

LAW OFFICES OF
DOUGLAS A. ALLISON

Douglas A. Allison

doug@dallisonlaw.com

April 13, 2026

VIA EMAIL:

Hon. Carolyn Vaughn: Carolyn.Vaughn2@CorpusChristiTX.gov

Hon. Roland Barrera: Roland.Barrera@CorpusChristiTX.gov

Hon. Mark Scott: Mark.Scott@CorpusChristiTX.gov

Hon. Everett Roy: Everett.Roy@cctexas.com

Hon. Sylvia Campos: Sylvia.Campos@cctexas.com

Hon. Eric Cantu: Eric.Cantu@CorpusChristiTX.gov

Hon. Kaylynn Paxson: Kaylynn.Paxson@CorpusChristiTX.gov

Hon. Gil Hernandez: Gil.Hernandez@CorpusChristiTX.gov

Re: City Charter Article II, Section 11, Removal of Mayor

Dear Members of the City Council and Staff:

INTRODUCTION

As you know, I represent Ajit David in a pending lawsuit designed to stop City's payment of \$2,000,000 to Elevate QOF LLC ("QOF," the company that created the false FEMA narrative and altered the federal FEMA screenshot to aid in validating the false FEMA narrative). I appeared before this City Council on March 24, 2026, to advocate for a public hearing process that would allow for full transparency of matters in dispute (not to advocate my client's interest). By this letter, I continue to advocate for a full and fair process so that all interested persons and the public may have every opportunity to learn the truth. "A lack of transparency results in distrust and a deep sense of insecurity."¹

RESPONSE TO JOHN FLOOD LETTER:

John Flood sent a letter to each of you on April 8, 2026. John Flood represents Mayor Paulette Guajardo who claims to be innocent of all wrongdoing, yet she opposes the public presentation of evidence. Mayor stands in opposition to public review of her misconduct that caused \$2,000,000 to be given to her "friends."

John Flood's ("Flood") letter makes several statements and/or arguments. I will re-state Mr. Flood's statements/arguments and thereafter respond, below:

¹ <https://www.azquotes.com/quotes/topics/transparency.html>

- 1) Flood states: “. . . City Charter provides for this [public hearing] process, [and] State law and the U.S. Constitution impose certain requirements that must be followed.”²

It is true that the City Council’s proposed public hearing process is supported by the City’s Charter, and this process should and will be carried out in such manner as complies with “State law and the U.S. Constitution” I agree with John Flood on these points, and this is easily accomplished.

- 2) Flood states: “. . . City Council has thoroughly investigated . . . and investigators have confirmed that insufficient evidence exists to say that any type of wrongdoing took place, and . . . that Mayor Guajardo’s conduct conformed to the requirements of the law”³

Flood’s statement is incorrect. In the light most favorable to Mayor, CCPD investigators have stated that there is insufficient evidence *to criminally prosecute Philip Ramirez* (criminality must be proven beyond a reasonable doubt). No one has investigated Mayor’s misconduct and malfeasance that are the subject of the Articles of Impeachment pending Mayor’s removal. Candidly, Flood’s statement that there is not “any type of wrongdoing” ignores the following evidence:

- a. [EXHIBIT 3](#) (QOF Application falsely claiming unexpected, new FEMA requirements give rise to request for money);
- b. [EXHIBIT 13](#) (text exchange between Mayor and Deven Bhakta (QOF), noting Mayor looking out for QOF during CCREDC confidential meeting);
- c. [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 slide to support the false narrative);
- d. [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 slide to support the false narrative (50:20-1:08:52));
- e. [EXHIBIT 14](#) (Mayor interrupting Councilman Hunter, and advocating for award to friends (\$2,000,000) based upon false narrative (so-called “changed” FEMA requirements));
- f. [EXHIBIT 19](#) (portion of recorded Zanoni/David phone conversation from April 2024);
- g. [EXHIBIT 20](#) (Philip Ramirez deposition testimony refusing to answer whether Philip Ramirez hatched a scheme to get \$2,000,000);
- h. [EXHIBIT 6](#) (Heather Hulbert deposition testimony confirming facts of case meet Texas Penal Code definition of forgery);
- i. [EXHIBIT 7](#) (Peter Zanoni deposition testimony agreeing facts of case meet Texas Penal Code definition of forgery);

² Flood letter, at p. 1.

³ Flood letter, at p. 2.

- j. [EXHIBIT 15](#) (Mayor wanted to approve \$2,000,000 award to QOF (friends) knowing federal FEMA document had been altered/forged);
- k. [EXHIBIT 24](#) (Risley's presentation to City Council (April 16, 2024) informing Mayor, and others, that QOF request for \$2,000,000 relied upon altered/forged federal FEMA slide);
- l. [EXHIBIT 8](#) (Philip Ramirez deposition testimony refusing to respond to Hulbert/Zanoni sworn testimony that alteration of federal FEMA screenshot constituted the offense of forgery as defined in the Texas Penal Code);
- m. [EXHIBIT 49](#) (Ordinance, version 1); [EXHIBIT 52](#) (Agenda Memorandum, 1st Reading); [EXHIBIT 54](#) (proposed QOF Agreement, Exhibit A); [EXHIBIT 56](#) (FEMA Flood Maps); [EXHIBIT 58](#) (altered presentation slide (1st Reading) before City Council); [EXHIBIT 48](#) (Legistar Audit Logs (Tab 3/lines 60, 30; Tab 3/lines 203, 41; Tab 3/186, 31; Tab 3/185, 43; Tab 3/184, 42)) (public information promoting FEMA false narrative deleted from City's website in violation of law to cover-up QOF's/Mayor's malfeasance, and at Mayor's behest);
- n. [EXHIBIT 29](#) (phone records produced in litigation show Mayor was constantly in contact with QOF, thus indicating Mayor's full knowledge).
- o. [EXHIBIT 47](#) (Mayor voting to approve knowing of related commission of malfeasance);
- p. [2026.02.17 Additional Video Excerpts](#) (video #8 is evidence of Mayor's false statement under oath (claiming no knowledge of QOF false narrative or the altered/forged federal FEMA screenshot, and then winking at her attorney)).

Flood's letter argues charges against Mayor are "based solely on speculation."⁴ Flood's assertion is not credible. The sworn evidence cited above shows Mayor was in constant contact with QOF, violated CCREDC rules of confidentiality, knowingly participated in promoting the false FEMA narrative which relied upon the altered/ forged FEMA screenshot, knowingly caused City staff to alter public information on the City's public website, and then lied under oath about her knowledge and role in the scheme. Mayor's unlawful conduct and perjury are certainly grounds for removal.

Although Mayor repeatedly argues the Nueces County District Attorney's office, Texas Rangers, Texas Attorney General's office, and Federal Bureau of Investigations ("FBI") have exonerated Mayor, this is false. To date, these prosecuting bodies have remained silent as evidence continues to be collected. Moreover, CCPD has only investigated the criminality of Philip Ramirez's conduct and has not investigated Mayor's misconduct or malfeasance. On information and belief, no person has yet filed a formal criminal complaint against any person (Ajit David certainly has not). The Articles of Impeachment only charge Mayor's removal from office because of her misconduct and malfeasance (not conviction of any crime).

⁴ Flood letter, at p. 1.

- 3) Flood's letter confirms that "a [public] hearing would provide a formal opportunity [for Mayor] to debunk these new claims"⁵ filed against Mayor. It seems an innocent person would want to welcome such an 'opportunity.' How many lawyers does Mayor need?
- 4) Flood's letter argues "City Council members who were witnesses to the claimed wrongdoing cannot participate as part of the tribunal making decisions if discipline is warranted;"⁶ citing "Texas Rule of Evidence 605."⁷ Flood's letter argues "four of you [City Council members] were on the City Council in 2024," and thus "cannot serve on the tribunal to consider evidence whether or not Mayor Guajardo should be removed or suspended"⁸

Flood's letter misstates Texas law. In *Bradley v. State ex rel. White*, 990 S.W.2d 245 (Texas Supreme Court, 1991), the high court makes clear that a City Council may remove the City's mayor, but that the removal process must comply with Texas Rule of Evidence ("TRE") 605. TRE 605 states: "The judge presiding at a trial may not testify in that trial as a witness." This only means that whomsoever *presides* (this will be one (1) person) over Mayor's public hearing must not be one of the City Council members who is a witness during the public hearing process. Thus, to guard against any possible error in the process, the City Council should select a presiding officer who did not serve upon the City Council during the relevant time frame (February/April 2024). All considered, Flood's assertion that a public meeting is "pointless" misconstrues *Bradley and* completely misses the importance of supporting public trust in governance by insisting upon transparency.

- 5) Flood states: "Mayor Guajardo is entitled to a hearing before being suspended [or removed] by fellow council members, as required by both constitutional and statutory provisions."⁹ It is true that the Mayor is entitled to a public hearing before being suspended or removed, and it appears as though a date for such public hearing will be scheduled on April 14, 2026 (as it should be).
- 6) Flood's letter argues "[t]hree other options exist for removal of a city council member [Mayor]."¹⁰ Flood is correct that City Charter Article II, section 11 (the present, proposed method) is one option, and that there are other options. It is the City Council's prerogative to choose which process to utilize (in this case, City Charter Article II, Section 11, is completely appropriate).
- 7) Flood's letter argues Mayor's cover-up carried out by City staff's removal of public information from the City's website occurred because "new documents automatically

⁵ Flood letter, at p. 1.

⁶ Flood letter, at p. 2.

⁷ Flood letter, at p. 2; see also *Bradley v. State ex rel. White*, 990 S.W.2d 245 (Texas Supreme Court, 1991).

⁸ Flood letter, at p. 2.

⁹ Flood letter, at p. 2.

¹⁰ Flood letter, at p. 3.

replace the prior documents.”¹¹ “That simply is the way the Legistar database system works.”¹²

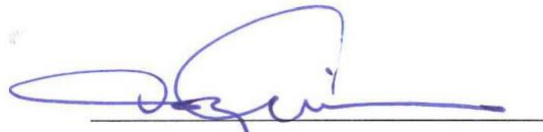
Flood’s assertion is untrue. A review of the City’s Legistar audit report shows exactly when each FEMA-related document was deleted from the City’s public website, and when each new document is added to the City’s public website.¹³ The deletion of all FEMA-related documents is Mayor’s unlawful conduct – and it is not automatic, but rather an intentional effort to remove every document that mentioned the false FEMA narrative and the altered/forged federal FEMA screenshot.

CONCLUSION:

The official documents and sworn testimony (and all evidence) gathered by legal process overwhelmingly prove facts that fully support the need for a public hearing of Mayor’s alleged misconduct/malfeasance. QOF, along with Mayor’s constant participation, promoted the FEMA false narrative and made use of the altered/forged federal FEMA screenshot to *sell the lie and get the money*. To do her part, Mayor breached her CCREDC confidentiality obligation, participated in promoting the lie during City’s 1st reading (‘FEMA changed, it changed, it changed’), further participated by instructing City Manager to place the matter upon City’s agenda for further consideration knowing that the false FEMA narrative and altered/forged FEMA screenshot were inextricably intertwined in the City’s process, further participated by promoting deletion of all FEMA-related documents (public information) from the City’s public website to cover these many bad acts and then voted for it. And to die with the lie, Mayor decided to give false sworn testimony under oath while she (Mayor) winked at her lawyer. Mayor has abandoned her Mayor’s oath, broken all public trust, and lied after having sworn to tell the truth and nothing but the truth. Clearly, there is an abundance of well-corroborated evidence that shows Mayor’s misconduct and malfeasance, and thus a public hearing is warranted.

Thank you for your attention to this matter.

Sincerely,



Douglas A. Allison

¹¹ Flood letter, at p. 9.

¹² Flood letter, at p. 9.

¹³ [EXHIBIT 48](#) (COCC001299 – Legistar Audit Logs (Tab 3/lines 60, 30; Tab 3/lines 203, 41; Tab 3/186, 31; Tab 3/185, 43; Tab 3/184, 42)) (public information detailing the FEMA false narrative removed from City’s website in violation of law, and at Mayor’s behest);

DAA/kdb

cc: Rebecca L. Huerta, City Secretary
Rebecca.Huerta@CorpusChristiTX.gov