



City of
Corpus
Christi

ETHICS COMMISSION COMPLAINT FORM

Date Filed 5.1.26

Rebecca Huerta

Rebecca Huerta
City Secretary

****NOTE:** Filing a complaint which falsely accuses someone of a violation of the City of Corpus Christi Ethics Ordinance may result in criminal prosecution of anyone who knowingly makes a false declaration. (Texas Penal Code, Title 8. Offenses Against Public Administration, Chapter 37. Perjury and Other Falsification, § 37.02) All parts of this form must be completed and then submitted to the City of Corpus Christi City Secretary.

Please PRINT or TYPE all information requested on this form.

PART A – COMPLAINANT INFORMATION (*this identifies YOU as the Complainant)

Full Name Meyer Sandra Kaye
LAST FIRST MIDDLE

Address of Residence 505 NAS Corpus Christi 78418
NUMBER STREET CITY ZIP CODE

Business Address _____
NUMBER STREET CITY ZIP CODE

Contact Phone Number 361-808-8033 (day) _____ (evening)

PART B – COMPLAINANT DECLARATION

I DECLARE I, Sandra Kaye Meyer, HAVE A COMPLAINT AGAINST:
(Print Your Full Name)

Full name of person against whom you are alleging violated the City of Corpus Christi Ethics Ordinance:

Eric Cantu

The above listed person is: (please check one and complete the last box)

	Position with City	Department/Office	Title of Individual
☒	Elected Official	City Council	<u>Council Member.</u>
☐	Appointed Official	Board or Commission	
☐	Employee	Department	

plus 16 pages supporting documents.

Part C – STATEMENT OF COMPLAINT

State the alleged unethical behavior or actions of the person whom this complaint is against.

According to Sec. 2-310. – Preamble: *The purpose of the code of ethics is to promote public trust by establishing rules of conduct for council members, board members and employees..... Situations with ethical implications will arise outside the prohibitions of the rules; in such situations, council members....are encouraged to keep in mind the ideal of public trust.....*

Ethics Code Section 2-311 (8)(e) states that elected city officials **may not** use their position to influence the action of a city official or city employee in the performance of their duties related to a contract or business transaction involving an individual or organization who contributed to the official's campaign contributions during the most recent election either directly, or indirectly via a third party.

Councilman Eric Cantu multiple campaign contributions during the most recent election from Ajit David via his hotel company, Bayfront Marina Investments and Doug Allison, his attorney in the civil lawsuit against the City of Corpus Christi and the mayor relating to the Homewood Suites Incentive:

1/16/25 -\$1,000 – Bayfront Marina Investments

1/16/2025 - \$1,000 Doug Allison attorney

While performing his duties as a City Councilman, Mr. Eric Cantu, used his position to:

- Request staff put items on the City Council's agenda's that pertained to Ajit David allegations, civil lawsuit and/or the Articles of Impeachment that Mr. David signed.
- Share his thoughts with other city council members with regards to Ajit David's allegations and civil lawsuit, and/or the Articles of Impeachment that Mr. David signed.
- Vote on multiple actions that pertained to Ajit David's allegations, civil lawsuit and/or the Articles of Impeachment that Mr. David signed.
- Voted on actions that related to concerns about statements made by people being deposed by Attorney Doug Allison in relation to Mr. David's civil lawsuit, as laid out in the Articles of Impeachment.

The only way for Mr. Cantu, as a city councilman, to have NOT used his position to influence the actions of a city official or employee in the performance of their duties would have been to refrain from participation in the official city business transactions. Had he NOT used his position, his name would NOT be on 3 signature memorandums requesting items be placed on the agenda. He would NOT have voted. At a minimum, he would have disclosed the conflict of interest, the receipt of the campaign contributions which causes Ethics code section 2-311 (8)(e) to become applicable prior to his sharing thoughts on the topic.

Specifically:

- **Jan 27, 2026:** Item: 26-0137 The Corpus Christi Police Department was scheduled to give the City Council a presentation on the findings of the Homewood Suites Investigation. When it came time for their presentation, Councilman Hernandez moved to postpone the presentation until the outside attorney's report would be received in mid-February. See council meeting video

Mr. Cantu was one of five council members that voted for this postponement. 3 of those 5 did not refrain from the discussion and/or the vote despite having received campaign contributions from Mr. David.

- **Feb 17, 2026:** At the City Council meeting, both the outside attorney firm and the Corpus Christi Police department shared the results of their investigations into Mr. David's Homewood Suites Incentive allegations. Neither found sufficient evidence to warrant criminal charges.
- **Feb 25, 2026:** Ajit David submitted an affidavit, as part of his lawsuit against the city, that he owns, in part, the Holiday Inn, at 707 Shoreline Blvd, and the Residence Inn. (Other documents, such as an Internal Revenue Service form W-9, that was found online, shows The Holiday Inn Marina Downtown as operating under Bayfront Marina Investments – 707 North Shoreline Blvd.)
- **March 11, 2026:** Eric Cantu was one of three council members that submitted a request to have a discussion at the March 24, 2026 as to whether the city council should take action on Rachel Caballero's August 29, 2025 petition for removal of the mayor. The petition was submitted after the Auditor's August 26 memo alleging fraud had been made public. It details Ajit David's concerns included in his civil lawsuit about the Homewood Suites incentive and comments made in depositions taken by attorney Doug Allison. Two of the three city council members that submitted this request received campaign donations between August 2024- January 2025, from Bayfront Marina Investments. Signatures included Council members Hernandez and Mr. Cantu.
- **March 18, 2026:** Eric Cantu was one of three council members that submitted a request to have a discussion at the March 24, 2026 City Council meeting as to whether the Legistar records that related to the 2024 Homewood Suites should reflect the modified version or the original version that was considered to be confusing. It should be noted that all three members received campaign donations between August 2024- February 2025, from Bayfront Marina Investments. Signatures included: Councilmembers Hernandez, Paxson and Cantu.
<https://corpuschristi.legistar.com/LegislationDetail.aspx?ID=7954960&GUID=5ECEB468-0094-446C-A817-5946FEC38F80>
- **March 24, 2026:** This item 26- 0419, City Council members discussed petition to remove the mayor. It was related to Mr. David's allegations and lawsuit. The city council was given four options to consider. These included having a hearing to decide the validity of the allegations and concerns. Several members, to include Mr. Cantu claimed the charter stated "shall." Doug Allison, Mr. David's attorney, spoke. He mentioned the charter stated "shall" and acknowledged the members that stated "shall" in their remarks. He went on to say that wasn't trying to say that Mr. David is right and the Mayor is wrong. He realizes that most people did not listen to all the testimony that he took. He stressed the petitioners' concerns needed to be heard in a public forum rather in the ethics committee.
<https://corpuschristi.legistar.com/LegislationDetail.aspx?ID=7954960&GUID=5ECEB468-0094-446C-A817-5946FEC38F80> Mr. Cantu discussed and voted aye on vote to for an April 14 procedural hearing.

- **March 24, 2026:** This item 26-0451 pertained to concerns that Mr. David had that related to topics in this allegations and lawsuit. Mr. David's attorney spoke on this item. He was also observed trying to keep discussion of items that pertained to litigation in the public while City Attorney was trying to move the group to Executive Session for the discussion. YouTube video. <https://corpuschristi.legistar.com/LegislationDetail.aspx?ID=7954960&GUID=5ECEB468-0094-446C-A817-5946FEC38F80> Mr. Cantu discussed and voted aye.
- **April 14, 2026:** Agenda Item 26-0510 Articles of Impeachment. This document includes Mr. Ajitt David's signature and includes concerns from his initial allegations and civil lawsuit. <https://corpuschristi.legistar.com/LegislationDetail.aspx?ID=7973096&GUID=EE0E4773-41C9-41CE-9902-9048F485F601> Mr. Cantu discussed and voted aye.

PART D – SUPPORTING FACTS (Required)

Provide a statement of the facts upon which your complaint is based. This is required because the "burden of proof" is with the Complainant. Describe the events in the order in which they occurred. Keep dates of the events in sequence. Include full name, addresses and phone numbers of all individuals involved, including any witnesses present when the alleged violations occurred. Be factual; the information you provide in this statement must be based facts and not personal conjecture. Try to answer the questions, who, what, where, and when. (Be specific when the alleged violation occurred and when you learned about it. Attach extra sheets if more space is required.

For the record, I have included information on my timeline that dates back to 2024. I found this information via online research that occurred between September 2025 to present. As a private citizen, this should not be interpreted as my having knowledge of that information at that time. I was not paying attention to city affairs, much less city council member's activities. I have included some items on the timeline to provide context even though they did not occur within the last 180 days.

On September 9, 2025, the City Auditor gave a presentation summarizing their Homewood Suites fraud investigation. It became evident during that meeting; the auditor did not publicly disclose his conflict of interest until that night. As a former Certified Internal Auditor and Certified Public Accountant, I believed his presentation was so 'atypical' that I became concerned.

I re-watched that presentation on the City's YouTube channel multiple times to see if anyone else disclosed potential conflicts of interest that night. For several months, I focused my research on the City Auditor's office activities. Auditor independence and compliance with standards is an integral component of that profession.

It was not until the March 24, 2026 City Council meeting, when I observed Ajit David and Doug Allison, his attorney, interacting with some City Council members that I, as a public citizen, was able to comprehend gravity of the ethical violations that I observed between September 9, 2025 and April 2026.

- **2021-2024:** Councilman Gil Hernandez chairs the audit committee.

- **July 16, 2024:** After Executive Session, a motion was made and passed 9:0 to place City Auditor on leave for 14 days. *(Note: The public was unaware of that an outside HR investigation report had recommended his termination. Report didn't become public until March 2025)*
- **July 30, 2024:** Council discussed the City Auditor in executive session. A motion was made and passed to place the City Auditor on paid Administrative leave from July 30 – August 13, 2024. Mr. Hernandez abstained. The other 8 members voted aye.
- **July/August 2024:** While on administrative leave, the City Auditor engaged the services of attorney Doug Allison, to assist him with this matter. (The City Auditor discloses this arrangement on Sept 9, 2025 during Homewood Suite Fraud Investigation presentation to the city council. He did not provide the specific date.)
- **August 13, 2024:** Council discussed the City Auditor in executive session. A motion was made and passed to place the City Auditor on paid leave through August 27, 2024. Mr. Hernandez voted nay. The other 8 members voted aye.
- **August 27, 2024:** Council discusses City Auditor in executive session. A motion is made to authorize the Audit Committee to establish further direction for the City auditor. It passes 9:0
- **August 28, 2024:** City Auditor returns to work.
- **August 28, 2024:** City Auditor is assigned to look into the Homewood Suites Incentive allegation(s).
- **August 29, 2024:** Gil Hernandez receives a campaign donation of \$1,500 from Bayfront Marina Investments. Multiple pieces of evidence indicate that the company is related to the hotels in which Mr. David is part owner. The address associated with the company is 707 N Shoreline Blvd. That is also the Holiday Inn Downtown Marina's address. (Per campaign finance report filed on 10/7/24) <https://www.corpuschristitx.gov/media/314lawbn/gill-hernandez.pdf>
- **September 30, 2024:** Doug Allison, the attorney that worked with the City Auditor, files a civil lawsuit against the City and the Mayor, on behalf of Ajit David, in reference to the Homewood Suites Incentive.
- **September 30, 2024:** Gil Hernandez received another campaign donation, \$1,000, from Ajit David's Bayfront Marina Investments. (Per campaign finance report filed on 10/28/24) <https://www.corpuschristitx.gov/media/wjbdutfh/ghernandez-8-day-report-2024.pdf>
- **August 21, 2025 (Thursday):** The City Auditor released a one page memo to the Mayor and City Council regarding the Homewood Suites Allegation. According to City Ordinance 12.5 this memo should have gone through the legal department and the City manager first. In the memo, the City Auditor states they found reasonable basis that the developers committed fraud.
- **August 22, 2025: (Friday) KRIS 6 Investigates** posts a report at 9:57 am "City Auditor finds 'reasonable basis' developers committed fraud for \$2M incentive."
- **August 26, 2025: (Tuesday)** Kiii, Kris 6 and the Caller Times have all reported on the City Auditor's memo. In Katie Nickas's Caller Times article, "City Auditor finds hotel developers likely committed fraud in requesting incentive," she states that Aug. 21 memo from City Auditor George Holland was provided to the Caller Times by City Councilman Gil Hernandez.
- **August 29, 2025:** Rachael Caballero files a petition at the City Secretary's office to have the mayor removed. She attached Ajit David's lawsuit and used the complaints within as the basis for wrongdoing. Online chatter starts that the City Auditor found forgery thus supporting the complaints in her petition. This continues for through March & people start sharing that viewpoint in city council meetings. She also starts an online petition to remove the mayor.

- **September 2, 2025:** Gil Hernandez, Kaylynn Paxson and Syliva Campos submit a request to have a discussion on the City Auditor's Aug 21 memorandum to have an outside agency investigate the Homewood Suites Fraud allegation at the Sept 9, 2025 City Council meeting.
- **Sept 9, 2025:** City Auditor makes a formal presentation to the city council about the matter. It is disclosed that the auditor's relied primarily upon depositions that were taken by Doug Allison, Mr. David's attorney. Evidence suggests that certain details/interviews with the Type B Board were not included in timelines or presentations. Those details would not necessarily support Mr. David's stance. As result, the objectivity of the auditor's report is questioned.

Upon questioning, the City Auditor discloses that Ajit David's attorney, Doug Allison, had also been his attorney. There was a significant amount of discussion relating to conflicts of interest. No potential conflicts of interest were disclosed by Gil Hernandez, or any other city council members had received campaign donations within the last 12 months from Mr. David or any business related to hotels in which he was affiliated with.

Eric Cantu and the majority that voted did not want to wait for a law enforcement investigation. They wanted the city to pay for an outside agency to investigate as they were concerned that they police department could be conflicted. (See YouTube Video recording of Sept 9, 2024 meeting)

- **Sept 23, 2025:** Councilman Cantu was not one of 7 persons on the City Council to authorize the execution of two professional services agreements to represent the City and the Mayor in the case of Ajit David vs City of Corpus Christi and Mayor Paulette Guajardo. The legal fees were not to exceed \$444,000. He voted nay.
- **Sept 25, 2025:** Kiiitv.com reports "Corpus Christi City Auditor's office failed peer review in May. The news article included a copy of the May 5, 2025 report. According to the article and supported by the attached report, "The City of Corpus Christi's Auditor's Office has failed its latest external peer review, raising serious concerns about independence, oversight and compliance with government auditing standards."
- **Oct 1, 2025:** Councilman Cantu was one of three council members that submitted a 3 Signature Memo request to have a discussion at the October 7 City Council meeting to retain yet another outside attorney for the internal investigation of the Homewood Suites fraud allegation.
- **Oct 7, 2025:** City Council meeting, Eric Cantu was 1 of 5 people who voted to retain yet another outside attorney for the internal investigation of the Homewood Suites fraud allegation. There was a significant amount of discussion relating to conflicts of interest. Gil Hernandez and the majority that voted did not want to wait for a law enforcement investigation. Once again, there were concerns the police department could be conflicted.

Councilman Cantu believed this investigation could be done for approximately \$50,000. It should be noted that 3 of the 5 people that authorized contracting with an outside attorney had all received campaign donations from Bayfront Marina Investments within the last 12 months, i.e. the most recent campaign cycle. He brought names of potential law firms to the meeting.

- **Oct 11, 2025.** Audit committee meeting. They discussed city auditor's personnel matter in Executive Session from 10:10 – 11:28. When they came out, Kaylynn Paxson made a motion that the city council be presented with a motion recommending that City Auditor receive a retroactive wage increase to July 28, 2025. Seconded by Campos.

- **Nov 4, 2025:** Audit committee in Executive Session from 10:01 – 11:21 discussing city auditor personnel matters. Kaylyn Paxson makes a motion to refer to the city council the City Auditor's performance evaluation and a market salary increase to \$168,000. Seconded by Campos.
Nov 18, 2025: Despite the negative publicity from the Auditor's HR investigation and the failed peer review, Eric Cantu is one of the three council members that received campaign contributions from Mr. David that voted for the City Auditor to receive a pay raise, to be retro-active to July 2025.
- **Dec 17, 2025:** Kris 6 News and Kiii both report that law enforcement agencies did not expect to file any criminal charges against the developer in relation to the Homewood Suites allegations.
- **Jan 6, 2026:** Item: 26-0061 Gil Hernandez was one of three council members that submitted a three signature memo request to have a discussion at the January 13, 2026 City Council meeting as to whether the City Council the Type B economic agreement with the Homewood Suites Developer should be withdrawn. That item was placed on the January 27 agenda but then was withdrawn that day.
<https://corpuschristi.legistar.com/LegislationDetail.aspx?ID=7794863&GUID=10DDB544-6E87-451E-B2CC-A2473B55CE4E>
- **Jan 27, 2026:** Item: 26-0137 The Corpus Christi Police Department was scheduled to give the City Council a presentation on the findings of the Homewood Suites Investigation. When it came time for their presentation, Councilman Hernandez moved to postpone the presentation until the outside attorney's report would be received in mid-February. Eric Cantu voted for this postponement.
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Part E- Ethics Ordinance Code Violations

According to Sec. 2-310. – Preamble: *The purpose of the code of ethics is to promote public trust by establishing rules of conduct for council members, board members and employees..... Situations with ethical implications will arise outside the prohibitions of the rules; in such situations, council members.....are encouraged to keep in mind the ideal of public trust.....*

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Part F – Sources and Attachments of Evidence

<https://www.corpuschristitx.gov/media/zccijrvh/cfr-eric-cantu.pdf>

<https://ewscripps.brightspotcdn.com/63/22/9b93d66b46e19154a35f3b233cb3/2024-09-30-ajit-david-pop.pdf>

<https://corpuschristi.legistar.com/DepartmentDetail.aspx?ID=16850&GUID=A6D0B73D-749A-4E86-8B51-441C31FAF5B1&Mode=MainBody> City Council Minutes 2024

<https://corpuschristi.legistar.com/DepartmentDetail.aspx?ID=16850&GUID=A6D0B73D-749A-4E86-8B51-441C31FAF5B1&Mode=MainBody> City Council Minutes 2025

<https://corpuschristi.legistar.com/DepartmentDetail.aspx?ID=16850&GUID=A6D0B73D-749A-4E86-8B51-441C31FAF5B1&Mode=MainBody> City Council Minutes 2026

<https://www.caller.com/story/news/local/2025/08/26/corpus-christi-fraud-homewood-suites-hilton-downtown-hotel-incentive/85816071007/?gnt-cfr=1&gca-cat=p&gca-uir=true&gca-epti=z11xx38p117050c117050e001100v11xx38b00xxxxd11xx65&gca-ft=235&gca-ds=sophi>
Caller Times Article

<https://www.kiiitv.com/article/news/local/homewood-suites-criminal-investigation/503-d9b3b98f-fd23-4046-a276-bc1d303e6e20>

<https://www.kristv.com/news/local-news/in-your-neighborhood/corpus-christi/downtown/law-enforcement-agencies-not-pursuing-criminal-charges-in-homewood-suites-case-developers-attorney-says>

<https://www.youtube.com/@CCTVCorpusChristi/streams> City of Corpus Christi YouTube channel.

PART G

My name is Sandra (First) Kaye (Middle) Meyer (Last), my date of birth is 8/29/1966, and my address is 505 NAS (Street) Corpus Christi (City) TX (State) 78416 (Zip Code), and Nueces (Country). I declare under penalty of perjury that the information provided by me herein is true and correct.

Executed in Nueces County, State of TX, on the 1 day of May, 2026.

Sandra Kaye Meyer
Declarant

Should you have any questions concerning this form or require additional information on the complaint review process, please contact the City Secretary's Office at (361) 826-3105 during regular business hours (8:30 am to 5:00 pm; Monday – Friday)

Upon completion of **ALL** sections of the Complaint Form, please either **hand-deliver** or send by **certified mail** with any attachments to:

Office of the City Secretary
City of Corpus Christi
P.O. Box 9277
Corpus Christi, TX 78469

Supporting Documents

CANDIDATE / OFFICEHOLDER CAMPAIGN FINANCE REPORT				FORM C/OH COVER SHEET PG 1																	
The C/OH Instruction Guide explains how to complete this form.			1 Filer ID (Ethics Commission Filers)		2 Total pages filed: 9																
3 CANDIDATE / OFFICEHOLDER NAME	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%; font-size: 0.8em;">MS / MRS / MR</td> <td style="width: 40%; font-size: 0.8em;">FIRST</td> <td style="width: 20%; font-size: 0.8em;">MI</td> <td style="width: 20%;"></td> </tr> <tr> <td>Mr.</td> <td>Eric</td> <td>J</td> <td></td> </tr> <tr> <td style="font-size: 0.8em;">NICKNAME</td> <td style="font-size: 0.8em;">LAST</td> <td colspan="2" style="font-size: 0.8em;">SUFFIX</td> </tr> <tr> <td></td> <td>Cantu</td> <td colspan="2"></td> </tr> </table>			MS / MRS / MR	FIRST	MI		Mr.	Eric	J		NICKNAME	LAST	SUFFIX			Cantu			OFFICE USE ONLY Date Received Date Filed 7/15/25 Rebecca Huerta City Secretary	
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4 CANDIDATE / OFFICEHOLDER MAILING ADDRESS Change of Address	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%; font-size: 0.8em;">ADDRESS / PO BOX;</td> <td style="width: 10%; font-size: 0.8em;">APT / SUITE #;</td> <td style="width: 10%; font-size: 0.8em;">CITY;</td> <td style="width: 10%; font-size: 0.8em;">STATE;</td> <td style="width: 30%; font-size: 0.8em;">ZIP CODE</td> </tr> <tr> <td colspan="5">P.O. Box 60871 Corpus Christi, TX 78466</td> </tr> </table>			ADDRESS / PO BOX;	APT / SUITE #;	CITY;	STATE;	ZIP CODE	P.O. Box 60871 Corpus Christi, TX 78466					<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 50%; font-size: 0.8em;">Receipt #</td> <td style="width: 50%; font-size: 0.8em;">Amount \$</td> </tr> <tr> <td colspan="2" style="font-size: 0.8em;">Date Processed</td> </tr> <tr> <td colspan="2" style="font-size: 0.8em;">Date Imaged</td> </tr> </table>		Receipt #	Amount \$	Date Processed		Date Imaged	
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9 REPORT TYPE	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 16.6%;">☐ January 15</td> <td style="width: 16.6%;">☐ 30th day before election</td> <td style="width: 16.6%;">☐ Runoff</td> <td style="width: 16.6%;">☐ 15th day after campaign treasurer appointment (Officeholder Only)</td> <td style="width: 16.6%;"></td> <td style="width: 16.6%;"></td> </tr> <tr> <td>☒ July 15</td> <td>☐ 6th day before election</td> <td>☐ Exceeded Modified Reporting Limit</td> <td>☐ Final Report (Attach C/OH - FR)</td> <td></td> <td></td> </tr> </table>					☐ January 15	☐ 30th day before election	☐ Runoff	☐ 15th day after campaign treasurer appointment (Officeholder Only)			☒ July 15	☐ 6th day before election	☐ Exceeded Modified Reporting Limit	☐ Final Report (Attach C/OH - FR)						
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10 PERIOD COVERED	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 10%; font-size: 0.8em;">Month</td> <td style="width: 10%; font-size: 0.8em;">Day</td> <td style="width: 10%; font-size: 0.8em;">Year</td> <td style="width: 10%;"></td> <td style="width: 10%; font-size: 0.8em;">Month</td> <td style="width: 10%; font-size: 0.8em;">Day</td> <td style="width: 10%; font-size: 0.8em;">Year</td> </tr> <tr> <td>1</td> <td>/</td> <td>1</td> <td>/</td> <td>25</td> <td>THROUGH</td> <td>6 / 30 / 25</td> </tr> </table>					Month	Day	Year		Month	Day	Year	1	/	1	/	25	THROUGH	6 / 30 / 25		
Month	Day	Year		Month	Day	Year															
1	/	1	/	25	THROUGH	6 / 30 / 25															
11 ELECTION	<table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 30%; font-size: 0.8em;">ELECTION DATE</td> <td style="width: 70%; font-size: 0.8em;">ELECTION TYPE</td> </tr> <tr> <td style="font-size: 0.8em;">Month Day Year</td> <td> ☐ Primary ☐ Runoff ☐ Other Description ☒ General ☐ Special </td> </tr> <tr> <td>11 / 5 / 24</td> <td></td> </tr> </table>					ELECTION DATE	ELECTION TYPE	Month Day Year	☐ Primary ☐ Runoff ☐ Other Description ☒ General ☐ Special	11 / 5 / 24											
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Month Day Year	☐ Primary ☐ Runoff ☐ Other Description ☒ General ☐ Special																				
11 / 5 / 24																					
12 OFFICE	OFFICE HELD (If any) City Council District 3		13 OFFICE SOUGHT (If known) City Council District 3																		
14 NOTICE FROM POLITICAL COMMITTEE(S) Additional Pages	THIS BOX IS FOR NOTICE OF POLITICAL CONTRIBUTIONS ACCEPTED OR POLITICAL EXPENDITURES MADE BY POLITICAL COMMITTEES TO SUPPORT THE CANDIDATE / OFFICEHOLDER. THESE EXPENDITURES MAY HAVE BEEN MADE WITHOUT THE CANDIDATE'S OR OFFICEHOLDER'S KNOWLEDGE OR CONSENT. CANDIDATES AND OFFICEHOLDERS ARE REQUIRED TO REPORT THIS INFORMATION ONLY IF THEY RECEIVE NOTICE OF SUCH EXPENDITURES. <table style="width: 100%; border-collapse: collapse;"> <tr> <td style="width: 20%; font-size: 0.8em;">COMMITTEE TYPE</td> <td style="width: 80%; font-size: 0.8em;">COMMITTEE NAME</td> </tr> <tr> <td>☐ GENERAL</td> <td></td> </tr> <tr> <td>☐ SPECIFIC</td> <td></td> </tr> <tr> <td></td> <td style="font-size: 0.8em;">COMMITTEE ADDRESS</td> </tr> <tr> <td></td> <td style="font-size: 0.8em;">COMMITTEE CAMPAIGN TREASURER NAME</td> </tr> <tr> <td></td> <td style="font-size: 0.8em;">COMMITTEE CAMPAIGN TREASURER ADDRESS</td> </tr> </table>					COMMITTEE TYPE	COMMITTEE NAME	☐ GENERAL		☐ SPECIFIC			COMMITTEE ADDRESS		COMMITTEE CAMPAIGN TREASURER NAME		COMMITTEE CAMPAIGN TREASURER ADDRESS				
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	COMMITTEE ADDRESS																				
	COMMITTEE CAMPAIGN TREASURER NAME																				
	COMMITTEE CAMPAIGN TREASURER ADDRESS																				

GO TO PAGE 2

5 1/6

CANDIDATE / OFFICEHOLDER CAMPAIGN FINANCE REPORT

FORM C/OH
COVER SHEET PG 2

15 C/OH NAME

Eric J. Cantu

16 Filer ID (Ethics Commission Filers)

17 CONTRIBUTION
TOTALS

1. TOTAL UNITEMIZED POLITICAL CONTRIBUTIONS (OTHER THAN
PLEDGES, LOANS, OR GUARANTEES OF LOANS, OR
CONTRIBUTIONS MADE ELECTRONICALLY)

\$

2. TOTAL POLITICAL CONTRIBUTIONS
(OTHER THAN PLEDGES, LOANS, OR GUARANTEES OF LOANS)

\$ 19,526.00

EXPENDITURE
TOTALS

3. TOTAL UNITEMIZED POLITICAL EXPENDITURE.

\$

4. TOTAL POLITICAL EXPENDITURES

\$ 172.23

CONTRIBUTION
BALANCE

5. TOTAL POLITICAL CONTRIBUTIONS MAINTAINED AS OF THE LAST DAY
OF REPORTING PERIOD

\$ 17,053.77

OUTSTANDING
LOAN TOTALS

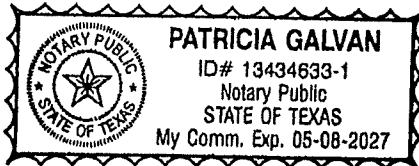
6. TOTAL PRINCIPAL AMOUNT OF ALL OUTSTANDING LOANS AS OF THE
LAST DAY OF THE REPORTING PERIOD

\$ 44,087.18

18 SIGNATURE

I swear, or affirm, under penalty of perjury, that the accompanying report is true and correct and includes all information required to be reported by me under Title 15, Election Code.

Signature of Candidate or Officeholder



Please complete either option below:

(1) Affidavit

NOTARY STAMP/SEAL

Sworn to and subscribed before me by Eric Cantu this the 15th day of July,

2025, to certify which, witness my hand and seal of office.

Signature of officer administering oath

Printed name of officer administering oath

Title of officer administering oath

OR

(2) Unsworn Declaration

My name is _____, and my date of birth is _____.

My address is _____, _____, _____, _____, _____.

(street)

(city)

(state)

(zip code)

(country)

Executed in _____ County, State of _____, on the _____ day of _____, 20____.

(month)

(year)

Signature of Candidate/Officeholder (Declarant)

SUBTOTALS - C/OH**FORM C/OH
COVER SHEET PG 3****19 FILER NAME**

Eric J. Cantu

20 Filer ID (Ethics Commission Filers)**21 SCHEDULE SUBTOTALS
NAME OF SCHEDULE****SUBTOTAL
AMOUNT**

1.	SCHEDULE A1: MONETARY POLITICAL CONTRIBUTIONS	\$ 17,226.00
2.	SCHEDULE A2: NON-MONETARY (IN-KIND) POLITICAL CONTRIBUTIONS	\$ 2,300.00
3.	SCHEDULE B: PLEDGED CONTRIBUTIONS	\$
4.	SCHEDULE E: LOANS	\$
5.	SCHEDULE F1: POLITICAL EXPENDITURES MADE FROM POLITICAL CONTRIBUTIONS	\$ 172.23
6.	SCHEDULE F2: UNPAID INCURRED OBLIGATIONS	\$
7.	SCHEDULE F3: PURCHASE OF INVESTMENTS MADE FROM POLITICAL CONTRIBUTIONS	\$
8.	SCHEDULE F4: EXPENDITURES MADE BY CREDIT CARD	\$
9.	SCHEDULE G: POLITICAL EXPENDITURES MADE FROM PERSONAL FUNDS	\$
10.	SCHEDULE H: PAYMENT MADE FROM POLITICAL CONTRIBUTIONS TO A BUSINESS OF C/OH	\$
11.	SCHEDULE I: NON-POLITICAL EXPENDITURES MADE FROM POLITICAL CONTRIBUTIONS	\$
12.	SCHEDULE K: INTEREST, CREDITS, GAINS, REFUNDS, AND CONTRIBUTIONS RETURNED TO FILER	\$

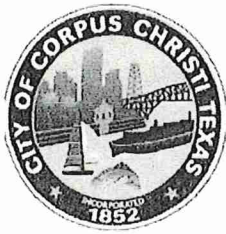
53/16

Eric Cantu Campaign

SCHEDULE A1: MONETARY POLITICAL CONTRIBUTIONS

Date	Name	Amount	Address	City	ST	ZIP
1/16/2025	Linebarger, Goggan Blair, Sampson, LLP	\$ 1,000.00		Austin	TX	78760
1/16/2025	Bayfront Marina Investments, LP	\$ 1,000.00		Corpus Christi	TX	78401
1/16/2025	Trepac - Texas Realtors PAC	\$ 1,000.00		Austin	TX	78768
1/16/2025	Nicholas Rhodes	\$ 500.00		McAllen	TX	78501
1/16/2025	Corpus Christi Police Officers Association PAC Acct	\$ 500.00		Corpus Christi	TX	78408
1/16/2025	Gignac & Associates, LLP	\$ 250.00		Corpus Christi	TX	78401
1/16/2025	Jesus Andres Noyola	\$ 150.00		Corpus Christi	TX	78416
1/16/2025	Jim Barnette	\$ 500.00		Corpus Christi	TX	78414
1/16/2025	Cynthia Salazar Garza	\$ 200.00		Corpus Christi	TX	78410
1/16/2025	Becky K. Moeller	\$ 50.00		Corpus Christi	TX	78412
1/16/2025	James & Teresa Klein	\$ 100.00		Corpus Christi	TX	78411
1/16/2025	Barton H. Braselton Operating Acct	\$ 1,000.00		Corpus Christi	TX	78413
1/16/2025	Gulley Family Investments, LTD General Acct	\$ 500.00		Corpus Christi	TX	78414
1/16/2025	Rajan Ahuja	\$ 500.00		Corpus Christi	TX	78414
1/16/2025	Paul & Elvira Chapa	\$ 500.00		Corpus Christi	TX	78414
1/16/2025	Michael & Amanda Miller	\$ 300.00		Corpus Christi	TX	78412
1/16/2025	Frances Morey	\$ 50.00		Corpus Christi	TX	78404
1/16/2025	Terry & Anneliese Arnold	\$ 100.00		Corpus Christi	TX	78411
1/16/2025	Doug Allison	\$ 1,000.00		Corpus Christi	TX	78412
1/16/2025	Juan F. Santos MD	\$ 200.00		Corpus Christi	TX	78418
1/16/2025	Billy & Delfina Lerma	\$ 150.00		Corpus Christi	TX	78410
1/16/2025	Ernest R. Garza	\$ 400.00		Corpus Christi	TX	78410
1/16/2025	David Loeb	\$ 500.00		Corpus Christi	TX	78411
1/16/2025	Laurie & Michael Mintz	\$ 2,000.00		Corpus Christi	TX	78411
1/16/2025	Herbert Rubio	\$ 100.00		Corpus Christi	TX	78410
1/16/2025	Rose Mary Gonzalez	\$ 20.00		Corpus Christi	TX	78404
1/16/2025	Sharon Wechsler	\$ 30.00		Corpus Christi	TX	78414
1/17/2025	Scott Corliss	\$ 1,500.00		Corpus Christi	TX	78418
1/19/2025	George Edwards	\$ 100.00		Corpus Christi	TX	78413
1/16/2025	Christopher Forrest	\$ 25.00		Corpus Christi	TX	78414
1/24/2025	Larry Elizondo, Sr.	\$ 1,001.00		Corpus Christi	TX	78413
1/27/2025	Jack Super Supertex Properties LP	\$ 2,000.00		Corpus Christi	TX	78415
		<u>\$ 17,226.00</u>				

54/16



**CITY OF CORPUS CHRISTI
CITY SECRETARY'S OFFICE
COUNCIL ACTION REQUEST**

TO: Rebecca Huerta, City Secretary

FROM: Council Member Eric Cantu, Dist. 3
Council Member Gil Hernandez, Dist. 5
Council Member Kaylynn Paxson, Dist. 4

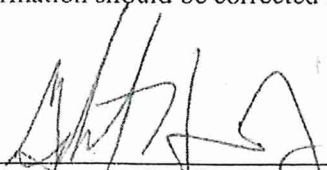
COPIES TO: Mayor & Council
Peter Zanoni, City Manager
Miles Risley, City Attorney

SUBJECT: Discussion and possible action to correct February 20, 2024 Council Meeting Agenda Item 24-0256 to original agenda memo and all associated documents as recorded in the city's official record taken from the Laserfiche archives.

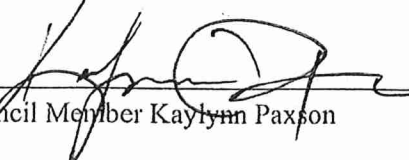
ACTION REQUEST:

Per Council Policy 16.d., we are requesting that the following item be placed on the March 24, 2026, City Council agenda for discussion and possible action to correct the February 20, 2024 Council Meeting Agenda Item 24-0256 in Legistar to original agenda memo and all associated documents as recorded in the city's official record taken from the Laserfiche archives.

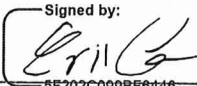
The agenda memo and all associated documents in Legistar for the February 20, 2024 City Council meeting were changed to the April 23, 2024 agenda memo, presentation, Type B agreement and other document. These documents are incorrect and do not reflect what was discussed during the February 20, 2024 meeting. Even though Legistar is not the city's official record, Legistar is the citizen website access to city council meeting information. In accordance with Texas Government Code Section 552, the information should be corrected to reflect the city's official record.



Council Member Gil Hernandez



Council Member Kaylynn Paxson

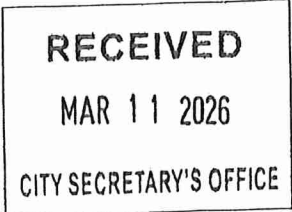
Signed by:


SF202C099BF0440...
Council Member Eric Cantu

55/16



**CITY OF CORPUS CHRISTI
CITY SECRETARY'S OFFICE
COUNCIL ACTION REQUEST**



TO: Rebecca Huerta, City Secretary

FROM: Council Member Carolyn Vaughn, At-Large
Council Member Gil Hernandez, Dist. 5
Council Member Eric Cantu, Dist. 3

COPIES TO: Mayor & Council
Peter Zaroni, City Manager
Miles Risley, City Attorney

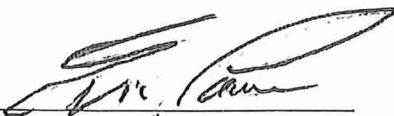
SUBJECT: Discussion and possible action on August 29, 2025 petition from Rachel Caballero for removal action against Mayor Paulette Guajardo.

ACTION REQUEST:

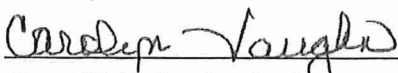
Per Council Policy 16.d., we are requesting that the following item be placed on the March 24, 2026, City Council agenda for discussion and possible action:

On the August 29, 2025, the City Council received a formal petition from Rachel Caballero for removal action against Mayor Paulette Guajardo.

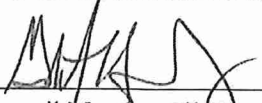
Discussion and possible action on to determine if any formal proceedings should taken pursuant to Article II, Section 11 of the City Charter.



Council Member Eric Cantu



Council Member Carolyn Vaughn



Council Member Gil Hernandez



CITY OF Corpus Christi

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[Details](#) [Reports](#)

File #: 26-0419 Version: 1
 Type: Motion
 File created: 3/11/2026
 On agenda: 3/24/2026
 Title: Discussion and possible action on A
 Members Carolyn Vaughn, Gil Hern
 Sponsors: [City Secretary's Office](#)
 Attachments: 1. [2026-03-11 Three Sig Memo - R](#)

[History \(1\)](#) [Text](#)

1 record	Group	Export
Date	Ver.	Action By
3/24/2026	1	City Council

City of Corpus Christi - Action Details

Details

File #: 260419 Version: 1
 Type: Motion
 Title: Discussion and possible action on August 29, 2025 petition from Rachel Caballero for removal acti
 against Mayor Paulette Guajardo, as requested by Council Members Carolyn Vaughn, Gil Hernandi
 and **Eric Cantu**.
 Mover: Gilbert Hernandez Second: Kaylynn Paxson
 Result: Pass
 Agenda note:
 Minutes note:
 Action: passed
 Action text: City Attorney Miles Risley responded to Council questions. Mayor Pro Tem Roy opened public
 comment. Susie Saldana, Corpus Christi, TX, Tony Reyes, Corpus Christi, TX, Marcus Lozano, Corp
 Christi, TX, Sondra Meyer, Corpus Christi, TX, John Hensley, Corpus Christi, TX, Robin Cox, Corp
 Christi, TX, John Bell, Corpus Christi, TX, James McKibben, Corpus Christi, TX, Ajit David, Corpus
 Christi, TX, Matthew Rankin, Corpus Christi, TX, **Doug Allison**, Corpus Christi, TX, and Marshall
 Gardner, Corpus Christi, TX, spoke. Mayor Pro Tem Roy closed public comment. Council Member
 Hernandez moved to approve the following motion: Motion to set agenda item and date on prelir
 and procedural matters for removal hearing on April 14, 2026, seconded by Council Member Paxs
 This Motion was passed and approved with the following vote:

Votes (5:3)

9 records	Group	Export
Person Name		Vote
Roland Barrera		Nay
Carolyn Vaughn		Aye
Gilbert Hernandez		Aye

Eric Cantu Aye

5/7/16



CITY OF Corpus Christi

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[Details](#) [Reports](#)

File #: 26-0451 Version: 1
 Type: Motion
 File created: 3/18/2026
 On agenda: 3/24/2026
 Title: Discussion and possible action to cc recorded in the city's official record
 Sponsors: [City Secretary's Office](#)
 Attachments: 1. [Add Agenda Item Legistar.com](#)

[History \(1\)](#) [Text](#)

1 record	Group	Export
Date	Ver.	Action By
3/24/2026	1	City Council

City of Corpus Christi - Action Details

Details

File #: 260451 Version: 1
 Type: Motion
 Title: Discussion and possible action to correct February 20, 2024 Council Meeting Agenda Item 24-025 original agenda memo and all associated documents as recorded in the city's official record taken the Laserfiche archives, as requested by Council Members [Eric Cantu](#), Gil Hernandez, and [Kaylynn Paxson](#).
 Mover: Gilbert Hernandez Second: Sylvia Campos
 Result: Pass
 Agenda note:
 Minutes note:
 Action: passed
 Action text: City Manager Peter Zanon, Director of Information Technology Peter Collins, and City Attorney Mil Risley responded to Council questions. Mayor Pro Tem Roy called for an executive session pursuant to Texas Government Code § 551.071 to consult with attorneys concerning legal issues related to the litigation matter related to City Council Agenda Item 24-0256 as stated by City Attorney Risley. Mayor Pro Tem Roy recessed the Council meeting for Executive Session at 6:17 p.m. Mayor Pro Tem Roy reconvened the meeting at 6:42 p.m. Mayor Pro Tem Roy opened public comment. Maria Teresa Cavazos Gutierrez Walker, Corpus Christi, TX, Sondra Meyer, Corpus Christi, TX, and Doug Allison, Corpus Christi, TX, spoke. Mayor Pro Tem Roy closed public comment. Council Member Hernandez moved to approve the following motion: Motion directing staff to correct February 20, 2024 Council Meeting Agenda Item 24-0256 with original documents when originally presented in Legistar, seconded by Council Member Campos. This Motion was passed and approved with the following vote:

Votes (8:1)

9 records	Group	Export
Person Name	Vote	
Roland Barrera	Aye	

5/8/16



CITY OF Corpus Christi

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[Details](#) [Reports](#)

File #: 26-0510 Version: 1

Type: Motion

File created: 3/31/2026

On agenda: 4/14/2026

Title: Discussion and/or possible actions (certification of Articles of Impeachn and/or removal hearing, and/or a R other related matters for the Remo

Sponsors: [City Secretary's Office](#)

Attachments: 1. [Agenda Memo - Preliminary Proc Removal Action Framework 3.24.pd](#)

History (1) Text

1 record	Group	Export
Date	Ver.	Action By
4/14/2026	1	City Council

City of Corpus Christi - Action Details

Type: Motion

Title: Discussion and/or possible actions on preliminary and procedural matters for removal proceedings the mayor, including but not limited to potential certification of Articles of Impeachment, potential suspension, potential reprimand, potential denial of removal action, potential scheduling of pretrial hearing(s) and/or removal hearing, and/or a Resolution scheduling a pretrial hearing on May 19, ; 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 Remov Action.

Mover: Gilbert Hernandez Second: Sylvia Campos

Result: Pass

Agenda note:

Minutes note:

Action: passed as amended

Action text: City Secretary Rebecca Huerta stated the purpose of this item is to discuss and act on the Prelimii & Procedural Matters for the Removal Action of the Mayor. Council Member Hernandez made the following motion: Motion to consent to Lisa Aguilar advising the City Council on procedural matter related to the Petition to Remove the Mayor pursuant to Comment 8 of Section 3.08 of the Texas of Disciplinary Conduct, seconded by Council Member Campos. This Motion was passed and appr with the following vote: Council Members Barrera, Campos, Cantu, Hernandez, Paxson, Scott, and Vaughn voting "yes," and Mayor Guajardo and Council Member Roy "abstained." (Enactment No: M2026-033) Assistant City Attorney Lisa Aguilar responded to Council questions. Council Member Hernandez moved to amend the resolution to add "five days prior to the pretrial hearing," second Council Member Campos. This Motion was passed and approved with the following vote: Council Members Barrera, Campos, Cantu, Hernandez, Paxson, Scott, and Vaughn voting "yes," and Mayo Guajardo and Council Member Roy "abstained." Mayor Pro Tem Vaughn opened public comment. : Saldana, Corpus Christi, TX, Julian Hernandez, Corpus Christi, TX, Rachel Caballero, Corpus Christ Robin Cox, Corpus Christi, TX, and Sandy Fernandez, Corpus Christi, TX, spoke. Mayor Pro Tem Vaughn closed public comment. Council Member Hernandez moved to accept the Petitioners' Artic of Impeachment, seconded by Council Member Campos. This Motion was passed and approved w the following vote: Council Members Campos, Cantu, Hernandez, Paxson, and Vaughn voting "yes" Council Members Barrera and Scott voting "no," and Mayor Guajardo and Council Member Roy

59/16

PETITIONERS'
ARTICLES OF IMPEACHMENT
OF MAYOR PAULETTE GUAJARDO

*pursuant to City of Corpus
Christi Code of Ordinances,
Part I, Charter Article II, and
other provisions therein*

CITY OF CORPUS CHRISTI

Impeaching Paulette Guajardo, Mayor of the City of Corpus Christi, as
permitted by City of Corpus Christi Charter.

Whereas, more than a sufficient number of registered voters has previously
filed with City of Corpus Christi the Registered Voters' Petition to Remove Mayor
Paulette Guajardo (subject to others joining) pursuant to provision(s) of the City of
Corpus Christi Charter;

Whereas, City of Corpus Christi Charter states:

"Sec. 10. – Rules of the council.

The city council shall determine its own rules of
procedure; may punish its members for disorderly

5/10/16

conduct; may compel attendance of its members;
and may impeach a member in the manner herein
provided.”

“Sec. 11. – Removal.

(a) A council member shall be subject to removal by
the council or by any other means authorized by law
for: . . .

(3) Misconduct, malfeasance, incompetence, inability
or willful neglect in performance of official duties.”

. . .

(b) A removal action by the council may be instituted on
its own initiative, or 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.”¹

Whereas, more than a sufficient number of registered voters further file with
City of Corpus Christi these Articles of Impeachment of Paulette Guajardo, Mayor
of City of Corpus Christi;

Whereas, that Paulette Guajardo, Mayor of City of Corpus Christi, shall be
and is impeached by Petitioners, in the names of themselves and/or for the people
of City of Corpus Christi, and that the following articles of impeachment be

¹ For full text, see Code of Ordinances City of Corpus Christi, Texas, Part I – Charter, Article II (Sections 9,
10, and others).

5/11/16 5/11/16 5/11/16

exhibited and published to the City Council members of City of Corpus Christi and residents of City of Corpus Christi.

ARTICLE ONE: FRAUD; AIDING & ABETTING FRAUD

- BREACH OF PUBLIC TRUST -

The City Charter provides that the City Council “may impeach a member in the manner herein provided,” for “[m]isconduct, malfeasance, incompetence, inability or willful neglect in performance of official duties.” On or about January 14, 2025, Paulette Guajardo did solemnly swear to uphold a laws of the State of Texas and integrity of the office of Mayor of City of Corpus Christi. In her conduct of the office of Mayor of the City of Corpus Christi, and in violation of her oath to faithfully discharge her duties and responsibilities as Mayor of the City of Corpus Christi, Petitioners, for themselves and for the people of the City of Corpus Christi, show Mayor Paulette Guajardo aided and abetted the commission of a fraud against the interest of the City of Corpus Christi and its resident taxpayers, in that:

Using the powers of the office of Mayor, the Mayor committed fraud, and aided and abetted the commission of a fraud, against the interest of the City of Corpus Christi and its resident taxpayers as follows:

5/2/10

- There was a “crime”² (the word used by City Manager Peter Zanoni, as early as April 2024);
- Mayor Paulette Guajardo was informed of the “crime” or fraud;³
- In Texas, the elements of “fraud” are: (1) a person makes a material, false representation (the false narrative and/or false FEMA writing); (2) the person making the false representation acted knowingly or recklessly (Philip and Mayor acted knowingly or recklessly); (3) the person intended another to act in some way upon the representation (Philip and Mayor intended others to vote for Ordinance 24-0256); and (4) others

² See EXHIBIT 19 EXHIBIT 19 (portion of recorded Zanoni/David phone conversation from April 2024). Compare EXHIBIT 1 EXHIBIT 1 (collection of unaltered FEMA writings showing revised FEMA flood maps made public in 2020, 2021, and April 13, 2022); with EXHIBIT 2 EXHIBIT 2 (altered/forged slide (slide 2) created by Philip Ramirez in December 2023); see also EXHIBIT 3 EXHIBIT 3 (QOF Application falsely claiming unexpected, new FEMA requirements give rise to request for money), EXHIBIT 4 EXHIBIT 4 (QOF’s Type B Corporation presentation falsely suggesting 3-year old FEMA revised flood maps were ‘new,’ ‘not anticipated,’ ‘threw us for a bit of a loop,’ and were ‘new FEMA requirements’ (false narrative), with use of altered/forged federal FEMA presentation slide to support the false narrative COCC000514); EXHIBIT 5 EXHIBIT 5 (City Council presentation on 2/20/24 falsely suggesting 3-year old FEMA revised flood maps were recently changed (false narrative), with use of altered/forged federal FEMA presentation slide to support the false narrative COCC000525, 50:20-1:08:52). EXHIBIT 6 EXHIBIT 6 (Heather Hulbert deposition testimony: facts of case meet Texas Penal Code definition of forgery; EXHIBIT 7 EXHIBIT 7 (Peter Zanoni deposition testimony: agrees facts of case meet Texas Penal Code definition of forgery); EXHIBIT 8 EXHIBIT 8 (Philip Ramirez deposition testimony refusing to respond to Hulbert/Zanoni sworn testimony that alteration of FEMA screenshot constituted the offense of forgery as defined in the Texas Penal Code definition. EXHIBIT 9 EXHIBIT 9 (Philip Ramirez deposition testimony: confirming his alteration of federal document was regarded by City staff as the commission of a crime (in April 2024); EXHIBIT 10 EXHIBIT 10 (Deven text to Heather Hulbert (00:383) acknowledging alteration of federal document immediately treated as “crime” by City’s staff (April 2024)). Accord EXHIBIT 29 EXHIBIT 29 (phone records produced in litigation).

³ EXHIBIT 15 EXHIBIT 15 (Peter Zanoni deposition testimony); EXHIBIT 36 EXHIBIT 36 (Mayor’s plan to be executed by Leah Olivari to ‘change the narrative’ by abandoning the false narrative); EXHIBIT 37 EXHIBIT 37 (Ajit David’s public comment on 4/16/24, using QOF’s altered/forged writing to show the alteration); EXHIBIT 38 EXHIBIT 38 (email from Ajit David to Mayor advising of altered/forged federal FEMA writing); EXHIBIT 24 EXHIBIT 24 (Miles Risley’s presentation to City Council (April 16, 2024)); EXHIBIT 40 EXHIBIT 40 (Ajit David’s public comment on 4/23/24, using QOF’s altered/forged writing to show the alteration); EXHIBIT 42 EXHIBIT 42 (Peter Zanoni deposition testimony: confirms criminal jeopardy for elected official if participating/aiding and abetting underlying criminal offense; see also EXHIBIT 43 EXHIBIT 43 (Texas Penal Code statutes relating to criminal fraud/forgery and aiding and abetting); and other evidence. Accord EXHIBIT 19 EXHIBIT 19 (portion of recorded Zanoni/David phone conversation from April 2024).

Corpus Christi, to the great prejudice of the cause of law and the public's trust in government, and to the manifest of injury to the City of Corpus Christi by causing a breakdown in the public's confidence in the City of Corpus Christi.

Wherefore, Mayor Paulette Guajardo, by such conduct, has demonstrated that she will remain a threat to the City of Corpus Christi if allowed to remain in office, and has acted in a manner grossly incompatible with self-governance and the rule of law. Mayor Paulette Guajardo thus warrants impeachment and trial as "shall be instituted,"²⁴ removal from office of Mayor, and disqualification to hold office and enjoy any office of honor, trust, or profit with the City of Corpus Christi (as specifically defined in City's Charter²⁵).

The undersigned, after being sworn in accordance with law, hereby state that we are the complainants in the above-entitled complaint of impeachment; that one or more of us have caused the said complaint to be prepared and have read the contents thereof; and that the allegations therein are accurate of our own knowledge and belief on the basis of our reading and appreciation of documents and other records pertinent thereto.

(signatures on pages to follow)

²⁴ See Code of Ordinances City of Corpus Christi, Texas, Part I – Charter, Article II (Section 11(b)).

²⁵ Code of Ordinances City of Corpus Christi, Texas, Part I – Charter, Article II (Section 11(e)).

Rachel Caballero

Print Name: Rachel Caballero

Registered Voter DOB: [REDACTED]

Robin Cox

Print Name: Robin Cox

Registered Voter DOB: [REDACTED]

Trevor Slowik

Print Name: Trevor Slowik

Registered Voter DOB: [REDACTED]

Laramie Fain

Print Name: LARAMIE FAIV

Registered Voter DOB: [REDACTED]

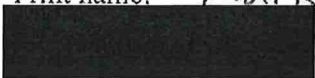
Jake Hernandez

Print Name: Jake Hernandez

Registered Voter DOB: [REDACTED]

5/5/16

My Dm
Print name: ADAM DAVIS


Mark Muenster
Print name: Mark Muenster


Print name: _____

Print name: _____

Print name: _____

Print name: _____

Print Name: _____

Print Name: _____

Print Name: _____

Print Name: _____

Print Name: _____

Print Name: _____