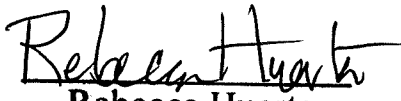


Date Filed 5-26-26

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


Rebecca Huerta
City Secretary

PETITIONERS' EXHIBIT LIST

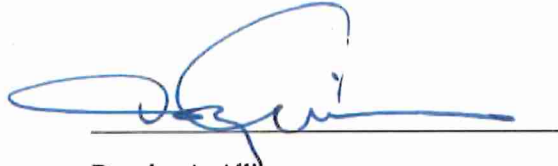
- EXHIBIT 1: is the sworn deposition testimony of Peter Zanoni;¹
- EXHIBIT 2: is the sworn testimony of Heather Hulbert;
- EXHIBIT 3: is the sworn testimony of Paulette Guajardo;
- EXHIBIT 4: is the sworn testimony of Philip Ramirez;
- EXHIBIT 5: is the sworn testimony of Mike Culbertson;
- EXHIBIT 6: 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);
- EXHIBIT 11: is Elevate QOF LLC's Application to CCREDC (dated September 27, 2023, and requesting Type B funds);
- EXHIBIT 12: is CCREDC BOD Meeting (meeting minutes dated October 12, 2023);

¹ Videotape copies of all depositions are available upon request (if such video recordings exist).

- EXHIBIT 13: is CCREDC Proposal Memorandum with attached Elevate QOF LLC's Application to CCREDC (requesting Type B funds);
- EXHIBIT 14: is CCREDC Proposal Memorandum (November 9, 2023);
- EXHIBIT 15: is CCREDC BOD Meeting (meeting minutes dated November 9, 2023);
- EXHIBIT 16: is City of Corpus Christi – Type B Corporation, Executive Session Term Sheet
- EXHIBIT 17: is John Bell email;
- EXHIBIT 18: is presentation slide deck from QOF Elevate LLC (slide 2, right column contains altered FEMA screenshot)
- EXHIBIT 19: is presentation slide deck from QOF Elevate LLC converted to PowerPoint;
- EXHIBIT 20: is presentation slide deck used during presentation to Type B Corporation (meeting on December 11, 2023);
- EXHIBIT 21: is video recording of Elevate QOF LLC's presentation to Type B Board Corporation (meeting December 11, 2023);
- EXHIBIT 22: is transcription of statements made by Elevate QOF LLC to Type B Board Corporation (meeting December 11, 2023);
- EXHIBIT 23: is City's Agenda Memorandum (January 30 2024);
- EXHIBIT 24: is email to Janet Whitehead (February 5, 2024);
- EXHIBIT 25: is City's Meeting Agenda (February 20, 2024);
- EXHIBIT 26: is collection of documents uploaded per Legistar (for City's 2/20/24 meeting);
- EXHIBIT 27: is City's presentation deck (1st Reading – February 20, 2024);
- EXHIBIT 28: is Legistar audit report (produced by City of Corpus Christi);

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

Submitted for admission of same into evidence in this matter.



Douglas A. Allison

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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