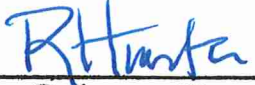


Date Filed 5-14-26

**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 Tunchez**
Reporter for Social Media – Cronica
810 Morgan Ave.
Corpus Christi, Texas 78404
- 12. Elisa Silva**
Former Executive Assistant City of Corpus Christi
City of Portland (City Secretary)
1900 Bill G Webb Drive
Portland, Texas
361-777-4513
Elisa.silva@portlandtx.gov
- 13. Randy Almaguer**
Corpus Christi Regional Economic Development Corporation (CCREDC)
One Shoreline Plaza
800 N. Shoreline Blvd., Suite 1300 S
Corpus Christi, Texas 78401
361-882-7448

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

14. Leah Olivari

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

15. Miles Risley

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

16. Jimmy Granberry

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

17. Gilbert Garcia

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

18. Chief Mike Markle

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

19. Deputy Chief Billy Breedlove

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

20. Wayne Dolcefino

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

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

/s/ Douglas A. Allison

Douglas A. Allison

LAW OFFICES OF DOUGLAS A.
ALLISON

State Bar No. 01083500

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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