

July 1, 2025  
CAUSE NO. 2024CCV-61174-3

AJIT DAVID	§	IN THE COUNTY COURT
Plaintiff,	§	
	§	
vs.	§	AT LAW NO. 3
	§	
	§	
CITY OF CORPUS CHRISTI,	§	
TEXAS	§	
Defendant.	§	NUECES COUNTY, TEXAS

ORAL VIDEOTAPED DEPOSITION OF

ALAN WILSON

July 1, 2025

Oral Videotaped Deposition OF ALAN WILSON,  
produced as a witness at the instance of the Plaintiff  
and duly sworn, was taken in the above-styled and  
numbered cause on July 1, 2025, from 12:55 p.m. to  
1:37 p.m., before Rosalba R. Taylor, Texas Apprentice  
Court Reporter in and for the State of Texas, reported  
by computerized stenotype machine at 801 Navigation  
Blvd, Suite 100, Corpus Christi, Texas 78408, pursuant  
to the Texas Rules of Civil Procedure and the provisions  
stated on the record or attached hereto.

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ALSO PRESENT:

Joel Jacob, Videographer

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1 P-R-O-C-E-E-D-I-N-G-S

2 Whereupon,

3 12:55 p.m.

4

5 THE VIDEOGRAPHER: Today is Tuesday,  
6 July 1st, 2025. The time now is 12:55. We are now on  
7 the record.

8 If all counsel will state their  
9 appearances and who they represent.

10 MR. ALLISON: We'll waive appearances. Is  
11 that okay with you?

12 MS. MARCUM: Sure.

13 MR. ALLISON: Okay. Go ahead.

14 (Witness sworn.)

15 ALAN WILSON,  
16 having been first duly sworn, testified as follows:

17 EXAMINATION

18 BY MR. ALLISON:

19 Q. Will you state your name, please.

20 A. Alan Wilson.

21 Q. Mr. Wilson, I think you know that we are here  
22 today in relation to a matter that was before the --  
23 what we call Type B Board; is that right?

24 A. Correct. That's correct.

25 Q. Before we get started on the exact subject

1 matter, I do want to get a little background on you --

2 A. Sure.

3 Q. -- so that the jury or the court if they're  
4 looking at this can know who you are.

5 A. Okay.

6 Q. First of all, you've told us your name, and  
7 where are you currently employed?

8 A. I am executive vice president of Charter Bank,  
9 Corpus Christi.

10 Q. And probably everybody who's going to be maybe  
11 hearing this or reading any of this knows Charter Bank,  
12 but what is Charter Bank?

13 A. Charter Bank is a local bank, primarily of  
14 local owners. We have locations in Corpus and one --  
15 three in Corpus and one in Rockport.

16 Q. Okay. And how long have you been with Charter  
17 Bank?

18 A. This past April was nine years.

19 Q. And how long have you been vice president?

20 A. Executive vice president, I've been an  
21 executive vice president or a market president for  
22 20 years.

23 Q. Okay. How long have you been in the banking  
24 industry?

25 A. I was telling Rosie, this month is 43 years in

1 Corpus Christi.

2 Q. Okay. And what part of the business of banking  
3 have you been involved with over your career?

4 A. Commercial lending and then management.

5 THE WITNESS: Thank you, Melissa.

6 MR. ALLISON: Thank you. This is where I  
7 say something on the record like, okay, we have an  
8 interruption, and so we'll probably edit that out. That  
9 way when I read it, I remember to do that.

10 THE WITNESS: Okay.

11 Q. (By Mr. Allison) You said that -- well, let me  
12 back up.

13 It sounds like then a big part of your  
14 banking experience historically has been commercial  
15 lending?

16 A. Yes. That's where I started.

17 Q. Tell me just very generically, 'cause, just  
18 generally, what's that process for commercial lending?

19 A. Well, if you're talking about when you start  
20 your career you learn to analyze credit and usually a  
21 year or two into that, if there's an opportunity, you  
22 become a commercial loan officer.

23 What's involved with that is being able to  
24 appraise people's character, being able to read and  
25 analyze financial statements, and then being able to

1 structure loans that doesn't put your bank at risk, but  
2 provides a service to your community.

3 Q. Okay. You mentioned in there, appraising  
4 people's character. Is that important to the loan  
5 process?

6 A. We talk about it in the lending process, the  
7 four Cs of credit. The first C is character.

8 Q. And why is character important?

9 A. I was telling my boss today that in my 43 years  
10 I have seen a lot of people who on paper you would think  
11 they can't pay, but they figure out a way to do it. And  
12 on the other side, I've seen times where it looked like  
13 they'd have no problem paying and they're constantly  
14 past due or in trouble.

15 Q. And if I'm reading between the lines there  
16 correctly or reading the lines that you've said  
17 expressly, there's a tie in or a relationship between  
18 character and someone's integrity about doing what they  
19 say they're going to do?

20 A. Yeah. We -- they -- when they borrow money  
21 from us, they sign a promissory note, and what that  
22 means is I promise to pay.

23 Q. So it sounds like from your perspective if it's  
24 one of the four Cs in terms of advancing any money when  
25 you're in the private sector, the bank is always in the

1 private sector, right?

2 A. Right.

3 Q. In terms of advancing any money, character is  
4 of one of the highest importance?

5 A. For me -- you -- there'd be some people that  
6 would disagree, but character is probably first and  
7 foremost and then competence after that.

8 Q. Okay. And character does that run hand in hand  
9 with the integrity of the person?

10 A. Yeah.

11 Q. Okay. The honesty of the person?

12 A. Sure.

13 Q. Okay. The truthfulness of the person?

14 A. Yeah. Those are almost synonyms.

15 Q. And just to give us a rough sense probably how  
16 many loans have you overseen in your career? I knew I  
17 was going to get you with that one.

18 A. Man, I don't even know how to -- 43 years,  
19 subtract two, 41, average loan portfolio 45 million, so  
20 average loan size, gosh, hundreds.

21 Q. Okay.

22 A. And hundreds, and I would say thousands.

23 Q. Okay. You're familiar?

24 A. Yeah.

25 Q. Okay. Now, somehow that led -- that experience



1 or that history in this community led to you being, I  
2 guess, on the Type B Board?

3 A. Yes.

4 Q. And tell me how long -- tell us first of all  
5 what the Type B Board is.

6 A. Well, there's a special provision in the state  
7 of Texas for -- to carve out, if the community votes for  
8 it, part of the sales tax that can be used for job  
9 retention and for job growth. And it's an appointed  
10 position by the city counsel.

11 Q. And how long have you served on the Type B  
12 Board as an appointee by the city?

13 A. I'm in my sixth year, and September, I will  
14 term out.

15 Q. And I think at the time of the application and  
16 funds that we're going to be talking about here, that  
17 all relates to a Homewood Suites Project?

18 A. Right.

19 Q. I think at that time you were a member of the  
20 board?

21 A. Yes. I was vice president.

22 Q. Okay. And I think now what is your current  
23 position?

24 A. President.

25 Q. Okay. And I think also, but help me here, that

1 the Type B Board has a relationship with what we call  
2 the R -- CCREDC?

3 A. Yes. They are the vetter of projects that come  
4 to us. They analyze what -- does it fit with the Type B  
5 regulations, does it retain jobs, does it advance job  
6 growth? They look at the feasibility. Their board  
7 votes on it.

8 So we don't get a project that -- unless,  
9 and there is one exception to that. If it went through  
10 the city. Sometimes those come direct.

11 Q. But the one we're talking about today, did not?

12 A. EDC.

13 Q. It went through EDC not the city?

14 A. That's correct.

15 Q. So it was not one of those exceptions?

16 A. No.

17 Q. And then I want to break down since we know  
18 this Homewood Suites Project came through, and I'm going  
19 to say CCREDC, that means Corpus Christi Regional  
20 Economic Development Corporation?

21 A. That's correct.

22 Q. Okay. Since we know this was one of the  
23 projects or that this project for Homewood Suites and  
24 the funding requests came through EDC, right?

25 A. Uh-huh.

1 Q. Is that a yes?

2 A. Yes. I'm sorry.

3 Q. It's okay. Let's stick to that framework.

4 A. Okay.

5 Q. And in that framework it would be the CCREDC  
6 that would vet the project?

7 A. Uh-huh.

8 Q. Is that a yes?

9 A. Yes.

10 MR. ALLISON: That nice lady right over  
11 there, if you nod your head, it's gonna really throw her  
12 off.

13 THE WITNESS: Okay.

14 Q. (By Mr. Allison) Okay.

15 A. I'm a rookie at this.

16 Q. That's okay. And it was also the CCREDC who  
17 would have done the analysis on this proposed Homewood  
18 project for funding from Type B money?

19 A. That's correct.

20 Q. And they would have done that analysis and --  
21 and one prerequisite to it even getting out of CCREDC is  
22 that it meets CCREDC criteria?

23 A. Okay.

24 Q. Correct?

25 A. Yes.

1 Q. Okay. And you don't, the Type B Board doesn't  
2 get a project unless, other than the exception which we  
3 know doesn't apply here?

4 A. Right.

5 Q. The Type B Board doesn't get a project unless  
6 it gets the check marks as meeting the criteria for the  
7 CCREDC?

8 A. That's correct. We get a presentation from the  
9 CCREDC. We get paperwork showing average salaries,  
10 number of jobs, that kind of thing to -- because they're  
11 more informed about details than we would be.

12 Q. Right. They being CCREDC?

13 A. That's correct.

14 Q. And then you all being the Type B Board?

15 A. That's correct.

16 Q. Okay. And this sort of process we're talking  
17 about you know that the project that was the Homewood  
18 Suites Project went through that CCREDC process?

19 A. Yes.

20 Q. And then it came in front of the Type B Board?

21 A. It did.

22 Q. And then it got voted on and therefore approved  
23 and passed on for city counsel consideration?

24 A. That's the process.

25 Q. Yeah. And part of that exact process, one of

1 the requirements for CCREDC is that there be some sort  
2 of an infrastructure component to the project?

3 A. Define what you mean by infrastructure  
4 component.

5 Q. Fair enough. Let me do it this way with you.  
6 I will show you the deposition of Mike Culbertson. Do  
7 you know who he is?

8 A. I do.

9 Q. Go ahead and tell us who Mike Culbertson is.

10 A. He's the current CEO of the CCREDC.

11 Q. And I know you don't have the benefit of having  
12 read Mr. Culbertson's deposition ahead of right now,  
13 right?

14 A. No, I haven't.

15 Q. Okay. And he was asked about whether or not  
16 there was an infrastructure component to this project at  
17 the time it passed from CCREDC to Type B; you understand  
18 the time frame?

19 A. Yeah. I know the time frame. I'm trying to  
20 picture what infrastructure portion means.

21 Q. Okay. Let me ask it to you this way. Well, I  
22 think the answer to infrastructure is that what we're  
23 talking about in Mr. Culbertson's deposition.

24 A. Uh-huh.

25 Q. Was the infrastructure had to do with the FEMA

1 representations made by the project to the CCREDC about  
2 FEMA flood plains?

3 A. Okay.

4 Q. Does that answer your question?

5 A. Yeah.

6 Q. In that context then he said, and it's on  
7 page 121, I'll let you read it if you want. He was  
8 actually asked about what the significance was to  
9 infrastructure for a CCREDC project. Do you understand  
10 what I'm saying?

11 A. Yeah.

12 Q. And he answered, quote, I agree that I said,  
13 he's referring to a conversation with him and  
14 Mr. Zanoni, I agree that I said it had to be tied to  
15 infrastructure.

16 Does -- do you agree that that's part of  
17 their criteria at CCREDC?

18 A. I don't know what their criteria is.

19 Q. Okay. And then he went on to say, quote, this  
20 is in his deposition, I told both my board, the project,  
21 and Type B, it had to be tied to infrastructure.

22 Do you agree with that?

23 A. Well, their request was to build a building,  
24 and the -- that's infrastructure, and the add on cost of  
25 being in a flood plain was a part of the request too, so

1 I'm not sure how he's framing that.

2 Q. Okay. Well, I can give you that context here.

3 And in his deposition and just so it's on  
4 the record, he's asked, When you read the entire  
5 PowerPoint, we're talking about the PowerPoint that was  
6 given to your Type B Board.

7 A. Presented to us, okay.

8 Q. Okay. When you read it, it was so obvious,  
9 this is the questioner, that the reader wanted one to  
10 believe that the FEMA change was just recent, recently  
11 released and this and that. Do you agree with that?  
12 Mike Culbertson answered, I would agree. And then  
13 continuing to quote -- what we're doing here is,  
14 actually, we're quoting from a discussion he had with  
15 Peter Zanoni.

16 Let me back up and do it that way.

17 A. Okay.

18 Q. Have you heard the discussion with Peter  
19 Zanoni?

20 A. I don't -- I don't think I have.

21 Q. Okay. And let me give you the context for it.  
22 You know that later in time this project was in front of  
23 the Corpus Christi City Council?

24 A. Yes.

25 Q. And between first and second reading, you

1 probably remember there being some hullabaloo?

2 A. Yes.

3 Q. About the altering of a federal document?

4 A. Yes.

5 Q. Okay. And there was an investigation by the  
6 city to look into that, correct?

7 A. I don't know that.

8 Q. Okay. Part of -- one of the conversations in  
9 that time frame was this conversation.

10 (Audio recording played.)

11 Q. (By Mr. Allison) It doesn't go much longer. I  
12 actually did not mean to shut it off.

13 But you understand from listening to that  
14 the very specific reference was that the infrastructure  
15 was the FEMA flood plain --

16 A. FEMA.

17 Q. -- right?

18 A. Yeah.

19 Q. So when we talk about infrastructure and the  
20 context of this project, can we agree that the  
21 infrastructure we're talking about is the FEMA flood  
22 plain issue?

23 A. The add on.

24 Q. Yes, sir. The add on of the additional expense  
25 that they said they were going to incur, the project was



1 going to incur because of what the applicant had said  
2 was a change or recent change in FEMA flood plain?

3 A. Yeah. I don't recall him telling me or that I  
4 heard he said recent change. But being a banker I knew  
5 it wasn't a recent change.

6 Q. Okay. Well, let me help you with that a little  
7 bit too --

8 A. Because all of our -- we had loans that weren't  
9 in flood plain and were in mid-construction and all of  
10 sudden were.

11 Q. Yeah. If somebody suggested it was a recent or  
12 unexpected flood plain FEMA rule change, you know that's  
13 false?

14 A. Yeah. I would have thought that somebody would  
15 know.

16 Q. Okay. And let me just restate that real quick  
17 here.

18 A. Okay.

19 Q. First thing, I think we've agreed to is in the  
20 context of this Homewood Suites project that the  
21 infrastructure component that was part of this package  
22 to get money for the applicant, the infrastructure  
23 component was the allegation or suggestion that there  
24 had been a FEMA flood plain change?

25 A. Recently, was the, I guess, the idea, but it

1 wasn't recent.

2 Q. Right. But we're agreeing on what we're  
3 referring to when we talk about infrastructure?

4 A. Yes.

5 Q. And we're also agreeing and I can show it to  
6 you, but you just said it, right? That the pitch from  
7 the applicant was that it was a recent change?

8 A. Okay.

9 Q. Do you know that?

10 A. I don't recall me hearing him say that.

11 Q. Well, I'll go ahead and quote from you on the  
12 presentation.

13 A. Okay.

14 Q. Okay.

15 A. All right.

16 Q. At the presentation he says, Mr. Phillip  
17 Ramirez said the one thing that came up is that we were  
18 not anticipating the FEMA maps were preliminary, but  
19 they became finalized and adopted as a part of the  
20 process of the city. We needed to comply with the new  
21 FEMA requirements that came into effect on October.

22 You know that they're not really new,  
23 they've been around for a long time?

24 A. I do know that they were preliminary.

25 Q. Well, they were preliminary from 2020, like

1 three years earlier.

2 A. Right. But --

3 Q. They become preliminary before they become  
4 final?

5 A. Right. But banks did not have to take action  
6 on the new maps until it was finalized.

7 Q. Fair enough. Okay. But then Mr. Ramirez says  
8 it kind of hit us midstream, it threw us for a little  
9 bit of a loop for some aspects of the project we're not  
10 planning on.

11 Okay. That certainly indicates that they  
12 were surprised by it, right?

13 A. Uh-huh.

14 Q. Correct?

15 A. Yes.

16 Q. But you and I both know, and I know it goes  
17 back to 2020, they do the preliminary and the proposed  
18 changes, and it's several years before they become  
19 final, right?

20 A. Yeah. There's -- and I think the city, y'all  
21 can correct me, but there's a time where challenges and  
22 requests for change can occur. I guess it's in that  
23 period.

24 Q. Yeah. It's about a three or four-year period,  
25 right?

1           A.     Okay.  I'll take your word for it, I don't know  
2     the timing.

3           Q.     Generally, that would be consistent with how  
4     FEMA operates?

5           A.     Sure.

6           Q.     Okay.  You know that much?

7           A.     Yeah.

8           Q.     And I think the website, the initial  
9     presentation of it was October of 2020, so that's years  
10    before this project was even imagined, right?

11          A.     Yeah.  Right.

12          Q.     Okay.  So it's not like they're new changes?

13          A.     Right.

14          Q.     It's not like they're a surprise?

15          A.     So --

16          Q.     Agreed?

17          A.     Yes.

18          Q.     Okay.

19          A.     Should somebody in the real estate business  
20    have known that they were coming, the answer is yes.

21          Q.     Yeah.  It shouldn't catch them by surprise?

22          A.     Yeah.

23          Q.     On a multi-million dollar project?

24          A.     Yeah.

25          Q.     Can we agree?

1           A.    I was surprised by that.  Yeah.

2           Q.    You're surprised that they're claiming they're  
3 surprised?

4           A.    I guess that's one way of putting it.

5           Q.    Yeah.  And then Phillip talks about,  
6 Mr. Ramirez talks about, quote, it did certainly throw a  
7 wrinkle in an aspect to our project from a  
8 constructability perspective, but also just an added cost  
9 that we were not anticipating when we first started  
10 moving forward with the project which is around 2022.

11                   If the regs were there in the preliminary  
12 form in 2020, then we can agree it shouldn't have been a  
13 wrinkle and it should have not been something that was  
14 unanticipated, agreed?

15          A.    I would -- I agree that they should have  
16 checked it out.

17          Q.    Yeah.  They should -- it should be anticipated.  
18 It should not be, oh, we didn't anticipate it?

19          A.    Yeah.

20          Q.    Okay.  They shouldn't be surprised by the  
21 regulation --

22          A.    The possibility of that becoming the law.

23          Q.    Right.  Because it had been proposed for years?

24          A.    Yeah.  I agree.

25          Q.    Okay.  And again Mr. Ramirez goes on to say the

1 applicant in front of the Type B Board, quote, so there  
2 were some FEMA requirements, he says requirements, but  
3 we know he's referring to FEMA, quote, so there were  
4 some requirements and parameters that we certainly did  
5 not anticipate.

6 Again, they should have anticipated them,  
7 right?

8 A. In my opinion, yes.

9 Q. Yeah. FEMA doesn't move fast, right?

10 A. Right. Government.

11 Q. Okay. They give you years of notice, they let  
12 you have a comment period, and you shouldn't be into a  
13 multi-million dollar project and act like, oh, I'm  
14 shocked that these rules were there like I didn't  
15 anticipate them?

16 A. Yeah.

17 Q. Agreed?

18 A. Right.

19 Q. Okay. And so you see from the quotes I've read  
20 that certainly, and it's in Peter's discussion on the  
21 tape I just played for you too, but is it -- let me back  
22 up.

23 From the information we have in the  
24 presentation is it very clear that the applicant is sort  
25 of pitching it like these were not anticipated, and that

1 it was some kind of recent change?

2 A. To the best of my recollection, I think that's  
3 true.

4 Q. Yeah. Okay. And we are agreeing that  
5 that's -- that that should not be true. It should be  
6 that the architect and the developer did their homework  
7 ahead of time and anticipated everything because the  
8 information was available?

9 A. Okay.

10 Q. Agreed?

11 A. Agreed.

12 Q. Okay. And you understand the audio tape I  
13 played a moment ago, pretty distinct voices, but that's  
14 Peter Zanon --

15 A. Peter and Ajit.

16 Q. Yes. Okay. I knew you knew.

17 A. Uh-huh.

18 Q. I have a transcript of it if you want to look  
19 at it at any time?

20 A. Yeah. First I've heard of it, but I don't need  
21 a transcript.

22 Q. I think we're now at the point then where it's  
23 clear not -- is it not, that the infrastructure  
24 component we're talking about relates to, relating to  
25 the application for receiving money is the FEMA flood

1 plain changes at least the suggestion of that by the  
2 applicant?

3 A. I think I can agree with that.

4 Q. Okay. And that in that context then Culbertson  
5 was asked about infrastructure, remember that's where we  
6 were talking a moment ago. That's where we diverted.

7 A. Uh-huh. Yeah.

8 Q. Okay. And do you agree that Culbertson,  
9 Mr. Culbertson's expertise definitely is the whole  
10 business of evaluating the project?

11 A. That's a significant role for him. He has  
12 other roles.

13 Q. The whole CCREDC's role is to, like you said  
14 vet the project to see if it even can get in front of  
15 Type B, right?

16 A. That's correct.

17 Q. And in terms of an infrastructure component we  
18 know now that's the FEMA flood plain issue, right?

19 A. Right.

20 Q. And we know that Mr. Culbertson said these  
21 things. And I'm going to ask you if you agree with  
22 them.

23 First of all, Mr. Culbertson says on  
24 page 121 of his deposition, quote, I agree that I said  
25 it had to be tied to infrastructure.



1 Did I read that correctly?

2 A. Uh-huh.

3 Q. Do you agree with that?

4 A. Yeah, I guess.

5 Q. I mean he knows his business?

6 A. Yeah. It was the EDC's plan to present it the  
7 way they did.

8 Q. Right. I mean, that's -- and so he's saying he  
9 agrees that it had to be tied to infrastructure, and he  
10 further says, quote, I told both my board and the  
11 project in Type B it had to be tied to infrastructure.

12 First, did I read that correctly?

13 A. Yes.

14 Q. And do you agree with that?

15 A. Yes.

16 Q. And then Mr. Culbertson goes on to testify,  
17 quote, And in fact that's all we've ever done when we  
18 looked at, at projects like this that it had to be tied  
19 to infrastructure.

20 Did I read that correctly?

21 A. Uh-huh. Yes.

22 Q. And do you agree with that?

23 A. Yes. Well, as far as I know. I don't know  
24 the -- his history with the project.

25 Q. Right. But this is his expertise?

1           A.     Yeah.

2           Q.     So you would also --

3           A.     I would expect he knew what he was talking  
4     about.

5           Q.     Right.  You're not here to disagree with him?

6           A.     No.

7           Q.     And then he went on to say, he was asked,  
8     quote, because you knew you couldn't get behind it  
9     without there being some infrastructure tie in, and his  
10    answer was correct.

11                     And then the next question, And you  
12    couldn't get Type B money in your mind unless, that's a  
13    typo.

14          A.     Uh-huh.

15          Q.     Unless there was an infrastructure tie in, and  
16    he says that correct?

17          A.     That's what he said.

18          Q.     Did I read that correctly?

19          A.     Uh-huh.  You did.

20          Q.     And so what he's very clearly saying, and,  
21    again, you've said he's kind of the expert in the field,  
22    he's very clearly saying that if there's no  
23    infrastructure component to it this FEMA flood plain  
24    deal, then there can't be any money?

25          A.     The implication is it would not qualify for

1 Type B.

2 Q. In which case there should be no money given?

3 A. Right.

4 Q. Okay. Now, then of course, you know that the  
5 applicant Mr. Ramirez and Mr. Deven Bhakta they came and  
6 made the presentation right?

7 A. Uh-huh.

8 Q. Correct?

9 A. Yes.

10 Q. And when they made that presentation, I'm sure  
11 you're now aware that they did so, and it's even talked  
12 about in the audio recording some, but let me back up  
13 from that.

14 When the applicant Deven Bhakta and  
15 Phillip Ramirez came and made the presentation, you know  
16 that they made a presentation using a FEMA slide?

17 A. Uh-huh.

18 Q. Correct?

19 A. Yes.

20 Q. And I think you probably now know it was  
21 falsified?

22 A. I know that it -- was it the date that was  
23 removed?

24 Q. Actually, it was a date in two places. I'll go  
25 ahead and show you the --

1           A.    I think Ajit had showed me.

2           Q.    Let me help you there so you have exact  
3 information?

4           A.    Okay.

5           Q.    Here's the original that's online still.  And  
6 I'm going to point out three things for you.

7           A.    All right.

8           Q.    There's a date here and a date here and a  
9 reference number there.

10          A.    Uh-huh.

11          Q.    Or release number.

12          A.    Right.

13          Q.    You see those three items?

14          A.    I do.

15          Q.    And then here's the actual slide they used in  
16 front of your Type B Board, and do you see that the date  
17 has -- the one day I pointed out a moment ago, has been  
18 removed.  It's not there.  Agreed?

19          A.    Yeah.  No.  I don't see it.

20          Q.    And then the second date I showed you is also  
21 not there?

22          A.    Right.

23          Q.    And then the release date is also or the  
24 release number is also not there?

25          A.    86009.

1 Q. Correct?

2 A. Correct.

3 Q. So that's three alterations where they changed,  
4 modified, forged, whatever word you want to use, the  
5 document?

6 A. Yeah.

7 Q. Okay. Now, and you can see how, and remember  
8 we talked about the exact words that Phillip Ramirez  
9 used talking about, did not anticipate, threw a wrinkle,  
10 you know all the things that he, Mr. Ramirez, said to  
11 the Type B Board you can see how timing was important,  
12 right?

13 A. Timing, which timing?

14 Q. Excellent question. The timing, the suggestion  
15 by Phillip that somehow they couldn't -- when I say  
16 Phillip you know I'm talking about Mr. Ramirez?

17 A. I do.

18 Q. Yeah. I'll try to say Mr. Ramirez.

19 A. Yeah.

20 Q. The suggestion by Mr. Ramirez that somehow this  
21 change in FEMA flood plain rules was not anticipated,  
22 and we've agreed that's what he's suggesting?

23 A. Uh-huh.

24 Q. Right?

25 A. Yes.

1           Q.    That suggestion sort of is time sensitive, the  
2 word recent or not anticipated are time-sensitive words?

3           A.    Yeah.   Right.

4           Q.    Okay.   And so removing the dates, deprives the  
5 person on the Type B Board or whoever is looking at the  
6 falsified slide, removing the dates, removes the  
7 reference to a time period?

8           A.    Okay.

9           Q.    True?

10          A.    Yeah.

11          Q.    Okay.   And so if you're going to go in front  
12 of, and let's just be honest and mis -- the presentation  
13 by removing the dates, I think we agreed probably is  
14 misleading?   I'm being nice.

15          A.    I don't know how to characterize it, because I  
16 wouldn't even have thought that somebody would go to  
17 that extent.

18          Q.    I'm not going to comment.

19          A.    Yeah.   Yeah.

20          Q.    But I appreciate your comment.

21          A.    Yeah.

22          Q.    It -- you live in a world where you do lending  
23 of private money, right?

24          A.    Uh-huh.   Yes.

25          Q.    And you understand that quite frankly you've

1    been given an awesome responsibility by serving on a  
2    board that can advance or loan or, or invest, whatever  
3    word you want to use, public money?

4       A.    Right.

5       Q.    And that's, in my view, and I don't mean to say  
6    less of the private sector, but when you're dealing with  
7    public funds there probably needs to be even higher  
8    scrutiny, do we agree?

9       A.    High standards.

10      Q.    Yes.   The highest of standards?

11      A.    Yes.

12      Q.    And back to what the most important thing is  
13    when you're advancing money, the highest standards for  
14    one's character, correct?

15      A.    Yes.

16      Q.    The highest standards should apply for one's  
17    integrity, right?

18      A.    Right.

19      Q.    The highest standards should apply to one's  
20    honesty in making the request for the money?

21      A.    Yes.

22      Q.    The highest standards should apply for one's  
23    truthfulness in making the request for the money?

24      A.    Correct.

25      Q.    For public money, right?

1 A. Correct.

2 Q. Okay. And so if you you're altering a -- you  
3 understand the federal, the FEMA document that they got  
4 off line from being online?

5 A. Right. Right.

6 Q. That's a -- that's a federal document?

7 A. Yeah.

8 Q. Okay. And altering a federal document to  
9 request public money, I'm sure you will agree lacks  
10 integrity?

11 A. Yeah. If it's material, yes.

12 Q. Well, and we've already proven it's materiality  
13 because time and this not anticipated argument is out  
14 there, right?

15 A. Okay.

16 Q. Okay. So let's not digress.

17 A. Okay.

18 Q. Altering a federal document is, you would never  
19 expect someone of good character to alter a federal  
20 document?

21 A. Not to mislead.

22 Q. You agree?

23 A. I agree.

24 Q. Yeah. And you would never expect somebody --  
25 well, altering a federal document is not honest, is it?



1           A.    Well, I mean, it depends on the context, I  
2    would say.  If there's -- if there's an intent to lie,  
3    to mislead, to get, gain something, no, of course not,  
4    you wouldn't do that.

5           Q.    Yeah.  Well, I mean, let me ask you this.

6                   Are you telling me that if somebody comes  
7    into your bank on private money and they alter a federal  
8    document, you're going to give them a loan?

9           A.    Well, depends on what they altered.

10          Q.    Okay.  Well, if they alter the very document  
11   that was the infrastructure component that would  
12   prohibit it from being approved by CCREDC like  
13   Culbertson testified to.  That's material, isn't it?

14          A.    That is material if the EDC would not have  
15   approved this because of the alteration.

16          Q.    When you saw Mr. Culbertson's deposition, he  
17   would not have, correct?

18          A.    I think that's correct.

19          Q.    Yeah.  Okay.  And so, so that's step one.

20          A.    That's step one.

21          Q.    To the process?

22          A.    Yeah.  It got approved.  It would have never  
23   come to us.

24          Q.    Yeah.  And if you, if CCREDC knew now, or  
25   excuse me, knew then what it knows now that the

1 infrastructure component was based upon a false document  
2 it should never have then come out of CCREDC?

3 A. If that -- yes, that's correct.

4 Q. Well, yeah. There's no if ands or buts about  
5 that one.

6 A. I didn't say if, I said, yes, that's correct.

7 Q. Yeah. And quite frankly, and I want to just --  
8 I'm gonna make the assumption that you think the Type  
9 Board B (sic) responsibility to administer public funds  
10 is a serious and awesome responsibility?

11 A. It is.

12 Q. And that it requires the highest standards for  
13 the words you used, character, integrity, honesty, and  
14 truthfulness?

15 A. Yes.

16 Q. Okay. And you know that the presentation, and  
17 I can show you the slide and the whole thing. But the  
18 whole argument there was we had these changes in FEMA  
19 and recent or not anticipated, whatever word you want to  
20 use, and therefore we need this money to pay for that  
21 part of the project that we got. It was kind of  
22 unexpected to us. That was the whole argument?

23 A. Yeah. And, of course, I knew that the FEMA  
24 rules had changed not just last week.

25 Q. Okay. Yeah. But are you suggesting to me that

1 you knew they were lying at the time they were lying?

2 A. No. I'm suggesting that it could have been  
3 incompetence on their part is what I thought. I know  
4 Phillip, and I know Deven, don't know Deven as well, but  
5 he's been nothing but honorable in anything in my  
6 interactions with him.

7 So I came to that meeting with a certain  
8 level of confidence from past experience. So it never  
9 even crossed my mind they would be altering documents or  
10 misleading on purpose.

11 Q. Yeah. But if you have a falsified federal  
12 document, are you going to approve a loan?

13 A. No.

14 Q. Yeah.

15 A. If it's material, no.

16 Q. Well, and this is material, we've --

17 A. Yeah. Yeah.

18 Q. Okay. So it should have never gotten approved?

19 A. Yeah. Well, it should've never come to us.

20 Q. Right. Okay. And if you had known back then  
21 what you now know to be true about --

22 A. We would have tabled it and investigated it,  
23 and try to understand why. And we would have gone  
24 several steps further.

25 Q. Yeah.

1           A.     But at the time --

2           Q.     In other words, you would not have approved it  
3 as is with that falsification?

4           A.     Not on that day.

5           Q.     We agree?

6           A.     We agree.

7           Q.     Okay. And then it never came back because that  
8 never happened because you were lied to and you relied  
9 upon the applicant?

10          A.     Yeah.

11          Q.     Okay.

12          A.     And so I became aware of the allegations after  
13 we had already voted.

14          Q.     I understand.

15          A.     And so then I thought, well, if it's true, then  
16 the city council will want to prove it.

17          Q.     Yeah. That's what they should have done in  
18 your opinion?

19          A.     I think there should have been a further  
20 investigation. I did hear that this was --

21          Q.     Let me stop you there for a minute, and then  
22 I'm just going to say, just 'cause you answer the  
23 question. If you want to volunteer something, that's  
24 fine. I'm not trying to cut you off. You did hear?

25          A.     I heard that the allegations were referred to

1 the FBI, and my response was, well, good. If the  
2 allegations are true, then they'll find out.

3 Q. Okay.

4 A. 'Cause I'm for truth.

5 Q. You're what?

6 A. I'm for truth. I'm not for misleading.

7 Q. Yeah. And the only reason I cut you off, you  
8 started saying, but then I let you say it.

9 The only reason I put a little blocker in  
10 there is, because you said I heard that, and most people  
11 are going to tell you that's hearsay.

12 A. Hearsay.

13 Q. And so I wanted to have a clean answer.

14 A. Sure. Sure.

15 Q. But I didn't want to cut you off either.

16 A. Yeah. Yeah.

17 Q. Okay.

18 A. But I wanted to be on record, I would never do  
19 anything if I thought that there was something untoward  
20 in it. It never crossed my mind.

21 Q. Yeah. I don't have -- I didn't ask a question  
22 and you volunteered that, so I'm going to ask a question  
23 so that you can answer it, so that it's proper, okay?

24 A. Okay.

25 Q. All said, can we agree that if there's anything

1 that would be misleading, misrepresenting, a false  
2 federal document or a false -- a federal document  
3 putting it in a false light?

4 A. Yeah.

5 Q. Let me say it that way.

6 A. Okay.

7 Q. Knowing what you now know -- I'm going to start  
8 again.

9 You now know very clearly there were the  
10 three alterations on the document, right?

11 A. Uh-huh. Yes. Sorry.

12 Q. And that the -- what do you want to call it, a  
13 forged or a false document was used in front of the Type  
14 B Board, right?

15 A. A changed document. Yeah. We were not aware  
16 of that, but.

17 Q. I understand, and that's important.

18 A. Yeah.

19 Q. Because you were not aware of it, but you  
20 nonetheless, voted to approve it because you were not  
21 aware of it?

22 A. Right.

23 Q. And if you had known about it, that's the sort  
24 of lack of integrity or honesty or truthfulness or  
25 misleading or whatever word you want to use or not use,

1 that's the sort of thing that puts a really harsh  
2 negative light on it. Can we agree on that?

3 A. It certainly, yeah, raises the possibility that  
4 there needed to be further investigation. I cannot  
5 speak for the whole board.

6 Q. But for you, you would not have --

7 A. But for me, I would have said I know these  
8 guys, this doesn't seem like them, but if it's true then  
9 we got a problem.

10 Q. So if it's true that they falsified the  
11 document, you would have voted no?

12 A. I would have voted no.

13 Q. Against it?

14 A. Yes.

15 MR. ALLISON: Okay. That's all I have.  
16 Thank you.

17 THE WITNESS: Okay.

18 MS. MARCUM: We'll reserve.

19 THE VIDEOGRAPHER: All right. The time  
20 now is 1:37. We're off the record.

21 (Signature having been waived, the  
22 deposition was concluded at 1:37 p.m.)

23

24

25

CAUSE NO. 2024CCV-61174-3

AJIT DAVID	§	IN THE COUNTY COURT
Plaintiff,	§	
	§	
vs.	§	AT LAW NO. 3
	§	
	§	
CITY OF CORPUS CHRISTI,	§	
TEXAS	§	
Defendant.	§	NUECES COUNTY, TEXAS

COURT REPORTERS CERTIFICATION

OF Alan Wilson

Taken on July 1, 2025

I, Rosalba R. Taylor, Apprentice Court  
Reporter in and for the State of Texas, hereby certify  
to the following:

That the witness, Alan Wilson was duly sworn  
and that the transcript of the oral deposition is a true  
record of the testimony given by the witness;

That examination and signature of the witness  
to the deposition transcript was waived by the witness  
and agreement of the parties at the time of the  
deposition;

That the amount of time used by each party at  
the deposition is as follows:

Mr. Allison (0h38m)  
Attorney for Plaintiff  
Ms. Marcum (0h0m)  
Attorney for Defendant



1           That \$\_\_\_\_\_ is the deposition officer's  
2 charges to Mr. Douglas Allison for preparing the  
3 original deposition transcript and any copies of  
4 exhibits;

5           That pursuant to information given to the  
6 deposition officer at the time said testimony was taken,  
7 the following includes counsel for all parties of  
8 record:

9           MR. ALLISON, Attorney for Plaintiff(s)

10          MS. MARCUM, Attorney for Defendant(s)

11          That a copy of this certificate was served on  
12 all parties shown herein on \_\_\_\_\_ and  
13 filed with the Clerk pursuant to Rule 203.3.

14          I further certify that I am neither counsel  
15 for, related to, nor employed by any of the parties in  
16 the action in which this proceeding was taken, and  
17 further that I am not financially or otherwise  
18 interested in the outcome of this action.

1                   Certified to by me on this 10th day of July,  
2                   2025.

3                     
4                   \_\_\_\_\_

5                   ROSALBA R. TAYLOR,  
6                   TX ACR #12021  
7                   Expire Date: 04/30/27  
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34:13 36:2 19 23:14  
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30:22  
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**Z**

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**Y**

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