

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
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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