

Date Filed 5.26.26

*Rebecca Huerta*  
Rebecca Huerta  
City Secretary

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

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**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;<sup>1</sup>
- 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);
- 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

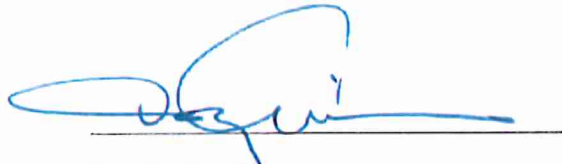
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<sup>1</sup> Videotape copies of all depositions are available upon request (if such video recordings exist).

- 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;
- 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 (1<sup>st</sup> 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);

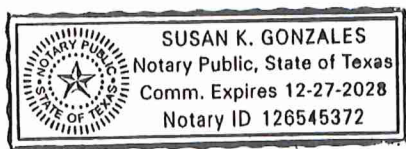
- Exhibit 36 is Miles Risley memorandum (confirming April 16, 2024, presentation to City Council Member in executive session);
- Exhibit 37 is email (with attachments) from Rebecca Huerta to Mayor;
- Exhibit 38 is video of Ajit David public comment (April 23, 2024);
- Exhibit 39 is Texas Penal Code, 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 23, 2024);
- 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 26<sup>th</sup> day of May, 2026.



Notary Public, State of Texas