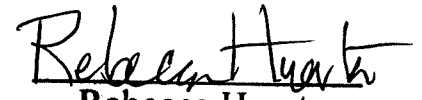


Date Filed 5-26-26

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);
- EXHIBIT 16: is City of Corpus Christi – Type B Corporation, Executive Session Term Sheet
- 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 Zandoni ("Red Flags" – March 7, 2024);
- EXHIBIT 33: is text from Ajit David to Peter Zandoni (attached Weslaco article);
- EXHIBIT 34: is audio recording of conversation between Ajit David and Peter Zandoni;
- 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 24, 2024);
- 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

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