

MEMORANDUM

TO: Mayor and Council
FROM: Rebecca Huerta, City Secretary *Rebecca Huerta*
COPY: City Manager Peter Zanoni, City Attorney Miles Risley
DATE: August 29, 2025
SUBJECT: Petition for Removal Action

Issue: Rachel Caballero filed a petition for removal action against Mayor Paulette Guajardo today, pursuant to Article II, Section 11 of the City Charter. This memo outlines possible future actions.

Background:

Article II, Section 11(b) of the Charter states the following:

Sec. 11. Removal.

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

- (1) Willful violation of any code of ethics or conflicts of interest provision under state or federal law or city ordinance.
- (2) Willful violation of any express prohibition of this Charter.
- (3) Misconduct, malfeasance, incompetence, inability or willful neglect in performance of official duties.
- (4) Conviction of any felony, or any misdemeanor involving moral turpitude.
- (5) Failing to maintain any residency requirement provided by law.
- (6) Absence from three consecutive regular council meetings without leave of absence first had, except due to circumstances over which the council member had no control.

(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.** The council may provide by ordinance for the referral of any disciplinary matter involving a council member to the ethics commission for recommendation. The challenged member shall have the right to written articles of impeachment, an opportunity to be heard, to be represented by counsel, to summon witnesses who shall be required to give testimony, and to reasonable advance notice of the hearing. The burden of proof shall be on those bringing the charges.

The hearing shall be open to the public, and the conclusions and findings of the council shall be final. If the member is removed, a complete statement of the reasons therefor shall be filed with the city secretary. The council shall additionally have the authority to reprimand or suspend a member for a period of not more than thirty days if removal is not warranted.

(c) Pending charges for removal, the council may suspend the challenged member from office for a period not exceeding thirty days by the majority vote of all council members holding office, with the exception of the challenged member.

(d) Commission of any of the violations specified in subparagraphs (1) through (5) above shall additionally be grounds for forfeiture of office in proceedings pursuant to state law.

(e) A member who is removed from office, whether pursuant to this section, by recall or other legal proceeding, or who resigns after any such proceedings have been initiated, shall not be eligible to be appointed to or run as a candidate for city office for two years from the date of removal, recall or resignation.

The City Secretary's Office has verified that the six signers of the petition are registered voters.

Per Article II, Section 11(b), "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." In accordance with Council Policy 16.d., an item can only be placed on the City Council agenda by the Mayor, City Manager, or three members of the City Council who must confirm their request with the office of the City Secretary prior to the three-business-day deadline to be placed on the next available City Council meeting for discussion and possible action.

Possible Council actions:

- 1) Refer a disciplinary matter to the Ethics Commission for recommendation via ordinance.
- 2) Schedule a hearing open to the public on the matter with at least 45 days' notice. The hearing will be conducted in a manner similar to a court trial. During the notice period, the petitioners are required to draft written articles of impeachment, and the challenged member may summon witnesses to testify.
- 3) Take no action.

Conclusion:

A petition has been filed for removal of the mayor per the Charter, and only the city council may act on the petition.

Please let me know if you have any questions.

Attachment: Petition for Removal Action

RECEIVED

AUG 29 2025

CITY SECRETARY'S OFFICE

REGISTERED VOTERS' PETITION TO REMOVE MAYOR PAULETTE GUAJARDO

1. The undersigned registered voters file this Petition to remove Paulette Guajardo from serving as mayor for the City of Corpus Christi.
2. According to City of Corpus Christi's Code of Ordinances, Article II, City Council, Section 11(a), the mayor "shall be subject to removal by the council . . . for:"
 - (1) "Willful violation of any code of ethics or conflicts of interest provision"
 - (2) "Willful violation of any express prohibition of this Charter."
 - (3) "Misconduct, malfeasance, incompetence, inability or willful neglect in performance of official duties." . . .
3. Article II, City Council, Section 11(b) states: "A removal action . . . 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.
4. Pursuant to these and all provisions of the City of Corpus Christi's Code of Ordinances, this petition is for the removal of Paulette Guajardo as mayor (and for all appropriate forms of reprimand, censure, suspension, and sentencing).
 - Philip Ramirez (campaign contributor to Paulette Guajardo) altered a FEMA screenshot, and then used that altered federal document to solicit a \$2,000,000.00 award from the Corpus Christi Economic Development Corporation, City of Corpus Christi Type B Board, and City of Corpus Christi;

- Paulette Guajardo, prior to the 4/23/24 reading of the ordinance to approve the \$2,000,000.00 award to her campaign contributor, was told by Peter Zaroni that the FEMA/federal document had been altered;
- Paulette Guajardo, prior to the 4/23/24 reading of the ordinance to approve the \$2,000,000.00 award to her campaign contributor, was told by Ajit David (on April 16, 2024) that the FEMA/federal document had been altered;
- Paulette Guajardo, prior to the 4/23/24 reading of the ordinance to approve the \$2,000,000.00 award to her campaign contributor, was told *again* by Ajit David (on April 23, 2024) that the FEMA/federal document had been altered;
- Other information confirms that Paulette Guajardo, in advance of the 4/23/24 reading of the ordinance and vote which allowed the award of \$2,000,000.00 to Paulette Guajardo's campaign contributor, was told that the FEMA/federal document had been altered.
- With full knowledge of the wrongful acts of her campaign contributor (the altering of the FEMA/federal document), Paulette Guajardo nonetheless directed Peter Zaroni to put it on the City Council's agenda for approval (4/23/24). Paulette Guajardo participated and aided approval of the award of \$2,000,000.00 to her campaign donor while her campaign contributors' request was being considered by the CCREDC, and while it was before the City Council on first reading, and in conversations with Peter Zaroni in advance of the 4/23/24 reading, and by directing Peter Zaroni to put it on the City Council's agenda for approval, and during the 4/23/24 City Council meeting, and in other ways.

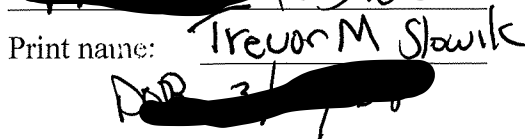
To be clear, the \$2,000,000.00 award is to Elevate QOF LLC, owned in part by Philip Ramirez and Deven Bhakta – both campaign contributors for Paulette Guajardo.

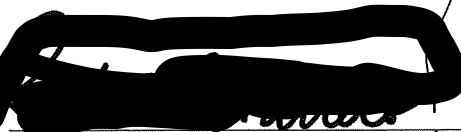
These facts and other information show that Paulette Guajardo is not fit for public service. We, the residents, voters, and taxpayers of the City of Corpus Christi, believe the facts clearly show that Paulette Guajardo pushed for approvals so that her friend / campaign contributor, by use of an altered FEMA/federal document, would get \$2,000,000.00 of taxpayer money – and Paulette Guajardo did so with full knowledge of FEMA/federal document had been altered/tampered/forged. This is “misconduct” and “malfeasance” on the part of Paulette Guajardo and thus grounds for removal. Even if it is argued that Paulette Guajardo turned a blind eye so that her campaign contributor could get the taxpayer money (\$2,000,000.00), this is “incompetence,” “inability,” and “willful neglect in performance of official duties.” The Mayor is in charge of the City of Corpus Christi, and thus responsible for the actions of the City. The Mayor had full knowledge of the scheme that was on-going (use of the altered/tampered/forged FEMA/federal document), and yet deliberately acted to make certain her friend would be allowed to get \$2,000,000.00 for his project.

Signatures:

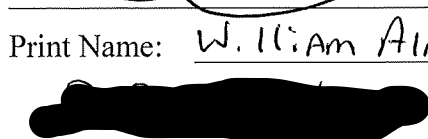

Print name: Robin Ramirez Corp



Print name: Trevor M Slowik



Print Name: Rachel Caballero



Print Name: William Alan Rickettsen


[Redacted]

Print name: LARAMIE FAIN

DOB: [Redacted]

Print name: _____

Print name: _____

Print name: _____

Print name: _____

Print name: _____

[Redacted]

Print Name: Mark Muenster

[Redacted]

Print Name: _____

Print Name: _____

Print Name: _____

Print Name: _____

Print Name: _____