

PETITIONERS'
ARTICLES OF IMPEACHMENT
OF MAYOR PAULETTE GUAJARDO

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

CITY OF CORPUS CHRISTI

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

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

Whereas, City of Corpus Christi Charter states:

“Sec. 10. – Rules of the council.

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

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

“Sec. 11. – Removal.

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

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

. . .

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

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

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

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

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

ARTICLE ONE: FRAUD; AIDING & ABETTING FRAUD

- BREACH OF PUBLIC TRUST -

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

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

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

² See EXHIBIT 19 EXHIBIT 19 (portion of recorded Zaroni/David phone conversation from April 2024). Compare EXHIBIT 1 EXHIBIT 1 (collection of unaltered FEMA writings showing revised FEMA flood maps made public in 2020, 2021, and April 13, 2022); with EXHIBIT 2 EXHIBIT 2 (altered/forged slide (slide 2) created by Philip Ramirez in December 2023); see also EXHIBIT 3 EXHIBIT 3 (QOF Application falsely claiming unexpected, new FEMA requirements give rise to request for money), EXHIBIT 4 EXHIBIT 4 (QOF’s Type B Corporation presentation falsely suggesting 3-year old FEMA revised flood maps were ‘new,’ ‘not anticipated,’ ‘threw us for a bit of a loop,’ and were ‘new FEMA requirements’ (false narrative), with use of altered/forged federal FEMA presentation slide to support the false narrative COCC000514); EXHIBIT 5 EXHIBIT 5 (City Council presentation on 2/20/24 falsely suggesting 3-year old FEMA revised flood maps were recently changed (false narrative), with use of altered/forged federal FEMA presentation slide to support the false narrative COCC000525, 50:20-1:08:52). EXHIBIT 6 EXHIBIT 6 (Heather Hulbert deposition testimony: facts of case meet Texas Penal Code definition of forgery; EXHIBIT 7 EXHIBIT 7 (Peter Zaroni deposition testimony: agrees facts of case meet Texas Penal Code definition of forgery); EXHIBIT 8 EXHIBIT 8 (Philip Ramirez deposition testimony refusing to respond to Hulbert/Zaroni sworn testimony that alteration of FEMA screenshot constituted the offense of forgery as defined in the Texas Penal Code definition. EXHIBIT 9 EXHIBIT 9 (Philip Ramirez deposition testimony: confirming his alteration of federal document was regarded by City staff as the commission of a crime (in April 2024); EXHIBIT 10 EXHIBIT 10 (Deven text to Heather Hulbert (000383) acknowledging alteration of federal document immediately treated as “crime” by City’s staff (April 2024)). Accord EXHIBIT 29 EXHIBIT 29 (phone records produced in litigation).

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

justifiably relied upon the representation which caused a detriment (Type

B members, and City Council members (2/20/24), relied upon

Philip's/Mayor's representations to the detriment of City (\$2,000,000 of

taxpayer money paid based upon false narrative/false writing); and

- Mayor knowingly, recklessly advocated/promoted the fraud.⁴

Mayor's conduct is fraud (see evidence referenced). At a minimum, Mayor's

conduct is aiding and abetting the fraud.⁵ With corrupt motive, Mayor's

misconduct ignored and injured the interests of the City of Corpus Christi.

Mayor's involvement in advocating/promoting the fraud (aiding and abetting the

fraud) is a violation of Mayor's oath, and is Mayor's "misconduct" / "malfeasance"

/ "willful neglect" – thereby warranting impeachment pursuant to the express

language in the Charter of the City of Corpus Christi.

ARTICLE TWO: PERJURY IS "MISCONDUCT"

- BREACH OF PUBLIC TRUST -

The City Charter provides that the City Council "may impeach a member in the manner herein provided," for "[m]isconduct, malfeasance, incompetence,

⁴ EXHIBIT 28 EXHIBIT 28 (CCREDC document showing Mayor's seconding of motion to award \$2,000,000). EXHIBIT 31 EXHIBIT 31 (2/20/24 City Council meeting: Paulette Guajardo interrupting Michael Hunter multiple times to push false narrative that FEMA requirements could not have been know because FEMA requirements had change); EXHIBIT 32 EXHIBIT 32 (Mayor's explanation to City Council members that \$2,000,000 was required because of FEMA requirements). EXHIBIT 15 EXHIBIT 15 (Peter Zanoni deposition testimony).

⁵ See evidence referenced; see also Texas law definition of aiding and abetting. Compare Texas Penal Code section 7.02.

inability or willful neglect in performance of official duties.” On or about January 14, 2025, Paulette Guajardo did solemnly swear to uphold a laws of the State of Texas and integrity of the office of Mayor of City of Corpus Christi. In her conduct of the office of Mayor of the City of Corpus Christi, and in violation of her oath to faithfully discharge her duties and responsibilities as Mayor of the City of Corpus Christi, Petitioners, for themselves and for the people of the City of Corpus Christi, show Mayor Paulette Guajardo – while testifying in her official capacity as Mayor – perjured herself and thereby perjured the office of Mayor against the interest of the City of Corpus Christi and its resident taxpayers, in that:

- There was a “crime”⁶ (the word used by City Manager Peter Zanoni, as early as April 2024);
- Mayor, despite having been told of the “crime” / fraud by Peter Zanoni,⁷ Ajit David (twice in-person, and twice in writing),⁸ Miles Risley,⁹ and undoubtedly by Philip Ramirez and Deven Bhaka,¹⁰ perjured herself by

⁶ See footnote xx.

⁷ EXHIBIT 15 [EXHIBIT 15](#) (Peter Zanoni deposition testimony); EXHIBIT 70 EXHIBIT 70 (Mayor directing placement of known fraud on City’s agenda); EXHIBIT 36 [EXHIBIT 36](#) (Mayor’s plan to be executed by Leah Olivari to ‘change the narrative’ by abandoning the false narrative).

⁸ EXHIBIT 37 [EXHIBIT 37](#) (Ajit David’s public comment on 4/16/24, using QOF’s altered/forged writing to show the alteration); see also EXHIBIT 38 [EXHIBIT 38](#) (email from Ajit David to Mayor advising of altered/forged federal FEMA writing); EXHIBIT 40 [EXHIBIT 40](#) (Ajit David’s public comment on 4/23/24, using QOF’s altered/forged writing to show the alteration); EXHIBIT XX EXHIBIT XX (Ajit David email dated April 19, 2024, informing the Mayor of the altered FEMA writing).

⁹ EXHIBIT 24 [EXHIBIT 24](#) (Miles Risley’s presentation to City Council (April 16, 2024)).

¹⁰ EXHIBIT 41 [EXHIBIT 41](#) (Philip Ramirez deposition testimony: confirms Philip told Mayor of alteration of federal FEMA writing); EXHIBIT 29 [EXHIBIT 29](#) (phone records produced in litigation).

denying knowledge of the fraud/wrongful conduct¹¹ -- thereby impugning her own integrity and the integrity of the office of Mayor.

Mayor's comments from the diocese *as Mayor* are lies to the public, and thus a breach of the public trust. Mayor's testimony under oath is perjury, and thus breach of the public trust. Both are "misconduct" and "malfeasance;" and "willful neglect" (at a minimum) of Mayor's oath, and the integrity of the office of Mayor. With corrupt motive, Mayor's misconduct and bad acts (malfeasance) ignored and injured the interests of the City of Corpus Christi – thereby warranting impeachment pursuant to the express language in the Charter of the City of Corpus Christi.

ARTICLE THREE: BREACH OF CONFIDENTIALITY IS "MALFEASANCE"

- BREACH OF PUBLIC TRUST -

The City Charter provides that the City Council "may impeach a member in the manner herein provided," for "[m]isconduct, malfeasance, incompetence, inability or willful neglect in performance of official duties." On or about January 14, 2025, Paulette Guajardo did solemnly swear to uphold a laws of the State of

¹¹ EXHIBIT 44 EXHIBIT 44 (Paulette Guajardo (9/9/25) denies all knowledge of the crime/fraud: (" . . . and to this date, no one, no expert has said . . . that the document was a fraud or whatever term they're using . . . no one has . . . I was never told the document was not legal, and I'm not an attorney"); EXHIBIT 39 EXHIBIT 39 (Paulette Guajardo (9/9/25) further denies knowledge of the crime/fraud: ("again, no one has said any document was fraud"); and EXHIBIT 45 EXHIBIT 45 (Paulette Guajardo sworn deposition testimony: Paulette Guajardo denies knowing of the altered/forged federal FEMA document (during relevant time frame), and then cleverly 'winks' at her attorney so proud of the lie being told).

Texas and integrity of the office of Mayor of City of Corpus Christi. Paulette Guajardo did execute a pledge/ promise to keep confidential internal dealings of the Corpus Christi Regional Economic Development Corporation (“CCREDC”). In her conduct of the office of Mayor of the City of Corpus Christi, and in violation of her oath to faithfully discharge her duties and responsibilities as Mayor of the City of Corpus Christi and her pledge/promise of confidentiality to CCREDC, Petitioners, for themselves and for the people of the City of Corpus Christi, show Mayor Paulette Guajardo violated her oath and pledge/promise, in that:

- CCREDC held a confidential meeting to discuss Elevate QOF LLC project’s request for an incentive award to ‘pay for unanticipated costs arising from recent FEMA Flood Map changes’ (the false narrative);¹² yet
- Mayor breached confidentiality by: (1) revealing details of CCREDC’s internal processes by texting Elevate QOF LLC (Deven) while the CCREDC meeting was in-progress;¹³ and (2) further disclosing details of CCREDC’s internal processes by phone call(s) with Elevate QOF LLC (Deven) immediately after the CCREDC confidential meeting.¹⁴

¹² EXHIBIT 28 EXHIBIT 28 (CCREDC document showing Mayor’s seconding of motion to award \$2,000,000).

¹³ Compare EXHIBIT 28 EXHIBIT 28 (CCREDC document showing Mayor’s seconding of motion to award \$2,000,000), with EXHIBIT 13 EXHIBIT 13 (text exchange between Mayor Paulette Guajardo and Deven Bhakta: noting Mayor looking out for QOF during CCREDC confidential meeting) and EXHIBIT 29 EXHIBIT 29 (phone records produced in litigation).

¹⁴ EXHIBIT 29 EXHIBIT 29 (phone records produced in litigation).

CCREDC manages millions of dollars of taxpayer money. Mayor's pledge/ promise of confidentiality is for the purpose of maintaining the integrity of CCREDC process; that it, to protect against the public's skepticism of insider trading in favor of elected officials' (Mayor's) friends. Mayor's breach of confidentiality is a breach of public trust, and properly regarded as "misconduct" and "malfeasance" on the part of Mayor; and "willful neglect" (at a minimum) of Mayor's oath and pledge/promise of confidentiality made to the CCREDC. With corrupt motive to steer \$2,000,000.00 to her (Mayor's) friends,¹⁵ Mayor's misconduct and bad acts (malfeasance) ignored and injured the interests of the City of Corpus Christi – thereby warranting impeachment pursuant to the express language in the Charter of the City of Corpus Christi.

ARTICLE FOUR: DELETION OF PUBLIC INFORMATION IS "MISCONDUCT"

- BREACH OF PUBLIC TRUST -

The City Charter provides that the City Council "may impeach a member in the manner herein provided," for "[m]isconduct, malfeasance, incompetence, inability or willful neglect in performance of official duties." On or about January 14, 2025, Paulette Guajardo did solemnly swear to uphold a laws of the State of Texas and integrity of the office of Mayor of City of Corpus Christi. In her

¹⁵ EXHIBIT 11 EXHIBIT 11 (Paulette Guajardo's deposition testimony: Philip Ramirez and Deven Bhakta are Mayor's "friends"); EXHIBIT 12 EXHIBIT 12 (campaign finance reports show Bhakta (including family) as Mayor's campaign donors/contributors).

conduct of the office of Mayor of the City of Corpus Christi, and in violation of her oath to faithfully discharge her duties and responsibilities as Mayor of the City of Corpus Christi, Petitioners, for themselves and for the people of the City of Corpus Christi, show Mayor Paulette Guajardo violated her oath, in that:

- City's February 20, 2025, agenda packet relating to the Elevate QOF LLC project included: (1) "Agenda Memo" advocating for the award of \$2,000,000.00 to Elevate QOF LLC to pay for alleged 'increased costs arising because of unanticipated, recent FEMA Flood Map changes' (the false narrative); (2) "Ordinance 24-0256 (version 1)" showing \$2,000,000.00 was to pay for alleged 'increased costs arising because of unanticipated, recent FEMA Flood Map changes' (the false narrative); (3) "FEMA Flood Map" (to support the false narrative); (4) "Exhibit A" detailing the alleged, increased FEMA costs; and (5) the Presentation containing the altered, fraudulent FEMA slide (to support the false narrative).¹⁶
- Mayor directed City employees to:

¹⁶ EXHIBIT 48 EXHIBIT 48 (COCC001299 – Legistar Audit Logs (Tab 3; line 30)); EXHIBIT 49 EXHIBIT 49 (Ordinance, version 1); EXHIBIT 48 EXHIBIT 48 (COCC001299 – Legistar Audit Logs (Tab 3; line 60)); EXHIBIT 56 EXHIBIT 56 (FEMA Flood Maps); EXHIBIT 48 EXHIBIT 48 (COCC001299 – Legistar Audit Logs (Tab 3; line 185)); EXHIBIT 54 EXHIBIT 54 (proposed QOF Agreement, Exhibit A); EXHIBIT 48 EXHIBIT 48 (COCC001299 – Legistar Audit Logs (Tab 3; line 186)); EXHIBIT 58 EXHIBIT 58 (Presentation slides (1st Reading) before City Council); EXHIBIT 48 EXHIBIT 48 (COCC001299 – Legistar Audit Logs (Tab 3; line 184)); EXHIBIT 68 EXHIBIT 68 Agenda Packet City Council – 2/20/24); EXHIBIT 48 EXHIBIT 48 (COCC001299 – Legistar Audit Logs (Tab 3; line nos. 60, 203, 186, 185, and 184)).

- a) delete the Agenda Memo;¹⁷
- b) delete Ordinance 24-0256 (version 1);¹⁸
- c) delete FEMA Flood Maps;¹⁹
- d) delete Exhibit A;²⁰ and
- e) delete the altered, fraudulent Presentation.²¹

If a person were to go to City's website right now, and review all matters relating to Ordinance 24-0256, the person would still find the public record has been altered; that is, the documents attached to this City agenda item TODAY are not the same documents provided as public information while City Council was considering the matter on February 20, 2024. The deletions of public information cover-up the "crime"/fraud. Texas Government Code ("TGC"), section 552.002, informs us that "'public information' means information that is written, produced, collected, assembled, or maintained . . . in connection with the transaction of official business . . . for a governmental body. TGC 552.203 makes clear "[e]ach officer for public information, subject to penalties provided in this chapter, shall: . .

¹⁷ EXHIBIT 48 EXHIBIT 48 (COCC001299 – Legistar Audit Logs (Tab 3; line 41)); EXHIBIT 53 EXHIBIT 53 (Hulbert email instructing removal of public information: CCOC001219).

¹⁸ EXHIBIT 48 EXHIBIT 48 (COCC001299 – Legistar Audit Logs (Tab 3; line 30)); EXHIBIT 50 EXHIBIT 50 (Hulbert email forwarding new Ordinance: CCOC001236). Compare EXHIBIT 51 EXHIBIT 51.

¹⁹ EXHIBIT 48 EXHIBIT 48 (COCC001299 – Legistar Audit Logs (Tab 3; line 43)); EXHIBIT 57 EXHIBIT 57 (Hulbert email instructing removal of public information (flood maps): COCC001215).

²⁰ EXHIBIT 48 EXHIBIT 48 (COCC001299 – Legistar Audit Logs (Tab 3; line 31)). Compare EXHIBIT 55 EXHIBIT 55 (COCC000944 (4/22/24)).

²¹ EXHIBIT 48 EXHIBIT 48 (COCC001299 – Legistar Audit Logs (Tab 3; line 42)); EXHIBIT 57 EXHIBIT 57 (Hulbert email instructing removal of public information (presentation): COCC001215).

. (2) carefully protect public information from deterioration, alteration, mutilation, loss, or unlawful removal. TGC 552.351 states: “A person commits an offense if the person willfully destroys, mutilates, removes without permission as provided by this chapter, or alters public information.” The evidence proves the City of Corpus Christi, pursuant to Mayor’s leadership, ‘removed’ public information from the City’s website to cover-up the “crime”²²/fraud – and the “cover-up” is further criminal offense pursuant to Texas Government Code 552.351. This is yet another example of Mayor’s breach of public trust, and properly regarded as “misconduct” and “malfeasance” on the part of Mayor; and “willful neglect” (at a minimum) of Mayor’s oath and obligation as highest ranking City official to maintain the integrity of public information. With corrupt motive to steer \$2,000,000.00 to her (Mayor’s) friends,²³ Mayor’s misconduct and bad acts (malfeasance) ignored and injured the interests of the City of Corpus Christi – thereby warranting impeachment pursuant to the express language in the Charter of the City of Corpus Christi.

In all of this, Mayor Paulette Guajardo has acted in such manner contrary to the trust as Mayor owed to the City of Corpus Christi and people of the City of

²² Compare references in footnote 1; with references in footnote 59.

²³ EXHIBIT 11 EXHIBIT 11 (Paulette Guajardo’s deposition testimony: Philip Ramirez and Deven Bhakta are Mayor’s “friends”); EXHIBIT 12 EXHIBIT 12 (campaign finance reports show Bhakta (including family) as Mayor’s campaign donors/contributors).

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

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

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

(signatures on pages to follow)

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

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

Rachel Caballero

Print Name: Rachel Caballero

Registered Voter DOB: [REDACTED]

Robin Cox

Print Name: Robin Cox

Registered Voter DOB: [REDACTED]

Trevor Slowik

Print Name: Trevor Slowik

Registered Voter DOB: [REDACTED]

Laramie Fain

Print Name: LARAMIE FAIN

Registered Voter DOB: [REDACTED]

Jake Hernandez

Print Name: Jake Hernandez

Registered Voter DOB: [REDACTED]

[illegible]

Mark Muck

Print name: Mark Muenster

Print name: _____

Print name: _____

Print name: _____

Print name: _____

Print Name: _____

Print Name: _____

Print Name: _____

Print Name: _____

Print Name: _____

Print Name: _____