

Record of Filings
Removal of Mayor Paulette Guajardo

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request through the City Secretary's Office

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AUG 29 2025

CITY SECRETARY'S OFFICE

REGISTERED VOTERS' PETITION TO REMOVE MAYOR PAULETTE GUAJARDO

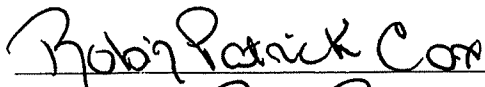
1. The undersigned registered voters file this Petition to remove Paulette Guajardo from serving as mayor for the City of Corpus Christi.
2. According to City of Corpus Christi's Code of Ordinances, Article II, City Council, Section 11(a), the mayor "shall be subject to removal by the council . . . for:"
 - (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;

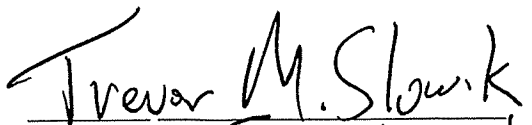
- Paulette Guajardo, prior to the 4/23/24 reading of the ordinance to approve the \$2,000,000.00 award to her campaign contributor, was told by Peter Zanoni that the FEMA/federal document had been altered;
- Paulette Guajardo, prior to the 4/23/24 reading of the ordinance to approve the \$2,000,000.00 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.

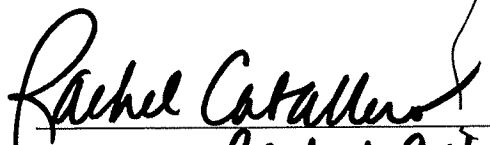
To be clear, the \$2,000,000.00 award is to Elevate QOF LLC, owned in part by Philip Ramirez and Deven Bhakta – both campaign contributors for Paulette Guajardo.

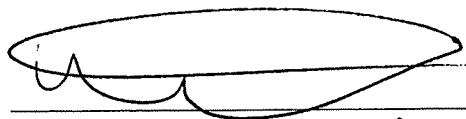
These facts and other information show that Paulette Guajardo is not fit for public service. We, the residents, voters, and taxpayers of the City of Corpus Christi, believe the facts clearly show that Paulette Guajardo pushed for approvals so that her friend / campaign contributor, by use of an altered 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 FAIN
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: _____

**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.

VII. Record

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

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 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.

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.
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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.
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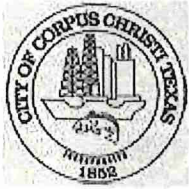
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Following the presentation of evidence and the arguments of the parties, the Council may deliberate in public or in closed session. The Council shall adopt findings of fact regarding the charges presented by Petitioners. An affirmative vote of a majority 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.



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.

R Huerta
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

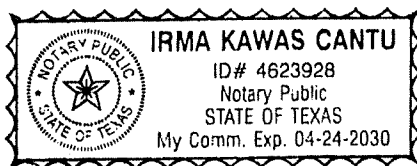
STATE OF TEXAS

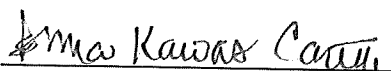
COUNTY OF NUECES

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

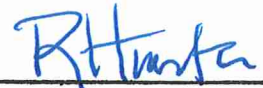
I hereby certify that on May 5, 2026, I electronically filed the foregoing document with the City Secretary via email.

/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**
Elevate 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 Tunches**
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. Tancagua St.
Corpus Christi, Texas 78401
T: 361/888-6002
Email: doug@dallisonlaw.com

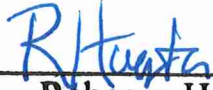
**ATTORNEY FOR PETITIONER
AJIT DAVID**

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

**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
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State Bar No. 01083500
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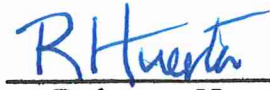
**ATTORNEY FOR PETITIONER
AJIT DAVID**

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
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Corpus Christi, Texas 78401
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**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
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(361) 654-8879 Fax
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Kate David
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Kate.David@huschblackwell.com
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Fax (713) 223-8879

**ATTORNEYS FOR
PAULETTE M. GUAJARDO**

CERTIFICATE OF SERVICE

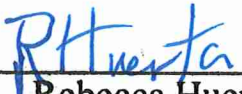
I hereby certify that on May 14, 2026, the foregoing document was emailed to the City Secretary.

/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
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(361) 654-8879 Fax
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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

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


Rebecca Huerta
City Secretary

PETITIONERS' AMENDED 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. Petitioners' Amended Exhibit List identifies Exhibit nos. 1 - 68 (subject to the adding of exhibits as may be permitted in advance of or during the hearing/trial). 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' Amended Exhibit List.
3. Attached please find the Affidavit of Douglas Allison supporting admission of these exhibits as evidence in this matter (Exhibit nos. 1 – 68, as listed on the Petitioners' Amended 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 – 68 identified on Petitioners’ Amended 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

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Email: doug@dallisonlaw.com

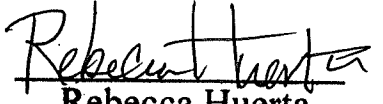
ATTORNEY FOR PETITIONERS

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 21st day of July 2026.

/s/ Douglas A. Allison

DOUGLAS A. ALLISON


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

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Email: doug@dallisonlaw.com

**ATTORNEY FOR PETITIONER
AJIT DAVID**

CERTIFICATE OF SERVICE

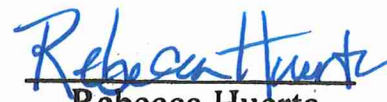
I hereby certify that a true and correct copy of the foregoing was electronically sent to all counsel of record via e-mail with City Secretary, Rebecca Huerta, on this the 26th day of May 2026.

/s/ Douglas A. Allison

DOUGLAS A. ALLISON

Date Filed 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

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**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.

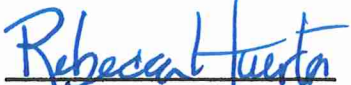
/s/ Douglas A. Allison

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);
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- Exhibit 12 is CCREDC BOD Meeting (meeting minutes dated October 12, 2023);
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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;
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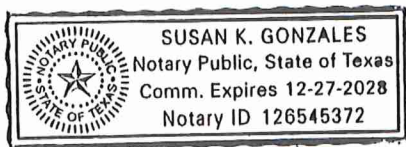
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- Exhibit 43 is City's published organization chart;
- Exhibit 44 is collection of Mayor's text messages;
- Exhibit 45 is collection of cellular phone invoices evidencing calls to/from Mayor.

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 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

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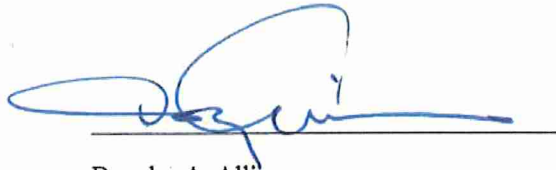
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Submitted for admission of same into evidence in this matter.

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- 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

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 13th day of July 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

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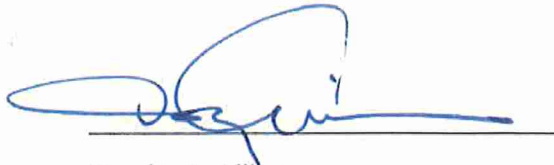
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- PETS EXHIBIT 50: Agreement Contract C2024-081
- PETS EXHIBIT 51: 2024.02.20 Agenda Packet City of Corpus Christi Council Meeting
- PETS EXHIBIT 52: 2024.02.20 Agenda Packet and Elevate QOF Item
- PETS EXHIBIT 53: 2024.02.27 City Council Meeting Agenda Packet
- PETS EXHIBIT 54: 2024.04.23 City Council Meeting Agenda Packet
- PETS EXHIBIT 55: 2024.04.23 City Council Agenda Item Approving 2nd Reading
- PETS EXHIBIT 56-1: 2024.01.25 RE Elevated QOF LLC Agreement Email
- PETS EXHIBIT 56-2: 2024.02.02 RE Homewood Suite Executed Agreement Email
- PETS EXHIBIT 56-3: 2024.02.05 RE Homewood Suite Executed Agreement Email
- PETS EXHIBIT 56-4: 2024.02.05 RE Homewood Suite Executed Agreement
- PETS EXHIBIT 56-5: 2024.02.12 Approval Tracking - Individual Review Request
- PETS EXHIBIT 57: 2024.04.15 is Clip of Audio Recording of Peter Zanoni and Ajit David Telephone Conversation
- PETS EXHIBIT 58: 2024.04.15 Transcription of Telephone Call between Peter Zanoni and Ajit David

- PETS EXHIBIT 59: 2026.02.17 City of Corpus Christi Council Meeting Video Clip of Presentation
- PETS EXHIBIT 60: 2026.02.17 City of Corpus Christi Council Meeting Video Clip of CCPD Presentation
- PETS EXHIBIT 61: 2025.09.09 Mayor Paulette Guajardo's Statement of Fact at City Council Meeting
- PETS EXHIBIT 62: 2025.09.09 Mayor Paulette Guajardo's Statement of Fact at City Council Meeting 2
- PETS EXHIBIT 63: ELEVATE000394 – Text Message with Peter Zanon
- PETS EXHIBIT 64: ELEVATE000372 – Text Message with Mayor Paulette Guajardo
- PETS EXHIBIT 65: ELEVATE000383 – Text Message with Heather Hurlbert
- PETS EXHIBIT 66: ELEVATE000416-000417: 2024.03.15 Email Exchange between Heather Hurlbert and Philip Ramirez
- PETS EXHIBIT 67: 2025.08.06 Video Clip of Deposition of Mayor Paulette Guahardo
- PETS EXHIBIT 68: Spreadsheet of Philip Ramirez Phone Logs (ELEVATE 000001-000150) and Deven Bhakta Phone Logs



Douglas A. Allison

LAW OFFICES OF DOUGLAS A.
ALLISON

State Bar No. 01083500

403 N. Tancagua St.

Corpus Christi, Texas 78401

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Email: doug@dallisonlaw.com

**ATTORNEY FOR PETITIONER
AJIT DAVID**

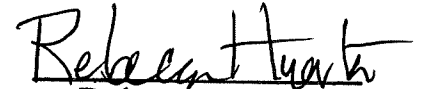
CERTIFICATE OF SERVICE

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 21st day of July 2026.

/s/ Douglas A. Allison
DOUGLAS A. ALLISON

Date Filed 5.26.26

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


Rebecca Huerta
City Secretary

PETITIONERS' EXHIBIT LIST

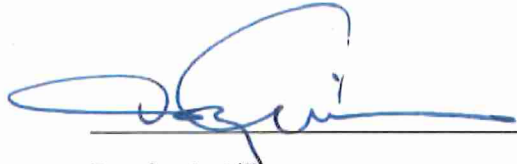
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**ATTORNEY FOR PETITIONER
AJIT DAVID**

CERTIFICATE OF SERVICE

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/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.

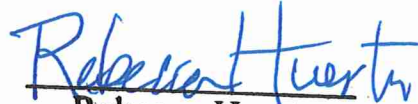


Signature of Council Member

05/27/2025

Date

Date Filed 5.20.26

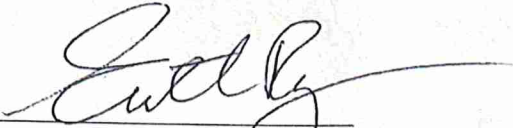


Rebecca Huerta
City Secretary

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
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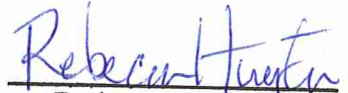


Signature of Council Member

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

(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

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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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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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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

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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Ben.Stephens@huschblackwell.com

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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

Respectfully submitted,

/s/ John Flood

John Flood

Texas Bar No. 07155910

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Of Counsel:

Stephen Dockery

Texas Bar No. 24120265

stephen@floodandflood.com

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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 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

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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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Flood & Flood

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Ben.Stephens@huschblackwell.com

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600 Travis, Suite 2350

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 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

Flood & Flood

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Houston, TX 77002

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Ben.Stephens@huschblackwell.com

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600 Travis, Suite 2350

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

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, TX 77002

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Texas Bar No. 24098472

Ben.Stephens@huschblackwell.com

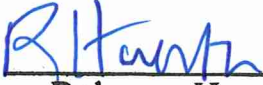
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600 Travis, Suite 2350

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.

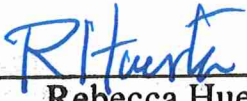
I, _____, was unable to deliver a copy of this subpoena to PAULETTE GUAJARDO who is a party to these proceedings, for the following reasons:

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. 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 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

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,

Date Filed 7-20-26

RESPONDENT GUAJARDO'S MOTION TO ADMIT EXHIBITS


Rebecca Huerta
City Secretary

NOW COMES respondent, and makes and files this her Motion to Admit Exhibits, and in support would show:

1. City's June 2, 2026, Amended Rule of Procedure VI. allows 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 Respondent's Exhibit List identifying Exhibit nos. 1 - 47. Subject to delivery of the exhibits to the City Secretary via an encrypted EFSS link and/or hardcopy for review/confirmation, Respondent requests that these exhibits be marked/identified by City Secretary in such manner as corresponds with the numeric designations on Respondent's Exhibit List.
3. Attached please find the Affidavit of John Flood supporting admission of these exhibits as evidence in this matter (Exhibit nos. 1 – 47, as listed on the Respondent's Exhibit List). Whereas City's Amended Rule of Procedure IV. C., confirms 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," Subject to her objections to this proceeding, including but not limited to, her objection to conflicted, material fact witnesses serving on the tribunal, Respondent requests that Exhibit nos. 1 – 47 identified on Respondent's Exhibit List and supported by

Affidavit of John Flood be admitted as evidence for consideration in this matter.

/s/ John Flood

John Flood
John T. Flood, LLP
819 N. Upper Broadway
Corpus Christi, Texas 78401
(361) 654-8877
(361) 654-8879 Fax
john@floodtriallawyers.com
Irma@floodtriallawyers.com

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 19th day of July, 2026.

/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,

AFFIDAVIT OF JOHN FLOOD

Upon his oath, John Flood - having been sworn by a person qualified to administer an oath in the State of Texas - testifies as follows:

My name is John Flood. 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.

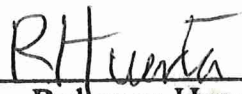
I am retained legal counsel for Mayor Paulette Guajardo, the respondent. I have been a licensed attorney in the State of Texas since 1990, and I remain in good standing with the Texas bar.

I have reviewed Respondent's Exhibit Nos. 1 - 47 referenced in the document attached to this affidavit (Exhibit A). I have reviewed these documents many times in a separate proceeding, and in conjunction with this proceeding. I have also reviewed other documents and emails in support of these same exhibits.

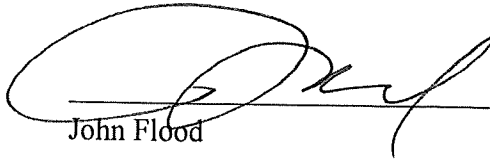
Each of the exhibits (Exhibit Nos. 1 - 47 listed on Exhibit A) are true copies of what each purports to be, or, each is the record it purports to be. Specifically, I hereby affirm that each of the following exhibits are true, correct, and authentic as described below. Further, I hereby affirm that each 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.

Affiant further sayeth naught.

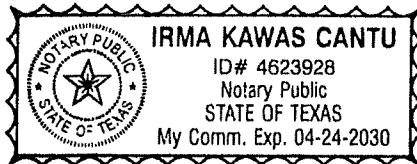
Date Filed 7-20-26



Rebecca Huerta
City Secretary


John Flood

SWORN TO AND SUBSCRIBED before me on the 19th day of July, 2026.




Notary Public in and for the State of Texas

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,

RESPONDENT MAYOR GUAJARDO'S EXHIBIT LIST

Exhibit 1 is the audio and video recording of the December 11, 2023, City of Corpus Christi's Type A B Corporations Board Meeting. The recording is available to the public from the City of Corpus Christi's website and it was downloaded therefrom. The video depicts an executive session that ends at approximately the 1:07:30 time stamp mark and the relevant public hearing on Item 5, the Elevate QOF application starts at such point and ends at the 1:39:30 time stamp mark.

Exhibit 2 is a transcript of Exhibit 1's audio recording from approximately the 1:07:30 time stamp through approximately the 1:39:30 time stamp. The initial speech-to-text was generated through YouTube's automated caption and transcript function and copied from the YouTube transcript accompanying the video. The raw YouTube transcript text was then provided to an AI model. Such model was used to isolate the relevant portion of the meeting, organize and format the text as a speaker-by-speaker transcript, identify and label speakers based on the meeting roll call and context, insert or retain approximate video time stamps, and lightly correct obvious automated-captioning errors involving names, punctuation, repeated false starts, and other speech-recognition errors for readability without intending to alter the substance of the statements. When a speaker could not be identified with confidence, the identification was expressly marked as uncertain. The AI model worked from the YouTube-generated transcript text and did not independently generate the initial speech-to-text from the audio. This is not a certified transcript and is imperfect, but a comparison of it to the audio recording proves it is reliable and helpful and has been relied upon by respondents' counsel as a reliable resource.

Exhibit 3 is the audio and video recording of the January 22, 2024, Meeting of the City of Corpus Christi's Type B Corporation's Board Meeting. The recording is available to the public from the City of Corpus Christi's website and it was downloaded therefrom. The video depicts the entire meeting; however, the relevant public hearing on Elevate QOF incentive agreement starts at the 6:47 time stamp mark and ends at the 10:36 time stamp mark.

Exhibit 4 is a transcript of the January 22, 2024, Type B portion of Exhibit 3's audio recording, beginning at approximately the 0:00 time stamp and ending when the Type B meeting adjourns at approximately the 11:03 time stamp. The relevant discussion concerning the Elevate QOF incentive agreement begins at approximately the 6:38 time

stamp, with the key exchange occurring from approximately the 9:09 time stamp through approximately the 9:39 time stamp. The initial speech-to-text was generated through YouTube's automated caption and transcript function and copied from the YouTube transcript accompanying the video. The raw YouTube transcript text was then provided to an AI model. Such model was used to isolate the relevant portion of the meeting, organize and format the text as a speaker-by-speaker transcript, identify and label speakers based on the meeting roll call and context, insert or retain approximate video time stamps, and lightly correct obvious automated-captioning errors involving names, punctuation, repeated false starts, and other speech-recognition errors for readability without intending to alter the substance of the statements. When a speaker could not be identified with confidence, the identification was expressly marked as uncertain. The AI model worked from the YouTube-generated transcript text and did not independently generate the initial speech-to-text from the audio. This is not a certified transcript and is imperfect, but a comparison of it to the audio recording proves it is reliable and helpful and has been relied upon by respondents' counsel as a reliable resource.

Exhibit 5 is the February 20, 2024, City of Corpus Christi City Council Meeting Agenda – Final – revised for February 20, 2024.

Exhibit 6 is the audio and video recording of the February 20, 2024, council meeting on Item 12. The recording of the entire council meeting is available to the public from the City of Corpus Christi's website and it was downloaded therefrom. Exhibit 6 is the relevant public hearing on Elevate QOF incentive agreement.

Exhibit 7 is a transcript of Exhibit 6's relevant audio recording concerning Item 12. The initial speech-to-text was generated through YouTube's automated caption and transcript function and copied from the YouTube transcript accompanying the video. The raw YouTube transcript text was then provided to an AI model. Such model was used to isolate the relevant portion of the meeting, organize and format the text as a speaker-by-speaker transcript, identify and label speakers based on the meeting roll call and context, and lightly correct obvious automated-captioning errors involving names, punctuation, repeated false starts, and other speech-recognition errors for readability without intending to alter the substance of the statements. When a speaker could not be identified with confidence, the identification was expressly marked as uncertain. The AI model worked from the YouTube-generated transcript text and did not independently generate the initial speech-to-text from the audio. This is not a certified transcript and is imperfect, but a comparison of it to the audio recording proves it is reliable and helpful and has been relied upon by respondents' counsel as a reliable resource.

Exhibit 8 is the audio and video recording of the April 23, 2024, council meeting on Item 7. The recording of the entire council meeting is available to the public from the City of Corpus Christi's website and it was downloaded therefrom. Exhibit 8 is the relevant public hearing on Elevate QOF incentive agreement.

Exhibit 9 is a transcript of Exhibit 8's relevant audio recording concerning Item 7. The initial speech-to-text was generated through YouTube's automated caption and transcript function and copied from the YouTube transcript accompanying the video. The raw YouTube transcript text was then provided to an AI model. Such model was used to isolate the relevant portion of the meeting, organize and format the text as a speaker-by-speaker transcript, identify and label speakers based on the meeting roll call and context, insert or retain approximate video time stamps, and lightly correct obvious automated-captioning errors involving names, punctuation, repeated false starts, and other speech-recognition errors for readability without intending to alter the substance of the statements. When a speaker could not be identified with confidence, the identification was expressly marked as uncertain. The AI model worked from the YouTube-generated transcript text and did not independently generate the initial speech-to-text from the audio. This is not a certified transcript and is imperfect, but a comparison of it to the audio recording proves it is reliable and helpful and has been relied upon by respondents' counsel as a reliable resource.

Exhibit 10 is the April 23, 2024, City Council Meeting Agenda – Final.

Exhibit 11 is the March 11, 2024, Agenda Memorandum from Heather Hurlbert and Mike Culbertson to City Manager Peter Zanon.

Exhibit 12 is the January 18, 2014, Business Incentive Agreement between the Type B Corporation and Elevate QOF, LLC, signed by Elevate.

Exhibit 13 is an August 27, 2025, email from Stephanie Box to Rebecca Huerta regarding Rachel Caballero's request for petition for removal from office.

Exhibit 14 is the August 29, 2025, Memorandum from City Secretary Rebecca Huerta to the Mayor and City Council regarding the Petition for Removal Action against Mayor Paulette Guajardo, with attached Petition for Removal Action signed by Rachel Caballero, Robin Patrick Cox, Mark Muenster, Trevor M. Slowik, William Alan Rickertson, and Laramie Fain.

Exhibit 15 is Plaintiff Ajit David's Original Petition for Declaratory Judgment, filed September 30, 2024, in Cause No. 2024CCV-61174-3, seeking a declaration that City Ordinance 24-0256 is void.

Exhibit 16 is Plaintiff Ajit David's Supplemental Petition for Declaratory Judgment and Application for Temporary Restraining Order and Temporary Injunction, filed in Cause No. 2024CCV-61174-3 on November 26, 2024, that added Mayor Paulette Guajardo as a defendant.

Exhibit 17 is Plaintiff Ajit David's First Amended Petition and Third Amended Petition for Declaratory Judgment, filed in Cause No. 2024CCV-61174-3 on November 22, 2025.

Exhibit 18 is the redacted Petitioners' Articles of Impeachment of Mayor Paulette Guajardo, dated March 13, 2026.

Exhibit 19 is a March 1, 2024, email from Type B Board President Leah Pagan Olivarri to Assistant City Manager Heather Hurlbert regarding the downtown hotel project. In the email, Olivarri states that she did not understand why the ordinance caption and news coverage referred to FEMA requirements and recalls that the Type B Board supported the project as a catalyst for downtown activity and street-level retail, rather than as FEMA or freeboard gap funding.

Exhibit 20 is an April 4, 2024, email from Heather Hurlbert to Leah Pagan Olivarri attaching an updated March 11, 2024, City Council Agenda Memorandum for the Homewood Suites ordinance. Hurlbert states that she incorporated the matters discussed with Olivarri and that the revised caption reflects wording previously provided by Olivarri.

Exhibit 21 is a March 29, 2024, email from Heather Hurlbert to CCREDC Compliance Officer Randy Almaguer, with Bonnie McLaughlin copied, attaching a draft March 11, 2024, City Council Agenda Memorandum for the Homewood Suites ordinance and requesting Almaguer's review.

Exhibit 22 is the January 6, 2026, Corpus Christi Police Department's "Project Elevate" investigation file concerning allegations related to the Homewood Suites Type B incentive. The file includes incident and investigation reports, investigative notes, reviews of witness and deposition testimony, and supporting materials gathered during the investigation.

Exhibit 23 is an August 21, 2025, memorandum from City Auditor George Holland to the Mayor and City Council entitled "Homewood Suites Allegation and Closed Internal Investigation." The memorandum summarizes an allegation received by the City Auditor's Office concerning the FEMA screenshot, states the Office's findings, closes the internal investigation, and refers the matter to the City Council for review and consideration of an external investigation.

Exhibit 24 is the April 23, 2024, City of Corpus Christi Legistar agenda packet and attachments, City Council meeting concerning Item 7, File No. 24-0256. The packet includes the revised agenda memorandum, proposed ordinance, business incentive agreement, presentations, cost information, FEMA-related materials, and other supporting documents concerning the Homewood Suites incentive.

Exhibit 25 is Defendant City of Corpus Christi's Second Amended Plea to the Jurisdiction, filed November 17, 2025, in Cause No. 2024CCV-61174-3. The pleading and its exhibits request dismissal of Plaintiff Ajit David's claims for lack of subject-matter jurisdiction and address the two City Council readings of Ordinance 24-0256 and the Homewood Suites incentive.

Exhibit 26 is a compilation of two excerpts from the City of Corpus Christi's publicly available audio and video recording of the April 23, 2024, City Council meeting concerning Item 7 and the Elevate QOF incentive agreement. The excerpts depict Council Member Sylvia Campos explaining that her concerns involved, among other things, the manner in which the project was presented to the City Council. The two nonconsecutive excerpts were extracted from the meeting recording and combined into a single video file, with an approximately two-second pause between them to make clear that they are separate excerpts.

Exhibit 27 is attorney Daniel Ray's Executive Summary entitled "Homewood Suites Type B Incentive - Procedural and Fraud Review." The summary presents the principal findings of an independent legal review concerning alleged fraud or forgery, compliance with the City Charter's two-reading requirement, the economic-development basis for the incentive, alleged Open Meetings Act violations, available corrective options, and proposed governance reforms.

Exhibit 28 is a July 13, 2026, letter from attorney Brian Miller to attorney John Flood stating that Miller represents Peter Zanoni and Miles Risley regarding their potential appearance as witnesses at the mayor-removal hearing and that Zanoni and Risley would not agree to requested depositions because the procedural rules for the hearing do not authorize depositions.

Exhibit 29 is a Frequently Asked Questions document prepared by the City Attorney's office concerning the Homewood Suites incentive. The document addresses the allegedly altered slide, the City's basis for approving the Type B incentive, the relevance of the FEMA flood-map dates, and whether any law-enforcement agency determined that prosecutable fraud or forgery occurred.

Exhibit 30 is a September 19, 2025, email from City Attorney Miles Risley to Mayor Paulette Guajardo, with City Manager Peter Zanoni copied, concerning the Homewood Suites incentive. Risley states that he and Zanoni informed the entire City Council during an April 16, 2024, executive session regarding allegations that documents in the developer's application are alleged to have been altered, and he attaches the presentation used during that executive session.

Exhibit 31 is Corpus Christi B Corporation Resolution No. 2026-0713-1, approved and adopted July 13, 2026. The resolution declares the business incentive agreement with Elevate QOF, LLC valid, states that all conditions precedent were met, restates the B Corporation's intent to perform the agreement, and rejects the City Council's notice of default.

Exhibit 32 is the Employment Agreement between the City of Corpus Christi and Peter D. Zanoni for his service as City Manager, executed in May 2019. The agreement addresses

Zanoni's duties and authority, compensation and benefits, term of employment, evaluation, termination, severance, and related employment conditions.

Exhibit 33 is the Transcript of January 27, 2026, Corpus Christi City Council Meeting Regarding Agenda Item No. 31 (KRIS 6 Video Recording).

Exhibit 34 is the Video Recording of January 27, 2026, Corpus Christi City Council Meeting Regarding Agenda Item No. 31 (KRIS 6 Video Recording).

Exhibit 35 is the Corpus Christi Police Department PowerPoint presentation regarding the investigation into allegations involving the Business Incentive Agreement between the Corpus Christi Type B Corporation and Elevate QOF, LLC (Homewood Suites matter), presented at the February 17, 2026, City Council meeting.

Exhibit 36 is the Conclusion of the Corpus Christi Police Department's presentation summarizing the investigative findings regarding the Homewood Suites matter.

Exhibit 37 is the Transcript of the February 17, 2026, City Council meeting-Daniel Ray Presentation and Council questions.

Exhibit 38 is the Video Recording of February 17, 2026, City Council meeting-Daniel Ray Presentation and Council questions.

Exhibit 39 is the March 11, 2026, Three Signature Memorandum Regarding Removal Petition of Mayor Paulette Guajardo, signed by Eric Cantu, Carolyn Vaughn and Gil Hernandez.

Exhibit 40 is the Transcript of March 24, 2026, Corpus Christi City Council Meeting Regarding Agenda Item No. 15-Petition for Removal Action Against Paulette Guajardo.

Exhibit 41 is the Video Recording of March 24, 2026, Corpus Christi City Council Meeting Regarding Agenda Item No. 15-Petition for Removal Action Against Paulette Guajardo.

Exhibit 42 is the March 24, 2026, City Council Action Details regarding agenda Item 15-File #260419 approving a motion to set an agenda item and date for preliminary and procedural matters regarding the removal hearing on April 14, 2026.

Exhibit 43 is the March 24, 2026, Transcript of City Council Meeting-Agenda Item #16 Discussion and possible action concerning February 20, 2024, Agenda record.

Exhibit 44 is the March 24, 2026, Video recording of the City Council Meeting-Agenda Item 16 Discussion and possible action concerning February 20, 2024, Agenda record.

Exhibit 45 is the March 24, 2026, Video clip from the Corpus Christi City Council meeting, from approximately 7:21:05 to 7:30:45, concerning Council Member Gil Hernandez's motion to restore the original February 20, 2024, agenda memorandum, presentation, Type B agreement, and exhibits, and ordinance to the City's Legistar records. The clip also includes related public comment and council discussion concerning changes made to the City's online records and the need for improved procedures and transparency.

Exhibit 46 is a March 24, 2026, Transcript excerpt of the Corpus Christi City Council meeting from approximately 7:21:05 to 7:30:45, identifying the speakers and transcribing the motion, public comments, council discussion, and vote concerning restoration of the original February 20, 2024, agenda materials in Legistar.

Exhibit 47 is the April 14, 2026, Motion to Accept Petitioners' Articles of Impeachment including City Council vote approving the motion.

Respectfully submitted,

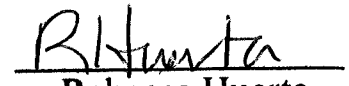
/s/ John Flood
John Flood
819 N. Upper Broadway
Corpus Christi, Texas 78401
(361) 654-8877
(361) 654-8879 Fax
john@floodtriallawyers.com
Irma@floodtriallawyers.com

**ATTORNEY FOR
PAULETTE M. GUAJARDO**

CERTIFICATE OF SERVICE

I hereby certify that on July 19, 2026, I electronically filed the foregoing document with the City Secretary via email.

/s/ John Flood
John Flood


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,

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Exhibit 2 is a transcript of Exhibit 1's audio recording from approximately the 1:07:30 time stamp through approximately the 1:39:30 time stamp. The initial speech-to-text was generated through YouTube's automated caption and transcript function and copied from the YouTube transcript accompanying the video. The raw YouTube transcript text was then provided to an AI model. Such model was used to isolate the relevant portion of the meeting, organize and format the text as a speaker-by-speaker transcript, identify and label speakers based on the meeting roll call and context, insert or retain approximate video time stamps, and lightly correct obvious automated-captioning errors involving names, punctuation, repeated false starts, and other speech-recognition errors for readability without intending to alter the substance of the statements. When a speaker could not be identified with confidence, the identification was expressly marked as uncertain. The AI model worked from the YouTube-generated transcript text and did not independently generate the initial speech-to-text from the audio. This is not a certified transcript and is imperfect, but a comparison of it to the audio recording proves it is reliable and helpful and has been relied upon by respondents' counsel as a reliable resource.

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Exhibit 4 is a transcript of the January 22, 2024, Type B portion of Exhibit 3's audio recording, beginning at approximately the 0:00 time stamp and ending when the Type B meeting adjourns at approximately the 11:03 time stamp. The relevant discussion concerning the Elevate QOF incentive agreement begins at approximately the 6:38 time

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Exhibit 5 is the February 20, 2024, City of Corpus Christi City Council Meeting Agenda – Final – revised for February 20, 2024.

Exhibit 6 is the audio and video recording of the February 20, 2024, council meeting on Item 12. The recording of the entire council meeting is available to the public from the City of Corpus Christi's website and it was downloaded therefrom. Exhibit 6 is the relevant public hearing on Elevate QOF incentive agreement.

Exhibit 7 is a transcript of Exhibit 6's relevant audio recording concerning Item 12. The initial speech-to-text was generated through YouTube's automated caption and transcript function and copied from the YouTube transcript accompanying the video. The raw YouTube transcript text was then provided to an AI model. Such model was used to isolate the relevant portion of the meeting, organize and format the text as a speaker-by-speaker transcript, identify and label speakers based on the meeting roll call and context, and lightly correct obvious automated-captioning errors involving names, punctuation, repeated false starts, and other speech-recognition errors for readability without intending to alter the substance of the statements. When a speaker could not be identified with confidence, the identification was expressly marked as uncertain. The AI model worked from the YouTube-generated transcript text and did not independently generate the initial speech-to-text from the audio. This is not a certified transcript and is imperfect, but a comparison of it to the audio recording proves it is reliable and helpful and has been relied upon by respondents' counsel as a reliable resource.

Exhibit 8 is the audio and video recording of the April 23, 2024, council meeting on Item 7. The recording of the entire council meeting is available to the public from the City of Corpus Christi's website and it was downloaded therefrom. Exhibit 8 is the relevant public hearing on Elevate QOF incentive agreement.

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Exhibit 13 is an August 27, 2025, email from Stephanie Box to Rebecca Huerta regarding Rachel Caballero's request for petition for removal from office.

Exhibit 14 is the August 29, 2025, Memorandum from City Secretary Rebecca Huerta to the Mayor and City Council regarding the Petition for Removal Action against Mayor Paulette Guajardo, with attached Petition for Removal Action signed by Rachel Caballero, Robin Patrick Cox, Mark Muenster, Trevor M. Slowik, William Alan Rickertson, and Laramie Fain.

Exhibit 15 is Plaintiff Ajit David's Original Petition for Declaratory Judgment, filed September 30, 2024, in Cause No. 2024CCV-61174-3, seeking a declaration that City Ordinance 24-0256 is void.

Exhibit 16 is Plaintiff Ajit David's Supplemental Petition for Declaratory Judgment and Application for Temporary Restraining Order and Temporary Injunction, filed in Cause No. 2024CCV-61174-3 on November 26, 2024, that added Mayor Paulette Guajardo as a defendant.

Exhibit 17 is Plaintiff Ajit David's First Amended Petition and Third Amended Petition for Declaratory Judgment, filed in Cause No. 2024CCV-61174-3 on November 22, 2025.

Exhibit 18 is the redacted Petitioners' Articles of Impeachment of Mayor Paulette Guajardo, dated March 13, 2026.

Exhibit 19 is a March 1, 2024, email from Type B Board President Leah Pagan Olivarri to Assistant City Manager Heather Hurlbert regarding the downtown hotel project. In the email, Olivarri states that she did not understand why the ordinance caption and news coverage referred to FEMA requirements and recalls that the Type B Board supported the project as a catalyst for downtown activity and street-level retail, rather than as FEMA or freeboard gap funding.

Exhibit 20 is an April 4, 2024, email from Heather Hurlbert to Leah Pagan Olivarri attaching an updated March 11, 2024, City Council Agenda Memorandum for the Homewood Suites ordinance. Hurlbert states that she incorporated the matters discussed with Olivarri and that the revised caption reflects wording previously provided by Olivarri.

Exhibit 21 is a March 29, 2024, email from Heather Hurlbert to CCREDC Compliance Officer Randy Almaguer, with Bonnie McLaughlin copied, attaching a draft March 11, 2024, City Council Agenda Memorandum for the Homewood Suites ordinance and requesting Almaguer's review.

Exhibit 22 is the January 6, 2026, Corpus Christi Police Department's "Project Elevate" investigation file concerning allegations related to the Homewood Suites Type B incentive. The file includes incident and investigation reports, investigative notes, reviews of witness and deposition testimony, and supporting materials gathered during the investigation.

Exhibit 23 is an August 21, 2025, memorandum from City Auditor George Holland to the Mayor and City Council entitled "Homewood Suites Allegation and Closed Internal Investigation." The memorandum summarizes an allegation received by the City Auditor's Office concerning the FEMA screenshot, states the Office's findings, closes the internal investigation, and refers the matter to the City Council for review and consideration of an external investigation.

Exhibit 24 is the April 23, 2024, City of Corpus Christi Legistar agenda packet and attachments, City Council meeting concerning Item 7, File No. 24-0256. The packet includes the revised agenda memorandum, proposed ordinance, business incentive agreement, presentations, cost information, FEMA-related materials, and other supporting documents concerning the Homewood Suites incentive.

Exhibit 25 is Defendant City of Corpus Christi's Second Amended Plea to the Jurisdiction, filed November 17, 2025, in Cause No. 2024CCV-61174-3. The pleading and its exhibits request dismissal of Plaintiff Ajit David's claims for lack of subject-matter jurisdiction and address the two City Council readings of Ordinance 24-0256 and the Homewood Suites incentive.

Exhibit 26 is a compilation of two excerpts from the City of Corpus Christi's publicly available audio and video recording of the April 23, 2024, City Council meeting concerning Item 7 and the Elevate QOF incentive agreement. The excerpts depict Council Member Sylvia Campos explaining that her concerns involved, among other things, the manner in which the project was presented to the City Council. The two nonconsecutive excerpts were extracted from the meeting recording and combined into a single video file, with an approximately two-second pause between them to make clear that they are separate excerpts.

Exhibit 27 is attorney Daniel Ray's Executive Summary entitled "Homewood Suites Type B Incentive - Procedural and Fraud Review." The summary presents the principal findings of an independent legal review concerning alleged fraud or forgery, compliance with the City Charter's two-reading requirement, the economic-development basis for the incentive, alleged Open Meetings Act violations, available corrective options, and proposed governance reforms.

Exhibit 28 is a July 13, 2026, letter from attorney Brian Miller to attorney John Flood stating that Miller represents Peter Zanoni and Miles Risley regarding their potential appearance as witnesses at the mayor-removal hearing and that Zanoni and Risley would not agree to requested depositions because the procedural rules for the hearing do not authorize depositions.

Exhibit 29 is a Frequently Asked Questions document prepared by the City Attorney's office concerning the Homewood Suites incentive. The document addresses the allegedly altered slide, the City's basis for approving the Type B incentive, the relevance of the FEMA flood-map dates, and whether any law-enforcement agency determined that prosecutable fraud or forgery occurred.

Exhibit 30 is a September 19, 2025, email from City Attorney Miles Risley to Mayor Paulette Guajardo, with City Manager Peter Zanoni copied, concerning the Homewood Suites incentive. Risley states that he and Zanoni informed the entire City Council during an April 16, 2024, executive session regarding allegations that documents in the developer's application are alleged to have been altered, and he attaches the presentation used during that executive session.

Exhibit 31 is Corpus Christi B Corporation Resolution No. 2026-0713-1, approved and adopted July 13, 2026. The resolution declares the business incentive agreement with Elevate QOF, LLC valid, states that all conditions precedent were met, restates the B Corporation's intent to perform the agreement, and rejects the City Council's notice of default.

Exhibit 32 is the Employment Agreement between the City of Corpus Christi and Peter D. Zanoni for his service as City Manager, executed in May 2019. The agreement addresses

Zanoni's duties and authority, compensation and benefits, term of employment, evaluation, termination, severance, and related employment conditions.

Exhibit 33 is the Transcript of January 27, 2026, Corpus Christi City Council Meeting Regarding Agenda Item No. 31 (KRIS 6 Video Recording).

Exhibit 34 is the Video Recording of January 27, 2026, Corpus Christi City Council Meeting Regarding Agenda Item No. 31 (KRIS 6 Video Recording).

Exhibit 35 is the Corpus Christi Police Department PowerPoint presentation regarding the investigation into allegations involving the Business Incentive Agreement between the Corpus Christi Type B Corporation and Elevate QOF, LLC (Homewood Suites matter), presented at the February 17, 2026, City Council meeting.

Exhibit 36 is the Conclusion of the Corpus Christi Police Department's presentation summarizing the investigative findings regarding the Homewood Suites matter.

Exhibit 37 is the Transcript of the February 17, 2026, City Council meeting-Daniel Ray Presentation and Council questions.

Exhibit 38 is the Video Recording of February 17, 2026, City Council meeting-Daniel Ray Presentation and Council questions.

Exhibit 39 is the March 11, 2026, Three Signature Memorandum Regarding Removal Petition of Mayor Paulette Guajardo, signed by Eric Cantu, Carolyn Vaughn and Gil Hernandez.

Exhibit 40 is the Transcript of March 24, 2026, Corpus Christi City Council Meeting Regarding Agenda Item No. 15-Petition for Removal Action Against Paulette Guajardo.

Exhibit 41 is the Video Recording of March 24, 2026, Corpus Christi City Council Meeting Regarding Agenda Item No. 15-Petition for Removal Action Against Paulette Guajardo.

Exhibit 42 is the March 24, 2026, City Council Action Details regarding agenda Item 15-File #260419 approving a motion to set an agenda item and date for preliminary and procedural matters regarding the removal hearing on April 14, 2026.

Exhibit 43 is the March 24, 2026, Transcript of City Council Meeting-Agenda Item #16 Discussion and possible action concerning February 20, 2024, Agenda record.

Exhibit 44 is the March 24, 2026, Video recording of the City Council Meeting-Agenda Item 16 Discussion and possible action concerning February 20, 2024, Agenda record.

Exhibit 45 is the March 24, 2026, Video clip from the Corpus Christi City Council meeting, from approximately 7:21:05 to 7:30:45, concerning Council Member Gil Hernandez's motion to restore the original February 20, 2024, agenda memorandum, presentation, Type B agreement, and exhibits, and ordinance to the City's Legistar records. The clip also includes related public comment and council discussion concerning changes made to the City's online records and the need for improved procedures and transparency.

Exhibit 46 is a March 24, 2026, Transcript excerpt of the Corpus Christi City Council meeting from approximately 7:21:05 to 7:30:45, identifying the speakers and transcribing the motion, public comments, council discussion, and vote concerning restoration of the original February 20, 2024, agenda materials in Legistar.

Exhibit 47 is the April 14, 2026, Motion to Accept Petitioners' Articles of Impeachment including City Council vote approving the motion.

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
Irma@floodtriallawyers.com

**ATTORNEY FOR
PAULETTE M. GUAJARDO**

CERTIFICATE OF SERVICE

I hereby certify that on July 19, 2026, I electronically filed the foregoing document with the City Secretary via email.

/s/ John Flood
John Flood

Mariah Resendez

From: John Flood <john@floodtriallawyers.com>
Sent: Tuesday, July 21, 2026 4:30 PM
To: George Hyde
Cc: Tom Thomsen; City Secretary
Subject: Re: Removal Proceeding - Motion for Protective Order

Date Filed 7.21.26

R. Huerta
Rebecca Huerta
City Secretary

Follow Up Flag: Follow up
Flag Status: Completed

[[WARNING: External e-mail. Avoid clicking on links or attachments. We will **NEVER** ask for a password, username, payment or to take action from an email. When in doubt, please forward to SecurityAlert@cctexas.com. **]]**

Warning: This email or its attached document contains a URL that has an unknown reputation status. While this does not guarantee the URL is malicious, the validity of the URL cannot be verified. Please exercise caution when clicking on any links inside of an email or an email attachment. If you have any questions or concerns, please contact the Service Desk at 826-3766. Thank you.

Mr. Hyde,

I release Diana Summers from the subpoena I issued to her.

Thank you,

JOHN FLOOD

John T. Flood, LLP

819 N. Upper Broadway Street, Corpus Christi, Texas 78401

O: 361.654.8877 C: 361.774.6441

www.FloodTrialLawyers.com

Board Certified in Personal Injury Trial Law, Texas Board of Legal Specialization

American Board
of Trial Advocates



From: Matthew Weston <mweston@txlocalgovlaw.com>

Date: Monday, July 20, 2026 at 6:18 PM

To: citysecretary@CorpusChristiTX.gov <citysecretary@CorpusChristiTX.gov>, John Flood <john@floodtriallawyers.com>

Cc: George Hyde <Ghyde@txlocalgovlaw.com>, Tom Thomsen <tthomsen@txlocalgovlaw.com>

Subject: FW: Removal Proceeding - Motion for Protective Order

Dear Ms. Huerta and Mr. Flood,

Our firm represents Diana Summers. Attached is Diana Summers' Motion for Protective Order in the Removal Proceedings before the City Council of Corpus Christi, Texas. Thank you,

Matt

P.S.: I am resending this email. My previous email was returned.

MATTHEW WESTON | SENIOR COUNSEL

mweston@txlocalgovlaw.com

512.893.5664 | Direct



HYDE KELLEY LLP

2806 Flintrock Trace, Suite A104

Austin, TX 78738

www.txlocalgovlaw.com

512.686.0700 Office

866.929.1641 Fax

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R Huerta
Rebecca Huerta
City Secretary

IN THE REMOVAL PROCEEDINGS §
BEFORE THE CITY COUNCIL OF §
CORPUS CHRISTI, TEXAS §

MOTION FOR PROTECTIVE ORDER

Diana Summers ("Summers") files this Motion for Protective Order as follows:

1. Mayor Paulette Guajardo ("Guajardo") issued a Subpoena requiring Summers to appear and testify in this proceeding. Summers objects to the time of her testimony and its undue burden and expense.

2. Guajardo has chosen to invoke Texas Rule of Civil Procedure 176.8 in her Subpoena. Accordingly, Summers relies on Texas Rules of Civil Procedure 176.6, 176.7 and 199.4 in this Motion.

3. Texas Rule of Civil Procedure 176.7 states,

A party causing a subpoena to issue must take reasonable steps to avoid imposing undue burden or expense on the person served. In ruling on objections or motions for protection, the court must provide a person served with a subpoena an adequate time for compliance, protection from disclosure of privileged material or information, and protection from undue burden or expense. The court may impose reasonable conditions on compliance with a subpoena, including compensating the witness for undue hardship.

4. Summers objects to the time of her testimony as well as her undue burden and expense. Summers will be out of the state for business and other matters the week which includes July 22, 2026. Expenses related to this trip are pre-paid and non-refundable. If required to appear, Summer will suffer a significant financial loss, both out of pocket and loss of business. Guajardo has not taken reasonable steps to avoid imposing this burden on Summers.

5. Summers was served with the Subpoena on July 16, 2026. Pursuant to Texas Rules of Civil Procedure 176.6(e) and 199.2, she files this Motion before the time of compliance and

within three business days. Under Rule 176.6(e) she “need not comply with the part of a subpoena from which protection is sought.” Under Rule 199.3, Summers’ testimony is stayed “until the motion can be determined.”

PRAYER

For the foregoing reasons, Diana Summers requests that the City Council quash Mayor Paulette Guajardo’s Subpoena Requiring Witness to Appear and Testify.

Dated: July 20, 2026

Respectfully submitted,

HYDE KELLEY LLP
2806 Flintrock Trace, Suite A104
Austin, Texas 78738
Telephone: (512) 686-0700
Facsimile: (866) 929-1641

/s/ George E. Hyde
GEORGE E. HYDE
Texas State Bar No. 45006157
ghyde@txlocalgovlaw.com
MATTHEW L. WESTON
Texas State Bar No. 24037698
mweston@txlocalgovlaw.com
ATTORNEYS FOR DIANA SUMMERS

CERTIFICATE OF SERVICE

The undersigned served the foregoing Motion for Protective Order on Rebecca L. Huerta, City Secretary and John Flood, counsel for Mayor Paulette Guajardo, by email on July 20, 2026.

/s/ George E. Hyde

Exhibit 1

Delivered 7/16/26 / 7:17 am pm
Served by: Shane

IN THE REMOVAL PROCEEDING BEFORE
THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

IN THE NAME OF THE STATE OF TEXAS

SUBPOENA REQUIRING WITNESS TO APPEAR AND TESTIFY

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, this subpoena is issued upon the request of, and on behalf of, the Mayor of the City of Corpus Christi, Texas, Paulette Guajardo.

REMOVAL PROCEEDING BEFORE THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

TO: ANY SHERIFF OR CONSTABLE OF THE STATE OF TEXAS OR OTHER PERSON AUTHORIZED TO SERVE AND EXECUTE SUBPOENAS AS PROVIDED IN THE CHARTER OF THE CITY OF CORPUS CHRISTI, TEXAS, SECTION 2-22, AND IRMA: I WANT TO ADD THE STATE .

YOU ARE HEREBY COMMANDED TO SUMMON *Diana Summers*, who may served at her physical address: 401 Santa Monica Place, Corpus Corpus, TX. 78411 or wherever she may be found, and who is represented to reside within one hundred fifty miles of the City of Corpus Christi City Hall, Corpus Christi, Texas.

Pursuant to Article II, Sections 2-22 through 2-24 of the Corpus Christi Code of Ordinances, the Corpus Christi City Charter, and the Rules of Procedure for City Council Hearing for Removal Action under the City Charter (Amended June 2, 2026), you are directed to appear at **9:00 a.m. on July 22, 2026, Mayor Betty Turner Council Chambers, City of Corpus Christi City Hall, 1201 Leopard Street, Corpus Christi, TX 78401-2120** to attend and give sworn testimony and to remain there from day to day until discharged by the party who issued this subpoena.

Notice of City of Corpus Christi Code of Ordinances Sec. 2-24: Contempt. Any person who shall refuse to be sworn or to testify or to produce books, papers or other evidence material to an inquiry when a subpoena or other process has been served upon him shall be guilty of contempt of the city council and, upon conviction thereof by the council, shall be fined not less than twenty-five dollars (\$25.00) nor more than one hundred dollars (\$100.00). Each day any person shall refuse to obey any subpoena, or process shall constitute a separate violation. The penalties provided herein shall be cumulative of all other penalties authorized by ordinance, law or city Charter for contempt of the city council.

TRCP 176.8(a). Contempt. Failure by any person without adequate excuse to obey a subpoena served upon that person 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.

ISSUED ON THIS 15th DAY OF JULY 2026.

By: Mayor Paulette Guajardo, through counsel:



John Flood
Texas Bar No. 0715581
John T. Flood, LLP
819 N. Upper Broadway
Corpus Christi, Texas 78401
(361) 654-8877
john@floodtriallawyers.com
irma@floodtriallawyers.com

**OFFICER'S RETURN ON THE NEXT PAGE
WITNESS SUBPOENA RETURN**

Came to hand the _____ day of _____, 2026, at _____ o'clock
_____.M., and executed the _____ day of _____, 2026, at _____ o'clock
_____.M., by delivering to the within named _____
_____ in person at _____ in _____
_____ County, Texas, a true copy of this Subpoena, and tendering said witness the sum of \$10.00.

By Deputy: _____
Sheriff/Constable _____
_____, County, Texas

OR

By: _____

Person who is not a party to the suit and is not less than 18 years of age.

IN THE REMOVAL PROCEEDING BEFORE
THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

IN THE NAME OF THE STATE OF TEXAS

SUBPOENA REQUIRING WITNESS TO APPEAR AND TESTIFY

ACCEPTANCE OF SERVICE OF SUBPOENA BY WITNESS

I, the undersigned witness named in the Subpoena acknowledge receipt thereof, and hereby accept service of the attached subpoena, and will appear at the time and place as directed in this subpoena.

City of Corpus Christi Charter Sec. 2-24: Contempt. *Any person who shall refuse to be sworn or to testify or to produce books, papers or other evidence material to an inquiry when a subpoena or other process has been served upon him shall be guilty of contempt of the city council and, upon conviction thereof by the council, shall be fined not less than twenty-five dollars (\$25.00) nor more than one hundred dollars (\$100.00). Each day any person shall refuse to obey any subpoena, or process shall constitute a separate violation.*

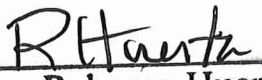
SIGNATURE OF WITNESS

DATE

Not executed as to the witness

for the following reasons:

FEE FOR SERVICE OF SUBPOENA: \$ _____


Rebecca Huerta
City Secretary

IN THE REMOVAL PROCEEDING BEFORE

THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

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,

**RESPONDENT MAYOR GUAJARDO'S TRE 804 OBJECTION
AND
OBJECTION TO HEARSAY REPLETE WITHIN
PETITIONERS' EXHIBITS 1, 2, 4, 5, 6 AND 7
AND
MOTION TO EXCLUDE**

Petitioners have moved for the admission of Exhibits 1, 2 and 4-7, the depositions of Peter Zaroni, Heather Hurlbert, and Philip Ramirez, Mike Culbertson, Alan Wilson and Sony Peronel, respectively. Respondent objects to such exhibits, and admission of the testimony contained therein, as set forth herein, and, prior to the receipt of any evidence, asks the tribunal to rule on such objections and include such rulings in the official record of this proceeding.

This tribunal has adopted the Texas Rules of Evidence regarding hearsay. Article VIII of the Texas Rules of Evidence.

Deposition evidence falls under Texas Rule of Evidence 804 regarding hearsay. Rule 804 applies when a declarant is unavailable. Unavailability does not exist here; the witnesses are available. Therefore, under this tribunal's own rules, these depositions are inadmissible.

Petitioners specifically object to the admission of the depositions based on TRE 804.

The depositions are also saturated with inadmissible hearsay-within-hearsay under 805. Rather than eliciting each witness's personal knowledge, Petitioners (then Ajit David) repeatedly read from or play other witnesses' depositions, recordings, emails, text messages, letters,

investigative conclusions, and news reports, then ask the witness to agree, defer, or react. That is improper under hearsay rules. Under Rule 805, every layer must independently satisfy an exclusion or exception: the original declarant's statement, any intermediary's repetition, and the deposition testimony through which it is ultimately offered. The problem is especially acute where a witness expressly lacks personal knowledge and merely adopts Hurlbert's alleged investigative conclusions, Zanoni's recorded accusations, Culbertson's claimed expertise, David's legal characterizations, or statements attributed to unidentified Council members or other sources. This hearsay cannot form the basis of a reliable conclusion, or even inference, that the Mayor was informed a crime or fraud.

One of the central purposes of the hearsay rule is to preserve the integrity of the fact-finding process by requiring testimony to come from witnesses with personal knowledge who are subject to contemporaneous cross-examination. That policy is completely undermined by Petitioners' (then Ajit David's) deposition designations. Rather than presenting firsthand testimony, Petitioners (then Ajit David) repeatedly attempt to prove critical facts through chains of out-of-court statements in which one witness recounts another witness's deposition, adopts an investigator's conclusions, repeats a recorded conversation, summarizes emails, texts, letters, or articles, or accepts counsel's characterization of those materials. Every additional layer increases the risk of misunderstanding, omission, embellishment, and distortion while depriving the factfinder of the opportunity to observe the actual declarant and assess credibility firsthand. Rule 805 exists precisely to prevent this compounding of unreliability. Allowing Petitioners to establish contested facts through nested hearsay would permit them to substitute repetition for proof, deprive Respondent of meaningful confrontation of the true declarants, and transform deposition testimony

into a vehicle for presenting unsworn investigative narratives and secondhand accusations that the Rules of Evidence were designed to exclude.

Attached hereto and incorporated herein are:

Respondent's Objections to Petitioner's Exhibit 1: Deposition of Peter Zanon

Respondent's Objections to Petitioner's Exhibit 2: Deposition of Heather Hurlbert

Respondent's Objections to Petitioner's Exhibit 4: Deposition of Philip Ramirez

Respondent's Objections to Petitioner's Exhibit 5: Deposition of Mike Culbertson

Respondent's Objections to Petitioner's Exhibit 6: Deposition of Alan Wilson

Respondent's Objections to Petitioner's Exhibit 7: Deposition of Sony Peronel

Respondent respectfully requests that her Rule 804 objection be sustained as to each deposition.

Respondent respectfully requests that her hearsay objections attached hereto be sustained.

Respondent respectfully requests that each of her objections be heard by the tribunal, granted, and formal rulings reduced to writing.

Respondent prays that the objected-to testimony be excluded from evidence in this proceeding.

Respectfully submitted,

/s/ John Flood

John Flood

John T. Flood, LLP

819 N. Upper Broadway

Corpus Christi, Texas 78401

(361) 654-8877

(361) 654-8879 Fax

john@floodtriallawyers.com

Irma@floodtriallawyers.com

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 21st day of July, 2026.

/s/ John Flood
John Flood

Respondent's Objections to Petitioner's Exhibit 1: Deposition of Peter Zanoni

Page:Line	Original declarant	Embedded statement or substance adopted	Hearsay analysis	Objection
57:2–60:14	Ajit David	Counsel reads and paraphrases David's March 7 email stating that the project was already committed, the FEMA release date and number were missing or hidden, the slide had been altered, and the developer was improperly using FEMA as a basis for the incentive. Zanoni repeatedly confirms the email's assertions.	David's email is an out-of-court written statement. Zanoni's agreement does not make David's assertions admissible.	Hearsay. TRE 801 and 802.
61:2–64:4	Ajit David and Peter Zanoni	Counsel introduces an audio recording and transcript of a prior conversation between David and Zanoni, then quotes David asking whether Council had been told about "tampering" and Zanoni responding that he had told them and would do so again.	The recording contains two declarants. David's assertions and questions are hearsay. Zanoni's own prior statements require a separate basis for admission and are not automatically party-opponent statements against Mayor Guajardo. The recording is then embedded within Zanoni's deposition.	Hearsay within hearsay, TRE 805.
66:14–67:14	Sony Peronel	Counsel summarizes Peronel's deposition testimony that Ramirez was stuttering, could not complete a sentence, and that it was obvious Ramirez or his team altered the document. Zanoni agrees with portions and disagrees with one conclusion.	Peronel's deposition testimony is being introduced through Zanoni's deposition. Zanoni's partial agreement does not cure the hearsay.	Hearsay within hearsay, TRE 801, 802, and 805.
69:19–70:8	Mike Culbertson	Zanoni recounts Culbertson stating that Ramirez created the PowerPoint, sent it to Culbertson, and that Culbertson merely inserted it into an EDC template without changing it.	Culbertson's account is offered to prove the origin and chain of custody of the altered presentation and to eliminate Culbertson as the source of the alteration.	Hearsay, TRE 801 and 802.

Respondent's Objections to Petitioner's Exhibit 1: Deposition of Peter Zanoni

Page:Line	Original declarant	Embedded statement or substance adopted	Hearsay analysis	Objection
73:5–74:4	Everett Roy; Raju Bhagat; Ajit David	Zanoni says Roy likely came to him after talking to Bhagat or David and probably said he had spoken with them, had concerns about the award and document tampering, and was concerned about placing the item on a future agenda.	Zanoni expressly reconstructs Roy's out-of-court statements and, within them, embeds statements or concerns originating with Bhagat and David. Multiple hearsay layers.	Hearsay and hearsay within hearsay, TRE 805.
83:6–17	Philip Ramirez, applicant representatives, and their attorneys	Zanoni states that follow-up emails or conversations produced no additional explanation and that the applicant group diverted inquiries to its attorneys.	To the extent offered to prove what the applicants or counsel said, refused to say, or directed, the testimony summarizes out-of-court communications. The content of any response is hearsay.	Hearsay as to the substance of applicant or counsel communications.
85:5–88:17	Ajit David and Peter Zanoni	Counsel repeatedly quotes the recorded David–Zanoni conversation, including Zanoni's statements about a "scheme," Culbertson supposedly saying the project had to be tied to infrastructure, the applicant developing a false FEMA narrative, and Zanoni refusing to recommend the item.	The recorded conversation is embedded in the deposition. It includes David's statements, Zanoni's prior statements, and an additional embedded statement attributed to Culbertson. At least three potential hearsay layers appear.	Hearsay within hearsay, TRE 805.
88:18–92:24	Unidentified Council members.	Counsel quotes Zanoni's recorded statement that Council members wanted the matter placed on the agenda.	The desire or direction of Council members is offered through Zanoni's recounting of their out-of-court communications.	Hearsay.
94:14–95:23	Heather Hurlbert	Counsel plays Hurlbert's deposition and asks Zanoni to agree. Zanoni adopts her testimony connecting the allegedly falsified document to the	Hurlbert's deposition is expressly embedded in Zanoni's deposition. Her conclusions are being offered through Zanoni for their truth.	Hearsay within hearsay, TRE 801, 802, and 805.

Respondent's Objections to Petitioner's Exhibit 1: Deposition of Peter Zanoni

Page:Line	Original declarant	Embedded statement or substance adopted	Hearsay analysis	Objection
96:1–99:6	Heather Hurlbert; persons Hurlbert interviewed	request and favorable first-reading vote and describing the applicant's conduct as misleading. Counsel plays another Hurlbert deposition clip in which she interprets the David–Zanoni recording and states that her investigation confirmed a scheme to create a basis for obtaining \$2 million. Zanoni agrees with the conclusion.	This sequence contains Hurlbert's deposition, Hurlbert's account of her investigation and conversations, the David–Zanoni recording, and Zanoni's deposition adoption. Each layer must independently qualify.	Multiple hearsay, TRE 805.
99:9–100:11	Heather Hurlbert	Counsel plays Hurlbert's deposition testimony applying the Texas Penal Code definition of forgery and asks Zanoni to agree that the conduct met that definition.	Hurlbert's prior testimony and legal conclusion are embedded in Zanoni's deposition. Her statement is offered for the truth of the conclusion that a forgery occurred.	Hearsay within hearsay, TRE 805.
101:21–102:16	Sony Peronel	Counsel states that Peronel told David that Zanoni warned Council members not to "touch" the item. Zanoni cannot recall saying those exact words but discusses what he would have advised.	Peronel's account of what Zanoni allegedly told Council is an out-of-court statement embedded in counsel's question. Zanoni does not clearly adopt the precise statement.	Hearsay.
102:18–25	Mike Culbertson	Counsel plays a portion of Culbertson's deposition and asks Zanoni whether he agrees. Zanoni agrees.	Culbertson's deposition testimony is introduced wholesale through Zanoni's deposition without an independent hearsay exception being identified.	Hearsay within hearsay, TRE 805.

Respondent's Objections to Petitioner's Exhibit 2: Deposition of Heather Hurlbert

Page:Line	Original declarant	Embedded statement or substance adopted	Hearsay analysis	Objection
48:22–49:6	Mike Culbertson	Counsel reads Culbertson's prior testimony that an applicant already committed to coming should not qualify for an incentive; Hurlbert confirms that is what Culbertson was saying.	Culbertson's deposition testimony is offered through Hurlbert's deposition for its truth. Hurlbert's acknowledgment does not remove the original hearsay layer.	Hearsay within hearsay, TRE 801, 802, 805.
53:1–17	Applicant representatives; Aimee Alcorn-Reed; possibly Miles Risley	Hurlbert recounts conversations through which she understood that, without the incentive, the applicants would do something different with the first floor and identifies their "needs" and "design pivot points."	To the extent offered to prove what the applicants would or would not build without the incentive, the testimony depends on their out-of-court representations. The unidentified legal communications may add another layer.	Hearsay; multiple hearsay to the extent the conclusion incorporates statements by Legal and the applicants.
54:5–15	Applicant representatives	Counsel states that the applicants represented to the REDC that the infrastructure component involved compliance with "new or recent FEMA rules"; Hurlbert agrees that this was how they characterized it.	The applicants' characterization is an out-of-court assertion offered to establish the represented basis for the incentive. It is offered to prove FEMA rules had not recently changed.	Hearsay because offered to prove that FEMA rules had not recently changed.
56:15–58:7	Mike Culbertson	Counsel repeatedly summarizes Culbertson's deposition dates: application received September 27; REDC presentation October 12; REDC vote November 9; closed Type B session November 23; open meeting December 11. Hurlbert defers to and accepts his testimony as true.	This is a sustained deposition-within-deposition sequence. Several dates were not within Hurlbert's independent memory, and she expressly accepted Culbertson's testimony as the source.	Hearsay within hearsay, TRE 805.
59:1–60:20	Mike Culbertson	Counsel reads Culbertson's deposition testimony that the Homewood Suites project would cannibalize existing hotels and would not increase economic	Culbertson's prior deposition testimony is embedded verbatim or substantially verbatim in Hurlbert's deposition. Her disagreement with	Hearsay within hearsay, TRE 801, 802, 805.

Respondent's Objections to Petitioner's Exhibit 2: Deposition of Heather Hurlbert

Page:Line	Original declarant	Embedded statement or substance adopted	Hearsay analysis	Objection
68:14–70:25	Philip Ramirez	development; Hurlbert confirms her understanding of his testimony. Counsel identifies statements attributed to Ramirez at the Type B meeting: FEMA maps unexpectedly became final; the change threw the project “for a loop”; it created unanticipated constructability problems and costs; floors had to be elevated; floodproofing and infrastructure were required; and the applicant needed money to comply. Hurlbert repeatedly confirms the statements.	part of it does not make the quoted testimony admissible. Ramirez’s meeting statements are introduced through Hurlbert to prove the asserted FEMA change, resulting costs, and reason for requesting the incentive. Hurlbert’s confirmation is based on recollection of his presentation, but the substance remains Ramirez’s out-of-court assertion.	Hearsay, TRE 801 and 802. TRE 805.
83:8–84:20	Philip Ramirez	Hurlbert recounts Ramirez saying that his staff prepared the presentation, that he did not know how the date was removed, that he did not know why the date was omitted, and that his staff prepared the presentation.	Ramirez’s statements are offered to establish who prepared the document and what he did or did not know about the alteration.	Hearsay, TRE 801 and 802.
85:2–14	Philip Ramirez	Hurlbert clarifies that Ramirez did not say he directed staff to remove the information; he said he directed staff to prepare the presentation and that the screenshot was merely a reference picture, without intent to omit the date. Counsel states that Culbertson testified the project no longer qualified at the REDC because it lacked an infrastructure component. Hurlbert says she does not know.	The testimony repeats Ramirez’s denial and explanation of intent. It is hearsay because it’s offered to prove the absence of intent or the purpose of the screenshot. The embedded assertion is in counsel’s question. Even though Hurlbert does not adopt it, the question should not be used as	Hearsay, TRE 801 and 802. Hearsay.

Respondent's Objections to Petitioner's Exhibit 2: Deposition of Heather Hurlbert

Page:Line	Original declarant	Embedded statement or substance adopted	Hearsay analysis	Objection
			substantive evidence of Culbertson's conclusion.	
107:22– 108:22	Ajit David	Counsel introduces David's email to Zononi and characterizes it as David telling Zononi that the City had an altered document. Hurlbert identifies the document and agrees with counsel's characterization.	David's email is an out-of-court written assertion. Hurlbert was not the sender or recipient. Offered to prove that the document was altered, it is hearsay.	Hearsay.
109:11–22	Unidentified person	Hurlbert testifies that she was told the agenda item was pulled because there were questions about the project and that she was probably told about the altered federal screenshot.	The declarant is unidentified, and the statements are offered to establish the reason the item was removed and what information had surfaced.	Hearsay, TRE 801 and 802.
118:19– 123:10	Peter Zononi and Ajit David	Counsel plays and supplies a transcript of a recorded conversation between David and Zononi. Hurlbert confirms their statements that a federal portal had been tampered with, that Zononi called it a "scheme" to obtain the money, and that Zononi repeatedly said he would not recommend the incentive.	The audio contains out-of-court statements by David and Zononi. Those statements are then embedded in Hurlbert's deposition. Hurlbert's agreement with the speakers' characterization does not independently cure either layer.	Hearsay within hearsay, TRE 805.
134:15– 135:5	Peter Zononi	Counsel paraphrases and then quotes Zononi's recorded statement that he had informed Council about the tampering and would tell Council again in executive session. Hurlbert says she thinks she remembers it.	Zononi's recorded out-of-court statement is offered through the recording and again through Hurlbert's deposition to prove that he informed Council.	Hearsay within hearsay, TRE 805.
136:5–12	Peter Zononi	Hurlbert recalls Zononi telling Council in executive session that there were claims the slide had been altered.	Zononi's statement is an out-of-court assertion. If offered to prove only that Council was placed on notice of	Hearsay if offered for truth; limit to

Respondent's Objections to Petitioner's Exhibit 2: Deposition of Heather Hurlbert

Page:Line	Original declarant	Embedded statement or substance adopted	Hearsay analysis	Objection
			accusations, it may be non-hearsay; if offered to prove actual alteration, it is hearsay.	notice or effect on Council.

Respondent's Objections to Petitioner's Exhibit 4: Deposition of Philip Ramirez

Page:Line	Original declarant	Embedded statement or substance presented	Hearsay analysis	Objection
74:3–77:24	Mike Culbertson	Counsel plays Culbertson's deposition concerning the sequence of the incentive request: the applicants wanted \$2 million, the request needed an infrastructure component, and the FEMA justification then arose. Ramirez disagrees with part of the sequence but agrees Culbertson instructed the applicants to tie the request to infrastructure.	Culbertson's prior deposition testimony is introduced through Ramirez's deposition. Ramirez's agreement with part and disagreement with part do not independently make Culbertson's testimony admissible.	Hearsay within hearsay, TRE 801, 802, and 805.
78:8–81:22	Mike Culbertson	Counsel plays another Culbertson deposition clip stating that the project had to be tied to infrastructure, that Type B would not support it otherwise, and apparently addressing allegations of tampering, forgery, or fraud. Ramirez comments on and disputes portions of Culbertson's testimony.	The Culbertson testimony remains an out-of-court statement even where Ramirez disputes it. The embedded criminal accusations should not be conveyed to the factfinder through counsel's questions or Ramirez's deposition.	Hearsay within hearsay, TRE 805. Exclude the question and answer sequence containing Culbertson's embedded assertions.
87:10–93:2	Mike Culbertson	Counsel plays Culbertson's testimony that the \$2 million request was based on FEMA floodplain changes and later plays testimony about the timing and sequence of the CCREDC and Type B process. Ramirez partially agrees, qualifies the testimony, and ultimately accepts part of the timeline.	This is direct deposition-within-deposition testimony offered to prove the asserted basis and chronology of the application. Ramirez's qualified adoption does not eliminate the original hearsay layer.	Hearsay within hearsay, TRE 801, 802, and 805.
141:18–143:20	Ajit David	Counsel introduces David's March 7 email to Zaroni stating that the original FEMA material contained release dates and numbers, that those	David's written assertions are hearsay because offered to prove that information was hidden or that the slide was altered. The email is not	Hearsay because offered for truth. TRE 801 and 802.

Respondent's Objections to Petitioner's Exhibit 4: Deposition of Philip Ramirez

Page:Line	Original declarant	Embedded statement or substance presented	Hearsay analysis	Objection
		items were missing or "hidden" from the presentation, and asking how they disappeared. Ramirez confirms what the email says.	admissible for the truth of David's accusations.	
158:1–14	Peter Zanon	Ramirez recounts Zanon accusing him during their meeting of committing or potentially committing a crime by altering a federal document.	Zanon's accusation is an out-of-court assertion. Offered to prove an alteration or crime occurred, it is hearsay.	Hearsay.
161:13–25	Peter Zanon	Counsel plays a clip of Zanon's deposition and asks Ramirez to agree that Ramirez made certain representations to the Type B Board. Ramirez agrees.	Zanon's prior deposition testimony is embedded in Ramirez's deposition. Even though Ramirez agrees with the underlying fact, the designated passage still conveys Zanon's testimony through a second deposition.	Hearsay within hearsay, TRE 805.
162:1–164:19	Ajit David and Peter Zanon	Counsel plays the recorded David–Zanon conversation. David asks whether Council was told about improper information and tampering; Zanon says he informed Council and would inform them again. Ramirez confirms that he heard the statements and comments upon their meaning.	The audio contains statements from two declarants and is then embedded in Ramirez's deposition. David's assertions and Zanon's response each require an independent hearsay basis.	Hearsay within hearsay, TRE 805.
166:15–170:20	Peter Zanon; Ajit David; possibly Mike Culbertson	Counsel continues the recording. Zanon states that the document was altered and describes a "scheme" involving a recent-FEMA-change narrative. Ramirez confirms hearing the statements but disputes them. The surrounding discussion attributes the	The recording is offered to communicate Zanon's and David's accusations notwithstanding Ramirez's denial. Ramirez's disagreement does not make the accusation admissible. Any embedded	Multiple hearsay, TRE 805. Exclude both the recorded accusations and counsel's repetition of them in the questions.

Respondent's Objections to Petitioner's Exhibit 4: Deposition of Philip Ramirez

Page:Line	Original declarant	Embedded statement or substance presented	Hearsay analysis	Objection
171:4– 172:15	Peter Zaroni	allegation to David and, in part, to a narrative allegedly involving City personnel. Counsel continues quoting or summarizing the recording: Zaroni repeatedly said he would not recommend the item, lacked information, and was awaiting an explanation from Ramirez concerning the allegedly altered slide. Ramirez confirms hearing the statements.	statement attributed to Culbertson creates an additional layer. Zaroni's recorded statements are out-of-court assertions offered to establish his position, the alleged absence of an explanation, and the reason for withholding his recommendation. They are embedded within Ramirez's deposition.	Hearsay within hearsay, TRE 805.
177:8–10	Peter Zaroni	Ramirez relies on the recording for the proposition that Zaroni said seven Council members still supported the incentive.	Zaroni's statement about the position of seven Council members is hearsay. If his statement itself was based on communications from individual Council members, it contains another hearsay layer.	Hearsay within hearsay, TRE 805.
182:3–11	Mike Culbertson	Counsel plays another Culbertson deposition clip and asks Ramirez whether he agrees. Ramirez answers yes.	The content of Culbertson's testimony is being supplied to the factfinder through Ramirez's deposition. Agreement by Ramirez does not establish that Culbertson's prior testimony falls within an exception.	Hearsay within hearsay, TRE 805.
182:13– 184:20	Heather Hurlbert	Counsel plays Hurlbert's deposition testimony that her investigation found tampering with a federal document. Ramirez confirms that this is what she appears to be saying but denies the conclusion.	Hurlbert's deposition and investigative conclusion are embedded directly into Ramirez's deposition. Ramirez lacks knowledge of the details of her investigation and does not adopt the conclusion.	Hearsay within hearsay, TRE 801, 802, and 805.

Respondent's Objections to Petitioner's Exhibit 4: Deposition of Philip Ramirez

Page:Line	Original declarant	Embedded statement or substance presented	Hearsay analysis	Objection
185:5– 188:3	Heather Hurlbert and Peter Zanon	Counsel plays Hurlbert's deposition and then Zanon's deposition commenting upon it. Counsel characterizes their combined testimony as finding that the applicants "cooked up" a scheme to obtain \$2 million. Ramirez is asked whether he agrees.	This is at least three procedural layers: Hurlbert's deposition, Zanon's deposition adoption or commentary, and Ramirez's deposition. Hurlbert's investigation may itself rest on further out-of-court interviews and statements.	Multiple hearsay, TRE 805.
188:4– 189:16	Mike Culbertson	Counsel plays Culbertson's deposition testimony concerning whether the recent-FEMA-change narrative was false. Ramirez states that he lacks sufficient context to agree or disagree.	Culbertson's testimony is presented substantively despite Ramirez's inability to identify its context. The question itself repeats counsel's interpretation of Culbertson's conclusion.	Hearsay within hearsay. TRE 805.
189:18– 190:15	Heather Hurlbert and Peter Zanon	Counsel plays Zanon's deposition testimony in which Zanon is shown or told of Hurlbert's testimony and agrees that a crime occurred under the Penal Code. Ramirez is asked whether he heard and accepts the compound testimony.	Hurlbert's deposition is embedded inside Zanon's deposition, which is then embedded inside Ramirez's deposition. The sequence also incorporates an out-of-court statutory application and alleged investigative findings. Ramirez's counsel expressly identified it as "hearsay within hearsay."	Multiple hearsay, TRE 805. Exclude the entire designation.
190:16– 191:7	Peter Zanon; unidentified investigation sources	Counsel plays another Zanon deposition clip asserting that an investigation determined federal law had been broken. Ramirez is instructed not to answer.	Zanon's conclusion is an out-of-court assertion. The underlying investigation incorporates statements from other witnesses and documents, producing further hearsay layers. Ramirez does not adopt it.	Hearsay and hearsay within hearsay, TRE 801, 802, and 805.

Respondent's Objections to Petitioner's Exhibit 4: Deposition of Philip Ramirez

Page:Line	Original declarant	Embedded statement or substance presented	Hearsay analysis	Objection
258:16– 259:6	Counsel's prior characterization; Heather Hurlbert	Ramirez's attorney recounts Counsel's earlier assertion that Hurlbert's "investigation" consisted of attending a meeting where Ramirez explained the situation and that she rejected his explanation. Ramirez confirms only that this was Allison's assertion.	Counsel's prior characterization is not evidence. It also repeats an alleged Hurlbert conclusion through a question by another attorney. Ramirez expressly does not adopt its truth.	Hearsay.
267:9–25	Alan Wilson	Counsel plays Wilson's deposition testimony that, had Wilson known a false document was involved, he would have voted against the incentive. Ramirez confirms that this is what Wilson said but disputes the premise that the document was false.	Wilson's prior testimony concerning how he would have voted is introduced through Ramirez's deposition. Ramirez's acknowledgment that Wilson made the statement does not establish its admissibility.	Hearsay within hearsay, TRE 805.

Respondent's Objections to Petitioner's Exhibit 5: Deposition of Mike Culbertson

Page:Line	Original declarant	Embedded statement or substance presented	Hearsay analysis	Objection
46:1–11	Philip Ramirez and Deven Bhakta	Culbertson recounts that the applicants verbally requested \$2 million and may have stated that the reason involved higher project costs.	The applicants' oral request and explanation are out-of-court statements.	Hearsay. TRE 801 and 802.
58:13–61:25	Philip Ramirez and Deven Bhakta	Culbertson recounts that the applicants tied the \$2 million request to increased FEMA requirements, changes in the floodplain, and increased construction costs. He identifies discussions with Ramirez and Bhakta as the source.	These are the applicants' out-of-court factual assertions offered to prove why the incentive was requested and that FEMA changes generated additional project costs.	Hearsay, TRE 801 and 802.
62:1–20	Randy Almaguer; Philip Ramirez; Deven Bhakta	Culbertson admits he was not present for the applicants' discussions with Randy. He testifies that Randy told him the applicants said the request was based on increased construction costs and FEMA requirements.	This is classic double hearsay: the applicants allegedly told Randy, and Randy then told Culbertson.	Hearsay within hearsay, TRE 805.
62:21–64:8	Randy Almaguer; unidentified CCREDC meeting participants	Culbertson, who was absent from the second CCREDC meeting, testifies that Randy would have informed the board of the \$2 million ask and its reasons and assumes the presentation followed protocol.	Culbertson recounts what another person supposedly said at a meeting he did not attend. His testimony rests on Randy's out-of-court presentation and, in part, assumption rather than personal observation.	Hearsay as to Randy's statements to the board. TRE 801 and 802.
64:17–65:24	Philip Ramirez and Randy Almaguer	Culbertson says Ramirez told him the request was caused by FEMA floodplain changes and that Randy had previously given him the same explanation.	Two separate out-of-court sources are offered to establish the asserted reason for the \$2 million request. Randy's account may itself repeat what Ramirez and Bhakta said.	Hearsay; hearsay within hearsay as to Randy's report of the applicants' statements. TRE 805.
66:8–22	Philip Ramirez; Randy Almaguer	Culbertson recounts Ramirez's statement that FEMA changes caused the \$2	Ramirez's explanation is hearsay because offered to prove the	Hearsay and, where transmitted through

Respondent's Objections to Petitioner's Exhibit 5: Deposition of Mike Culbertson

Page:Line	Original declarant	Embedded statement or substance presented	Hearsay analysis	Objection
		million request and says Randy had communications with the applicants concerning the presentation.	FEMA justification. Any information Culbertson received through Randy adds another layer.	Randy, hearsay within hearsay.
70:1–71:12	Randy Almaguer	Randy allegedly told Culbertson that a date was missing from the presentation, denied removing it, and said he received the presentation in that condition. Culbertson then inferred that it came from the applicant.	Randy's statements are offered to establish the condition of the document, Randy's lack of responsibility, and the presentation's source. Culbertson's inference does not make Randy's account admissible.	Hearsay, TRE 801 and 802.
71:8–12	Mike Culbertson's prior statement to Ajit David	Counsel asks Culbertson to confirm that he previously told David the altered presentation came from the applicant; Culbertson agrees.	Culbertson's own prior statement is being offered through his deposition.	Hearsay.
75:6–76:11	Philip Ramirez and/or Deven Bhakta	Culbertson recounts the applicants' Type B presentation: FEMA rules had changed, the project was surprised by the requirements, part of the \$2 million was needed to comply, and the first floor had to be elevated four feet.	The applicants' meeting statements are out-of-court assertions offered to prove the asserted FEMA change, surprise, required construction, and need for funds.	Hearsay, TRE 801 and 802. Even if the meeting video is independently admitted, each speaker's statement still requires a hearsay basis.
93:14–94:25	Leah Olivarri and Heather Hurlbert	Culbertson recounts communications with Olivarri and Hurlbert concerning the need to change the agenda item. He states that Leah's input and Council questions were relayed through Heather, likely by email.	This testimony summarizes out-of-court oral and written communications. If Heather relayed Leah's statements, there are at least two hearsay layers.	Hearsay within hearsay, TRE 805.
99:6–100:10	Heather Hurlbert and Leah Olivarri	Culbertson summarizes an email exchange in which Hurlbert stated that discussions with Olivarri required	Hurlbert's email is hearsay; within it, Hurlbert allegedly reports Olivarri's statements. Culbertson	Hearsay within hearsay, TRE 805.

Respondent's Objections to Petitioner's Exhibit 5: Deposition of Mike Culbertson

Page:Line	Original declarant	Embedded statement or substance presented	Hearsay analysis	Objection
119:14–120:13	Peter Zononi	changing the agenda item to better reflect what Type B had decided. Counsel reads Zononi's recorded statement that the presentation had been altered and was designed to make the FEMA change appear recent. Culbertson agrees with the assertion.	then recounts both through his deposition. Zononi's recorded out-of-court statement is embedded within Culbertson's deposition. Culbertson's agreement does not independently establish an exception for the recording.	Hearsay within hearsay, TRE 805.
120:14–123:19	Peter Zononi; Councilman Hunter; applicants	Counsel continues reading Zononi's recorded statement that Culbertson required an infrastructure tie, that the applicants "hatched a scheme," and that they developed a recent-FEMA-change narrative because others would say they should have known earlier. Culbertson partially agrees.	This passage contains Zononi's recorded statement, Zononi's account of Culbertson's statement, Zononi's characterization of the applicants' conduct, and a statement attributed to Hunter. Multiple layers are present.	Multiple hearsay, TRE 805.
127:12–129:17	Peter Zononi	Counsel reads additional Zononi statements from the recording: "I'm not recommending it," "I got screwed," and "two bad people weren't truthful." Culbertson is asked to agree with Zononi's conclusions.	Zononi's recorded accusations and characterizations are offered through Culbertson's deposition. Culbertson's partial agreement does not render Zononi's statements admissible.	Hearsay within hearsay, TRE 801, 802, and 805.
130:10–17	Alan Wilson	Counsel asks whether Culbertson heard that Wilson later said he would not have supported the project had he known of the altered document. Culbertson says he did not hear that.	The assertion appears only in counsel's question and is not adopted by Culbertson. It should not be presented as substantive evidence through the designation.	Hearsay.

Respondent's Objections to Petitioner's Exhibit 6: Deposition of Alan Wilson

Page:Line	Original declarant	Embedded statement or substance presented	Hearsay analysis	Objection
13:5– 14:25	Mike Culbertson	Counsel introduces Culbertson's deposition and states that Culbertson testified the Homewood Suites project had to contain an infrastructure component. Counsel then reads Culbertson's testimony that the project "had to be tied to infrastructure" and asks Wilson whether he agrees.	Culbertson's prior deposition testimony is introduced through Wilson's deposition for its truth. Wilson had not read the deposition and did not independently know the CCREDC's criteria.	Hearsay within hearsay, TRE 801, 802, and 805.
15:3– 16:18	Mike Culbertson; Peter Zononi; Ajit David	Counsel summarizes Culbertson's deposition concerning the FEMA narrative, explains that Culbertson was discussing a recorded conversation with Zononi, and then plays the David–Zononi recording for Wilson.	This sequence combines Culbertson's deposition, Zononi's recorded statements, and David's recorded statements inside Wilson's deposition. Each declarant and each level requires a separate hearsay basis.	Multiple hearsay, TRE 805.
16:9– 18:10	Peter Zononi and Ajit David	Counsel plays the recording and uses it to establish that the "infrastructure" component was the FEMA floodplain issue and that the applicant claimed a recent FEMA change. Wilson comments on the recording and agrees with counsel's interpretation.	The recording contains out-of-court statements by Zononi and David. Wilson's agreement with counsel's characterization does not render either speaker's statements admissible.	Hearsay within hearsay, TRE 805.
18:11– 19:15	Philip Ramirez	Counsel quotes Ramirez's Type B presentation: the FEMA maps had been preliminary, became final and adopted, the project had to comply with "new FEMA requirements," and the change caught the applicants midstream and threw them "for a loop." Wilson is asked to evaluate those assertions.	Ramirez's meeting statements are out-of-court assertions offered to prove what the applicants represented and, potentially, that they claimed surprise or lack of anticipation.	Hearsay. TRE 801 and 802.
21:5– 22:18	Philip Ramirez	Counsel continues quoting Ramirez's presentation that the FEMA requirements created constructability problems, unexpected	The quoted testimony remains Ramirez's out-of-court statement. Wilson may give an independent	Hearsay as to Ramirez's quoted statements.

Respondent's Objections to Petitioner's Exhibit 6: Deposition of Alan Wilson

Page:Line	Original declarant	Embedded statement or substance presented	Hearsay analysis	Objection
22:19–23:21	Philip Ramirez; Peter Zanolini; Ajit David	costs, and requirements the applicants “certainly did not anticipate.” Wilson agrees that the applicants should have anticipated them. Counsel asks Wilson to combine the quotations from Ramirez’s presentation with the David–Zanolini recording and conclude that the applicants pitched the FEMA issue as recent and unanticipated. Wilson identifies the recorded voices as Zanolini and David and says it is the first time he has heard the recording.	opinion about what a developer should have known, but Ramirez’s assertions should not be admitted through Wilson as substantive evidence. The conclusion is constructed from multiple out-of-court sources. Wilson’s first-time reaction to the material does not cure the hearsay contained in either Ramirez’s statements or the recorded conversation.	Multiple hearsay, TRE 805.
24:4–26:25	Mike Culbertson	Counsel repeatedly reads Culbertson’s deposition testimony: the project had to be tied to infrastructure; Culbertson told his board, the applicants, and Type B that infrastructure was required; projects like this had always been tied to infrastructure; and the project could not obtain Type B money without that connection. Wilson repeatedly agrees or defers to Culbertson’s expertise.	This is an extended deposition-within-deposition sequence. Wilson’s deference to Culbertson’s expertise is not an independent hearsay exception and does not transform Culbertson’s prior testimony into Wilson’s personal knowledge.	Hearsay within hearsay, TRE 801, 802, and 805. Exclude the entire quoted sequence.
27:10–27:25	Peter Zanolini; Philip Ramirez; Deven Bhakta	Counsel states that the applicants’ conduct is “even talked about in the audio recording” and then characterizes their presentation as involving a falsified FEMA slide. Wilson initially says only that he knows a date was removed.	Because Petitioners offer the recording or statements of others to establish falsification, the question contains embedded hearsay.	Hearsay.
28:1–2	Ajit David	Wilson says, “I think Ajit had showed me,” apparently referring to the original and modified FEMA material.	Any explanation David gave about what the documents proved would be hearsay because offered for truth. The	Hearsay.

Respondent's Objections to Petitioner's Exhibit 6: Deposition of Alan Wilson

Page:Line	Original declarant	Embedded statement or substance presented	Hearsay analysis	Objection
			cited passage does not disclose the substance of David's statements.	
29:7– 30:10	Philip Ramirez	Counsel reminds Wilson of “all the things” Ramirez said to the Board—unexpected changes, timing, and lack of anticipation—and asks Wilson to agree that removal of dates made those representations misleading.	Ramirez's statements are again embedded in counsel's questions.	Hearsay.
32:12– 34:3	Mike Culbertson	Counsel states that materiality had already been established because Culbertson testified the CCREDC would not have approved the project had it known about the altered document. Wilson says he thinks that is correct and concludes the project would not have come to Type B.	Culbertson's supposed conclusion is introduced through Wilson. Wilson had no personal knowledge of what the CCREDC would have done and expressly bases his answer on Culbertson's deposition.	Hearsay within hearsay, TRE 805.

Respondent's Objections to Petitioner's Exhibit 7: Deposition of Sony Peronel

Page:Line	Original declarant	Embedded statement or substance presented	Hearsay analysis	Objection
71:17– 73:2	Mike Culbertson	Counsel states that Culbertson testified the Homewood Suites project could not be recommended without an infrastructure component. Peronel acknowledges Culbertson's claimed expertise and says he would defer to him.	Culbertson's deposition testimony is offered through Peronel's deposition for its truth. Peronel expressly lacks personal involvement with the CCREDC process. His deference does not make Culbertson's testimony admissible.	Hearsay within hearsay, TRE 801, 802, and 805.
73:20– 76:15	Heather Hurlbert; unidentified members of the alleged investigation	Counsel represents that Hurlbert participated in an investigation of the altered document and was better positioned than Peronel to report its findings. Peronel says he assumes Hurlbert and Legal were involved and that he would defer to her.	Peronel lacks personal knowledge of the investigation's composition and bases his answers partly on assumptions and counsel's characterization. Any investigative facts or conclusions attributed to Hurlbert remain out-of-court assertions.	Hearsay and lack of personal knowledge; TRE 602, 801, and 802.
76:18– 82:25	Heather Hurlbert	Counsel gives Peronel a portion of Hurlbert's deposition and asks him to confirm that she testified: someone altered the FEMA document; no matching original FEMA document existed; the conduct met several Penal Code definitions of forgery; she found no evidence it was not forgery; and it constituted felony forgery. Peronel repeatedly confirms that this is what he read and says he would defer to her.	This is direct deposition-within-deposition testimony. Peronel was not involved in all investigative meetings, has no legal expertise, and is merely repeating or adopting Hurlbert's conclusions. His deference does not cure the original hearsay layer or any hearsay underlying Hurlbert's investigation.	Multiple hearsay, TRE 805. Exclude the entire Hurlbert-deposition sequence.
83:6– 89:11	Heather Hurlbert; Peter Zanon; City Legal; unidentified	Counsel relies on Hurlbert's deposition to assert that she uncovered felony forgery, fully informed Zanon, and worked with City Legal. Peronel is	Hurlbert's deposition is one layer; the unidentified information she allegedly uncovered is another; counsel's summary adds no	Multiple hearsay, TRE 805.

Respondent's Objections to Petitioner's Exhibit 7: Deposition of Sony Peronel

Page:Line	Original declarant	Embedded statement or substance presented	Hearsay analysis	Objection
	investigative sources	then asked to accept those alleged findings and infer what Zanoni should have told Council.	evidentiary value. Peronel repeatedly admits he was not in all meetings and does not know what was communicated.	
95:10–96:9	Heather Hurlbert	Counsel states that Zanoni knew the investigation's results because Hurlbert testified that she disclosed them fully to him. Peronel says he cannot speak to that and knows only what he just read.	Hurlbert's alleged statement to Zanoni is introduced through Hurlbert's deposition and then again through Peronel's deposition. The sequence contains at least two hearsay layers, plus any underlying investigative sources.	Hearsay within hearsay, TRE 805.
99:21–104:17	Peter Zanoni; Ajit David; Mike Culbertson	Counsel plays the recorded Zanoni–David conversation. Zanoni allegedly states that the federal document was tampered with, the PowerPoint was designed to suggest a recent FEMA change, Culbertson required an infrastructure tie, and the applicants "hatched" a scheme. Peronel confirms hearing the statements but repeatedly says they are Zanoni's interpretation or opinion.	The recording is embedded within Peronel's deposition. It includes statements by Zanoni and David and an additional statement attributed by Zanoni to Culbertson. Peronel's recognition of the voices or belief that Zanoni was expressing a truthful opinion does not cure the hearsay.	Multiple hearsay, TRE 805.
104:18–105:8	Peter Zanoni; unidentified persons who allegedly reported Council votes	Counsel refers to Zanoni's recorded statement that there were seven votes for the ordinance. Peronel notes that Zanoni said, "I heard," and that Peronel does not know who told him.	This is double hearsay: unidentified persons allegedly told Zanoni how Council members would vote, and Zanoni repeated that information during the recorded conversation. The recording is then embedded in Peronel's deposition.	Multiple hearsay, TRE 805.

Respondent's Objections to Petitioner's Exhibit 7: Deposition of Sony Peronel

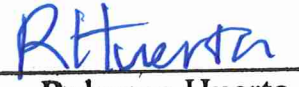
Page:Line	Original declarant	Embedded statement or substance presented	Hearsay analysis	Objection
105:20– 108:15	Peter Zanoni	Peronel recounts hearing Zanoni say in a separate internal meeting that he had informed Council there was an allegation concerning an altered document. Peronel was not present for Zanoni's communication to Council.	Zanoni's internal statement is offered to prove that he informed Council. Because Peronel did not witness the underlying communication, his testimony depends entirely on Zanoni's out-of-court report.	Hearsay, TRE 801 and 802.
116:18– 121:4	Ajit David; Heather Hurlbert	Counsel reads David's text stating that anyone with knowledge of an intentionally altered document is automatically an accomplice. Peronel describes it as David's statement that a crime had been committed. Counsel then combines David's text with Hurlbert's deposition conclusion that felony forgery occurred.	David's legal and factual assertions are hearsay because they are offered for their truth. Combining them with Hurlbert's deposition produces multiple hearsay.	Hearsay. TRE 801, 802, and 805.
122:16– 133:9	Ajit David; author of DOJ article; persons quoted or described in article; Peter Zanoni	Counsel introduces David's text linking a DOJ article about the Weslaco prosecution. Counsel reads or summarizes the article's assertions about bribes, a fictitious agreement, a scheme, incentives, indictments, and criminal charges, and compares them to Zanoni's recorded "scheme" statement.	The article is hearsay. Statements and reported facts within the article create additional hearsay layers.	Multiple hearsay, TRE 805.
128:4– 131:19	Peter Zanoni and Heather Hurlbert	Counsel uses Zanoni's recording and Hurlbert's deposition to assert that the alteration was no longer an allegation but a proven felony offense. Peronel continues to distinguish between an altered document and a proven crime.	This sequence combines Zanoni's recorded opinion, Hurlbert's deposition conclusion, and Peronel's deposition. Neither out-of-court statement becomes admissible	Multiple hearsay, TRE 805. Exclude the compound premise that the investigation proved a felony.

Respondent's Objections to Petitioner's Exhibit 7: Deposition of Sony Peronel

Page:Line	Original declarant	Embedded statement or substance presented	Hearsay analysis	Objection
			because counsel asks Peronel to accept it as a proven fact.	
132:16– 135:14	Ajit David; DOJ article; Heather Hurlbert	Counsel characterizes David's transmission of the Weslaco article as notice that using false documents could result in indictment, then invokes Hurlbert's alleged felony-forgery conclusion and David's "accomplice" statement.	The testimony layers David's text, the article's reported facts, Hurlbert's deposition, and Peronel's deposition.	Multiple hearsay, TRE 805.
136:4– 142:5	Ajit David and Sony Peronel's prior text messages	Counsel reads David's text, "this is scandalous," and Peronel's response, "indeed," and asks Peronel to agree that he adopted David's characterization of the alteration.	David's statement is hearsay because it's offered to prove the conduct was scandalous. Peronel's own prior written response is also an out-of-court statement.	Hearsay. TRE 801.
142:11– 145:15	Philip Ramirez and Deven Bhakta; unidentified meeting participants	Counsel introduces the April 11 Elevate letter stating that Ramirez and Bhakta had met with City staff, the Type B chair, and three Council members and that the incentive was not tied to floodproofing improvements. Peronel was not present at the identified meeting and had never previously seen the letter.	The letter is an out-of-court written assertion. Its description of the meeting and participants is hearsay, and any statements made during that meeting create additional layers. Peronel's interpretation of the letter does not authenticate the truth of its contents.	Hearsay within hearsay, TRE 805.
147:12– 148:7	Ajit David; unidentified former Council member; Peter Zaroni	Counsel introduces a text exchange concerning blame for the altered document. Peronel says he saw a document in which David reported that a former Council member made a statement. Counsel then refers again to	David's report of a former Council member's statement is double hearsay. Zaroni's recorded statement is another out-of-court assertion embedded in the deposition.	Multiple hearsay, TRE 805.

Respondent's Objections to Petitioner's Exhibit 7: Deposition of Sony Peronel

Page:Line	Original declarant	Embedded statement or substance presented	Hearsay analysis	Objection
149:1– 153:9	Sony Peronel's prior statement to Ajit David; Peter Zanolini	Zanolini's recording that he did not want to be blamed. Counsel attributes to Peronel a prior statement that it was obvious Ramirez and his team altered the document and that Zanolini was going to advise Council not to "touch" the item. Peronel confirms making part of the statement and clarifies that Zanolini meant he would not recommend it.	Peronel's own prior statement is out-of-court and is being used substantively. Within it, he repeats Zanolini's intended advice, creating another hearsay layer.	Hearsay within hearsay, TRE 805.
150:21– 154:19	Philip Ramirez	Peronel recounts the meeting in which Zanolini asked Ramirez to explain the difference between the FEMA source document and the version provided to the CCREDC. Peronel testifies that Ramirez stuttered, could not complete a sentence, and did not provide an answer.	No answer was provided.	Counsel's characterization that the conduct proved guilt or alteration is hearsay.


Rebecca Huerta
City Secretary

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

PETITIONERS' RESPONSE TO GUAJARDO'S TRE 804 OBJECTION
PETITIONERS' RESPONSE TO GUAJARDO'S MOTION TO EXCLUDE

NOW COME Petitioners, and make and file this Petitioners' Response to Guajardo's TRE 804 Objection, and Petitioners' Response to Motion to Exclude, and in support would show:

GUAJARDO'S OBJECTION IS UNTIMELY

1. On or about May 26, 2026, Petitioners filed their Petitioners' Exhibit List, inclusive of all exhibits now complained of by Guajardo.
2. Today, the United States Fifth Circuit Court of Appeals denied Guajardo's request to enjoin the City of Corpus Christi ("City") Council from proceeding with removal/ disciplinary hearing scheduled to commence tomorrow (July 22, 2026).
3. Guajardo's last-minute (11th Hour) filing is untimely; and should thus be **DENIED**. Guajardo has had approximately two (2) months to file her objections but has failed to file any objections until the eve before commencement of the proceedings. Further, Guajardo's

last-minute (11th Hour) filing is properly denied pursuant to the City's Rules of Procedure which expressly allow for use of the depositions made the subject of Guajardo's objection/motion (City's Rule states: "Evidence – Witnesses: . . . "All testimony (live or by deposition) shall be presented under oath." **SHALL MEANS SHALL**, and the depositions are permitted "Evidence" pursuant to the City's Rules of Procedure.

4. The untimeliness of Guajardo's filing is a procedural reason to deny Guajardo's request for relief.

GUAJARDO'S MOTION TO EXCLUDE FAILS

5. A review of the City's Rules of Procedure also supports denial of Guajardo's request *on the merits*.
6. Guajardo's objection/motion relies upon a City Rule of Procedure titled and setting forth as follows:

"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." (RULE IV. A)

THIS IS ONE (1) OF SEVEN (7) OF THE **"GENERAL RULES."** This "General Rule[]" (RULE IV. A) does not mention depositions, and thus lacks applicability to depositions.

7. Another provision of the "General Rules" states: "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." (RULE IV. C). This "General Rule[]" (RULE IV. C) although still listed as a "General Rule[]" deals more specifically with "deposition testimony" than RULE IV. A; and this more specific "General Rule[]"

clearly favors admission of deposition testimony if “the type commonly relied upon,” which sworn deposition testimony is reliable, trustworthy, and of “the type commonly relied upon.” **Thus, the depositions made the subject of Guajardo’s objection/ motion are properly admissible pursuant to RULE IV. C.**

8. And to put a finer point on it, section V is extremely specific as to how deposition testimony “shall” be managed during these disciplinary/impeachment proceedings. RULE V. is titled “Evidence – Witnesses.” RULE V. A states: All testimony (live or by deposition) shall be presented under oath.” This is the only one (1) of the City’s Rules of Procedure that specifically (not a “General Rule[.]”) addresses how “depositions” “shall” be utilized in these proceedings.
9. The City’s Rules of Procedure are similar to provisions of law (whether state law, or ordinance approved by a city). As such, **Texas Government Code section 311.026** provides guidance:

“(b) If the conflict between the general provision and the special or local provision is irreconcilable, the special or local provision prevails as an exception to the general rule”

Simply stated: if there is conflict or confusion as to how to apply multiple rules (provisions), then apply the rule (“provision”) that is more specific, not the rule (“provision”) that is more “general.” In this case, Guajardo is reading the “General Rule[.]” to argue that depositions are not admissible – *even though the “General Rule[.]” (RULE IV. A) never mentions or refers to “deposition(s).”* In contrast, the specific rule dealing with “Evidence – Witnesses” and specifically mentioning “testimony” “by deposition” states such “testimony” “shall be presented under oath” (and all depositions challenged by

Guajardo were properly taken pursuant to “oath . . . administered by [a] person qualified to administer an oath in the State of Texas”); as required by specific RULE V. A.

- 10. Texas law makes clear that we apply the specific provision (rule), not the general provision (rule). As such, the admission of sworn deposition testimony is governed by RULE V. A (the City Rule of Procedure that actually mentions ‘depositions’). The sworn depositions properly admitted as evidence.**

PUBLICITY POLICY

11. Public policy endeavors to promote transparency in governance. The sworn deposition testimony made the subject of Guajardo’s motion is properly admitted in search of honest, fair governance. Guajardo is trying to stop the public from knowing the truth about her misconduct, malfeasance, and willful neglect of the City’s best interest. As such, public policy favors admission of this sworn deposition testimony as evidence.
12. Texas Rules of Evidence governing admission of evidence are designed to allow a tribunal’s (jury, judge) consideration of trustworthy evidence. Nothing in Guajardo’s objection/motion calls into question the trustworthiness of the sworn deposition testimony offered herein by Petitioners; and – as such – the testimony is properly admitted into evidence.

WHEREFORE, PREMISES CONSIDERED, Petitioners pray for all relief requested herein and pray that Guajardo’s objections/motion be in all things denied, and for such other and further relief to which Petitioners may be justly entitled, both at law and in equity.


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 21st day of July 2026.


Douglas A. Allison


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 – 68 referenced in Petitioners' Second Amended Exhibit List. 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 – 68 listed on Petitioners' Second Amended Exhibit List) 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.

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

- PETS EXHIBIT 13: is CCREDC Proposal Memorandum with attached Elevate QOF LLC's Application to CCREDC (requesting Type B funds);
- PETS EXHIBIT 14: is CCREDC Proposal Memorandum (November 9, 2023);
- PETS EXHIBIT 15: is CCREDC BOD Meeting (meeting minutes dated November 9, 2023);
- PETS EXHIBIT 16: is City of Corpus Christi – Type B Corporation, Executive Session Term Sheet
- PETS EXHIBIT 17: is John Bell email;
- PETS EXHIBIT 18: is presentation slide deck from QOF Elevate LLC (slide 2, right column contains altered FEMA screenshot)
- PETS EXHIBIT 19: is presentation slide deck from QOF Elevate LLC converted to PowerPoint;
- PETS EXHIBIT 20: is presentation slide deck used during presentation to Type B Corporation (meeting on December 11, 2023);
- PETS EXHIBIT 21: is video recording of Elevate QOF LLC's presentation to Type B Board Corporation (meeting December 11, 2023);
- PETS EXHIBIT 22: is transcription of statements made by Elevate QOF LLC to Type B Board Corporation (meeting December 11, 2023);
- PETS EXHIBIT 23: is City's Agenda Memorandum (January 30 2024);
- PETS EXHIBIT 24: is email to Janet Whitehead (February 5, 2024);
- PETS EXHIBIT 25: is City's Meeting Agenda (February 20, 2024);

- PETS EXHIBIT 26: document collection uploaded per Legistar (City's 2/20/24 meeting);
- PETS EXHIBIT 27: is City's presentation deck (1st Reading – February 20, 2024);
- PETS EXHIBIT 28: is Legistar audit report (produced by City of Corpus Christi);
- PETS EXHIBIT 29: is video of Mayor's introduction of Elevate QOF LLC agenda item;
- PETS EXHIBIT 30: is video of presentation to City Council of agenda item (2/20/24);
- PETS EXHIBIT 31: is video of Mayor interrupting Councilman Hunter (2/20/24);
- PETS EXHIBIT 32: is email from Ajit David to Peter Zanoni ("Red Flags" – March 7, 2024);
- PETS EXHIBIT 33: is text from Ajit David to Peter Zanoni (attached Weslaco article);
- PETS EXHIBIT 34: 2024.04.15 Audio Recording of Peter Zanoni and Ajit David Telephone Conversation
- PETS EXHIBIT 35: is video of Ajit David public comment (April 16, 2024);
- PETS EXHIBIT 36: is Miles Risley memorandum (confirming April 16, 2024, presentation to City Council Member in executive session);
- PETS EXHIBIT 37: is email (with attachments) from Rebecca Huerta to Mayor;
- PETS EXHIBIT 38: is video of Ajit David public comment (April 23, 2024);
- PETS EXHIBIT 39: is Texas Penal Code, section 32.21;
- PETS EXHIBIT 40: is Texas Penal Code, section 7.02;
- PETS EXHIBIT 41: is City Agenda Memorandum (for April 23, 2024 Reading);
- PETS EXHIBIT 42: is City Meeting Agenda (April 24, 2024);

- PETS EXHIBIT 43: is City's published organization chart;
- PETS EXHIBIT 44: is collection of Mayor's text messages;
- PETS EXHIBIT 45: is collection of phone invoices evidencing calls to/from Mayor;
- PETS EXHIBIT 46: Mayor Paulette Guajardo Facebook Post "REMOVAL HEARING UPDATE #5"
- PETS EXHIBIT 47: Mayor Paulette Guajardo Facebook Post "REMOVAL HEARING UPDATE #4"
- PETS EXHIBIT 48: Mayor Paulette Guajardo Facebook Post "REMOVAL HEARING UPDATE #3"
- PETS EXHIBIT 49: Email String regarding ongoing mediation efforts
- PETS EXHIBIT 50: Agreement Contract C2024-081
- PETS EXHIBIT 51: 2024.02.20 Agenda Packet City of Corpus Christi Council Meeting
- PETS EXHIBIT 52: 2024.02.20 Agenda Packet and Elevate QOF Item
- PETS EXHIBIT 53: 2024.02.27 City Council Meeting Agenda Packet
- PETS EXHIBIT 54: 2024.04.23 City Council Meeting Agenda Packet
- PETS EXHIBIT 55: 2024.04.23 City Council Agenda Item Approving 2nd Reading
- PETS EXHIBIT 56-1: 2024.01.25 RE Elevated QOF LLC Agreement Email
- PETS EXHIBIT 56-2: 2024.02.02 RE Homewood Suite Executed Agreement Email
- PETS EXHIBIT 56-3: 2024.02.05 RE Homewood Suite Executed Agreement Email

- PETS EXHIBIT 56-4: 2024.02.05 RE Homewood Suite Executed Agreement
- PETS EXHIBIT 56-5: 2024.02.12 Approval Tracking - Individual Review Request
- PETS EXHIBIT 57: 2024.04.15 is Clip of Audio Recording of Peter Zanoni and Ajit David Telephone Conversation
- PETS EXHIBIT 58: 2024.04.15 Transcription of Call between P. Zanoni and A. David;
- PETS EXHIBIT 59: 2026.02.17 City of Corpus Christi Council Meeting Video Clip of Presentation
- PETS EXHIBIT 60: 2026.02.17 City of Corpus Christi Council Meeting Video Clip of CCPD Presentation
- PETS EXHIBIT 61: 2025.09.09 Mayor Paulette Guajardo's Statement of Fact at City Council Meeting
- PETS EXHIBIT 62: 2025.09.09 Mayor Paulette Guajardo's Statement of Fact at City Council Meeting 2
- PETS EXHIBIT 63: ELEVATE000394 – Text Message with Peter Zanoni
- PETS EXHIBIT 64: ELEVATE000372 – Text Message with Mayor Paulette Guajardo
- PETS EXHIBIT 65: ELEVATE000383 – Text Message with Heather Hurlbert
- PETS EXHIBIT 66: ELEVATE000416-000417: 2024.03.15 Email Exchange between Heather Hurlbert and Philip Ramirez
- PETS EXHIBIT 67: 2025.08.06 Video Clip of Deposition of Mayor Paulette Guahardo; and
- PETS EXHIBIT 68: Spreadsheet of Philip Ramirez Phone Logs (ELEVATE 000001-

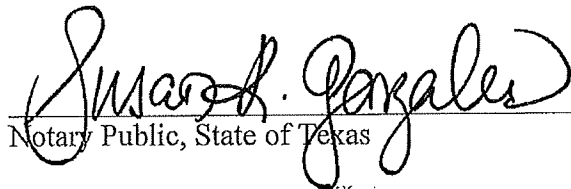
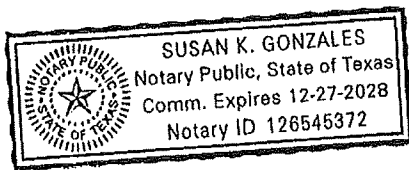
000150) and Deven Bhakta Phone Logs.

Affiant further sayeth naught.



Douglas A. Allison

SWORN TO AND SUBSCRIBED before me on the 21st day of July, 2026.



Notary Public, State of Texas


Rebecca Huerta
City Secretary

IN THE REMOVAL PROCEEDING BEFORE
THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

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,

RESPONDENT'S MOTION FOR CONTINUANCE

Respondent respectfully asks for a continuance of the Removal Hearing due to last-minute evidence production by Petitioners.

The afternoon before the Removal Hearing, while Respondent presided over a Council meeting, Petitioners added 19 additional exhibits to their already extensive set of exhibits. The new exhibits contain 1,922 (one-thousand, nine hundred and twenty-two) pages of documents, 5 videos, and one audio recording.

It was impossible for Respondent to review the new exhibits prior to the hearing.

It was impossible for the undersigned Counsel to review all such exhibits with Respondent prior the start of the hearing.

It was impossible for the undersigned Counsel to review all such exhibits prior to the start of the hearing without Respondent.

Respondent requires additional time to review such new evidence prior to the start of the hearing.

Respondent further objects on due process grounds. Receipt of new evidence to be offered against her, that she cannot review and prepare to respond to prior to the start of the hearing, violates her procedural and substantive due process rights under Texas and federal law.

Respondent respectfully prays for a continuance of the Removal Hearing.

This motion is not made for delay only, but so that justice may be done.

Respectfully submitted,

/s/ John Flood

John Flood
John T. Flood, LLP
819 N. Upper Broadway
Corpus Christi, Texas 78401
(361) 654-8877
(361) 654-8879 Fax
john@floodtriallawyers.com
Irma@floodtriallawyers.com

Verification

I have read the foregoing Motion for Continuance. The factual statements contained therein are within my personal knowledge and are true and correct.

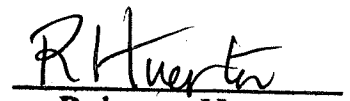
Dated: July 22, 2026

/s/ John Flood
John Flood

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was either electronically sent to all counsel of record via e-mail with City Secretary, Rebecca Huerta, on this the 22nd day of July, 2026, or, hand delivered to same.

/s/ John Flood
John Flood


Rebecca Huerta
City Secretary

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

SUBPOENA

ISSUED IN THE NAME OF THE CITY OF CORPUS CHRISTI, and PURSUANT TO THE AUTHORITY GRANTED BY THE CITY OF CORPUS CHRISTI CHARTER, on July 21, 2026.

TO: Mayor, **PAULETTE GUAJARDO**, in-person and through her attorney John T. Flood at John T. Flood LLP.

TO ANY SHERIFF, CONSTABLE, OR ANY OTHER PERSON AUTHORIZED TO SERVE AND EXECUTE SUBPOENAS IN THE STATE OF TEXAS.

YOU, **PAULETTE GUAJARDO**, ARE HEREBY COMMANDED, by personal service upon you and by and through your attorneys of record, to be and appear in person before the City of Corpus Christi Council, Corpus Christi City Hall, 901 Leopard Street, Council Chambers, Corpus Christi, Texas 78401, to begin on the **23rd day of July 2026, at 9:00 a.m.**, and there to make answers under oath to certain questions to be propounded to **PAULETTE GUAJARDO** at this instance of the Petitioners in the pending and above-referenced proceeding and further commanded and **PAULETTE GUAJARDO** remain in attendance from day to day until discharged.

FAILURE BY ANY PERSON WITHOUT ADEQUATE EXCUSE TO OBEY A SUBPOENA SERVED UPON THAT PERSON MAY BE DEEMED A CONTEMPT OF THE CITY COUNCIL AND CITY CHARTER FROM WHICH THE SUBPOENA IS ISSUED, AND MAY OR MAY NOT BE PUNISHED BY FINE OR CONFINEMENT.

Issued this 21st day of July 2026.

Respectfully submitted,

LAW OFFICES OF DOUGLAS A. ALLISON

403 N. Tancahua 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

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was electronically filed with Rebecca Huerta, City Secretary of City of Corpus Christi, and John Flood, attorney for Paulette Guajardo, on this the 21std day of July 2026.

/s/ Douglas A. Allison

DOUGLAS A. ALLISON

EXHIBIT A
SUBPOENA DUCES TECUM

Please take notice, that in connection with the taking of this deposition and pursuant to Rule 201 of the Texas Rules of Civil Procedure, the deponent is hereby required to produce and permit Plaintiff to inspect and copy the following documents and things at the commencement of the taking of this deposition:

1. All oaths signed by Mayor Paulette Guajardo;
2. All oaths signed by Paulette Guajardo (as Mayor and as Councilwoman serving At-Large) relating to Corpus Christi regional Economic Development Corporation (CCREDC);
3. All oaths signed by Paulette Guajardo relating to CC Type B Corporation;
4. Any and all documents, including but not limited to invoices showing source of payment received by Dolcefino Consulting (Media) and/or Wayne Dolcefino from 1951 Richmond, Houston, Texas and as dolcefino.com.

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

RETURN OF SERVICE OF SUBPOENA

I, Gabriel Perez delivered a copy of this subpoena to **PAULETTE GUAJARDO** who is a party to these proceedings, at 901 Leopard, Corpus Christi, in Nueces County, Texas on the 21st day of July 2026, at 2:18 o'clock P.m., and tendered to the witness a fee of \$11 in cash.

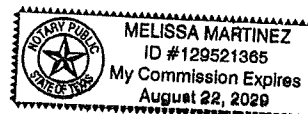
I, _____, was unable to deliver a copy of this subpoena to **PAULETTE GUAJARDO** who is a party to these proceedings, for the following reasons:

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 21st day of July 2026.

Notary Public for State of Texas



Date Filed 7-29-26

AFFIDAVIT OF SERVICE

Rebecca Huerta
Rebecca Huerta
City Secretary

IN THE REMOVAL PROCEEDING BEFORE
THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

For:

John Flood
John T. Flood, LLP
819 N. Upper Broadway
Corpus Christi, TX. 78401

Received by Keith Bulsterbaum on the 15th day of July, 2026 at 3:00 pm to be served on Deputy Chief William Breedlove, 321 John Sartian Street, Corpus Christi Police Department, Corpus Christi, Nueces County, TX 78401.

I, Keith Bulsterbaum, being duly sworn, depose and say that on the 16th day of July, 2026 at 9:55 am, I:

INDIVIDUALLY and PERSONALLY Executed, by delivering a true copy of the \$40.00 Witness Fee and Subpoena for Hearing with the date of service endorsed thereon by me, to Deputy Chief William Breedlove in person at the Work address of 321 John Sartian Street, Corpus Christi Police Department, Corpus Christi, Nueces County, TX 78401.

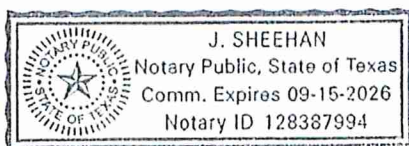
Description of Person Served: Age: 60, Sex: M, Race/Skin Color: Caucasian, Height: 5'8", Weight: 200, Hair: Grey, Glasses: N

I am over eighteen, not a party to nor interested in the outcome of the above numbered suit and that I am authorized to serve civil process. I have personal knowledge of the facts set forth in the foregoing affidavit and declare that the statements therein contained are true and correct. I am familiar with the Rules of Civil Procedure. I have never been convicted of a Felony or Misdemeanor involving Moral Turpitude.

NOTARY PUBLIC IN AND FOR
THE STATE OF TEXAS

Subscribed and Sworn to before me on
the 17 day of July, 2026
by the affiant who is personally known to me.

J. Sheehan
NOTARY PUBLIC



Keith Bulsterbaum

Keith Bulsterbaum
PSC-18577 Exp: 9/30/2026
Allen Civil Process
Service@acptx.com
P.O. BOX 181293
Corpus Christi, TX 78480-1293
(361) 884-1657

Our Job Serial Number: ALN-2026004571
Ref: Paulette Guajardo

036-2026

IN THE REMOVAL PROCEEDING BEFORE
THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

IN THE NAME OF THE STATE OF TEXAS

SUBPOENA REQUIRING WITNESS TO APPEAR AND TESTIFY

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, this subpoena is issued upon the request of, and on behalf of, the Mayor of the City of Corpus Christi, Texas, Paulette Guajardo.

REMOVAL PROCEEDING BEFORE THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

TO: ANY SHERIFF OR CONSTABLE OF THE STATE OF TEXAS OR OTHER PERSON AUTHORIZED TO SERVE AND EXECUTE SUBPOENAS AS PROVIDED IN THE CHARTER OF THE CITY OF CORPUS CHRISTI, TEXAS, SECTION 2-22, AND [IRMA: I WANT TO ADD THE STATE .

YOU ARE HEREBY COMMANDED TO SUMMON Deputy Chief, William Breedlove, who may served at his physical address: **Corpus Christi Police Department, 321 John Sartian Street, Corpus Christi, TX 78401** or wherever he may be found, and who is represented to reside within one hundred fifty miles of the City of Corpus Christi City Hall, Corpus Christi, Texas.

Pursuant to Article II, Sections 2-22 through 2-24 of the Corpus Christi Code of Ordinances, the Corpus Christi City Charter, and the Rules of Procedure for City Council Hearing for Removal Action under the City Charter (Amended June 2, 2026), you are directed to appear at **9:00 a.m. on July 22, 2026, Mayor Betty Turner Council Chambers, City of Corpus Christi City Hall, 1201 Leopard Street, Corpus Christi, TX 78401-2120** to attend and give sworn testimony and to remain there from day to day until discharged by the party who issued this subpoena.

Notice of City of Corpus Christi Code of Ordinances Sec. 2-24: Contempt. Any person who shall refuse to be sworn or to testify or to produce books, papers or other evidence material to an inquiry when a subpoena or other process has been served upon him shall be guilty of contempt of the city council and, upon conviction thereof by the council, shall be fined not less than twenty-five dollars (\$25.00) nor more than one hundred dollars (\$100.00). Each day any person shall refuse to obey any subpoena, or process shall constitute a separate violation. The penalties provided herein shall be cumulative of all other penalties authorized by ordinance, law or city Charter for contempt of the city council.

TRCP 176.8(a). Contempt. Failure by any person without adequate excuse to obey a subpoena served upon that person 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.

ISSUED ON THIS 15th DAY OF JULY 2026.

By: Mayor Paulette Guajardo, through counsel:



John Flood
Texas Bar No. 0715581
John T. Flood, LLP
819 N. Upper Broadway
Corpus Christi, Texas 78401
(361) 654-8877
john@floodtriallawyers.com
irma@floodtriallawyers.com

OFFICER'S RETURN ON THE NEXT PAGE

WITNESS SUBPOENA RETURN

Came to hand the _____ day of _____, 2026, at _____ o'clock
_____.M., and executed the _____ day of _____, 2026, at _____ o'clock
_____.M., by delivering to the within named _____
_____ in person at _____ in _____
_____ County, Texas, a true copy of this Subpoena, and tendering said witness the sum of \$10.00.

By Deputy: _____
Sheriff/Constable _____
_____, County, Texas

OR

By: _____

Person who is not a party to the suit and is not less than 18 years of age.

IN THE REMOVAL PROCEEDING BEFORE
THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

IN THE NAME OF THE STATE OF TEXAS

SUBPOENA REQUIRING WITNESS TO APPEAR AND TESTIFY

ACCEPTANCE OF SERVICE OF SUBPOENA BY WITNESS

I, the undersigned witness named in the Subpoena acknowledge receipt thereof, and hereby accept service of the attached subpoena, and will appear at the time and place as directed in this subpoena.

***City of Corpus Christi Charter Sec. 2-24: Contempt.** Any person who shall refuse to be sworn or to testify or to produce books, papers or other evidence material to an inquiry when a subpoena or other process has been served upon him shall be guilty of contempt of the city council and, upon conviction thereof by the council, shall be fined not less than twenty-five dollars (\$25.00) nor more than one hundred dollars (\$100.00). Each day any person shall refuse to obey any subpoena, or process shall constitute a separate violation.*

SIGNATURE OF WITNESS

DATE

Not executed as to the witness

for the following reasons:

FEE FOR SERVICE OF SUBPOENA: \$ _____

AFFIDAVIT OF SERVICE


Rebecca Huerta
City Secretary

IN THE REMOVAL PROCEEDING BEFORE
THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

For:

John Flood
John T. Flood, LLP
819 N. Upper Broadway
Corpus Christi, TX. 78401

Received by Keith Bulsterbaum on the 15th day of July, 2026 at 1:18 pm to be served on Leah Pagan Olivarri, 33 Camden Place, Corpus Christi, Nueces County, TX 78412.

I, Keith Bulsterbaum, being duly sworn, depose and say that on the 16th day of July, 2026 at 7:25 pm, I:

INDIVIDUALLY and PERSONALLY Executed, by delivering a true copy of the \$40.00 Witness Fee and Subpoena For Hearing with the date of service endorsed thereon by me, to Leah Pagan Olivarri in person at the Abode address of 33 Camden Place, Corpus Christi, Nueces County, TX 78412.

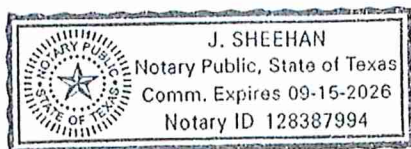
Description of Person Served: Age: 65, Sex: F, Race: Caucasian, Height: 5'4", Weight: 160, Hair: Blonde, Glasses: N

I am over eighteen, not a party to nor interested in the outcome of the above numbered suit and that I am authorized to serve civil process. I have personal knowledge of the facts set forth in the foregoing affidavit and declare that the statements therein contained are true and correct. I am familiar with the Rules of Civil Procedure. I have never been convicted of a Felony or Misdemeanor involving Moral Turpitude.

NOTARY PUBLIC IN AND FOR
THE STATE OF TEXAS

Subscribed and Sworn to before me on
the 20 day of July, 2026
by the affiant who is personally known to me.


NOTARY PUBLIC





Keith Bulsterbaum
PSC-18577 Exp: 9/30/2026
Allen Civil Process
Service@acptx.com
P.O. BOX 181293
Corpus Christi, TX 78480-1293
(361) 884-1657

Our Job Serial Number: ALN-2026004575
Ref: Paulette Guajardo

IN THE REMOVAL PROCEEDING BEFORE
THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

IN THE NAME OF THE STATE OF TEXAS

SUBPOENA REQUIRING WITNESS TO APPEAR AND TESTIFY

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, this subpoena is issued upon the request of, and on behalf of, the Mayor of the City of Corpus Christi, Texas, Paulette Guajardo.

REMOVAL PROCEEDING BEFORE THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

TO: ANY SHERIFF OR CONSTABLE OF THE STATE OF TEXAS OR OTHER PERSON AUTHORIZED TO SERVE AND EXECUTE SUBPOENAS AS PROVIDED IN THE CHARTER OF THE CITY OF CORPUS CHRISTI, TEXAS, SECTION 2-22, AND [IRMA: I WANT TO ADD THE STATE .

YOU ARE HEREBY COMMANDED TO SUMMON Leah Pagan Olivarri, who may served at her physical address: 33 Camden Place, Corpus Corpus, TX. 78412 or wherever she may be found, and who is represented to reside within one hundred fifty miles of the City of Corpus Christi City Hall, Corpus Christi, Texas.

Pursuant to Article II, Sections 2-22 through 2-24 of the Corpus Christi Code of Ordinances, the Corpus Christi City Charter, and the Rules of Procedure for City Council Hearing for Removal Action under the City Charter (Amended June 2, 2026), you are directed to appear at **9:00 a.m. on July 22, 2026, Mayor Betty Turner Council Chambers, City of Corpus Christi City Hall**, 1201 Leopard Street, Corpus Christi, TX 78401-2120 to attend and give sworn testimony and to remain there from day to day until discharged by the party who issued this subpoena.

Notice of City of Corpus Christi Code of Ordinances Sec. 2-24: Contempt. Any person who shall refuse to be sworn or to testify or to produce books, papers or other evidence material to an inquiry when a subpoena or other process has been served upon him shall be guilty of contempt of the city council and, upon conviction thereof by the council, shall be fined not less than twenty-five dollars (\$25.00) nor more than one hundred dollars (\$100.00). Each day any person shall refuse to obey any subpoena, or process shall constitute a separate violation. The penalties provided herein shall be cumulative of all other penalties authorized by ordinance, law or city Charter for contempt of the city council.

TRCP 176.8(a). Contempt. Failure by any person without adequate excuse to obey a subpoena served upon that person 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.

ISSUED ON THIS 15th DAY OF JULY 2026.

By: Mayor Paulette Guajardo, through counsel:



John Flood
Texas Bar No. 0715581
John T. Flood, LLP
819 N. Upper Broadway
Corpus Christi, Texas 78401
(361) 654-8877
john@floodtriallawyers.com
irma@floodtriallawyers.com

OFFICER'S RETURN ON THE NEXT PAGE

WITNESS SUBPOENA RETURN

Came to hand the _____ day of _____, 2026, at _____ o'clock
_____.M., and executed the _____ day of _____, 2026, at _____ o'clock
_____.M., by delivering to the within named _____
_____ in person at _____ in _____
_____ County, Texas, a true copy of this Subpoena, and tendering said witness the sum of \$10.00.

By Deputy: _____
Sheriff/Constable _____
_____, County, Texas

OR

By: _____

Person who is not a party to the suit and is not less than 18 years of age.

IN THE REMOVAL PROCEEDING BEFORE
THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

IN THE NAME OF THE STATE OF TEXAS

SUBPOENA REQUIRING WITNESS TO APPEAR AND TESTIFY

ACCEPTANCE OF SERVICE OF SUBPOENA BY WITNESS

I, the undersigned witness named in the Subpoena acknowledge receipt thereof, and hereby accept service of the attached subpoena, and will appear at the time and place as directed in this subpoena.

***City of Corpus Christi Charter Sec. 2-24: Contempt.** Any person who shall refuse to be sworn or to testify or to produce books, papers or other evidence material to an inquiry when a subpoena or other process has been served upon him shall be guilty of contempt of the city council and, upon conviction thereof by the council, shall be fined not less than twenty-five dollars (\$25.00) nor more than one hundred dollars (\$100.00). Each day any person shall refuse to obey any subpoena, or process shall constitute a separate violation.*

SIGNATURE OF WITNESS

DATE

Not executed as to the witness

for the following reasons:

FEE FOR SERVICE OF SUBPOENA: \$ _____

R. Huerta

Rebecca Huerta
City Secretary

AFFIDAVIT OF SERVICE

IN THE REMOVAL PROCEEDING BEFORE
THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

For:

John Flood
John T. Flood, LLP
819 N. Upper Broadway
Corpus Christi, TX. 78401

Received by Keith Bulsterbaum on the 15th day of July, 2026 at 1:18 pm to be served on James "Jimmy" Granberry, 901 Leopard Street Room 206, Nueces County District Attorney's Office, Corpus Christi, Nueces County, TX 78401.

I, Keith Bulsterbaum, being duly sworn, depose and say that on the 17th day of July, 2026 at 10:15 am, I:

INDIVIDUALLY and PERSONALLY Executed, by delivering a true copy of the \$40.00 Witness Fee and Subpoena For Hearing with the date of service endorsed thereon by me to James "Jimmy" Granberry in person at the Work address of 901 Leopard Street Room 206, Nueces County District Attorney's Office, Corpus Christi, Nueces County, TX 78401.

Description of Person Served: Age: 60, Sex: M, Race: Caucasian, Height: 5'9", Weight: 240, Hair: Grey, Glasses: Y

I am over eighteen, not a party to nor interested in the outcome of the above numbered suit and that I am authorized to serve civil process. I have personal knowledge of the facts set forth in the foregoing affidavit and declare that the statements therein contained are true and correct. I am familiar with the Rules of Civil Procedure. I have never been convicted of a Felony or Misdemeanor involving Moral Turpitude.

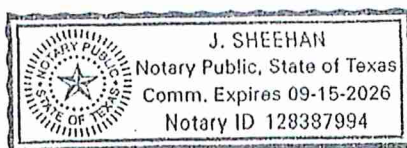
K. Bulsterbaum

NOTARY PUBLIC IN AND FOR
THE STATE OF TEXAS

Subscribed and Sworn to before me on
the 20 day of July, 2026
by the affiant who is personally known to me.

J. Sheehan

NOTARY PUBLIC



Keith Bulsterbaum
PSC-18577 Exp: 9/30/2026
Allen Civil Process
Service@acptx.com
P.O. BOX 181293
Corpus Christi, TX 78480-1293
(361) 884-1657

Our Job Serial Number: ALN-2026004570
Ref: Paulette Guajardo

IN THE REMOVAL PROCEEDING BEFORE
THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

IN THE NAME OF THE STATE OF TEXAS

SUBPOENA REQUIRING WITNESS TO APPEAR AND TESTIFY

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, this subpoena is issued upon the request of, and on behalf of, the Mayor of the City of Corpus Christi, Texas, Paulette Guajardo.

REMOVAL PROCEEDING BEFORE THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

TO: ANY SHERIFF OR CONSTABLE OF THE STATE OF TEXAS OR OTHER PERSON AUTHORIZED TO SERVE AND EXECUTE SUBPOENAS AS PROVIDED IN THE CHARTER OF THE CITY OF CORPUS CHRISTI, TEXAS, SECTION 2-22, AND [IRMA: I WANT TO ADD THE STATE .

YOU ARE HEREBY COMMANDED TO SUMMON James "Jimmy" Granberry, who may served at his physical address: **Nueces County District Attorney's Office Nueces County Courthouse, 901 Leopard Street, Room 206**, Corpus Christi, TX 78401 or wherever he may be found, and who is represented to reside within one hundred fifty miles of the City of Corpus Christi City Hall, Corpus Christi, Texas.

Pursuant to Article II, Sections 2-22 through 2-24 of the Corpus Christi Code of Ordinances, the Corpus Christi City Charter, and the Rules of Procedure for City Council Hearing for Removal Action under the City Charter (Amended June 2, 2026), you are directed to appear at **9:00 a.m. on July 22, 2026, Mayor Betty Turner Council Chambers, City of Corpus Christi City Hall**, 1201 Leopard Street, Corpus Christi, TX 78401-2120 to attend and give sworn testimony and to remain there from day to day until discharged by the party who issued this subpoena.

Notice of City of Corpus Christi Code of Ordinances Sec. 2-24: Contempt. Any person who shall refuse to be sworn or to testify or to produce books, papers or other evidence material to an inquiry when a subpoena or other process has been served upon him shall be guilty of contempt of the city council and, upon conviction thereof by the council, shall be fined not less than twenty-five dollars (\$25.00) nor more than one hundred dollars (\$100.00). Each day any person shall refuse to obey any subpoena, or process shall constitute a separate violation. The penalties provided herein shall be cumulative of all other penalties authorized by ordinance, law or city Charter for contempt of the city council.

TRCP 176.8(a). Contempt. Failure by any person without adequate excuse to obey a subpoena served upon that person 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.

ISSUED ON THIS 15th DAY OF JULY 2026.

By: Mayor Paulette Guajardo, through counsel:



John Flood
Texas Bar No. 0715581
John T. Flood, LLP
819 N. Upper Broadway
Corpus Christi, Texas 78401
(361) 654-8877
john@floodtriallawyers.com
irma@floodtriallawyers.com

OFFICER'S RETURN ON THE NEXT PAGE

WITNESS SUBPOENA RETURN

Came to hand the _____ day of _____, 2026, at _____ o'clock
_____.M., and executed the _____ day of _____, 2026, at _____ o'clock
_____.M., by delivering to the within named _____
_____ in person at _____ in _____
_____ County, Texas, a true copy of this Subpoena, and tendering said witness the sum of \$10.00.

By Deputy: _____
Sheriff/Constable _____
_____, County, Texas

OR

By: _____

Person who is not a party to the suit and is not less than 18 years of age.

IN THE REMOVAL PROCEEDING BEFORE
THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

IN THE NAME OF THE STATE OF TEXAS

SUBPOENA REQUIRING WITNESS TO APPEAR AND TESTIFY

ACCEPTANCE OF SERVICE OF SUBPOENA BY WITNESS

I, the undersigned witness named in the Subpoena acknowledge receipt thereof, and hereby accept service of the attached subpoena, and will appear at the time and place as directed in this subpoena.

***City of Corpus Christi Charter Sec. 2-24: Contempt.** Any person who shall refuse to be sworn or to testify or to produce books, papers or other evidence material to an inquiry when a subpoena or other process has been served upon him shall be guilty of contempt of the city council and, upon conviction thereof by the council, shall be fined not less than twenty-five dollars (\$25.00) nor more than one hundred dollars (\$100.00). Each day any person shall refuse to obey any subpoena, or process shall constitute a separate violation.*

SIGNATURE OF WITNESS

DATE

Not executed as to the witness

for the following reasons:

FEE FOR SERVICE OF SUBPOENA: \$ _____

Rebecca Huerta
Rebecca Huerta
City Secretary

AFFIDAVIT OF SERVICE

IN THE REMOVAL PROCEEDING BEFORE
THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

For:

John Flood
John T. Flood, LLP
819 N. Upper Broadway
Corpus Christi, TX. 78401

Received by Keith Bulsterbaum on the 15th day of July, 2026 at 1:18 pm to be served on Everett Roy, 14626 Red River Drive, Corpus Christi, Nueces County, TX 78410.

I, Keith Bulsterbaum, being duly sworn, depose and say that on the 17th day of July, 2026 at 6:03 pm, I:

INDIVIDUALLY and PERSONALLY Executed, by delivering a true copy of the \$40.00 Witness Fee and Subpoena For Hearing with the date of service endorsed thereon by me to Everett Roy in person at the Abode address of 14626 Red River Drive, Corpus Christi, Nueces County, TX 78410.

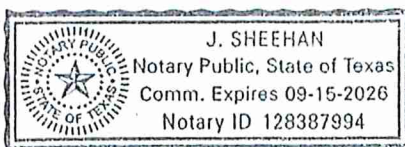
Description of Person Served: Age: 55, Sex: M, Race: Tan, Height: 5'11", Weight: 225, Hair: Bald, Glasses: Y

I am over eighteen, not a party to nor interested in the outcome of the above numbered suit and that I am authorized to serve civil process. I have personal knowledge of the facts set forth in the foregoing affidavit and declare that the statements therein contained are true and correct. I am familiar with the Rules of Civil Procedure. I have never been convicted of a Felony or Misdemeanor involving Moral Turpitude.

NOTARY PUBLIC IN AND FOR
THE STATE OF TEXAS

Subscribed and Sworn to before me on
the 20 day of July, 2026
by the affiant who is personally known to me.

J. Sheehan
NOTARY PUBLIC



Keith Bulsterbaum

Keith Bulsterbaum
PSC-18577 Exp: 9/30/2026
Allen Civil Process
Service@acptx.com
P.O. BOX 181293
Corpus Christi, TX 78480-1293
(361) 884-1657

Our Job Serial Number: ALN-2026004572
Ref: Paulette Guajardo

IN THE REMOVAL PROCEEDING BEFORE
THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

IN THE NAME OF THE STATE OF TEXAS

SUBPOENA REQUIRING WITNESS TO APPEAR AND TESTIFY

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, this subpoena is issued upon the request of, and on behalf of, the Mayor of the City of Corpus Christi, Texas, Paulette Guajardo.

REMOVAL PROCEEDING BEFORE THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

TO: ANY SHERIFF OR CONSTABLE OF THE STATE OF TEXAS OR OTHER PERSON AUTHORIZED TO SERVE AND EXECUTE SUBPOENAS AS PROVIDED IN THE CHARTER OF THE CITY OF CORPUS CHRISTI, TEXAS, SECTION 2-22, AND [IRMA: I WANT TO ADD THE STATE .

YOU ARE HEREBY COMMANDED TO SUMMON Everett Roy, who may served at his physical address: 14626 Red River Drive, Corpus Corpus, TX. 78410 or wherever she may be found, and who is represented to reside within one hundred fifty miles of the City of Corpus Christi City Hall, Corpus Christi, Texas.

Pursuant to Article II, Sections 2-22 through 2-24 of the Corpus Christi Code of Ordinances, the Corpus Christi City Charter, and the Rules of Procedure for City Council Hearing for Removal Action under the City Charter (Amended June 2, 2026), you are directed to appear at **9:00 a.m. on July 22, 2026, Mayor Betty Turner Council Chambers, City of Corpus Christi City Hall**, 1201 Leopard Street, Corpus Christi, TX 78401-2120 to attend and give sworn testimony and to remain there from day to day until discharged by the party who issued this subpoena.

Notice of City of Corpus Christi Code of Ordinances Sec. 2-24: Contempt. Any person who shall refuse to be sworn or to testify or to produce books, papers or other evidence material to an inquiry when a subpoena or other process has been served upon him shall be guilty of contempt of the city council and, upon conviction thereof by the council, shall be fined not less than twenty-five dollars (\$25.00) nor more than one hundred dollars (\$100.00). Each day any person shall refuse to obey any subpoena, or process shall constitute a separate violation. The penalties provided herein shall be cumulative of all other penalties authorized by ordinance, law or city Charter for contempt of the city council.

TRCP 176.8(a). Contempt. Failure by any person without adequate excuse to obey a subpoena served upon that person 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.

ISSUED ON THIS 15th DAY OF JULY 2026.

By: Mayor Paulette Guajardo, through counsel:



John Flood
Texas Bar No. 0715581
John T. Flood, LLP
819 N. Upper Broadway
Corpus Christi, Texas 78401
(361) 654-8877
john@floodtriallawyers.com
irma@floodtriallawyers.com

OFFICER'S RETURN ON THE NEXT PAGE
WITNESS SUBPOENA RETURN

Came to hand the _____ day of _____, 2026, at _____ o'clock
_____.M., and executed the _____ day of _____, 2026, at _____ o'clock
_____.M., by delivering to the within named _____
_____ in person at _____ in _____
_____ County, Texas, a true copy of this Subpoena, and tendering said witness the sum of \$10.00.

By Deputy: _____
Sheriff/Constable _____
_____, County, Texas

OR

By: _____

Person who is not a party to the suit and is not less than 18 years of age.

IN THE REMOVAL PROCEEDING BEFORE
THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

IN THE NAME OF THE STATE OF TEXAS

SUBPOENA REQUIRING WITNESS TO APPEAR AND TESTIFY

ACCEPTANCE OF SERVICE OF SUBPOENA BY WITNESS

I, the undersigned witness named in the Subpoena acknowledge receipt thereof, and hereby accept service of the attached subpoena, and will appear at the time and place as directed in this subpoena.

***City of Corpus Christi Charter Sec. 2-24: Contempt.** Any person who shall refuse to be sworn or to testify or to produce books, papers or other evidence material to an inquiry when a subpoena or other process has been served upon him shall be guilty of contempt of the city council and, upon conviction thereof by the council, shall be fined not less than twenty-five dollars (\$25.00) nor more than one hundred dollars (\$100.00). Each day any person shall refuse to obey any subpoena, or process shall constitute a separate violation.*

SIGNATURE OF WITNESS

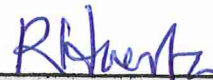
DATE

Not executed as to the witness

for the following reasons:

FEE FOR SERVICE OF SUBPOENA: \$_____

AFFIDAVIT OF SERVICE


Rebecca Huerta
City Secretary

IN THE REMOVAL PROCEEDING BEFORE
THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

For:

John Flood
John T. Flood, LLP
819 N. Upper Broadway
Corpus Christi, TX. 78401

Received by Keith Bulsterbaum on the 15th day of July, 2026 at 1:18 pm to be served on Roland Barrera, 807 N Upper Broadway, Suite 102 Corpus Christi, TX 78401.

I, Keith Bulsterbaum, being duly sworn, depose and say that on the 17th day of July, 2026 at 9:27 am, I:

INDIVIDUALLY and PERSONALLY Executed, by delivering a true copy of the \$40.00 Witness Fee and Subpoena For Hearing with the date of service endorsed thereon by me, to Roland Barrera in person at the Work address of 807 N Upper Broadway, Suite 102, Corpus Christi, Nueces County, TX 78401.

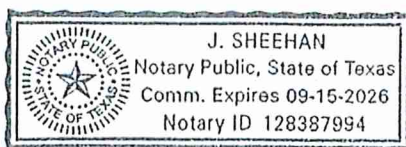
Description of Person Served: Age: 50, Sex: M, Race: Hispanic, Height: 5'7", Weight: 200, Hair: Salt & Pepper, Glasses: Y

I am over eighteen, not a party to nor interested in the outcome of the above numbered suit and that I am authorized to serve civil process. I have personal knowledge of the facts set forth in the foregoing affidavit and declare that the statements therein contained are true and correct. I am familiar with the Rules of Civil Procedure. I have never been convicted of a Felony or Misdemeanor involving Moral Turpitude.

NOTARY PUBLIC IN AND FOR
THE STATE OF TEXAS

Subscribed and Sworn to before me on
the 20 day of July, 2026
by the affiant who is personally known to me.


NOTARY PUBLIC




Keith Bulsterbaum
PSC-18577 Exp: 9/30/2026
Allen Civil Process
Service@acptx.com
P.O. BOX 181293
Corpus Christi, TX 78480-1293
(361) 884-1657

Our Job Serial Number: ALN-2026004573
Ref: Paulette Guajardo

IN THE REMOVAL PROCEEDING BEFORE
THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

IN THE NAME OF THE STATE OF TEXAS

SUBPOENA REQUIRING WITNESS TO APPEAR AND TESTIFY

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, this subpoena is issued upon the request of, and on behalf of, the Mayor of the City of Corpus Christi, Texas, Paulette Guajardo.

REMOVAL PROCEEDING BEFORE THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

TO: ANY SHERIFF OR CONSTABLE OF THE STATE OF TEXAS OR OTHER PERSON AUTHORIZED TO SERVE AND EXECUTE SUBPOENAS AS PROVIDED IN THE CHARTER OF THE CITY OF CORPUS CHRISTI, TEXAS, SECTION 2-22, AND [IRMA: I WANT TO ADD THE STATE .

YOU ARE HEREBY COMMANDED TO SUMMON Roland Barrera, who may served at his physical address: 84 Lake Shore Dr., Corpus Corpus, TX. 78413 or wherever he may be found, and who is represented to reside within one hundred fifty miles of the City of Corpus Christi City Hall, Corpus Christi, Texas.

Pursuant to Article II, Sections 2-22 through 2-24 of the Corpus Christi Code of Ordinances, the Corpus Christi City Charter, and the Rules of Procedure for City Council Hearing for Removal Action under the City Charter (Amended June 2, 2026), you are directed to appear at **9:00 a.m. on July 22, 2026, Mayor Betty Turner Council Chambers, City of Corpus Christi City Hall**, 1201 Leopard Street, Corpus Christi, TX 78401-2120 to attend and give sworn testimony and to remain there from day to day until discharged by the party who issued this subpoena.

Notice of City of Corpus Christi Code of Ordinances Sec. 2-24: Contempt. Any person who shall refuse to be sworn or to testify or to produce books, papers or other evidence material to an inquiry when a subpoena or other process has been served upon him shall be guilty of contempt of the city council and, upon conviction thereof by the council, shall be fined not less than twenty-five dollars (\$25.00) nor more than one hundred dollars (\$100.00). Each day any person shall refuse to obey any subpoena, or process shall constitute a separate violation. The penalties provided herein shall be cumulative of all other penalties authorized by ordinance, law or city Charter for contempt of the city council.

TRCP 176.8(a). Contempt. Failure by any person without adequate excuse to obey a subpoena served upon that person 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.

ISSUED ON THIS 15th DAY OF JULY 2026.

By: Mayor Paulette Guajardo, through counsel:



John Flood
Texas Bar No. 0715581 John T. Flood, LLP
819 N. Upper Broadway
Corpus Christi, Texas 78401
(361) 654-8877
john@floodtriallawyers.com
irma@floodtriallawyers.com

OFFICER'S RETURN ON THE NEXT PAGE
WITNESS SUBPOENA RETURN

Came to hand the _____ day of _____, 2026, at _____ o'clock
_____.M., and executed the _____ day of _____, 2026, at _____ o'clock
_____.M., by delivering to the within named _____
_____ in person at _____ in _____
_____ County, Texas, a true copy of this Subpoena, and tendering said witness the sum of \$10.00.

By Deputy: _____
Sheriff/Constable _____
_____, County, Texas

OR

By: _____

Person who is not a party to the suit and is not less than 18 years of age.

IN THE REMOVAL PROCEEDING BEFORE
THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

IN THE NAME OF THE STATE OF TEXAS

SUBPOENA REQUIRING WITNESS TO APPEAR AND TESTIFY

ACCEPTANCE OF SERVICE OF SUBPOENA BY WITNESS

I, the undersigned witness named in the Subpoena acknowledge receipt thereof, and hereby accept service of the attached subpoena, and will appear at the time and place as directed in this subpoena.

***City of Corpus Christi Charter Sec. 2-24: Contempt.** Any person who shall refuse to be sworn or to testify or to produce books, papers or other evidence material to an inquiry when a subpoena or other process has been served upon him shall be guilty of contempt of the city council and, upon conviction thereof by the council, shall be fined not less than twenty-five dollars (\$25.00) nor more than one hundred dollars (\$100.00). Each day any person shall refuse to obey any subpoena, or process shall constitute a separate violation.*

SIGNATURE OF WITNESS

DATE

Not executed as to the witness

for the following reasons:

FEE FOR SERVICE OF SUBPOENA: \$ _____

R Huerta

Rebecca Huerta
City Secretary

AFFIDAVIT OF SERVICE

IN THE REMOVAL PROCEEDING BEFORE
THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

For:

John Flood
John T. Flood, LLP
819 N. Upper Broadway
Corpus Christi, TX. 78401

Received by Keith Bulsterbaum on the 15th day of July, 2026 at 1:18 pm to be served on Peter Zaroni, 201 Southern Street, Corpus Christi, Nueces County, TX 78404.

I, Keith Bulsterbaum, being duly sworn, depose and say that on the 17th day of July, 2026 at 7:08 pm, I:

INDIVIDUALLY and PERSONALLY Executed, by delivering a true copy of the \$40.00 Witness Fee and Subpoena For Hearing with the date of service endorsed thereon by me to Peter Zaroni in person at the Abode address of 201 Southern Street, Corpus Christi, Nueces County, TX 78404.

Description of Person Served: Age: 55, Sex: M, Race: Caucasian, Height: 5'9", Weight: 215, Hair: Black, Glasses: N

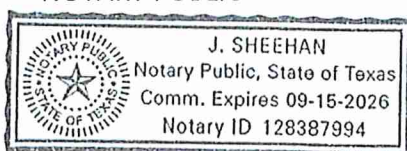
I am over eighteen, not a party to nor interested in the outcome of the above numbered suit and that I am authorized to serve civil process. I have personal knowledge of the facts set forth in the foregoing affidavit and declare that the statements therein contained are true and correct. I am familiar with the Rules of Civil Procedure. I have never been convicted of a Felony or Misdemeanor involving Moral Turpitude.

NOTARY PUBLIC IN AND FOR
THE STATE OF TEXAS

Subscribed and Sworn to before me on
the 20 day of July, 2026
by the affiant who is personally known to me.

J. Sheehan

NOTARY PUBLIC



Keith Bulsterbaum

Keith Bulsterbaum
PSC-18577 Exp: 9/30/2026
Allen Civil Process
Service@acptx.com
P.O. BOX 181293
Corpus Christi, TX 78480-1293
(361) 884-1657

Our Job Serial Number: ALN-2026004576
Ref: Paulette Guajardo

IN THE REMOVAL PROCEEDING BEFORE
THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

IN THE NAME OF THE STATE OF TEXAS

SUBPOENA REQUIRING WITNESS TO APPEAR AND TESTIFY

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, this subpoena is issued upon the request of, and on behalf of, the Mayor of the City of Corpus Christi, Texas, Paulette Guajardo.

REMOVAL PROCEEDING BEFORE THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

TO: ANY SHERIFF OR CONSTABLE OF THE STATE OF TEXAS OR OTHER PERSON AUTHORIZED TO SERVE AND EXECUTE SUBPOENAS AS PROVIDED IN THE CHARTER OF THE CITY OF CORPUS CHRISTI, TEXAS, SECTION 2-22, AND [IRMA: I WANT TO ADD THE STATE .

YOU ARE HEREBY COMMANDED TO SUMMON Peter Zaroni, who may served at his physical address: 201 Southern Street, Corpus Corpus, TX. 78404 or wherever he may be found, and who is represented to reside within one hundred fifty miles of the City of Corpus Christi City Hall, Corpus Christi, Texas.

Pursuant to Article II, Sections 2-22 through 2-24 of the Corpus Christi Code of Ordinances, the Corpus Christi City Charter, and the Rules of Procedure for City Council Hearing for Removal Action under the City Charter (Amended June 2, 2026), you are directed to appear at **9:00 a.m. on July 22, 2026, Mayor Betty Turner Council Chambers, City of Corpus Christi City Hall**, 1201 Leopard Street, Corpus Christi, TX 78401-2120 to attend and give sworn testimony and to remain there from day to day until discharged by the party who issued this subpoena.

Notice of City of Corpus Christi Code of Ordinances Sec. 2-24: Contempt. Any person who shall refuse to be sworn or to testify or to produce books, papers or other evidence material to an inquiry when a subpoena or other process has been served upon him shall be guilty of contempt of the city council and, upon conviction thereof by the council, shall be fined not less than twenty-five dollars (\$25.00) nor more than one hundred dollars (\$100.00). Each day any person shall refuse to obey any subpoena, or process shall constitute a separate violation. The penalties provided herein shall be cumulative of all other penalties authorized by ordinance, law or city Charter for contempt of the city council.

TRCP 176.8(a). Contempt. Failure by any person without adequate excuse to obey a subpoena served upon that person 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.

ISSUED ON THIS 15th DAY OF JULY 2026.

By: Mayor Paulette Guajardo, through counsel:



John Flood
Texas Bar No. 0715581
John T. Flood, LLP
819 N. Upper Broadway
Corpus Christi, Texas 78401
(361) 654-8877
john@floodtriallawyers.com
irma@floodtriallawyers.com

OFFICER'S RETURN ON THE NEXT PAGE

WITNESS SUBPOENA RETURN

Came to hand the _____ day of _____, 2026, at _____ o'clock
_____.M., and executed the _____ day of _____, 2026, at _____ o'clock
_____.M., by delivering to the within named _____
_____ in person at _____ in _____
_____ County, Texas, a true copy of this Subpoena, and tendering said witness the sum of \$10.00.

By Deputy: _____
Sheriff/Constable _____
_____, County, Texas

OR

By: _____

Person who is not a party to the suit and is not less than 18 years of age.

IN THE REMOVAL PROCEEDING BEFORE
THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

IN THE NAME OF THE STATE OF TEXAS

SUBPOENA REQUIRING WITNESS TO APPEAR AND TESTIFY

ACCEPTANCE OF SERVICE OF SUBPOENA BY WITNESS

I, the undersigned witness named in the Subpoena acknowledge receipt thereof, and hereby accept service of the attached subpoena, and will appear at the time and place as directed in this subpoena.

***City of Corpus Christi Charter Sec. 2-24: Contempt.** Any person who shall refuse to be sworn or to testify or to produce books, papers or other evidence material to an inquiry when a subpoena or other process has been served upon him shall be guilty of contempt of the city council and, upon conviction thereof by the council, shall be fined not less than twenty-five dollars (\$25.00) nor more than one hundred dollars (\$100.00). Each day any person shall refuse to obey any subpoena, or process shall constitute a separate violation.*

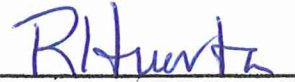
SIGNATURE OF WITNESS

DATE

Not executed as to the witness

for the following reasons:

FEE FOR SERVICE OF SUBPOENA: \$ _____


Rebecca Huerta
City Secretary

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

SUBPOENA

ISSUED IN THE NAME OF THE CITY OF CORPUS CHRISTI, and PURSUANT TO THE AUTHORITY GRANTED BY THE CITY OF CORPUS CHRISTI CHARTER, on July 21, 2026.

TO: Mayor, **PAULETTE GUAJARDO**, in-person and through her attorney John T. Flood at John T. Flood LLP.

TO ANY SHERIFF, CONSTABLE, OR ANY OTHER PERSON AUTHORIZED TO SERVE AND EXECUTE SUBPOENAS IN THE STATE OF TEXAS.

YOU, **PAULETTE GUAJARDO**, ARE HEREBY COMMANDED, by personal service upon you and by and through your attorneys of record, to be and appear in person before the City of Corpus Christi Council, Corpus Christi City Hall, 901 Leopard Street, Council Chambers, Corpus Christi, Texas 78401, to begin on the **6th day of August 2026, at 9:00 a.m.**, and there to make answers under oath to certain questions to be propounded to **PAULETTE GUAJARDO** at this instance of the Petitioners in the pending and above-referenced proceeding and further commanded and **PAULETTE GUAJARDO** remain in attendance from day to day until discharged.

FAILURE BY ANY PERSON WITHOUT ADEQUATE EXCUSE TO OBEY A SUBPOENA SERVED UPON THAT PERSON MAY BE DEEMED A CONTEMPT OF THE CITY COUNCIL AND CITY CHARTER FROM WHICH THE SUBPOENA IS ISSUED, AND MAY OR MAY NOT BE PUNISHED BY FINE OR CONFINEMENT.

Issued this 28th day of July 2026.

Respectfully submitted,

LAW OFFICES OF DOUGLAS A. ALLISON

403 N. Tancanhua 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

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was electronically filed with Rebecca Huerta, City Secretary of City of Corpus Christi, and John Flood, attorney for Paulette Guajardo, on this the 28th day of July 2026.

/s/ Douglas A. Allison

DOUGLAS A. ALLISON

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

RETURN OF SERVICE OF SUBPOENA

I, Santos Ronje, delivered a copy of this subpoena to **PAULETTE GUAJARDO** who is a party to these proceedings, at 1201 Leopard, Corpus Christi, TX, in Nueces County, Texas on the 28 day of July 2026, at 2:47 o'clock P.m., and tendered to the witness a fee of \$11 in cash.

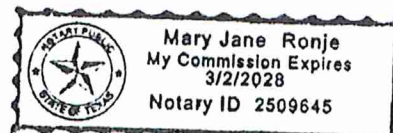
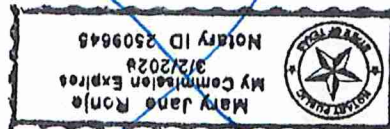
I, _____, was unable to deliver a copy of this subpoena to **PAULETTE GUAJARDO** who is a party to these proceedings, for the following reasons:

By: Santos Ronje

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 28 day of July 2026.

Mary Jane Ronje
Notary Public for State of Texas



[Faint, illegible handwritten text]

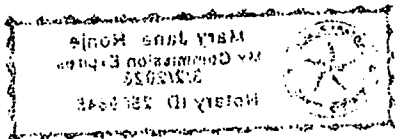
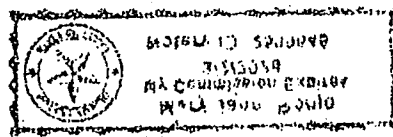


EXHIBIT A
SUBPOENA DUCES TECUM

Please take notice, that in connection with the taking of this deposition and pursuant to Rule 201 of the Texas Rules of Civil Procedure, the deponent is hereby required to produce and permit Petitioners to inspect and copy the following documents and things at the commencement of the taking of this deposition:

1) For cell phone no. 361.688.9399, please produce:

(a) invoices showing all calls to/from Peter Zaroni, Heather Hurlbert, Leah Olivarri, Deven Bhakta, and/or Philip Ramirez; and

(b) text messages to/from Peter Zaroni, Heather Hurlbert, Leah Olivarri, Deven Bhakta, and/or Philip Ramirez. Please limit your response to the period beginning August 1, 2023, through May 15, 2024.

2) for cell phone no. 361.834.4125, please produce:

(a) invoices showing all calls to/from Peter Zaroni, Heather Hurlbert, Leah Olivarri, Deven Bhakta, and/or Philip Ramirez; and

(b) text messages to/from Peter Zaroni, Heather Hurlbert, Leah Olivarri, Deven Bhakta, and/or Philip Ramirez. Please limit your response to the period beginning August 1, 2023, through May 15, 2024.

3) Oath of office to serve as Mayor for this present term.

4) Confidentiality agreement, and/or other similar agreement(s), signed by Paulette Guajardo in connection with Paulette Guajardo's serving as CCREDC board member.



Rebecca Huerta
City Secretary

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

SUBPOENA

(to produce documents only (not testify))

ISSUED IN THE NAME OF THE CITY OF CORPUS CHRISTI, and PURSUANT TO THE AUTHORITY GRANTED BY THE CITY OF CORPUS CHRISTI CHARTER, on July 29, 2026.

TO: **REBECCA HUERTA**, City Secretary, in-person at Corpus Christi City Hall, 901 Leopard Street, Corpus Christi, Texas 78401.

TO ANY SHERIFF, CONSTABLE, OR ANY OTHER PERSON AUTHORIZED TO SERVE AND EXECUTE SUBPOENAS IN THE STATE OF TEXAS.

YOU, **REBECCA HUERTA**, ARE HEREBY COMMANDED, by personal service upon you, to produce true and correct copies of documents requested on Exhibit A (only) at the location known as City of Corpus Christi Council, Corpus Christi City Hall, 901 Leopard Street, Council Chambers, Corpus Christi, Texas 78401, on the **6th day of August 2026, at 9:00 a.m.**; at the instance of the Petitioners in the pending and above-referenced proceeding.

Issued this 29th day of July 2026.

Respectfully submitted,

LAW OFFICES OF DOUGLAS A. ALLISON
403 N. Tanchua 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

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was served and electronically filed on Rebecca Huerta, City Secretary of City of Corpus Christi, and John Flood, attorney for Paulette Guajardo, on this the 29th day of July 2026.

/s/ Douglas A. Allison
DOUGLAS A. ALLISON

This subpoena duces tecum to produce documents only (not testify) was issued at the request of PETITIONERS, whose attorney of record is Douglas A. Allison, Law Offices of Douglas Allison, 403 N. Tancanhua Street, Corpus Christi, Texas 78401, Phone: 361.888.6002.

RETURN OF SERVICE OF SUBPOENA

I, _____, delivered a copy of this subpoena duces tecum to produce documents only (not testify) to **REBECCA HUERTA** who is a non-party to these proceedings, at 901 Leopard Street, Corpus Christi, in Nueces County, Texas on the _____ day of _____ 2026, at _____ o'clock _____m., and tendered to the witness a fee of \$11 in cash.

I, _____, was unable to deliver a copy of this subpoena to **REBECCA HUERTA** who is a non-party to these proceedings, for the following reasons:

By: _____
Person authorized by law who has no interest
in the lawsuit and is at least 18 years old.

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

Notary Public for State of Texas

EXHIBIT A
SUBPOENA DUCES TECUM

Please take notice, that in connection with the taking of this deposition and pursuant to Rule 201 of the Texas Rules of Civil Procedure, the deponent is hereby required to produce and permit Petitioners to inspect and copy the following documents and things at the commencement of the taking of this deposition:

- 1) Each and every oath signed by Paulette Guajardo to serve as City Council member At-Large;
- 2) Each and every oath signed by Mayor Paulette Guajardo to serve as City Mayor; and
- 3) Each and every agreement signed by Paulette Guajardo relating to confidentiality of CCREDC meetings.

Date Filed 7.30.26

R Huerta
Rebecca Huerta
City Secretary

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

AFFIDAVIT OF DOUGLAS ALLISON

PETITIONERS' THIRD AMENDED EXHIBIT LIST

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 – 93 referenced in Petitioners' Third Amended Exhibit List. 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 – 93) listed on Petitioners' Third Amended Exhibit List (also detailed, below) 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. Additionally, or alternatively, 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.

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

- PETS EXHIBIT 13: is CCREDC Proposal Memorandum with attached Elevate QOF LLC's Application to CCREDC (requesting Type B funds);
- PETS EXHIBIT 14: is CCREDC Proposal Memorandum (November 9, 2023);
- PETS EXHIBIT 15: is CCREDC BOD Meeting (meeting minutes dated November 9, 2023);
- PETS EXHIBIT 16: is City of Corpus Christi – Type B Corporation, Executive Session Term Sheet;
- PETS EXHIBIT 17: is John Bell email;
- PETS EXHIBIT 18: is presentation slide deck for us with QOF Elevate LLC request for incentive award (slide 2, right column contains altered FEMA screenshot);
- PETS EXHIBIT 19: is slide from QOF Elevate LLC presentation converted to PowerPoint;
- PETS EXHIBIT 20: is presentation slide deck used during presentation to Type B Corporation (meeting on December 11, 2023);
- PETS EXHIBIT 21: is video recording of Elevate QOF LLC's presentation to Type B Board Corporation (meeting December 11, 2023);
- PETS EXHIBIT 22: is transcription of statements made by Elevate QOF LLC to Type B Board Corporation (meeting December 11, 2023);
- PETS EXHIBIT 23: is City's Agenda Memorandum (January 30, 2024);
- PETS EXHIBIT 24: is email to Janet Whitehead (February 5, 2024);
- PETS EXHIBIT 25: is City's Meeting Agenda (February 20, 2024);
- PETS EXHIBIT 26: document collection uploaded per Legistar (for City's 2/20/24 meeting);
- PETS EXHIBIT 27: is City's presentation deck (1st Reading – February 20, 2024);

- PETS EXHIBIT 28: is Legistar audit report (produced by City of Corpus Christi);
- PETS EXHIBIT 29: is video of Mayor's introduction of Elevate QOF LLC agenda item;
- PETS EXHIBIT 30: is video of presentation to City Council of agenda item (2/20/24);
- PETS EXHIBIT 31: is video of Mayor interrupting Councilman Hunter (2/20/24);
- PETS EXHIBIT 32: is email from Ajit David to Peter Zaroni ("Red Flags" – March 7, 2024);
- PETS EXHIBIT 33: is text from Ajit David to Peter Zaroni (attached Weslaco article);
- PETS EXHIBIT 34: 2024.04.15 Audio Recording of Peter Zaroni and Ajit David Telephone Conversation;
- PETS EXHIBIT 35: is video of Ajit David public comment (April 16, 2024);
- PETS EXHIBIT 36: is Miles Risley memorandum (confirming April 16, 2024, presentation to City Council Member in executive session);
- PETS EXHIBIT 37: is email (with attachments) from Rebecca Huerta to Mayor;
- PETS EXHIBIT 38: is video of Ajit David public comment (April 23, 2024):
- PETS EXHIBIT 39: is Texas Penal Code, section 32.21;
- PETS EXHIBIT 40: is Texas Penal Code, section 7.02;
- PETS EXHIBIT 41: is City Agenda Memorandum (for April 23, 2024, reading);
- PETS EXHIBIT 42: is City Meeting Agenda (April 23, 2024);
- PETS EXHIBIT 43: is City's published organization chart;

- PETS EXHIBIT 44: is collection of Mayor's text messages;
- PETS EXHIBIT 45: is collection of phone invoices evidencing calls to/from Mayor;
- PETS EXHIBIT 46: is Mayor Paulette Guajardo Facebook Post "REMOVAL HEARING UPDATE #5";
- PETS EXHIBIT 47: is Mayor Paulette Guajardo Facebook Post "REMOVAL HEARING UPDATE #4";
- PETS EXHIBIT 48: is Mayor Paulette Guajardo Facebook Post "REMOVAL HEARING UPDATE #3";
- PETS EXHIBIT 49: is an email string regarding ongoing mediation efforts;
- PETS EXHIBIT 50: is Agreement Contract ("Agreement");
- PETS EXHIBIT 51: is 2024.02.20 Agenda Packet City of Corpus Christi Council Meeting (comprehensive copy);
- PETS EXHIBIT 52: is 2024.02.20 Agenda Packet relating to Elevate QOF LLC agenda item (as it existed on February 20, 2024, except actual ordinance was late-upload);
- PETS EXHIBIT 53: is 2024.02.27 Agenda Packet City of Corpus Christi Council Meeting (comprehensive copy);
- PETS EXHIBIT 54: is 2024.04.23 Agenda Packet City of Corpus Christi Council Meeting (comprehensive copy);
- PETS EXHIBIT 55: is 2024.04.23 Agenda Packet relating to Elevate QOF LLC agenda item (as it existed on April 23, 2024);
- PETS EXHIBIT 56-1: is 2024.01.25 email relating to Agreement;
- PETS EXHIBIT 56-2: is 2024.02.02 email relating to executed Agreement;

- PETS EXHIBIT 56-3: is 2024.02.05 email with Exhibit A Agreement, and flood map;
- PETS EXHIBIT 56-4: is 2024.02.05 email relating to presentation;
- PETS EXHIBIT 56-5: is 2024.02.12 email confirming details of proposed ordinance;
- PETS EXHIBIT 57: is 2024.04.15 audio recording of portion of Peter Zaroni and Ajit David telephone conversation;
- PETS EXHIBIT 58: is 2024.04.15 transcription of audio recording of portion of Peter Zaroni and Ajit David telephone conversation;
- PETS EXHIBIT 59: is 2026.02.17 City of Corpus Christi Council Meeting: video recording of portion of meeting (Daniel Ray);
- PETS EXHIBIT 60: is 2026.02.17 City of Corpus Christi Council Meeting: video recording of portion of meeting (CCPD);
- PETS EXHIBIT 61: is 2025.09.09 Mayor Paulette Guajardo's 'Statement of Fact' at City Council Meeting (video recording);
- PETS EXHIBIT 62: is 2025.09.09 Mayor Paulette Guajardo's Statement of Fact at City Council Meeting 2 (video recording);
- PETS EXHIBIT 63: is ELEVATE000394 – Text Message with Peter Zaroni;
- PETS EXHIBIT 64: is ELEVATE000372 – Text Message with Mayor Paulette Guajardo;
- PETS EXHIBIT 65: is ELEVATE000383 – Text Message with Heather Hurlbert;
- PETS EXHIBIT 66: is ELEVATE000416-000417: 2024.03.15 email exchange between Heather Hurlbert and Philip Ramirez;
- PETS EXHIBIT 67: is 2025.08.06 video recording of portion of deposition of Mayor Paulette Guahardo;

- PETS EXHIBIT 68: is summary spreadsheet of Philip Ramirez's cell phone invoices and Deven Bhakta cell phone invoices;
- PETS EXHIBIT 69: is 2023.12.05 email from Philip Ramirez to Randy Almaguer;
- PETS EXHIBIT 70: is 2026.05.14 Notice of Default letter from City to Elevate QOF LLC;
- PETS EXHIBIT 71: is 2021.10.04 Elevate Corpus Christi LLC Certificate of Formation;
- PETS EXHIBIT 72: is 2022.12.27 Elevate QOF LLC Certificate of Formation;
- PETS EXHIBIT 73: is Company Agreement of Elevate QOF LLC;
- PETS EXHIBIT 74: is 2026.01.21 13th Court of Appeals Amended Petition for Writ of Mandamus and Motion to Stay Discovery;
- PETS EXHIBIT 75: is 2026.01.14 13th Court of Appeals signed Order Granting Stay;
- PETS EXHIBIT 76: is 2026.07.13 Affidavit of Linda Mikulencak;
- PETS EXHIBIT 77: is 026.06.29 Texas Supreme Court Relator's' Emergency Motion for Temporary Relief Staying Discovery Under Rule 52.10;
- PETS EXHIBIT 78: is 2026.07.06 Supreme Court of Texas Order Granting Temporary Stay;
- PETS EXHIBIT 79: is Public Information Reports on:
 - Elevate Corpus Christi, LLC
 - Elevate QOF LLC
 - Jacek LLC
 - La Mer Holdings LLC
 - STCC Investment Fund I
 - ZJZ Capital QOF LLC;
- PETS EXHIBIT 80: is 2022.12.30 Elevate CC to Elevate QOF deed transferring title of real property made subject of proceedings;

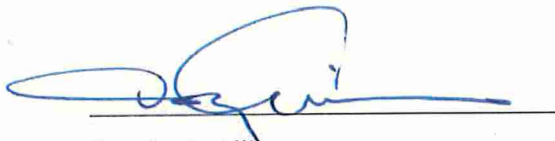
- PETS EXHIBIT 81: is 2022.01.13 General Warranty Deed Centre Theatre LLC to Elevate Corpus Christi LLC;
- PETS EXHIBIT 82: is 2024.02.20 City of Corpus Christi Council Meeting Details (as it exists on present date);
- PETS EXHIBIT 83: is 2024.02.27 City of Corpus Christi Council Meeting Details (as it exists on present date);
- PETS EXHIBIT 84: is 2024.04.23 City of Corpus Christi Council Meeting Details (as it exists on present date);
- PETS EXHIBIT 85: Official meeting minutes from February 27, 2024, City of Corpus Christi Council Meeting; and
- PETS EXHIBIT 86: Copy of City of Corpus Christi Charter (sections 10-18, only).
- PETS EXHIBIT 87: is signed Oaths of Office of Mayor Paulette Guajardo
- PETS EXHIBIT 88: 2025.04.10 Corpus Christi Regional Economic Development Corporation Code of Ethics and Confidentiality Statement
- PETS EXHIBIT 89: Video Depo Cuts of Mike Culbertson
- PETS EXHIBIT 90: Video Depo Cuts of Alan Wilson
- PETS EXHIBIT 91: Video Depo Cuts of Heather Hurlbert
- PETS EXHIBIT 92: Video Depo Cuts of Peter Zaroni
- PETS EXHIBIT 93: Video Depo Cuts of Philip Ramirez

As additional support for each of the exhibits referenced herein, please consider the following. The undersigned has made multiple attempts to communicate with Heather Hurlbert (who now lives in San Antonio, Texas, on information and belief), but this witness refuses to even respond (thereby refusing to co-operate). Philip Ramirez, per his legal counsel's email dated 7/2/26, was

out of the country from July 10 – 25, 2026, and thus unavailable for the trial/hearing dates (July 22 and July 23). Neither Mike Culbertson nor Alan Wilson continue in the employ or service, respectively, of the City, and unavailable given the City's power of summons is without enforcement, and thus their depositions utilized. As such, each of these witnesses are unavailable considering the City's Rules of Procedure and related inability to enforce power of summons. Moreover, and as stated above, use of these depositions was expressly contemplated in the rules of procedure adopted by the City of Corpus Christi; and each of the depositions are type commonly relied upon by prudent persons in the conduct of the type of affairs made the subject of these proceedings (as stated above).

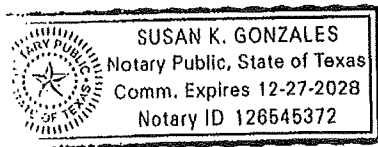
Finally, this affidavit further confirms that the following exhibits meet one or more exceptions set forth in Texas Rules of Evidence ("TRE") 803, and/or are the exhibit type commonly relied upon by prudent persons in the conduct of the type of affairs made the subject of these proceedings and thus admissible notwithstanding hearsay objections, as follows: Exhibit nos. 8-10, 71, 72, 74-86 (also consider TRE 803(8)); Exhibit nos. 11-18, 19-21, 23-32, 35-38, 41-45, 50-56 (1-5), 59-66, 69-70, and 73-86 (also consider TRE 803(6), TRE 803(8) and others). Exhibit 34 is also admissible as the type of statement commonly relied upon by prudent persons in the conduct of the type of affairs made the subject of these proceedings, and pursuant to TRE 801(e)(1)(B) as non-hearsay.

Affiant further sayeth naught.



Douglas A. Allison

SWORN TO AND SUBSCRIBED before me on the 30th day of July 2026.



Susan K. Gonzales

Notary Public, State of Texas


Rebecca Huerta
City Secretary

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

PETITIONERS' THIRD AMENDED EXHIBIT LIST

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

SCANNED

- PETS EXHIBIT 13: is CCREDC Proposal Memorandum with attached Elevate QOF LLC's Application to CCREDC (requesting Type B funds);
- PETS EXHIBIT 14: is CCREDC Proposal Memorandum (November 9, 2023);
- PETS EXHIBIT 15: is CCREDC BOD Meeting (meeting minutes dated November 9, 2023);
- PETS EXHIBIT 16: is City of Corpus Christi – Type B Corporation, Executive Session Term Sheet
- PETS EXHIBIT 17: is John Bell email;
- PETS EXHIBIT 18: is presentation slide deck from QOF Elevate LLC (slide 2, right column contains altered FEMA screenshot)
- PETS EXHIBIT 19: is presentation slide deck from QOF Elevate LLC converted to PowerPoint;
- PETS EXHIBIT 20: is presentation slide deck used during presentation to Type B Corporation (meeting on December 11, 2023);
- PETS EXHIBIT 21: is video recording of Elevate QOF LLC's presentation to Type B Board Corporation (meeting December 11, 2023);
- PETS EXHIBIT 22: is transcription of statements made by Elevate QOF LLC to Type B Board Corporation (meeting December 11, 2023);
- PETS EXHIBIT 23: is City's Agenda Memorandum (January 30 2024);
- PETS EXHIBIT 24: is email to Janet Whitehead (February 5, 2024);
- PETS EXHIBIT 25: is City's Meeting Agenda (February 20, 2024);
- PETS EXHIBIT 26 FINAL: is collection of documents uploaded per Legistar (for City's 2/20/24 meeting);

- PETS EXHIBIT 27: is City's presentation deck (1st Reading – February 20, 2024);
- PETS EXHIBIT 28: is Legistar audit report (produced by City of Corpus Christi);
- PETS EXHIBIT 29: is video of Mayor's introduction of Elevate QOF LLC agenda item;
- PETS EXHIBIT 30: is video of presentation to City Council of agenda item (2/20/24);
- PETS EXHIBIT 31: is video of Mayor interrupting Councilman Hunter (2/20/24);
- PETS EXHIBIT 32: is email from Ajit David to Peter Zanon ("Red Flags" – March 7, 2024);
- PETS EXHIBIT 33: is text from Ajit David to Peter Zanon (attached Weslaco article);
- PETS EXHIBIT 34: 2024.04.15 Audio Recording of Peter Zanon and Ajit David Telephone Conversation
- PETS EXHIBIT 35: is video of Ajit David public comment (April 16, 2024);
- PETS EXHIBIT 36: is Miles Risley memorandum (confirming April 16, 2024, presentation to City Council Member in executive session);
- PETS EXHIBIT 37: is email (with attachments) from Rebecca Huerta to Mayor;
- PETS EXHIBIT 38: is video of Ajit David public comment (April 23, 2024);
- PETS EXHIBIT 39: is Texas Penal Code, section 32.21;
- PETS EXHIBIT 40: is Texas Penal Code, section 7.02;
- PETS EXHIBIT 41: is City Agenda Memorandum (for April 23, 2024 Reading);
- PETS EXHIBIT 42: is City Meeting Agenda (April 24, 2024);
- PETS EXHIBIT 43: is City's published organization chart;
- PETS EXHIBIT 44: is collection of Mayor's text messages; AND
- PETS EXHIBIT 45: is collection of cellular phone invoices evidencing calls to/from Mayor.

Submitted for admission of same into evidence in this matter.

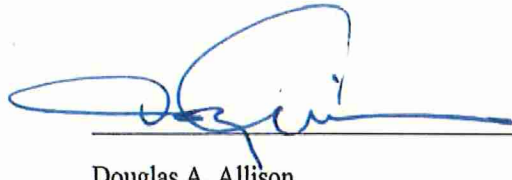
- PETS EXHIBIT 46: Mayor Paulette Guajardo Facebook Post “REMOVAL HEARING UPDATE #5”
- PETS EXHIBIT 47: Mayor Paulette Guajardo Facebook Post “REMOVAL HEARING UPDATE #4”
- PETS EXHIBIT 48: Mayor Paulette Guajardo Facebook Post “REMOVAL HEARING UPDATE #3”
- PETS EXHIBIT 49: Email String regarding ongoing mediation efforts
- PETS EXHIBIT 50: Agreement Contract C2024-081
- PETS EXHIBIT 51: 2024.02.20 Agenda Packet City of Corpus Christi Council Meeting
- PETS EXHIBIT 52: 2024.02.20 Agenda Packet and Elevate QOF Item
- PETS EXHIBIT 53: 2024.02.27 City Council Meeting Agenda Packet
- PETS EXHIBIT 54: 2024.04.23 City Council Meeting Agenda Packet
- PETS EXHIBIT 55: 2024.04.23 City Council Agenda Item Approving 2nd Reading
- PETS EXHIBIT 56-1: 2024.01.25 RE Elevated QOF LLC Agreement Email
- PETS EXHIBIT 56-2: 2024.02.02 RE Homewood Suite Executed Agreement Email
- PETS EXHIBIT 56-3: 2024.02.05 RE Homewood Suite Executed Agreement Email
- PETS EXHIBIT 56-4: 2024.02.05 RE Homewood Suite Executed Agreement
- PETS EXHIBIT 56-5: 2024.02.12 Approval Tracking - Individual Review Request
- PETS EXHIBIT 57: 2024.04.15 is Clip of Audio Recording of Peter Zanoni and Ajit David Telephone Conversation
- PETS EXHIBIT 58: 2024.04.15 Transcription of Telephone Call between Peter Zanoni and Ajit David

- PETS EXHIBIT 59: 2026.02.17 City of Corpus Christi Council Meeting Video Clip of Presentation
- PETS EXHIBIT 60: 2026.02.17 City of Corpus Christi Council Meeting Video Clip of CCPD Presentation
- PETS EXHIBIT 61: 2025.09.09 Mayor Paulette Guajardo's Statement of Fact at City Council Meeting
- PETS EXHIBIT 62: 2025.09.09 Mayor Paulette Guajardo's Statement of Fact at City Council Meeting 2
- PETS EXHIBIT 63: ELEVATE000394 – Text Message with Peter Zanon
- PETS EXHIBIT 64: ELEVATE000372 – Text Message with Mayor Paulette Guajardo
- PETS EXHIBIT 65: ELEVATE000383 – Text Message with Heather Hurlbert
- PETS EXHIBIT 66: ELEVATE000416-000417: 2024.03.15 Email Exchange between Heather Hurlbert and Philip Ramirez
- PETS EXHIBIT 67: 2025.08.06 Video Clip of Deposition of Mayor Paulette Guahardo
- PETS EXHIBIT 68: Spreadsheet of Philip Ramirez Phone Logs (ELEVATE 000001-000150) and Deven Bhakta Phone Logs
- PETS EXHIBIT 69: 2023.12.05 email from Philip Ramirez to Randy Almaguer;
- PETS EXHIBIT 70: 2026.05.14 Notice of Default letter from City to Elevate QOF LLC;
- PETS EXHIBIT 71: 2021.10.04 Elevate Corpus Christi LLC Certificate of Formation;
- PETS EXHIBIT 72: 2022.12.27 Elevate QOF LLC Certificate of Formation;
- PETS EXHIBIT 73: Company Agreement of Elevate QOF LLC;
- PETS EXHIBIT 74: 2026.01.21 13th Court of Appeals Amended Petition for Writ of

Mandamus and Motion to Stay Discovery;

- PETS EXHIBIT 75: 2026.01.14 13th Court of Appeals signed Order Granting Stay;
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- PETS EXHIBIT 87: signed Oaths of Office of Mayor Paulette Guajardo
- PETS EXHIBIT 88: 2025.04.10 Corpus Christi Regional Economic Development Corporation Code of Ethics and Confidentiality Statement
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- PETS EXHIBIT 92: Video Depo Cuts of Peter Zaroni
- PETS EXHIBIT 93: Video Depo Cuts of Philip Ramirez



Douglas A. Allison

LAW OFFICES OF DOUGLAS A.
ALLISON

State Bar No. 01083500

403 N. Tancanhua St.

Corpus Christi, Texas 78401

T: 361/888-6002

Email: doug@dallisonlaw.com

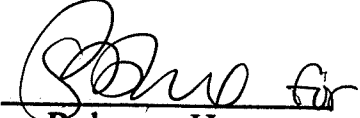
**ATTORNEY FOR PETITIONER
AJIT DAVID**

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 30th day of July 2026.

/s/ Douglas A. Allison

DOUGLAS A. ALLISON


Rebecca Huerta
City Secretary

IN THE REMOVAL PROCEEDING BEFORE

THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

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,

**RESPONDENT MAYOR GUAJARDO'S OBJECTIONS TO
PETITIONERS' EXHIBITS AND AFFIDAVIT IN SUPPORT THEREOF**

Respondent Mayor Paulette Guajardo ("Respondent") files these Objections to Petitioners' Exhibits numbered 70 through 93 ("new exhibits"), and the Affidavit of Douglas Allison in Support of Petitioners' Third Amended Exhibit List ("Affidavit"), received on, and filed with the City Secretary on, July 30, 2026, and, prior to the receipt of any evidence, respectfully requests that the Tribunal rule on Respondent's following objections and include such rulings in the official record of this proceeding.

This tribunal has adopted the Texas Rules of Evidence regarding hearsay. Article VIII of the Texas Rules of Evidence. It has also specifically excluded in its Rules irrelevant evidence. The new exhibits include irrelevant information, inadmissible hearsay, hearsay within hearsay, unauthenticated materials, statements lacking personal knowledge, and improper conclusions.

Respondent objects to Petitioners' exhibits and affidavit as set forth herein and requests that such evidence be excluded.

Objection 1

Respondent specifically reasserts her objections to the admission of the deposition testimony of Peter Zanoni, Heather Hurlbert, Philip Ramirez, Mike Culbertson, Alan Wilson, and Sony

Peronel. The deposition testimony previously challenged by Respondent remains inadmissible because Texas Rule of Evidence 804 applies only when a declarant is unavailable. The witnesses whose depositions Petitioners seek to offer are available and may testify. Therefore, Petitioners cannot satisfy the requirements for admission under Rule 804.

Objection 2

To the extent Petitioners' new exhibits and affidavit or other evidence contain, reference, rely upon, summarize, or incorporate any portion of the previously objected-to deposition testimony, Respondent's prior objections are expressly reasserted.

Objection 3

Respondent objects to Petitioners' Affidavit in Support because it is not proper to use an affidavit as a means to circumvent the Texas Rules of Evidence or transform otherwise inadmissible evidence into admissible evidence, and because the jurat is false. Accordingly, Respondent objects to the Affidavit and all evidence offered through or supported by the Affidavit.

Objection 4

Respondent objects to all of Petitioners' new exhibits because they are replete with inadmissible hearsay and hearsay within hearsay in violation of Texas Rules of Evidence 801, 802, and 805. Rather than presenting testimony from witnesses with personal knowledge, Petitioners repeatedly attempt to establish facts through layers of out-of-court statements, including:

- statements made by other witnesses;
- deposition testimony of individuals who are available to testify;
- recorded conversations;
- emails and text messages;
- letters and written communications;
- investigative materials and conclusions;
- news reports; and
- statements attributed to unidentified individuals.

Under Rule 805, each layer of hearsay must independently satisfy an exception or exclusion. Petitioners cannot establish contested facts by having one witness repeat what another person said, adopt another person's conclusions, or summarize materials created by individuals who are not before the Tribunal.

Objection 5

Respondent objects to Petitioners Exhibit 70 because the May 14, 2026, letter is not relevant to any fact issue raised by the Articles of Impeachment.

Objection 6

Respondent objects to Petitioners Exhibits 71 and 72 because Secretary of State formation filings of entities are not relevant to any fact issue raised by the Articles of Impeachment.

Objection 7

Respondent objects to Petitioners Exhibits 73 because the Company Agreement is not relevant to any fact issue raised by the Articles of Impeachment.

Objection 8

Respondent objects to Petitioners Exhibits 74, 75, 77 and 78 because appellate court filings in the *David v. City* are not relevant to any fact issue raised by the Articles of Impeachment.

Objection 9

Respondent objects to Petitioners Exhibit 71 and 72 because Secretary of State formation filings of entities are not relevant to any fact issue raised by the Articles of Impeachment.

Objection 10

Respondent objects to Petitioners Exhibit 76 because its contents are not relevant; they do not tend to prove or disprove any element of the Articles of Impeachment.

Objection 11

Respondent objects to Petitioners Exhibit 76 because its content is all inadmissible hearsay.

Objection 12

Respondent objects to Petitioners Exhibit 76's multiple hearsay.

Objection 13

Respondent objects to Petitioners Exhibit 76's speculation, improper lay opinion, and legal conclusions.

Objection 14

Respondent objects to Petitioners Exhibit 79, the various Franchise Tax Public Information Reports, because they are hearsay and not relevant; they do not tend to prove or disprove any element of the Articles of Impeachment.

Objection 15

Respondent objects to Petitioners Exhibits 80 and 81, the deeds, because they are hearsay and not relevant; they do not tend to prove or disprove any element of the Articles of Impeachment.

Objection 16

Respondent objects to Petitioners Exhibit 86, the City Charter provisions, because they are not relevant; they do not tend to prove or disprove any element of the Articles of Impeachment.

Objection 17

Respondent objects to Petitioners Exhibits 88 because it is hearsay and not relevant.

Objection 18

Respondent objects to Petitioners Exhibits 89 – 93, because they are hearsay under 804.

Objection 19

Respondent objects to Petitioners Exhibits 89 – 93, because they are unduly repetitious or cumulative.

Respondent requests that all such objections be heard by the Tribunal and that formal rulings be made and included in the record prior to admission.

Respectfully submitted,

/s/ John Flood

John Flood

John T. Flood, LLP

819 N. Upper Broadway

Corpus Christi, Texas 78401

(361) 654-8877

(361) 654-8879 Fax

john@floodtriallawyers.com

Irma@floodtriallawyers.com

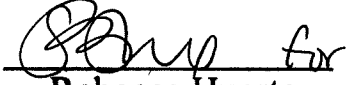
CERTIFICATE OF SERVICE

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 31st day of July, 2026.

/s/ John Flood

John Flood

Date Filed 7.31.26


Rebecca Huerta
City Secretary

IN THE REMOVAL PROCEEDING BEFORE

THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

RETURN OF SERVICE

RANDY ALMAGUER

"The following came to hand on Jul 27, 2026, 4:16 pm,

SUBPOENA REQUIRING WITNESS TO APPEAR AND TESTIFY, WITNESS FEE,

and was executed at **8113 RESPLANDOR STREET, CORPUS CHRISTI, TX 78414** within the county of **NUECES** at **09:00 PM** on **Tue, Jul 28 2026**, by delivering a true copy to the within named

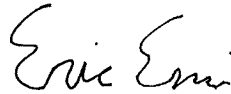
RANDY ALMAGUER

in person, having first endorsed the date of delivery on same.

I am a person over eighteen (18) years of age and I am competent to make this affidavit. I am a resident of the State of Texas. I am familiar with the Texas Rules of Civil Procedure as they apply to service of Process. I am not a party to this suit nor related or affiliated with any herein, and have no interest in the outcome of the suit. I have never been convicted of a felony or of a misdemeanor involving moral turpitude. I have personal knowledge of the facts stated herein and they are true and correct."

My name is **Eric Enim**, and my address is **4801 Everhart Rd Unit 6901, Corpus Christi, TX 78411**. I declare under penalty of perjury that the foregoing is true and correct.

Executed in **NUECES** County, State of **TX**, on **July 31, 2026**.



Eric Enim

Certification Number: PSC-4903

Certification Expiration: 04/30/2028

Date Filed 7.31.26


Rebecca Huerta
City Secretary

IN THE REMOVAL PROCEEDING BEFORE

THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

RETURN OF SERVICE
PAUL MICHAEL CULBERTSON

"The following came to hand on **Jul 27, 2026, 4:16 pm**,

SUBPOENA REQUIRING WITNESS TO APPEAR AND TESTIFY, WITNESS FEE,

and was executed at **3006 MOORE AVENUE, PORTLAND, TX 78374** within the county of **SAN PATRICIO** at **09:15 AM** on **Wed, Jul 29 2026**, by delivering a true copy to the within named

PAUL MICHAEL CULBERTSON

in person, having first endorsed the date of delivery on same.

I am a person over eighteen (18) years of age and I am competent to make this affidavit. I am a resident of the State of Texas. I am familiar with the Texas Rules of Civil Procedure as they apply to service of Process. I am not a party to this suit nor related or affiliated with any herein, and have no interest in the outcome of the suit. I have never been convicted of a felony or of a misdemeanor involving moral turpitude. I have personal knowledge of the facts stated herein and they are true and correct."

My name is **Eric Enim**, and my address is **4801 Everhart Rd Unit 6901, Corpus Christi, TX 78411**. I declare under penalty of perjury that the foregoing is true and correct.

Executed in **NUECES** County, State of **TX**, on **July 31, 2026**.



Eric Enim
Certification Number: PSC-4903
Certification Expiration: 04/30/2028

048-2026

Date Filed 7.31.26


Rebecca Huerta
City Secretary

IN THE REMOVAL PROCEEDING BEFORE
THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

RETURN OF SERVICE
ALAN WILSON

"The following came to hand on **Jul 27, 2026, 4:16 pm**,

SUBPOENA REQUIRING WITNESS TO APPEAR AND TESTIFY, WITNESS FEE,

and was executed at **1485 DANCING ELK DRIVE, CORPUS CHRISTI, TX 78415** within the county of **NUECES** at **07:44 PM** on **Thu, Jul 30 2026**, by delivering a true copy to the within named

ALAN WILSON

in person, having first endorsed the date of delivery on same.

I am a person over eighteen (18) years of age and I am competent to make this affidavit. I am a resident of the State of Texas. I am familiar with the Texas Rules of Civil Procedure as they apply to service of Process. I am not a party to this suit nor related or affiliated with any herein, and have no interest in the outcome of the suit. I have never been convicted of a felony or of a misdemeanor involving moral turpitude. I have personal knowledge of the facts stated herein and they are true and correct."

My name is **Eric Enim**, and my address is **4801 Everhart Rd Unit 6901, Corpus Christi, TX 78411**. I declare under penalty of perjury that the foregoing is true and correct.

Executed in **NUECES** County, State of **TX**, on **July 31, 2026**.



Eric Enim
Certification Number: PSC-4903
Certification Expiration: 04/30/2028

IN THE REMOVAL PROCEEDING BEFORE


Rebecca Huerta
City Secretary

THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

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 QUASH
UNAUTHORIZED SUBPOENA

NOW COMES, Paulette M. Guajardo, by and through counsel, to submit this motion to quash the untimely and unauthorized subpoena directed to her on July 28, 2026.

A subpoena for documents was served on July 28, 2026, 108 days since the initiation of the impeachment process by City Council on April 14. *Exhibit A*. The subpoena claims to be issued by the city council and city charter but cites no authority for a mid-trial subpoena. *Exhibit A*.

The American legal system is broken into two parts, pretrial and trial. Trials are about proving evidence after pretrial investigation, they are not inquisitorial tools. Corpus Christi's Charter reads accordingly, Article 2 Section 17 of the Charter, authorizes the council to compel records and evidence as part of an "Investigation," the title of the chapter. Petitioners specifically requested subpoena

power during the pretrial period for the issuance of summons of documents and records. *Exhibit B*. On June 2, 2026, this Council authorized the Petitioners to issue subpoenas “as requested” by the parties as part of the pretrial stage in this matter:

Mayor Pro Tem: [...] Both parties have filed witnesses list and requested subpoenas. I move to authorize the attorneys for the petitioners and the mayor to issue subpoenas as requested in their motions. The requesting party will be responsible for service of subpoenas. Any objection from the city council to this ruling?

[...] We need a motion and a second for that one. Can I get a motion in a second? So move. All in favor say I. Any opposed? Same. Motion carries.

The City Council did not unconditionally handover its subpoena authority to Petitioner’s counsel. Petitioners were not given City Council’s subpoena authority during the trial period nor is there indication that City Council specifically authorized *Exhibit A*, the July 28, 2026, subpoena. Accordingly, the July 28, 2026, subpoena was issued without legal authority and should be quashed by City Council.

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
Irma@floodtriallawyers.com

LEAD ATTORNEY
ATTORNEY FOR PLAINTIFF
PAULETTE M. GUAJARDO

CERTIFICATE OF SERVICE

I hereby certify that on August 3, 2026, I electronically filed the foregoing document with the City Secretary via email.

/s/ John Flood

John Flood

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

SUBPOENA

ISSUED IN THE NAME OF THE CITY OF CORPUS CHRISTI, and PURSUANT TO THE AUTHORITY GRANTED BY THE CITY OF CORPUS CHRISTI CHARTER, on July 21, 2026.

TO: Mayor, **PAULETTE GUAJARDO**, in-person and through her attorney John T. Flood at John T. Flood LLP.

TO ANY SHERIFF, CONSTABLE, OR ANY OTHER PERSON AUTHORIZED TO SERVE AND EXECUTE SUBPOENAS IN THE STATE OF TEXAS.

YOU, **PAULETTE GUAJARDO**, ARE HEREBY COMMANDED, by personal service upon you and by and through your attorneys of record, to be and appear in person before the City of Corpus Christi Council, Corpus Christi City Hall, 901 Leopard Street, Council Chambers, Corpus Christi, Texas 78401, to begin on the **6th day of August 2026, at 9:00 a.m.**, and there to make answers under oath to certain questions to be propounded to **PAULETTE GUAJARDO** at this instance of the Petitioners in the pending and above-referenced proceeding and further commanded and **PAULETTE GUAJARDO** remain in attendance from day to day until discharged.

FAILURE BY ANY PERSON WITHOUT ADEQUATE EXCUSE TO OBEY A SUBPOENA SERVED UPON THAT PERSON MAY BE DEEMED A CONTEMPT OF THE CITY COUNCIL AND CITY CHARTER FROM WHICH THE SUBPOENA IS ISSUED, AND MAY OR MAY NOT BE PUNISHED BY FINE OR CONFINEMENT.

Issued this 28th day of July 2026.



Respectfully submitted,

LAW OFFICES OF DOUGLAS A. ALLISON

403 N. Tancahua 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

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing was electronically filed with Rebecca Huerta, City Secretary of City of Corpus Christi, and John Flood, attorney for Paulette Guajardo, on this the 28th day of July 2026.

/s/ Douglas A. Allison

DOUGLAS A. ALLISON

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

RETURN OF SERVICE OF SUBPOENA

I, Santos Ronje, delivered a copy of this subpoena to **PAULETTE GUAJARDO** who is a party to these proceedings, at 1201 Leopard, Corpus Christi, TX, in Nueces County, Texas on the 28 day of July 2026, at 2:47 o'clock P.m., and tendered to the witness a fee of \$11 in cash.

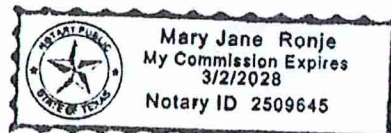
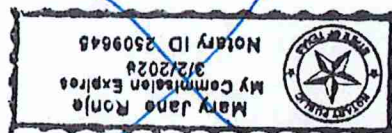
I, _____, was unable to deliver a copy of this subpoena to **PAULETTE GUAJARDO** who is a party to these proceedings, for the following reasons:

By:

Santos Ronje
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 28 day of July 2026.

Mary Jane Ronje
Notary Public for State of Texas



[Faint, illegible handwritten text]

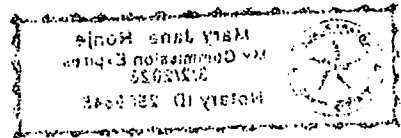
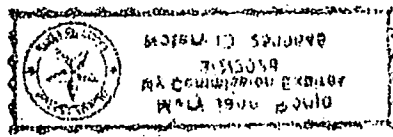


EXHIBIT A
SUBPOENA DUCES TECUM

Please take notice, that in connection with the taking of this deposition and pursuant to Rule 201 of the Texas Rules of Civil Procedure, the deponent is hereby required to produce and permit Petitioners to inspect and copy the following documents and things at the commencement of the taking of this deposition:

1) For cell phone no. 361.688.9399, please produce:

(a) invoices showing all calls to/from Peter Zaroni, Heather Hurlbert, Leah Olivarri, Deven Bhakta, and/or Philip Ramirez; and

(b) text messages to/from Peter Zaroni, Heather Hurlbert, Leah Olivarri, Deven Bhakta, and/or Philip Ramirez. Please limit your response to the period beginning August 1, 2023, through May 15, 2024.

2) for cell phone no. 361.834.4125, please produce:

(a) invoices showing all calls to/from Peter Zaroni, Heather Hurlbert, Leah Olivarri, Deven Bhakta, and/or Philip Ramirez; and

(b) text messages to/from Peter Zaroni, Heather Hurlbert, Leah Olivarri, Deven Bhakta, and/or Philip Ramirez. Please limit your response to the period beginning August 1, 2023, through May 15, 2024.

3) Oath of office to serve as Mayor for this present term.

4) Confidentiality agreement, and/or other similar agreement(s), signed by Paulette Guajardo in connection with Paulette Guajardo's serving as CCREDC board member.



City of Corpus Christi
Meeting Agenda - Final
Special City Council Meeting

1201 Leopard Street
Corpus Christi, TX 78401
corpuschristitx.gov

POSTED
6/3/2026 2:02:34 PM
Rebecca Huerta
City Secretary

Tuesday, June 9, 2026

9:00 AM

Council Chambers

Public Notice: Persons with disabilities who plan to attend this meeting and who may need auxiliary aids or services are requested to contact the City Secretary's office (at 361-826-3105) at least 48 hours in advance so that appropriate arrangements can be made.

Si usted desea dirigirse al Concilio y cree que su inglés es limitado, habrá un intérprete inglés-español en todas las juntas del Concilio para ayudarle.

This meeting may be held via videoconference call pursuant to Texas Government Code § 551.127. If this meeting is held via videoconference call or other remote method of meeting, then a member of this governmental body presiding over this meeting will be physically present at the location of this meeting unless this meeting is held pursuant to Texas Government Code § 551.125 due to an emergency or other public necessity pursuant to Texas Government Code § 551.045.

- A. Mayor Pro Tem Carolyn Vaughn to call the meeting to order.
- B. City Secretary Rebecca Huerta to call the roll of the required Charter Officers.
- C. **PUBLIC COMMENT**

PLEASE BE ADVISED THAT THE OPEN MEETINGS ACT PROHIBITS THE BOARD OF DIRECTORS FROM RESPONDING AND DISCUSSING YOUR COMMENTS AT LENGTH. THE LAW ONLY AUTHORIZES THEM TO DO THE FOLLOWING:

- 1. MAKE A STATEMENT OF FACTUAL INFORMATION.
- 2. RECITE AN EXISTING POLICY IN RESPONSE TO THE INQUIRY.
- 3. ADVISE THE CITIZEN THAT THIS SUBJECT WILL BE PLACED ON AN AGENDA AT A LATER DATE.

D. PRETRIAL HEARING FOR THE REMOVAL ACTION OF THE MAYOR (ITEM 1)

- 1. 26-0901 Pretrial Hearing for the Removal Action of the Mayor, with discussion and possible action regarding preliminary and procedural matters for removal proceedings, including other motions before the City Council, witness lists, issuance of subpoenas, and all other related matters for the Removal Action, and scheduling of additional pretrial hearings and the Hearing for

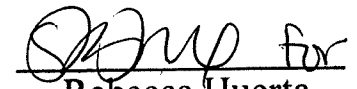
the Removal Action of the Mayor.

Sponsors: City Secretary's Office

E. **EXECUTIVE SESSION: (ITEM 2)**

2. 26-0906 **Executive Session pursuant to Texas Government Code § 551.071**
and Texas Disciplinary Rules of Professional Conduct Rule 1.05 to consult
with attorneys concerning legal issues related to the Pretrial Hearing for the
Removal Action of the Mayor.

F. **ADJOURNMENT**


Rebecca Huerta
City Secretary

IN THE REMOVAL PROCEEDING BEFORE
THE CITY COUNCIL OF THE CITY OF CORPUS CHRISTI, TEXAS

MOTION TO QUASH SUBPOENA

COMES NOW, James D. Granberry, Nueces County District Attorney [District Attorney Granberry], by and through his Assistant District Attorney, and files this Motion to Quash Subpoena, and in support of such motion would show the following:

I. Receipt of Subpoena.

On or about July 17, 2026, District Attorney Granberry, was handed a Subpoena directing him to appear and give sworn testimony in the Mayor Betty Turner Council Chambers, City of Corpus Christi City Hall, in the above referenced removal proceeding. Said subpoena represents that it was issued "Pursuant to Article II, Sections 2-22 through 2-24 of the Corpus Christi Code of Ordinances, and Corpus Christi City Charter." District Attorney Granberry was not called as a witness during the hearings on July 22, 2026, and July 23, 2026, but understands that either or both of the parties may attempt to call him as a witness when the removal proceedings resume on August 6, 2026.

II. Deficiencies in Form.

District Attorney Granberry would initially point out that purported authority for the present subpoena is deficient for several reasons. First, the ordinance supposedly authorizing the subpoena, Article II, Section 2-22, gives the mayor “the authority to sign, for or on behalf of the city council, any subpoena,” yet the present subpoena was not signed by the mayor on behalf of the city council, but by the mayor’s personal attorney on her own behalf. Second, subpoenas under this same section are authorized only with regard to an inquiry or investigation “under the authority of article II, section 19 of the Charter of the city,” which provides for a recall proceeding, not a removal proceeding of the present nature. For these reasons alone, the subpoena should be quashed.

III. Law Enforcement Exceptions.

The information sought is protected from discovery or disclosure by the statutory law enforcement privilege for information held by a law enforcement agency or prosecutor that deals with the detection, investigation, or prosecution of crime, and internal records of a law enforcement agency or prosecutor that is maintained for internal use in matters relating to law enforcement or prosecution. Tex. Gov’t Code § 552.108; *see also Hobson v. Moore*, 734 S.W.2d 340, 341 (Tex. 1987)

(accepting the law enforcement privilege as an exemption from discovery); *Houston Chronical Pub. Co. v. City of Houston*, 531 S.W.2d 177 (Tex. Civ. App.—Houston [14th Dist.] 1975, writ ref'd n.r.e.).

Likewise, the Texas Civil Practice and Remedies Code provides that a court in a civil action may not order discovery from a nonparty law enforcement agency that employs a peace officer, which includes the Nueces County District Attorney's Office by virtue of its investigators,¹ if the requested discovery deals with the prosecution of crime and its release would interfere with such prosecution. Tex. Civ. Prac. & Rem. Code § 30.006 (c). Discovery may only be ordered after motion by the requesting party, *in camera* review, and a determination that the discovery is relevant and that the requesting party has a specific need. Tex. Civ. Prac. & Rem. Code § 30.006 (d).

IV. Protection of Privileged Materials.

In the present case, it is clear that the parties have all of the factual matters relevant to the alleged wrongdoing at issue in the removal proceeding and that the present subpoena seeks to compel District Attorney Granberry to testify concerning his analysis of potential criminal charges and reasons for failing to pursue such criminal charges, which would clearly

¹ See Tex. Code Crim. Proc. art. 2A.001(5).

fall under the work product privilege. *Quinones v. State*, 592 S.W.2d 933, 940 (Tex. Crim. App. 1980) (defining work product in terms of “summaries of the evidence or discussions about the offense that have been prepared for the internal use of law enforcement officers”). “The primary purpose of the work product rule is to shelter the mental processes, conclusions, and legal theories of the attorney, providing a privileged area within which the lawyer can analyze and prepare his or her case.” *In re Bexar County Criminal Dist. Attorney's Office*, 224 S.W.3d 182, 186 (Tex. 2007); *see also Brem v. State*, 571 S.W.2d 314, 322 (Tex. Crim. App. [Panel Op.] 1978); *Guilder v. State*, 794 S.W.2d 765, 767 (Tex. App.—Dallas 1990, no pet.) (an attorney's files and papers are work product and are therefore privileged); *Hankins v. State*, 132 S.W.3d 380, 388 (Tex. Crim. App. 2004) (upholding trial court's decision to quash subpoenas issued to district attorneys whose testimony would have been irrelevant). In addition, Police reports and prosecution files concerning other cases are work product of police and are not discoverable. *Brem v. State*, 571 S.W.2d 314, 322 (Tex. Crim. App. 1978); *Vasquez Garza v. State*, 794 S.W.2d 530, 535 (Tex. App.—Corpus Christi—Edinburg 1990, pet. ref'd).

Nothing that would not be considered work product can be gained from the testimony of District Attorney Granberry or any of his staff. To

have him or his staff appear as witnesses will take them away from their duties and unnecessarily interfere with the work of the Nueces County District Attorney's Office. The Subpoena is clearly unnecessary and unduly burdensome.

Moreover, to the extent that District Attorney Granberry is being called as a legal expert to render an expert legal opinion, he has not been retained and paid as an expert witness.

PRAYER

For the reasons explained above, District Attorney Granberry respectfully requests that the subpoena be quashed in this case, and that he not be required to appear in this proceeding.

Respectfully submitted,

/s/ Douglas K. Norman

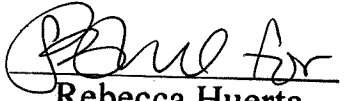
Douglas K. Norman
State Bar No. 15078900
Assistant District Attorney
105th Judicial District of Texas
901 Leopard, Room 206
Corpus Christi, Texas 78401
Telephone: (361) 888-0410
Facsimile: (361) 888-0399
douglas.norman@nuecescountytexas.gov

CERTIFICATE OF SERVICE

This is to certify that true and correct copies of the foregoing Motion to Quash Subpoena have been e-served on August 4, 2025, on the following attorneys representing the parties to the above-referenced proceeding: doug@dallisonlaw.com, and john@floodtriallawyers.com.

/s/ Douglas K. Norman

Douglas K. Norman


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,

RESPONDENT MAYOR GUAJARDO'S SUPPLEMENTAL EXHIBIT LIST

Exhibit 48 is the Type guidelines approved by City Council on August 31, 2021.

Exhibit 48.1 is the resume of Lean Pagan Olivarri.

Exhibit 49 is the October 18, 2023, email string between Philip Ramirez, Randy Almaguer Deven Bhakta.

Exhibit 50 is the December 11, 2023, video clip of Type B Meeting-Leah Olivarri speaking.

Exhibit 52 is the January 22, 2024, video clip of Type B meeting-Leah Olivarri speaking.

Exhibit 54 is the March 8, 2024, email string between Leah Olivarri and Heather Hurlbert.

Exhibit 55 is the March 15, 2024, email string between Leah Olivarri, Heather Hurlbert Olivarri regarding Ordinance wording.

Exhibit 56 is the April 4, 2024, email string between Heather Hurlbert and Leah Olivarri.

Exhibit 57 is the April 6, 2024, transcript of Ajit David presentation at public comment.

Exhibit 59 is the April 23, 2024, video clip of Peter Zanoni support; second Clip of 4.23.24 City Council Meeting-Zanoni states City staff agrees with Type B recommendation.

Exhibit 60 are the July 11, 2025, video clips of Peter Zanoni's deposition support for Type B -47; second clip from Peter Zanoni deposition.

Exhibit 61 is the July 2025 ICMA Code of Ethic

Exhibit 62 is the February 17, 2026, Transcript excerpt of the Corpus Christi City Council meeting, regarding Item 24, Presentation by Corpus Christi Police Department on findings of Homewood Suites Investigation by Deputy Chief Breedlove.

Exhibit 63 is the February 17, 2026, video of the Corpus Christi City Council meeting, regarding Item 24, Presentation by Corpus Christi Police Department on findings of Homewood Suites Investigation by Deputy Chief Breedlove.

Respectfully submitted,

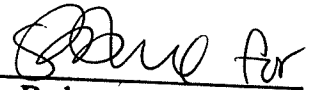
/s/ John Flood
John Flood
819 N. Upper Broadway
Corpus Christi, Texas 78401
(361) 654-8877
(361) 654-8879 Fax
john@floodtriallawyers.com
Irma@floodtriallawyers.com

**ATTORNEY FOR
PAULETTE M. GUAJARDO**

CERTIFICATE OF SERVICE

I hereby certify that on August 4th , 2026, I electronically filed the foregoing document with the City Secretary via email.

/s/ John Flood
John Flood



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,

AFFIDAVIT OF JOHN FLOOD

Upon his oath, John Flood - having been sworn by a person qualified to administer an
oath in the State of Texas - testifies as follows:

My name is John Flood. 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 Mayor Paulette Guajardo, the respondent. I have been
a licensed attorney in the State of Texas since 1990, and I remain in good standing with the
Texas bar.

I have reviewed Respondent's Supplemental Exhibit Nos. Exhibit Nos. 48 – 50; 52, 54,
55, 56, 57, 59 – 63 referenced in the document attached to this affidavit (Exhibit A). I have
reviewed these documents many times in this proceeding, and less so in a separate, but related,
proceeding. I have also reviewed other documents and emails in support of these same exhibits.

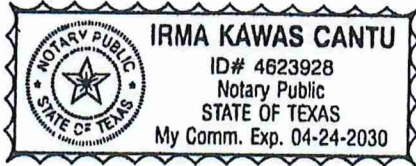
Each of the exhibits (Exhibit Nos. 48 – 50; 52, 54, 55, 56, 57, 59 - 63 listed on Exhibit A)
are true copies of what each purports to be, or, each is the record it purports to be. Specifically, I
hereby affirm that each of the following exhibits are true, correct, and authentic as described below.
Further, 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.

Affiant further sayeth naught.



John Flood

SWORN TO AND SUBSCRIBED before me on the 4th day of August, 2026.



Irma Kawas Cantu

Notary Public in and for the State of Texas