

Dolcefino Media

The Truth is Worth Fighting For

August 12, 2026

Nueces County District Attorney
901 Leopard Street
Corpus Christi, Texas 78401

via email: nueces.districtattorney@nuecescountytexas.gov

Department of Public Safety
ATTN: Company D, Texas Rangers
2525 N. International Boulevard
Weslaco, Texas 78599

via email: rangers@dps.texas.gov

Nueces County Sheriff's Office
901 Leopard Street
Corpus Christi, Texas 78401

via email: contact.sheriff@nuecescountytexas.gov

Corpus Christi Police Department
321 John Sartrain Street
Corpus Christi, Texas 78401

via email: erycag@corpuschristitx.gov

via email: antonioc@corpuschristitx.gov

To the Nueces County District Attorney, Texas Rangers, Company D, Nueces County Sheriff's Office, and the Corpus Christi Police Department:

Please allow this letter to serve as a formal criminal complaint against former Corpus Christi City Auditor George Holland ("Holland") and attorney Douglas Allison ("Allison") (Bar No. 01083500) for violations of the Texas Penal Code. The violated sections of the Penal Code include, but are not limited to, the following:

Section 36.02. Tex. Pen. Code. Bribery.

Section 36.09. Tex. Pen. Code. Offering Gift to Public Servant.

COMPLAINT BACKGROUND

1. George Holland was the City Auditor for the City of Corpus Christi, Texas since January of 2023, until he announced his retirement in May of 2026, effective June 1, 2026.

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2. In July of 2023, a HR investigation was launched against Holland due to allegations of a “toxic work environment...lack of credible leadership and essential skills,” and “unwanted physical contact with [a] subordinate employee.” See Exhibit A.
3. Attorney Allison represented Holland during this investigation.
4. Holland was placed on paid administrative leave from July 16, 2024, to August 13, 2024, when Corpus Christi City Council voted to extend his paid administrative leave to August 27, 2024.
5. On August 27, 2024, Holland was allowed to return to work by the City Council despite the ongoing investigation.
6. On August 28, 2024, a complaint was purportedly filed with Holland stating that the developer of the Homewood Suites in Corpus Christi had procured a \$2 million tax incentive by fraudulently submitting a tampered government document.
7. Upon information and belief, Dolcefino Media believes this complaint was filed by developer Ajit David (“David”) and/or his attorney Allison.
8. On September 30, 2024, almost one month to the day after the complaint to the auditor was filed, David filed Nueces County Case No. 2024CCV-61174-3 against the City of Corpus Christi and Mayor Paulette Guajardo, in which he states identical allegations against the developer of the Homewood Suites in an attempt to invalidate the \$2 million tax incentive received by the developer of the Homewood Suites.
9. Attorney Allison represents David in this ongoing lawsuit.
10. In March of 2025, the investigation into Holland was completed with the external law firm investigators recommending the termination of Holland. *Id.*
11. Despite the findings of the investigation, City Council ended up allowing the continued employment of Holland and subsequently even gave him a \$38,000 pay increase.
12. On August 21, 2025, a year after his return to work, Holland sent a City Auditor’s Office Memorandum to the Mayor and City Council stating that he had “received an allegation on August 28, 2024, regarding a \$2 million incentive to the Homewood Suites by

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Hilton,” and that “according to the allegation, a government document was altered to obtain tax dollars from the Type B Corporation.” *See* Exhibit B.

13. Holland took it upon himself to conclude in his purported investigation of the Homewood Suites that “there is a reasonable basis...that fraud, abuse, and/or illegal conduct have occurred, and consider our internal investigation closed.” *Id.*
14. The allegations from Holland were investigated by an independent attorney and determined that there existed no credibility to them.
15. Further, no law enforcement authority found fraud or abuse or even tampering with a governmental document occurred.
16. Holland also failed to interview the subjects of the investigation, the developers of the Homewood Suites, nor did he interview Mayor Guajardo.
17. Neither the City of Corpus Christi nor the Auditor’s Office has provided any of the purported documents reviewed to form their conclusion of fraud, nor have they provided any work product of Holland, nor any communications of the City Council pertaining to the investigation or developer David, despite Dolcefino Media sending several public information requests.
18. What little production Dolcefino Media has received include several emails sent by David and Allison to the public officials of Corpus Christi showing continued attempts to interfere with the Homewood Suites development. *See* Exhibit C.
19. Further, Dolcefino Media has received an affidavit from the former Senior Auditor of the Corpus Christi Auditor’s Office, Wendy Pullin, who states under oath that during a telephone conversation on or around the date of August 26, 2024 Allison informed her that he was not charging Holland for legal services related to the investigation into Holland by the City. *See* Exhibit D.
20. Considered in combination with the aforementioned facts, it appears that Holland provided a purported investigative conclusion that the developers of Homewood Suites

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committed fraud was a “thank you” to Allison for his free legal services provided to Holland in order that he would retain his job.

21. This gladhanding between Holland and Allison constitutes bribery, a felony of the second degree, and possibly even an improper gift to a public servant, a class A misdemeanor.

BRIBERY

22. Texas Penal Code Section 36.02 reads as follows:

(a) A person commits an offense if he intentionally or knowingly offers, confers, or agrees to confer on another, or solicits, accepts, or agrees to accept from another:

- (1) Any benefit as consideration for the recipient’s decision, opinion, recommendation, vote, or other exercise of discretion as a public servant, party official, or voter;
- (2) Any benefit as consideration for the recipient’s decision, opinion, recommendation, vote, or other exercise of official discretion in a judicial or administrative proceedings;
- (3) Any benefit as consideration for a violation of a duty imposed by law on a public servant or party official;
- (4)

23. Further, Section 36.02 reads:

(c) It is no defense to prosecution under this section that the benefit is not solicited or accepted until after:

- (1) the decision, opinion, recommendation, vote, or other exercise of discretion has occurred; or
- (2) the public servant ceases to be a public servant.

24. Texas Penal Code Section 36.09 reads as follows:

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(a) A person commits an offense if he offers, confers, or agrees to confer any benefit on a public servant that he knows the public servant is prohibited by law from accepting.

25. Therefore, the benefit of a conclusion favorable to Allison's client, Ajit David, in return for the free legal services provided to Holland, Allison's other client, qualifies as a knowing offer of a benefit and a knowing acceptance of a benefit by the parties involved, all rooted in the actions of developer Ajit David to prevent competition in the form of another hotel development, the Homewood Suites.

CONCLUSION

The general purpose of the Texas Penal Code is to "establish a system of prohibitions, penalties, and correctional measures to deal with conduct that unjustifiably and inexcusably causes or threatens harm to those individual or public interests for which state protection is appropriate." Tex. Pen. Code § 1.02. Bearing this in mind, Dolcefino Media does respectfully request that the Nueces County District Attorney's Office and the Texas Rangers properly initiate an investigation into the imprudent inactions of attorney Douglas Allison, former City Auditor George Holland, and developer Ajit David, and prosecute accordingly.

If the District Attorney's Office or the Texas Rangers has any questions or concerns, feel free to contact us.

Respectfully,



Wayne Dolcefino
Dolcefino Media
1951 Richmond Avenue
Houston, Texas 77098

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RECOMMENDATIONS & EXECUTIVE SUMMARY

1. After a thorough investigation and review of all the relevant facts, including input from all members of the Audit Department and other City employees, it is clear to the Investigators that Holland is not the right fit for the City's Audit Department. The evidence points to a toxic work environment created by Holland, along with a lack of credible leadership and essential skills needed to manage the Audit Department. Holland's actions have intimidated and continue to have a chilling effect on his subordinates, which is further cause for the imposition of disciplinary action, including termination. As a result, the Investigators recommend that the City Council take action to remove Holland from his position as City Auditor.

2. Holland wrongfully interfered with the investigation by threatening an employee witness with loss of pay and termination, expanding his threat of lawsuits and other retribution to other employees who participated in the investigation. This conduct standing alone is sufficient cause for the imposition of disciplinary action, including termination. As Director of the Audit Department, Holland used his office to pressure a subordinate to lie and to prevent an employee's cooperation with the investigation and threatened her with the loss of her job if she did not lie. There are indications that he attempted to improperly involve himself in the investigation and exert undue influence prior to the retention of the Investigators.

3. Holland wrongfully targeted the Complainant to make her "work life miserable" as a form of professed retaliation, because he believed she reported him to HRD for an alleged improper approval of overtime compensation for a Saturday trip with a temporary employee.

4. There is cause for disciplinary action based on Holland's unwelcome physical contact with the subordinate employee which occurred during that same Saturday trip to San

Holland's unwelcome physical contact is conduct that might, standing alone, constitute a basis for a reprimand, counseling, and verification that Holland is aware of and acknowledges the City's policies regarding sexual harassment.

5. The same employee's fear of being branded a liar and/or losing her employment, was exacerbated by Holland's insistence that she sign what was, in essence, a Non-Disclosure Agreement prohibiting her from further discussing the San Antonio trip with presumed consequences if she "breached" the agreement. The only reasonable inference is that Holland attempted to effectively silence the employee from discussing an incident that might be prejudicial to his standing or reputation. The act of suppressing an employee's voice within the organizational context could have several significant repercussions. First, it could undermine the authority and effectiveness of the City Auditor, whose role is to ensure transparency and accountability within the city's operations. Second, it may reflect poorly on the City Council, as it could be interpreted as a failure to address or acknowledge the issue. This could lead to questions about the council's ability to govern effectively. Finally, such actions could tarnish the reputation of the city as a whole in the eyes of the public, potentially leading to a loss of trust and confidence. Such actions create further grounds for the removal of Holland.

6. Holland's dealings with another City Department Head further casts doubt on Holland's judgment when resolving audit-related disputes. The evidence supports a finding that rather than attempt to diffuse a difference in opinion concerning the scope of a legitimate audit and requests for information thereto related—Holland escalated the problems, taking steps, whether deliberate or not, that unnecessarily and unfairly maligned the other Director. Holland's actions with managing the dispute raises concerns about his professional judgment and constitute a basis for a counseling and training in inter-departmental communication and conflict resolution.

7. Although the Investigators strongly recommend the removal of Holland from office, if the City Council decides to retain him as City Auditor, due consideration should be given to the implications of this decision.

- a. Considering the toxic environment and fear of retaliation expressed by members of the Audit Department, it may be appropriate to move them to other departments within the City. This situation is risky because the Department members will hold the City accountable if safeguards are not provided for their participation in the investigation and any resulting disciplinary action that may be taken against them, especially the outcry employee, who was directly threatened with the loss of a raise, job, and other forms of retribution by Holland.
- b. Placing him on a Performance Improvement Plan (PIP) with specific conditions to address his management deficiencies, lack of knowledge and adherence to the City's policies, and his discourteous demeanor towards members of the Audit Department and beyond. Clear timeframes for corrective improvement should be provided, along with stated consequences if improvement measures are not met, including further disciplinary action up to and including termination.

Prior to imposing a PIP, the City should conduct a peer review of Holland within the scope provided by the Code of Ordinances, Section 12-7 and with specific attention to general standards such as "due professional care," as noted in the Ordinance and impose disciplinary actions as deemed appropriate from the results of the review, such as inclusion of findings in the PIP.

**CITY AUDITOR'S OFFICE
MEMORANDUM**

TO: Mayor and City Council
FROM: George Holland, City Auditor *GH*
DATE: August 21, 2025
SUBJECT: Homewood Suites Allegation and Closed Internal Investigation

Allegation

Our office received an allegation on August 28, 2024, regarding a \$2 million incentive to the Homewood Suites by Hilton at the corner of North Chaparral Street and Lomax Street in Downtown Corpus Christi. According to the allegation, a government document was altered to obtain tax dollars from the Type B Corporation.

Issue

The request was first presented to the Type B Corporation for review in an Executive Session on November 13, 2023. The funds would be used for additional costs related to newly defined Federal Emergency Management Agency (FEMA) AE Flood Zone requirements, resulting in unexpected project expenses. The altered presentation was presented to the Type B board during a Public Hearing on December 11, 2023. Final approval from the Type B Corporation President and board members occurred on January 22, 2024. After approval from the Type B Corporation, the presentation was introduced to the City Council through a two-reading ordinance, first on February 20, 2024, and again on April 23, 2024. However, an updated version of the known altered presentation was used on April 23, 2024, and it made no mention of FEMA or any known altered documents.

Finding

The Applicant's request for \$2 million, at the time of presentation to the Type B Board and upon 1st Reading to City Council, relied upon a FEMA website screenshot that was allegedly altered by the Applicant. Specifically, the FEMA website screenshot had the following information concealed: "Release Date" "April 13, 2022" "Release Number" "R6-009" "Release Date: April 13, 2022." This information was concealed by dropping two (2) text boxes onto the FEMA website screenshot, and filling both text boxes with the same color that surrounded the text; thereby hiding this text. If not hidden, the information would have shown that FEMA's final flood maps had been released to the public months before the Applicant's project was even considered. If not hidden, the information would have contradicted the Applicant's reasons for requesting the \$2 million. Based upon review of the altered PowerPoint slide, the effort to conceal the hidden information would have required at least 8-10 intentional computer key or keypad strokes. City Leadership investigated and concluded that the facts of the case constitute a felony forgery under the Texas Penal Code 32, a violation of law. Therefore, given the City's two-reading rule, the passing of Ordinance 24-0256 is tied to a forgery of a federal document (the FEMA website screenshot). The evidence presented above gives rise to a serious concern regarding fraud, abuse, or illegality, and thus, the City Council Audit Committee and City Council are now advised and referred to this matter for appropriate action.

Conclusion

The City Auditor's Office has determined there is a reasonable basis to conclude that fraud, abuse, and/or illegal conduct have occurred, and consider our internal investigation closed. The information reviewed by the City Auditor's Office is hereby referred to the City Council for review and recommendation to perform an external investigation.

From: [REDACTED]
To: [Paulette Guajardo](#)
Cc: [Tiffany Dake](#); [Roland Barrera \[council\]](#); [Mark Scott](#); [Carolyn Vaughn](#); [Everett Roy](#); [Sylvia Campos](#); [Eric Cantu](#); [Kaylynn Paxson](#); [Gil Hernandez \[Council\]](#)
Subject: [EXTERNAL]Fwd: Fire Safety Concern Downtown
Date: Thursday, February 5, 2026 7:33:08 AM
Attachments: [79194543499_8BDBDFB5-6D6C-44B4-A28F-5304D3BC78DC.HEIC](#)
[79194554311_2E706EAE-C8AF-447E-B94A-B2A99982AC90.HEIC](#)
[79194546458_A3B665C1-E5ED-4BCB-AF1B-866128E87571.HEIC](#)
[79194545733_7DD8A652-F65F-46F1-A542-03A221718EEB.HEIC](#)
[79194551776_F741A922-30E0-47E9-AE6D-2D2684A83DB1.HEIC](#)
[79194541852_B616FD7D-01A7-4AB0-B8A2-234EED305994.HEIC](#)
[79194541005_A584FB93-6372-43AB-B67E-1DDCDED2B41D.HEIC](#)
[CC DSD Bulletin TCO 01232024.pdf](#)

[[WARNING: External e-mail. Avoid clicking on links or attachments. We will NEVER ask for a password, username, payment or to take action from an email. When in doubt, please forward to SecurityAlert@cctexas.com.]]

Mayor:

Over the past several weeks, I personally observed ongoing Furniture, Fixtures, and Equipment (FF&E) stocking at the downtown Homewood Suites. Under applicable fire and life safety requirements, stocking a commercial building with furniture and merchandise is permitted only after written approval from the Building Official and only after all fire protection and life safety systems have been fully installed, tested, and approved, with all Mechanical, Electrical, and Plumbing (MEP) inspections finalized. Upon completion of these requirements, a Temporary Certificate of Occupancy (TCO) is issued to allow FF&E installation.

The attached bulletin reflects these requirements, which I was required to follow on several projects. The attached photographs dated 02/03/26 show ongoing heavy construction activities, making it highly unlikely that MEP, Fire, or Building inspections have been finalized and therefore rendering the building ineligible for issuance of a TCO.

It is further my understanding that the building currently lacks a functioning fire alarm panel, fire pump, and a tested and approved fire suppression system. These conditions pose a serious fire and life safety risk. **How long has this violation been ongoing?** In addition to posing a serious fire and life safety risk, this situation is unfair to all developers and businesses who continue to comply with all Fire and Building codes.

Respectfully,
Ajit David

----- Forwarded message -----

From: **Doug Allison** <doug@dallisonlaw.com>

Date: Wed, Feb 4, 2026 at 5:09 PM

Subject: Fw: Fire Safety Concern Downtown

To: [REDACTED] >

From: Doug Allison

Sent: Wednesday, February 4, 2026 5:06 PM

To: peterz@cctexas.com

Subject: Fw: Fire Safety Concern Downtown

Mr. Zanoni-

I know you understand the seriousness of a fire code violation (see details below).

Please immediately inform your council members, and take action to stop all work on the Project.

Please, no more Mayor-favors on this safety issue.

doug

From: Doug Allison

Sent: Wednesday, February 4, 2026 4:59 PM

To: YvetteDo@cctexas.com

Cc: michaeld3@cctexas.com

Subject: Fw: Fire Safety Concern Downtown

As you know, I represent Ajit David. It has come to my client's attention that the Homewood Suites Hotel project (the downtown "Project") is presently in violation of city codes.

Specifically, the Project has no TCO, is not qualified to receive a TCO, and is engaged in on-going activities in violation of IBC Fire Code (Chapter 33) and DSD's Information Bulletin 017 (attached).

On information and belief, the Project has no fire panel installed; has no water pump for the fire suppression system; and thus does not have a fire suppression system -- BUT nonetheless the building has been filled with combustibles (furniture, fixtures, and equipment ("FFE")). For reasons of safety, the Project must immediately be red-tagged, shut down, and a full review of fire and safety issues completed.

My client tried to address this issue more collaboratively (by email below), but was ignored. My client has since learned more of the seriousness of QOF's violations, and thus I am asking the matter be immediately addressed. This appears to be another example of the City trying to cover-up bad acts of QOF, and it must stop.

Thank you.

Douglas Allison

From: Ajit David <[REDACTED]>
Date: February 3, 2026 at 15:35:01 CST
To: YvetteDo@cctexas.com
Subject: Re: Fire Safety Concern Downtown

Sorry - I missed the attachment referenced in my email. Here it is.
Regards,
Ajit David
361-455-1873

On Tue, Feb 3, 2026 at 1:19 PM Ajit David <[REDACTED]> wrote:

Hi Yvette. I understand you are now serving as the DSD Director. Congratulations.

I am writing because of a fire safety concern. For obvious reasons, I am quite aware of the construction schedule for the Homewood Suites Hotel (downtown location). I am sure that you have great awareness, too. All considered, Elevate QOF's ("Developer's") desire to hurry the project is no justification for unsafe practices.

We are both familiar with the IBC Fire Code (Chapter 33) and DSD's Information Bulletin 017 (attached), which I was required to recently comply with. I am reliably informed that the project has no TCO (and none should be backdated). As such, placing and/or installing FF&E is inappropriate, as it is a fire hazard to place combustibles in a space still waiting for a full fire suppression system.

I want to be sure that this email receives appropriate follow-up. Please confirm whether FF&E is being placed and/or installed. Please confirm whether a TCO has been approved. I hope this is a false alarm, but we must be certain that all rules are being followed, especially when addressing a concern such as fire.

Thank you.
Ajit David
361-455-1873

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STATE OF TEXAS

§

COUNTY OF NUECES

§ KNOW BY ALL MEN THESE PRESENTS

§

AFFIDAVIT OF WENDY PULLIN

Before me, the undersigned notary public in the State of Texas, on this day personally appeared Wendy Pullin, whose identity is known to me. After I administered an oath to affiant, affiant testified as follows:

My name is Wendy Pullin, I am over 18 years of age, of sound mind, and capable of making this affidavit. The facts stated are within my personal knowledge are true and correct, and form the basis of my affidavit.

1. My birthdate is August 4, 1960.
2. To the best of my knowledge, George Holland was born in July of 1962, making him an adult as of July of 1980.
3. I have been a Certified Public Accountant (CPA) since 1989.
4. I was employed as a Certified Public Accountant (CPA) in the City Auditor's Office for the City of Corpus Christi. I worked under George Holland, who served as the City Auditor.
5. My employment began on or about September 23, 2023, with an official hire date of October 25, 2023, and ended on July 5, 2025.
6. During my tenure with the City Auditor's Office, I was responsible for recovering approximately \$350,000 in

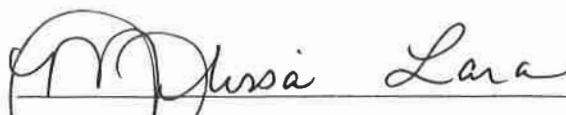
8. During my tenure with the City Auditor's Office, I worked in the Audit Department while the City of Corpus Christi conducted an investigation into allegations concerning George Holland's actions as City Auditor.
9. As part of that investigation, I was interviewed by an independent third party. During my interview, I confirmed allegations concerning a toxic work environment, a lack of credible leadership and essential management skills.
10. On the day before a Corpus Christi City council meeting at which allegations concerning George Holland were scheduled to be discussed, I received a telephone call from attorney Douglas Allison on or around August 26, 2024.
11. During one of multiple telephone conversations, Mr. Allison informed me that he was providing legal services to George Holland on a pro-bono basis in connection with the City's investigation into Mr. Holland.
12. During the investigation, I communicated with Mr. Allison by telephone and text message numerous times on or around August 26, 2024.
13. Mr. Allison contacted me by telephone after normal business hours, on or around August 26, 2024.
14. During our communications, Mr. Allison asked me if there was anything positive that I could say about my working relationship with George Holland that would help preserve George Holland's position as City Auditor.

Further affiant sayeth not.

Wendy Pullin

Affiant

IN WITNESS WHEREOF, I have hereunto subscribed my name
and affixed my official seal, this 06 day of August, 2026.


NOTARY PUBLIC

My commission expires: 01-15-2027

