as a part of the record of the proceeding.
- C. A copy of any document may be used instead of the original, except where there appears to be a substantial reason to suspect the accuracy or authenticity of the copy.
- D. Any party may pay a court reporter to make a certified reporter's record which shall be part of the formal record of the matter.

VII. **Record**

The record of the proceedings shall consist of the minutes of the City Secretary and the exhibits admitted into evidence, and certified reporter's record (if any).

VIII. **Burden of Proof**

The burden of proof in this case is upon the Petitioners. The standard of persuasion is a mere preponderance of the evidence.

"PREPONDERANCE OF THE EVIDENCE" means the greater weight and degree of credible testimony or evidence introduced before you and admitted in evidence in this case.

IX. **Deliberations**

Following the presentation of evidence and the closing arguments of the parties, the City Council may deliberate. The deliberations may be in public or in closed session at the sole discretion of the presiding officer. The Council may adopt findings of fact regarding the charges presented by Petitioners. An affirmative vote of a majority of all City Council members holding office shall be required for the removal of the Council Member challenged. The City Council shall additionally have the authority to reprimand or suspend a City Council Member for a period of not more than thirty days if removal is not warranted.



Date Filed 5-26-26

Rebecca Huerta
Rebecca Huerta
City Secretary

RULES OF PROCEDURE FOR CITY COUNCIL HEARING
FOR REMOVAL ACTION UNDER THE CITY CHARTER

(Effective: May 27, 2026)

I. Parties:

There shall be two parties to the proceeding: (1) Council Member subject to removal and (2) Petitioners. Each party shall be represented by no more than one person, who shall, on behalf of his/her respective party, make an opening statement, present evidence, examine witnesses, and make a final statement. The City Attorney's Office is not a party hereto, is not an advocate for either party hereto, and has no role in either prosecution or the defense of this case. The City's Attorney's Office will advise the City Council in the hearing pursuant to the duties and responsibilities established by the City Charter, Article IV, Sec 10(a).

II. City Council Members' Roles: The Mayor Pro Tem shall serve as the presiding officer and be solely responsible for rulings upon all pre-trial matters, admissibility of evidence, and how the proceedings are conducted. The Mayor Pro Tem and other City Council Members shall serve to deliberate and vote upon a final decision upon conclusion of the presentation of evidence and closing arguments. The presiding officer, who may confer with legal counsel of his/her choosing, may advise the City Council in the hearing pursuant to the duties and responsibilities established by the City Council. Legal advice includes, but is not limited to, advising the City Council on Charter and Ordinance requirements, procedural matters, and potential options. Whether such legal advice is received in public or in executive session shall be at the sole discretion of the presiding officer.

III. Order of Appearance

- A. Each party will make an opening statement before any evidence is presented and may make a closing argument after all evidence has been presented.
- B. The Petitioners have the burden of proof and may make the first opening statement and the last closing argument. The Petitioners shall present their evidence prior to the presentation of evidence by the Council Member subject to removal. Rebuttal evidence by all parties shall be allowed.

IV. General Rules

- A. Except for the admission of hearsay evidence, the technical Texas Rules of Evidence and Texas Rules of Civil Procedure for court proceedings shall not apply. Hearsay evidence shall not be admissible.

- B. Irrelevant, immaterial, or incompetent evidence shall not be admitted. Unduly repetitious or cumulative evidence shall not be allowed.
- C. Evidence will be admitted if it is of the type commonly relied upon by prudent persons in the conduct of their affairs, including documentary evidence and sworn deposition testimony.
- D. Objections to evidence may be made by any party or party's attorney. The presiding officer shall rule upon the admissibility of evidence. But if any other member of the Council requests with regard to particular evidence, a vote of the Council shall determine whether the evidence will be admitted.
- E. Evidence may be stipulated by agreement of all parties.
- F. The burden of proof shall be on the Petitioners.

V. **Evidence - Witnesses**

- A. Oaths - All testimony (live or by deposition) shall be presented under oath. The oath may be administered by the presiding officer, or any person qualified to administer an oath in the State of Texas. Notary Public. Any attorney testifying to facts shall also take the oath. An attorney representing a party who does not testify does not take the oath.
- B. "The Rule" may not be invoked and witnesses will not be excluded from the hearing room during testimony of other witnesses, unless the Council presiding officer specifically orders otherwise.
- C. The witness offered by a party may be cross-examined by the other party.
- D. Following the directed cross-examination of a witness by a party, the witness may be examined by members of the Council.
- E. The presiding officer or other members of the Council, through the presiding officer, may call witnesses. All parties may cross-examine such a witness.

VI. **Evidence - Exhibits**

- A. An exhibit (documentary or sworn testimony) shall be first marked for identification by the City Secretary or presiding officer and identified by the testimony of a witness or by affidavit. The exhibit may then be offered for admission into evidence.
- B. Every exhibit marked into evidence shall be retained by the City Secretary as a part of the record of the proceeding.
- C. A copy of any document may be used instead of the original, except where there appears to be a substantial reason to suspect the accuracy or authenticity of the copy.

- D. Any party may pay a court reporter to make a certified reporter's record which shall be part of the formal record of the matter.

VII. **Record**

The record of the proceedings shall consist of the minutes of the City Secretary and the exhibits admitted into evidence, and certified reporter's record (if any).

VIII. **Burden of Proof**

The burden of proof in this case is upon the Petitioners. The standard of persuasion is a mere preponderance of the evidence.

"PREPONDERANCE OF THE EVIDENCE" means the greater weight and degree of credible testimony or evidence introduced before you and admitted in evidence in this case.

IX. **Deliberations**

Following the presentation of evidence and the closing arguments of the parties, the City Council may deliberate. The deliberations may be in public or in closed session at the sole discretion of the presiding officer. The Council shall may adopt findings of fact regarding the charges presented by Petitioners. An affirmative vote of a majority of all City Council members holding office shall be required for the removal of the Council Member challenged. The City Council shall additionally have the authority to reprimand or suspend a City Council Member for a period of not more than thirty days if removal is not warranted.

Date Filed 5-26-26

Rebecca Huerta
Rebecca Huerta
City Secretary

IN THE MATTER OF
PETITIONERS' ARTICLES OF
IMPEACHMENTS OF
MAYOR PAULETTE GUAJARDO

AFFIDAVIT OF DOUGLAS ALLISON

Upon his oath, Douglas Allison – having been sworn by a person qualified to administer an oath in the State of Texas – testifies as follows:

My name is Douglas Allison. I am over the age of twenty-one (21) years of age, and fully competent to attest to the matters set forth herein. All statements set forth herein are within my personal knowledge. All statements set forth herein are true and correct.

I am retained legal counsel for Ajit David, one of the petitioners in the above-referenced matter. With permission from all petitioners, I am appearing as legal counsel for the petitioners in these proceedings (only one representative per side being permitted by City's Rules of Procedure). I have been a licensed attorney in the State of Texas since 1986, and I remain in good standing with the Texas bar.

I have reviewed Exhibit Nos. 1 – 45 referenced in the document attached to this affidavit (Exhibit A). I have reviewed these documents many times in support of pending litigation, and in conjunction with this matter relating to possible action against Mayor Paulette Guajardo. I have also reviewed other documents and emails in support of these same exhibits.

Each of the exhibits (Exhibit Nos. 1 – 45 listed on Exhibit A) are true copies of what each purports to be. Specifically, I hereby affirm that each of the following exhibits are true, correct, and authentic copies as described below. Further, I hereby affirm that each of the following

exhibits are of the type commonly relied upon by prudent persons in the conduct of the type of affairs made the subject of these proceedings.

- Exhibit 1 is the sworn deposition testimony of Peter Zanoni;¹
- Exhibit 2 is the sworn testimony of Heather Hulbert;
- Exhibit 3 is the sworn testimony of Paulette Guajardo;
- Exhibit 4 is the sworn testimony of Philip Ramirez;
- Exhibit 5 is the sworn testimony of Mike Culbertson;
- Exhibit 6 is the sworn testimony of Alan Wilson;
- Exhibit 7 is the sworn testimony of Sony Peronel;
- Exhibit 8 is a screenshot (partial) of Federal Emergency Management Agency release (2020);
- Exhibit 9 is a screenshot (partial) of FEMA release (2021);
- Exhibit 10 is a screenshot (partial) of FEMA release (2022);
- Exhibit 11 is Elevate QOF LLC's Application to CCREDC (dated September 27, 2023, and requesting Type B funds);
- Exhibit 12 is CCREDC BOD Meeting (meeting minutes dated October 12, 2023);
- Exhibit 13 is CCREDC Proposal Memorandum with attached Elevate QOF LLC's Application to CCREDC (requesting Type B funds);
- Exhibit 14 is CCREDC Proposal Memorandum (November 9, 2023);
- Exhibit 15 is CCREDC BOD Meeting (meeting minutes dated November 9, 2023);
- Exhibit 16 is City of Corpus Christi – Type B Corporation, Executive Session Term Sheet

¹ Videotape copies of all depositions are available upon request (if such video recordings exist).

- Exhibit 17 is John Bell email;
- Exhibit 18 is presentation slide deck from QOF Elevate LLC (slide 2, right column contains altered FEMA screenshot)
- Exhibit 19 is presentation slide deck from QOF Elevate LLC converted to PowerPoint;
- Exhibit 20 is presentation slide deck used during presentation to Type B Corporation (meeting on December 11, 2023);
- Exhibit 21 is video recording of Elevate QOF LLC's presentation to Type B Board Corporation (meeting December 11, 2023);
- Exhibit 22 is transcription of statements made by Elevate QOF LLC to Type B Board Corporation (meeting December 11, 2023);
- Exhibit 23 is City's Agenda Memorandum (January 30 2024);
- Exhibit 24 is email to Janet Whitehead (February 5, 2024);
- Exhibit 25 is City's Meeting Agenda (February 20, 2024);
- Exhibit 26 is collection of documents uploaded per Legistar (for City's 2/20/24 meeting);
- Exhibit 27 is City's presentation deck (1st Reading – February 20, 2024);
- Exhibit 28 is Legistar audit report (produced by City of Corpus Christi);
- Exhibit 29 is video of Mayor's introduction of Elevate QOF LLC agenda item;
- Exhibit 30 is video of presentation to City Council of agenda item (2/20/24);
- Exhibit 31 is video of Mayor interrupting Councilman Hunter (2/20/24);
- Exhibit 32 is email from Ajit David to Peter Zanolini ("Red Flags" – March 7, 2024);
- Exhibit 33 is text from Ajit David to Peter Zanolini (attached Weslaco article);
- Exhibit 34 is audio recording of conversation between Ajit David and Peter Zanolini;
- Exhibit 35 is video of Ajit David public comment (April 16, 2024);

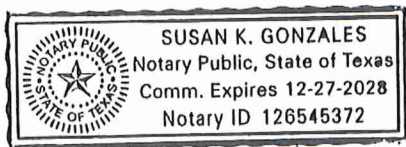
- Exhibit 36 is Miles Risley memorandum (confirming April 16, 2024, presentation to City Council Member in executive session);
- Exhibit 37 is email (with attachments) from Rebecca Huerta to Mayor;
- Exhibit 38 is video of Ajit David public comment (April 23, 2024);
- Exhibit 39 is Texas Penal Code, section 32.21;
- Exhibit 40 is Texas Penal Code, section 7.02;
- Exhibit 41 is City Agenda Memorandum (for April 23, 2024, Reading);
- Exhibit 42 is City Meeting Agenda (April 23, 2024);
- Exhibit 43 is City's published organization chart;
- Exhibit 44 is collection of Mayor's text messages;
- Exhibit 45 is collection of cellular phone invoices evidencing calls to/from Mayor.

Affiant further sayeth naught.



Douglas A. Allison

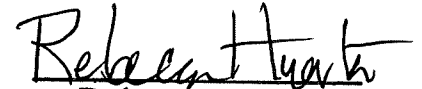
SWORN TO AND SUBSCRIBED before me on the 26th day of May, 2026.



Notary Public, State of Texas

Date Filed 5.26.26

IN THE MATTER OF
PETITIONERS' ARTICLES OF
IMPEACHMENTS OF
MAYOR PAULETTE GUAJARDO


Rebecca Huerta
City Secretary

PETITIONERS' EXHIBIT LIST

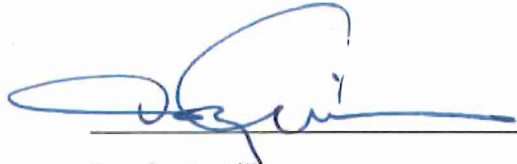
- EXHIBIT 1: is the sworn deposition testimony of Peter Zaroni;¹
- EXHIBIT 2: is the sworn testimony of Heather Hulbert;
- EXHIBIT 3: is the sworn testimony of Paulette Guajardo;
- EXHIBIT 4: is the sworn testimony of Philip Ramirez;
- EXHIBIT 5: is the sworn testimony of Mike Culbertson;
- EXHIBIT 6: is the sworn testimony of Alan Wilson;
- EXHIBIT 7: is the sworn testimony of Sony Peronel;
- EXHIBIT 8: is a screenshot (partial) of Federal Emergency Management Agency release (2020);
- EXHIBIT 9: is a screenshot (partial) of FEMA release (2021);
- EXHIBIT 10: is a screenshot (partial) of FEMA release (2022);
- EXHIBIT 11: is Elevate QOF LLC's Application to CCREDC (dated September 27, 2023, and requesting Type B funds);
- EXHIBIT 12: is CCREDC BOD Meeting (meeting minutes dated October 12, 2023);

¹ Videotape copies of all depositions are available upon request (if such video recordings exist).

- EXHIBIT 13: is CCREDC Proposal Memorandum with attached Elevate QOF LLC's Application to CCREDC (requesting Type B funds);
- EXHIBIT 14: is CCREDC Proposal Memorandum (November 9, 2023);
- EXHIBIT 15: is CCREDC BOD Meeting (meeting minutes dated November 9, 2023);
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- EXHIBIT 19: is presentation slide deck from QOF Elevate LLC converted to PowerPoint;
- EXHIBIT 20: is presentation slide deck used during presentation to Type B Corporation (meeting on December 11, 2023);
- EXHIBIT 21: is video recording of Elevate QOF LLC's presentation to Type B Board Corporation (meeting December 11, 2023);
- EXHIBIT 22: is transcription of statements made by Elevate QOF LLC to Type B Board Corporation (meeting December 11, 2023);
- EXHIBIT 23: is City's Agenda Memorandum (January 30 2024);
- EXHIBIT 24: is email to Janet Whitehead (February 5, 2024);
- EXHIBIT 25: is City's Meeting Agenda (February 20, 2024);
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- EXHIBIT 28: is Legistar audit report (produced by City of Corpus Christi);

- EXHIBIT 29: is video of Mayor's introduction of Elevate QOF LLC agenda item;
- EXHIBIT 30: is video of presentation to City Council of agenda item (2/20/24);
- EXHIBIT 31: is video of Mayor interrupting Councilman Hunter (2/20/24);
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- EXHIBIT 34: is audio recording of conversation between Ajit David and Peter Zaroni;
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- EXHIBIT 43: is City's published organization chart;
- EXHIBIT 44: is collection of Mayor's text messages; AND
- EXHIBIT 45: is collection of cellular phone invoices evidencing calls to/from Mayor.

Submitted for admission of same into evidence in this matter.



Douglas A. Allison

LAW OFFICES OF DOUGLAS A.
ALLISON

State Bar No. 01083500

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Corpus Christi, Texas 78401

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Email: doug@dallisonlaw.com

**ATTORNEY FOR PETITIONER
AJIT DAVID**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was electronically sent to all counsel of record via e-mail with City Secretary, Rebecca Huerta, on this the 26th day of May 2026.

/s/ Douglas A. Allison

DOUGLAS A. ALLISON

Date Filed 7.13.26

**IN THE MATTER OF
PETITIONERS' ARTICLES OF
IMPEACHMENTS OF
MAYOR PAULETTE GUAJARDO**

R. Huerta
Rebecca Huerta
City Secretary

PETITIONERS' AMENDED EXHIBIT LIST

- EXHIBIT 1: is the sworn deposition testimony of Peter Zanoni;¹
- EXHIBIT 2: is the sworn testimony of Heather Hulbert;
- EXHIBIT 3: is the sworn testimony of Paulette Guajardo;
- EXHIBIT 4: is the sworn testimony of Philip Ramirez;
- EXHIBIT 5: is the sworn testimony of Mike Culbertson;
- EXHIBIT 6: is the sworn testimony of Alan Wilson;
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- EXHIBIT 8: is a screenshot (partial) of Federal Emergency Management Agency release (2020);
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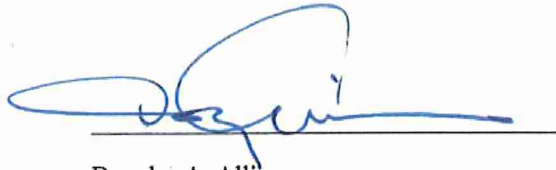
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- EXHIBIT 45: is collection of cellular phone invoices evidencing calls to/from Mayor.

Submitted for admission of same into evidence in this matter.

- EXHIBIT 46: Mayor Paulette Guajardo Facebook Post "REMOVAL HEARING UPDATE #5"
- EXHIBIT 47: Mayor Paulette Guajardo Facebook Post "REMOVAL HEARING UPDATE #4"

- EXHIBIT 48: Mayor Paulette Guajardo Facebook Post “REMOVAL HEARING UPDATE #3”
- EXHIBIT 49: Email String regarding ongoing mediation efforts



Douglas A. Allison

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State Bar No. 01083500

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Corpus Christi, Texas 78401

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Email: doug@dallisonlaw.com

**ATTORNEY FOR PETITIONER
AJIT DAVID**

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was electronically sent to all counsel of record via e-mail with City Secretary, Rebecca Huerta, on this the 13th day of July 2026.

/s/ Douglas A. Allison

DOUGLAS A. ALLISON

RECUSAL FROM QUASI-JUDICIAL PROCEEDING

I, Roland Barrera (name), as a member of City Council of the City of Corpus Christi hereby recuse myself in the matter of the Removal Action or the Mayor. All further proceedings in this case shall be conducted without my presence.

As a result of this recusal, I will refrain from participating in the discussion and voting on the proceedings listed above, including discussions with any person likely to consider the matter.

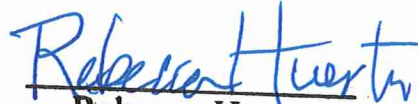


Signature of Council Member

05/27/2025

Date

Date Filed 5.20.26

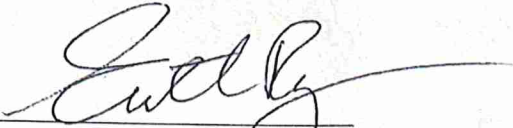


Rebecca Huerta
City Secretary

RECUSAL FROM QUASI-JUDICIAL PROCEEDING

I, Everett Roy (name), as a member of City Council of the City of Corpus Christi hereby
recuse myself in the matter of the Removal Action or the Mayor. All further proceedings in this case shall be conducted
without my presence.

As a result of this recusal, I will refrain from participating in the discussion and voting on the proceedings listed
above, including discussions with any person likely to consider the matter.

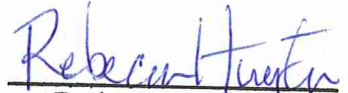


Signature of Council Member

5-26-26

Date

Date Filed 5-27-26



Rebecca Huerta
City Secretary

Subject to her claims, objections and complaints that this removal proceeding is unlawful, as pleaded in Case 2:26-cv-00111 *Guajardo v. City of Corpus Christi, Texas*, in the United States District Court for the Southern District of Texas, and without waiving same,

NOTICE OF ORAL/VIDEOTAPED DEPOSITION OF SYLVIA CAMPOS

TO: The Witness, Sylvia Campos, by and through the City Secretary, Rebecca Huerta, 1201 Leopard Street, Corpus Christi, TX 78401-2120.

City of Corpus Christi, by and through the City Secretary, Rebecca Huerta, 1201 Leopard Street, Corpus Christi, TX 78401-2120.

Petitioner Rachal Caballero, via rachelcab@hotmail.com

Petitioner Laramie Fain, via laramie.fain@gmail.com

Petitioner Mark Muenster, via mjmuenster728@gmail.com

Petitioner Robin Patrick Cox, via cox1691@aol.com

Petitioner Trevor Slowik, via simpleinspection@gmail.com

Petitioner Willaim Rickertsen, by and through the City Secretary, Rebecca Huerta, 1201 Leopard Street, Corpus Christi, TX 78401-2120 (Petitioner's email unknown).

Please take notice that, pursuant to Rule of Procedure V.A., for City Council Hearing for Removal Action under the City Charter (Amended June 2, 2026), the following oral and video recorded deposition will be taken by the undersigned attorney:

- (1) The witness is **SYLVIA CAMPOS**.
- (2) The deposition will begin at **9:30 a.m., CDT on July 17, 2026**, and continue from day to day until it is completed.
- (3) The deposition will take place at:

City of Corpus Christi
1201 Leopard Street
Corpus Christi, TX 78401-2120
- (4) After the witness is placed under oath by a person authorized to administer oaths, she will be questioned by oral examination before a court reporter authorized by law to take depositions. The testimony will also be videotaped.

RECEIVED

JUN 23 2026

CITY SECRETARY'S OFFICE

017-2026

Respectfully submitted,

/s/ John Flood

John Flood

Texas Bar No. 07155910

JOHN T. FLOOD, L.L.P.

819 N. Upper Broadway

Corpus Christi, Texas 78401

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(361) 654-8879 Fax

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irma@FloodTrialLawyers.com

ATTORNEYS FOR

PAULETTE M. GUAJARDO

Of Counsel:

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Flood & Flood

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F: (713) 223-8879

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Ben.Stephens@huschblackwell.com

HUSCH BLACKWELL LLP

600 Travis, Suite 2350

Houston, Texas 77002

T: (713) 647-6800

F: (713) 647-6884

Subject to her claims, objections and complaints that this removal proceeding is unlawful, as pleaded in Case 2:26-cv-00111 *Guajardo v. City of Corpus Christi, Texas*, in the United States District Court for the Southern District of Texas, and without waiving same,

NOTICE OF ORAL/VIDEOTAPED DEPOSITION OF CAROLYN VAUGHN

TO: The Witness, Carolyn Vaughn, by and through the City Secretary, Rebecca Huerta, 1201 Leopard Street, Corpus Christi, TX 78401-2120.

City of Corpus Christi, by and through the City Secretary, Rebecca Huerta, 1201 Leopard Street, Corpus Christi, TX 78401-2120.

Petitioner Rachal Caballero, via rachelcab@hotmail.com

Petitioner Laramie Fain, via laramie.fain@gmail.com

Petitioner Mark Muenster, via mjmuenster728@gmail.com

Petitioner Robin Patrick Cox, via cox1691@aol.com

Petitioner Trevor Slowik, via simpleinspection@gmail.com

Petitioner Willaim Rickertsen, by and through the City Secretary, Rebecca Huerta, 1201 Leopard Street, Corpus Christi, TX 78401-2120 (Petitioner's email unknown).

Please take notice that, pursuant to Rule of Procedure V.A., for City Council Hearing for Removal Action under the City Charter (Amended June 2, 2026), the following oral and video recorded deposition will be taken by the undersigned attorney:

- (1) The witness is **CAROLYN VAUGHN**.
- (2) The deposition will begin at **2:30 p.m., CDT on July 17, 2026**, and continue from day to day until it is completed.
- (3) The deposition will take place at:

City of Corpus Christi
1201 Leopard Street
Corpus Christi, TX 78401-2120
- (4) After the witness is placed under oath by a person authorized to administer oaths, she will be questioned by oral examination before a court reporter authorized by law to take depositions. The testimony will also be videotaped.

RECEIVED

JUN 23 2026

CITY SECRETARY'S OFFICE

018-2026

Respectfully submitted,

/s/ John Flood

John Flood

Texas Bar No. 07155910

JOHN T. FLOOD, L.L.P.

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irma@FloodTrialLawyers.com

ATTORNEYS FOR

PAULETTE M. GUAJARDO

Of Counsel:

Stephen Dockery

Texas Bar No. 24120265

stephen@floodandflood.com

Flood & Flood

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Subject to her claims, objections and complaints that this removal proceeding is unlawful, as pleaded in Case 2:26-cv-00111 *Guajardo v. City of Corpus Christi, Texas*, in the United States District Court for the Southern District of Texas, and without waiving same,

NOTICE OF ORAL/VIDEOTAPED DEPOSITION OF KAYLYNN PAXSON

TO: The Witness, Kaylynn Paxson, by and through the City Secretary, Rebecca Huerta, 1201 Leopard Street, Corpus Christi, TX 78401-2120.

City of Corpus Christi, by and through the City Secretary, Rebecca Huerta, 1201 Leopard Street, Corpus Christi, TX 78401-2120.

Petitioner Rachal Caballero, via rachelcab@hotmail.com

Petitioner Laramie Fain, via laramie.fain@gmail.com

Petitioner Mark Muenster, via mjmuenster728@gmail.com

Petitioner Robin Patrick Cox, via cox1691@aol.com

Petitioner Trevor Slowik, via simpleinspection@gmail.com

Petitioner Willaim Rickertsen, by and through the City Secretary, Rebecca Huerta, 1201 Leopard Street, Corpus Christi, TX 78401-2120 (Petitioner's email unknown).

Please take notice that, pursuant to Rule of Procedure V.A., for City Council Hearing for Removal Action under the City Charter (Amended June 2, 2026), the following oral and video recorded deposition will be taken by the undersigned attorney:

- (1) The witness is **KAYLYNN PAXSON**.
- (2) The deposition will begin at **2:30 p.m., CDT on July 15, 2026**, and continue from day to day until it is completed.
- (3) The deposition will take place at:

City of Corpus Christi
1201 Leopard Street
Corpus Christi, TX 78401-2120
- (4) After the witness is placed under oath by a person authorized to administer oaths, she will be questioned by oral examination before a court reporter authorized by law to take depositions. The testimony will also be videotaped.

RECEIVED

JUN 23 2026

CITY SECRETARY'S OFFICE

Respectfully submitted,

/s/ John Flood

John Flood

Texas Bar No. 07155910

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Corpus Christi, Texas 78401

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ATTORNEYS FOR

PAULETTE M. GUAJARDO

Of Counsel:

Stephen Dockery

Texas Bar No. 24120265

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Ben.Stephens@huschblackwell.com

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600 Travis, Suite 2350

Houston, Texas 77002

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Subject to her claims, objections and complaints that this removal proceeding is unlawful, as pleaded in Case 2:26-cv-00111 *Guajardo v. City of Corpus Christi, Texas*, in the United States District Court for the Southern District of Texas, and without waiving same,

NOTICE OF ORAL/VIDEOTAPED DEPOSITION OF ERIC CANTU

TO: The Witness, Eric Cantu, by and through the City Secretary, Rebecca Huerta, 1201 Leopard Street, Corpus Christi, TX 78401-2120.

City of Corpus Christi, by and through the City Secretary, Rebecca Huerta, 1201 Leopard Street, Corpus Christi, TX 78401-2120.

Petitioner Rachal Caballero, via rachelcab@hotmail.com

Petitioner Laramie Fain, via laramie.fain@gmail.com

Petitioner Mark Muenster, via mjmuenster728@gmail.com

Petitioner Robin Patrick Cox, via cox1691@aol.com

Petitioner Trevor Slowik, via simpleinspection@gmail.com

Petitioner Willaim Rickertsen, by and through the City Secretary, Rebecca Huerta, 1201 Leopard Street, Corpus Christi, TX 78401-2120 (Petitioner's email unknown).

Please take notice that, pursuant to Rule of Procedure V.A., for City Council Hearing for Removal Action under the City Charter (Amended June 2, 2026), the following oral and video recorded deposition will be taken by the undersigned attorney:

- (1) The witness is **ERIC CANTU**.
- (2) The deposition will begin at **9:30 a.m., CDT on July 15, 2026**, and continue from day to day until it is completed.
- (3) The deposition will take place at:

City of Corpus Christi
1201 Leopard Street
Corpus Christi, TX 78401-2120
- (4) After the witness is placed under oath by a person authorized to administer oaths, he will be questioned by oral examination before a court reporter authorized by law to take depositions. The testimony will also be videotaped.

RECEIVED

JUN 23 2026

CITY SECRETARY'S OFFICE

020-2026

Respectfully submitted,

/s/ John Flood

John Flood

Texas Bar No. 07155910

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Corpus Christi, Texas 78401

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Of Counsel:

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stephen@floodandflood.com

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NOTICE OF ORAL/VIDEOTAPED DEPOSITION OF MILES RISLEY

TO: The Witness, Miles Risley, by and through the City Secretary, Rebecca Huerta, 1201 Leopard Street, Corpus Christi, TX 78401-2120.

City of Corpus Christi, by and through the City Secretary, Rebecca Huerta, 1201 Leopard Street, Corpus Christi, TX 78401-2120.

Petitioner Rachal Caballero, via rachelcab@hotmail.com

Petitioner Laramie Fain, via laramie.fain@gmail.com

Petitioner Mark Muenster, via mjmuenster728@gmail.com

Petitioner Robin Patrick Cox, via cox1691@aol.com

Petitioner Trevor Slowik, via simpleinspection@gmail.com

Petitioner Willaim Rickertsen, by and through the City Secretary, Rebecca Huerta, 1201 Leopard Street, Corpus Christi, TX 78401-2120 (Petitioner's email unknown).

Please take notice that, pursuant to Rule of Procedure V.A., for City Council Hearing for Removal Action under the City Charter (Amended June 2, 2026), the following oral and video recorded deposition will be taken by the undersigned attorney:

- (1) The witness is **MILES RISLEY**.
- (2) The deposition will begin at **9:30 a.m., CDT on July 14, 2026**, and continue from day to day until it is completed.
- (3) The deposition will take place at:

City of Corpus Christi
1201 Leopard Street
Corpus Christi, TX 78401-2120
- (4) After the witness is placed under oath by a person authorized to administer oaths, he will be questioned by oral examination before a court reporter authorized by law to take depositions. The testimony will also be videotaped.

RECEIVED

JUN 23 2026

CITY SECRETARY'S OFFICE

Respectfully submitted,

/s/ John Flood

John Flood

Texas Bar No. 07155910

JOHN T. FLOOD, L.L.P.

819 N. Upper Broadway

Corpus Christi, Texas 78401

(361) 654-8877

(361) 654-8879 Fax

john@FloodTrialLawyers.com

irma@FloodTrialLawyers.com

ATTORNEYS FOR

PAULETTE M. GUAJARDO

Of Counsel:

Stephen Dockery

Texas Bar No. 24120265

stephen@floodandflood.com

Flood & Flood

914 Preston, Suite 800

Houston, TX 77002

T: (713) 223-8877

F: (713) 223-8879

Ben Stephens

Texas Bar No. 24098472

Ben.Stephens@huschblackwell.com

HUSCH BLACKWELL LLP

600 Travis, Suite 2350

Houston, Texas 77002

T: (713) 647-6800

F: (713) 647-6884

Subject to her claims, objections and complaints that this removal proceeding is unlawful, as pleaded in Case 2:26-cv-00111 *Guajardo v. City of Corpus Christi, Texas*, in the United States District Court for the Southern District of Texas, and without waiving same,

NOTICE OF ORAL/VIDEOTAPED DEPOSITION OF GIL HERNANDEZ

TO: The Witness, Gil Hernandez, by and through the City Secretary, Rebecca Huerta, 1201 Leopard Street, Corpus Christi, TX 78401-2120.

City of Corpus Christi, by and through the City Secretary, Rebecca Huerta, 1201 Leopard Street, Corpus Christi, TX 78401-2120.

Petitioner Rachal Caballero, via rachelcab@hotmail.com

Petitioner Laramie Fain, via laramie.fain@gmail.com

Petitioner Mark Muenster, via mjmuenster728@gmail.com

Petitioner Robin Patrick Cox, via cox1691@aol.com

Petitioner Trevor Slowik, via simpleinspection@gmail.com

Petitioner Willaim Rickertsen, by and through the City Secretary, Rebecca Huerta, 1201 Leopard Street, Corpus Christi, TX 78401-2120 (Petitioner's email unknown).

Please take notice that, pursuant to Rule of Procedure V.A., for City Council Hearing for Removal Action under the City Charter (Amended June 2, 2026), the following oral and video recorded deposition will be taken by the undersigned attorney:

- (1) The witness is **GIL HERNANDEZ**.
- (2) The deposition will begin at **9:30 a.m., CDT on July 13, 2026**, and continue from day to day until it is completed.
- (3) The deposition will take place at:

City of Corpus Christi
1201 Leopard Street
Corpus Christi, TX 78401-2120
- (4) After the witness is placed under oath by a person authorized to administer oaths, he will be questioned by oral examination before a court reporter authorized by law to take depositions. The testimony will also be videotaped.

RECEIVED

JUN 23 2026

CITY SECRETARY'S OFFICE

022-2026

Respectfully submitted,

/s/ John Flood

John Flood

Texas Bar No. 07155910

JOHN T. FLOOD, L.L.P.

819 N. Upper Broadway

Corpus Christi, Texas 78401

(361) 654-8877

(361) 654-8879 Fax

john@FloodTrialLawyers.com

irma@FloodTrialLawyers.com

ATTORNEYS FOR

PAULETTE M. GUAJARDO

Of Counsel:

Stephen Dockery

Texas Bar No. 24120265

stephen@floodandflood.com

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Houston, Texas 77002

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F: (713) 647-6884

Subject to her claims, objections and complaints that this removal proceeding is unlawful, as pleaded in Case 2:26-cv-00111 *Guajardo v. City of Corpus Christi, Texas*, in the United States District Court for the Southern District of Texas, and without waiving same,

NOTICE OF ORAL/VIDEOTAPED DEPOSITION OF PETER ZANONI

TO: The Witness, Peter Zanoni, City Manager, by and through the City Secretary, Rebecca Huerta, 1201 Leopard Street, Corpus Christi, TX 78401-2120.

City of Corpus Christi, by and through the City Secretary, Rebecca Huerta, 1201 Leopard Street, Corpus Christi, TX 78401-2120.

Petitioner Rachal Caballero, via rachelcab@hotmail.com

Petitioner Laramie Fain, via laramie.fain@gmail.com

Petitioner Mark Muenster, via mjmuenster728@gmail.com

Petitioner Robin Patrick Cox, via cox1691@aol.com

Petitioner Trevor Slowik, via simpleinspection@gmail.com

Petitioner Willaim Rickertsen, by and through the City Secretary, Rebecca Huerta, 1201 Leopard Street, Corpus Christi, TX 78401-2120 (Petitioner's email unknown).

Please take notice that, pursuant to Rule of Procedure V.A., for City Council Hearing for Removal Action under the City Charter (Amended June 2, 2026), the following oral and video recorded deposition will be taken by the undersigned attorney:

- (1) The witness is **PETER ZANONI**.
- (2) The deposition will begin at **9:30 a.m., CDT on July 16, 2026**, and continue from day to day until it is completed.
- (3) The deposition will take place at:

City of Corpus Christi
1201 Leopard Street
Corpus Christi, TX 78401-2120
- (4) After the witness is placed under oath by a person authorized to administer oaths, he will be questioned by oral examination before a court reporter authorized by law to take depositions. The testimony will also be videotaped.

RECEIVED

JUN 23 2026

CITY SECRETARY'S OFFICE

023-2026

Respectfully submitted,

/s/ John Flood

John Flood

Texas Bar No. 07155910

JOHN T. FLOOD, L.L.P.

819 N. Upper Broadway

Corpus Christi, Texas 78401

(361) 654-8877

(361) 654-8879 Fax

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irma@FloodTrialLawyers.com

ATTORNEYS FOR

PAULETTE M. GUAJARDO

Of Counsel:

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Texas Bar No. 24120265

stephen@floodandflood.com

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Houston, TX 77002

T: (713) 223-8877

F: (713) 223-8879

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Ben.Stephens@huschblackwell.com

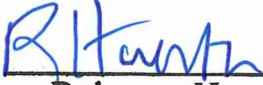
HUSCH BLACKWELL LLP

600 Travis, Suite 2350

Houston, Texas 77002

T: (713) 647-6800

F: (713) 647-6884


Rebecca Huerta
City Secretary

**IN THE MATTER OF
PETITIONERS' ARTICLES OF
IMPEACHMENTS OF
MAYOR PAULETTE GUAJARDO**

**MOTION TO QUASH
OBJECTIONS TO PROPOSED DEPOSITIONS**

NOW COME Petitioners, and file this Motion to Quash and Objections to Proposed Depositions, and would show:

I.

City's Rules of Procedure ("City Rules") were adopted/amended by the City Council on or about June 2, 2026. Generally, the City Rules discuss "Parties," "City Council Members' Roles," "Order of Appearance," "General Rules," "Evidence – Witnesses," "Evidence – Exhibits," "Record," "Burden of Proof," and "Deliberations." There is no section of the City's Rules that contemplate a discovery process. Mayor's legal counsel has not requested any modification of the City's Rules to permit the taking of depositions. This is likely because a formal discovery process sometimes takes months or years, and the City Charter most definitely contemplates a more prompt resolution of possible disciplinary action against a City council member (e.g., in this case, Mayor).

II.

Mayor's counsel in this matter recently sent emails suggesting depositions of the following persons: 1) Peter Zaroni, 2) Miles Risley, 3) Carolyn Vaughn, 4) Eric Cantu, 5) Kaylynn Paxton,

6) Gil Hernandez, and 7) Sylvia Campos (July 13th through 17th). Mayor's purported notices for oral/video depositions are reminiscent of how proceedings may occur in a court of law (not City Council proceedings). Specifically, Mayor's purported notices track Texas Rules of Civil Procedure ("TRCP"):

- RULE 192. PERMISSIBLE DISCOVERY: FORMS AND SCOPE; WORK PRODUCT; PROTECTIVE ORDERS; DEFINITIONS
- RULE 199. DEPOSITIONS UPON ORAL EXAMINATION
- RULE 203. SIGNING, CERTIFICATION AND USE OF ORAL AND WRITTEN DEPOSITIONS

This tribunal may recall that Mayor's counsel has previously made a similar mistake by arguing TRCP 18b applied, which it does not. In fact, the City's Rules expressly state that "... Texas Rules of Civil Procedure for court proceedings shall not apply." (Section IV A.). As such, Petitioners object to the taking of any depositions at this eleventh hour.

III.

Additionally, Petitioners would show that Vaughn, Cantu, and Paxton were not even council members for the period made the subject of this lawsuit. As such, Mayor's attempt to depose is solely an attempt to harass, intimidate, and bully Mayor's fellow council members. This must not be permitted (and it is not permitted by the City's Rules, as set forth above). Moreover, and even if Vaughn, Cantu, and Paxton were witnesses (which they are not), then their participation as witnesses cannot be compelled. (citations omitted).

IV.

Additionally, Petitioners would show that Hernandez and Campos are not properly deposed since both are sitting council members (citations omitted), and evidence, if any, possessed by either can be readily obtained from other sources (citations omitted). Again, these depositions are sought by Mayor only to harass, intimidate, and bully Mayor's fellow council members.

V.

As for Miles Risley, the City's Rules to not permit discovery/taking of depositions; but rather contemplate a process that does not allow for full advance discovery of matters. See more complete discussion of City's Rules, above.

VI.

For reasons set forth herein, Petitioners request that the proposed depositions be quashed. Petitioners object to the taking of such depositions since there is no discovery process allowed for in these impeachment proceedings. Petitioners request that all council members and would-be witnesses be properly informed that their attendance/ participation is not required but rather may only proceed after either side to this impeachment proceeding request permission or ruling from the presiding officer.

/s/ Douglas A. Allison
Douglas A. Allison
LAW OFFICES OF DOUGLAS A.
ALLISON
State Bar No. 01083500
403 N. Tancagua St.
Corpus Christi, Texas 78401
T: 361/888-6002
Email: doug@dallisonlaw.com

ATTORNEY FOR PETITIONERS

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was electronically sent to all counsel of record via e-mail with City Secretary, Rebecca Huerta, on this the 30th day of May 2026.

/s/ Douglas A. Allison
DOUGLAS A. ALLISON

R Huerta

Rebecca Huerta
City Secretary

IN THE MATTER OF
PETITIONERS' ARTICLES OF
IMPEACHMENTS OF
MAYOR PAULETTE GUAJARDO

SUBPOENA PURSUANT TO TEXAS RULE OF CIVIL PROCEDURE 176

TO: The Witness, **PAULETTE GUAJARDO**, 1201 Leopard Street, Corpus Christi, Texas 78401; or wherever she may be found.

ISSUED IN THE NAME OF THE STATE OF TEXAS, on July 1, 2026.

TO ANY SHERIFF, CONSTABLE, OR ANY OTHER PERSON AUTHORIZED TO SERVE AND EXECUTE SUBPOENAS AS PROVIDED IN TEXAS RULE OF CIVIL PROCEDURE 176, IN THE STATE OF TEXAS.

YOU, **PAULETTE GUAJARDO**, ARE HEREBY COMMANDED as permitted by Texas Rule of Civil Procedure ("TRCP") 176, to be and appear before a court reporter and videographer on **Saturday, July 11, 2026, at 10:00 a.m.**, and there to make answers under oath to certain questions to be propounded to **PAULETTE GUAJARDO** by the other parties or other parties' legal counsels.

THEREFORE, PLEASE TAKE NOTICE that pursuant to the *Texas Rules of Civil Procedure*, Petitioners herein, by and through counsel, will take the oral and videotaped deposition of **PAULETTE GUAJARDO** on **Saturday, July 11, 2026, at 10:00 a.m.** at the law offices of Douglas A. Allison, 403 N. Tanchua Street, Corpus Christi, Texas 78401. See notice of deposition attached hereto.

The deposition will take place before a certified court reporter with U.S. Legal Support, Telephone 713-653-7100 and when transcribed may be used as evidence upon the trial of the above-entitled and numbered civil action. The deposition will continue from day to day until completed.

FAILURE BY ANY PERSON WITHOUT ADEQUATE EXCUSE TO OBEY A SUBPOENA SERVED UPON THAT PERSON (or his/her attorney as permitted by TRCP 176.5) MAY BE DEEMED A CONTEMPT OF THE COURT FROM WHICH THE SUBPOENA IS ISSUED OR A DISTRICT COURT IN THE COUNTY IN WHICH THE SUBPOENA IS SERVED, AND MAY BE PUNISHED BY FINE OR CONFINEMENT, OR BOTH (PER RULE 176.8(a), TEXAS RULES OF CIVIL PROCEDURE).

Issued this 1st day of July 2026.

Respectfully submitted,

LAW OFFICES OF DOUGLAS A. ALLISON

403 N. Tancagua Street

Corpus Christi, Texas 78401

Telephone: (361) 888 6002

Facsimile: (361) 888-6651

Email: doug@dallisonlaw.com

By: /s/ Douglas A. Allison

DOUGLAS A. ALLISON

Texas Bar Number 01083500

ATTORNEY FOR PETITIONERS

IN THE MATTER OF
PETITIONERS' ARTICLES OF
IMPEACHMENTS OF
MAYOR PAULETTE GUAJARDO

PETITIONERS' NOTICE OF INTENTION TO TAKE
ORAL/VIDEOTAPED DEPOSITION OF PAULETTE GUAJARDO

TO: The Witness, **PAULETTE GUAJARDO**, 1201 Leopard Street, Corpus Christi, Texas 78401; or wherever she may be found.

City of Corpus Christi, by and through the City Secretary, Rebecca Huerta, via RebeccaH@corpuschristitx.gov.

Petitioner Rachal Caballero, via rachelcab@hotmail.com

Petitioner Laramie Fain, via laramie.fain@gmail.com

Petitioner Mark Muenster, via mjmuenster728@gmail.com

Petitioner Robin Patrick Cox, via cox1691@aol.com

Petitioner Trevor Slowik, via simpleinspection@gmail.com

Petitioner Willaim Rickertsen, by and through the City Secretary, Rebecca Huerta, RebeccaH@corpuschristitx.gov. (Rickertsen's email is unknown).

Please take notice that, pursuant to Rule of Procedure V.A., for City Council Hearing for Removal Action under the City Charter (Amended June 2, 2026), the following oral and video recorded deposition will be taken by the undersigned attorney:

- (1) The witness is **PAULETTE GUAJARDO**.
- (2) The deposition will begin at **10:00 a.m., CDT on Saturday, July 11, 2026**, and continue from day to day until it is completed.
- (3) The deposition will take place at: The Law Offices of Dougla A. Allison, 403 N. Tanchua, Corpus Christi, TX 78401.
- (4) After the witness is placed under oath by a person authorized to administer oaths, she will be questioned by oral examination before a court reporter authorized by law to take depositions. The testimony will also be videotaped.

This subpoena was issued at the request of Petitioner Ajit David, whose attorney of record is Douglas A. Allison, Law Offices of Douglas Allison, 403 N. Tancagua Street, Corpus Christi, Texas 78401, Phone: 361.888.6002.

RETURN OF SERVICE OF SUBPOENA

I, _____, delivered a copy of this subpoena to PAULETTE GUAJARDO who is a party to these proceedings, at _____, in Nueces County, Texas on the _____ day of July, 2026, at _____ o'clock _____.m., and tendered to the witness a fee of \$10 in cash.

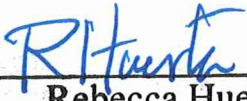
I, _____, was unable to deliver a copy of this subpoena to PAULETTE GUAJARDO who is a party to these proceedings, for the following reasons:

By: _____
Person authorized by law or written order of trial court who has no interest in the lawsuit and is at least 18 years old.

Sworn to and subscribed before me this _____ day of July, 2026.

Notary Public for State of Texas

IN THE MATTER OF
PETITIONERS' ARTICLES OF
IMPEACHMENTS OF
MAYOR PAULETTE GUAJARDO


Rebecca Huerta
City Secretary

SUBPOENA PURSUANT TO TEXAS RULE OF CIVIL PROCEDURE 176

TO: The Witness, **PHILIP RAMIREZ**, 3751 South Alameda, Corpus Christi, Texas 78411; or wherever he may be found.

ISSUED IN THE NAME OF THE STATE OF TEXAS, on July 1, 2026.

TO ANY SHERIFF, CONSTABLE, OR ANY OTHER PERSON AUTHORIZED TO SERVE AND EXECUTE SUBPOENAS AS PROVIDED IN TEXAS RULE OF CIVIL PROCEDURE 176, IN THE STATE OF TEXAS.

YOU, **PHILIP RAMIREZ**, ARE HEREBY COMMANDED as permitted by Texas Rule of Civil Procedure ("TRCP") 176, to be and appear before a court reporter and videographer on **Monday, July 13, 2026, at 8:30 a.m.**, and there to make answers under oath to certain questions to be propounded to **PHILIP RAMIREZ** by the other parties or other parties' legal counsels.

THEREFORE, PLEASE TAKE NOTICE that pursuant to the *Texas Rules of Civil Procedure*, Petitioners herein, by and through counsel, will take the oral and videotaped deposition of **PHILIP RAMIREZ** on **Monday, July 13, 2026, at 8:30 a.m.** at the law offices of Douglas A. Allison, 403 N. Tancanhua Street, Corpus Christi, Texas 78401. See notice of deposition attached hereto.

The deposition will take place before a certified court reporter with U.S. Legal Support, Telephone 713-653-7100 and when transcribed may be used as evidence upon the trial of the above-entitled and numbered civil action. The deposition will continue from day to day until completed.

FAILURE BY ANY PERSON WITHOUT ADEQUATE EXCUSE TO OBEY A SUBPOENA SERVED UPON THAT PERSON (or his/her attorney as permitted by TRCP 176.5) MAY BE DEEMED A CONTEMPT OF THE COURT FROM WHICH THE SUBPOENA IS ISSUED OR A DISTRICT COURT IN THE COUNTY IN WHICH THE SUBPOENA IS SERVED, AND MAY BE PUNISHED BY FINE OR CONFINEMENT, OR BOTH (PER RULE 176.8(a), TEXAS RULES OF CIVIL PROCEDURE).

Issued this 1st day of July 2026.

Respectfully submitted,

LAW OFFICES OF DOUGLAS A. ALLISON

403 N. Tancagua Street

Corpus Christi, Texas 78401

Telephone: (361) 888 6002

Facsimile: (361) 888-6651

Email: doug@dallisonlaw.com

By: /s/ Douglas A. Allison

DOUGLAS A. ALLISON

Texas Bar Number 01083500

ATTORNEY FOR PETITIONERS

IN THE MATTER OF
PETITIONERS' ARTICLES OF
IMPEACHMENTS OF
MAYOR PAULETTE GUAJARDO

PETITIONERS' NOTICE OF INTENTION TO TAKE
ORAL/VIDEOTAPED DEPOSITION OF PHILIP RAMIREZ

TO: The Witness, **PHILIP RAMIREZ**, 3751 South Alameda, Corpus Christi, Texas 78411; or wherever he may be found.

City of Corpus Christi, by and through the City Secretary, Rebecca Huerta, via RebeccaH@corpuschristitx.gov.

Petitioner Rachal Caballero, via rachelcab@hotmail.com

Petitioner Laramie Fain, via laramie.fain@gmail.com

Petitioner Mark Muenster, via mjmuenster728@gmail.com

Petitioner Robin Patrick Cox, via cox1691@aol.com

Petitioner Trevor Slowik, via simpleinspection@gmail.com

Petitioner Willaim Rickertsen, by and through the City Secretary, Rebecca Huerta, RebeccaH@corpuschristitx.gov. (Rickertsen's email is unknown).

Please take notice that, pursuant to Rule of Procedure V.A., for City Council Hearing for Removal Action under the City Charter (Amended June 2, 2026), the following oral and video recorded deposition will be taken by the undersigned attorney:

- (1) The witness is **PHILIP RAMIREZ**.
- (2) The deposition will begin at **8:30 a.m., CDT on Monday, July 13, 2026**, and continue from day to day until it is completed.
- (3) The deposition will take place at: The Law Offices of Dougla A. Allison, 403 N. Tanchua, Corpus Christi, TX 78401.
- (4) After the witness is placed under oath by a person authorized to administer oaths, he will be questioned by oral examination before a court reporter authorized by law to take depositions. The testimony will also be videotaped.

This subpoena was issued at the request of Petitioner Ajit David, whose attorney of record is Douglas A. Allison, Law Offices of Douglas Allison, 403 N. Tancagua Street, Corpus Christi, Texas 78401, Phone: 361.888.6002.

RETURN OF SERVICE OF SUBPOENA

I, _____, delivered a copy of this subpoena to PHILIP RAMIREZ who is a party to these proceedings, at _____, in Nueces County, Texas on the _____ day of July 2026, at _____ o'clock ____m., and tendered to the witness a fee of \$10 in cash.

I, _____, was unable to deliver a copy of this subpoena to PHILIP RAMIREZ who is a party to these proceedings, for the following reasons:

By: _____
Person authorized by law or written order of
trial court who has no interest in the lawsuit
and is at least 18 years old.

Sworn to and subscribed before me this _____ day of July 2026.

Notary Public for State of Texas