

Dear Leon Valley City Council, as qualified electors of the City of Leon Valley, we, the undersigned, demand the removal of Leon Valley City Council Member, Donna Charles, and demand that the City Council to order and hold an election to determine where such officer shall be removed from office by recall pursuant to Article VI of the Home Rule Charter.

The grounds for removal, including the alleged action(s) and factual circumstance(s) surrounding such action(s) are:

1. Abdicating responsibilities of constituent services by failing to allow "Citizens to be Heard" during the special council meetings on July 2-3, 2019; July 18-19, 2019; August 8-9, 2019; August 13-14, 2019 AND voting to shorten, place excessive limitations, and censor constituents voices during "Citizens to be Heard" as evidenced by passage of the "Rules of Conduct and Decorum for Public Meetings" on September 17, 2019.
2. Voting to continue allow, via definitions of "junked vehicle" in Section 8.08.001 of the Leon Valley Code of Ordinances, police to continue overly zealous practice of towing motor vehicles with expired registrations only, including vehicles contained on private property. This was evidenced by councilmember Charles's vote to leave things "as-is" despite Councilor Bradshaw pointing out the inconsistencies with Leon Valley ordinances and Texas Law in the council meeting on June 18, 2019.
3. Malfeasance during the administrative hearing of Councilor Benny Martinez, including poor application of Leon Valley Home Rule Charter regarding allegations against accused council member; inability to differentiate what evidence should be considered subjective versus objective and thus, disregarded; improperly displaying partiality, and improperly allowing bias to dictate decision making, as evidenced by dialogue during deliberations on August 14, 2019 council meeting.
4. Failure to vote and appoint unbiased, disinterested, and qualified, "Designated Officer" in accordance with Section 1.04.006 of the Leon Valley Code of Ordinances, Section (1)(A)(2) during the months of April, May, June, July, or August 2019, deemed necessary to "promote neutrality in the process" of the formal 3-12 administrative hearing.
5. Defiance of citizens' ability to participate in fair democratic process as well as violation of Home Rule Charter Section 3.08 (E)(4) and Section 3.09 (E) by attempting to forfeit the seat of the duly elected official with only a total of three (3) members of City Council allowed to vote, with blatant disregard of the requirement that 2/3 vote of City Council must vote to forfeit the seat of a council member. The Leon Valley Home Rule Charter approved by voters of Leon Valley in 2017 defines City Council as five council members and a mayor--- contrary to the work crafting of "those who may deliberate and vote" intentionally placed into the ordinance containing the 3-12 procedures by the biased legal counsel retained by the City Manager. This was evidenced by the vote for forfeiture on August 14, 2019 council meeting and evidenced by vote on meeting of August 20, 2019 in which the vote was made for a non-duly elected official to take over Leon Valley Council Seat 4.
6. Spending over \$100,000 of taxpayer money and wasting thousands of hours of city staff, employee, and official's time in effort to cancel the votes of the citizens of Leon Valley, as evidenced by financial reports from agenda packets for council meetings in 2019, Attorney Ryan Henry's billing statements, content presented and discussed at 2019 special council meetings, and staff/ employee/ official presence at 2019 special council meetings.

Signature	Printed Name	DOB or Voter ID #	Residence Address	Date Signed
	Eugene Flores	[REDACTED]	[REDACTED]	[REDACTED] 78240 10/27/19
	Yvonne Hall	[REDACTED]	[REDACTED]	[REDACTED] 78240 10-27-19
	Luis Alvarado	[REDACTED]	[REDACTED]	[REDACTED] 78240 10/27/19
	Ricardo Morales	[REDACTED]	[REDACTED]	78240 10-27-19
	Herminilda Jaquin	[REDACTED]	[REDACTED]	78240 10/27/19
	YVONNE GARCIA	[REDACTED]	[REDACTED]	78240 10/27/19
	ELIZABETH OCHOA	[REDACTED]	[REDACTED]	78240 10/27/19
	Bernice Sanchez	[REDACTED]	[REDACTED]	78240 10/28/19
	Alicia A Craig	[REDACTED]	[REDACTED]	78240 10/28/19

STATE OF TEXAS
 COUNTY OF BEXAR

I, Erick Matte, being first duly sworn, on oath depose and say that I am one of the signers of the above petition, and that the statements made therein are true, and that each signature appearing thereto was made in my presence on the day and date it purports to have been made, and I solemnly swear that the same is the genuine signature of the person it purports to be.

Sworn and subscribed before me this 12th day of Nov 2019.

Signature

NOTARY PUBLIC, STATE OF TEXAS
 My commission expires: 05-22-2023

Dear Leon Valley City Council, as qualified electors of the City of Leon Valley, we, the undersigned, demand the removal of Leon Valley City Council Member, Donna Charles, and demand that the City Council to order and hold an election to determine where such officer shall be removed from office by recall pursuant to Article VI of the Home Rule Charter.

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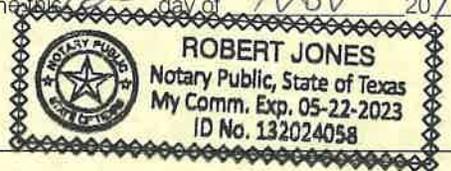
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1. <i>Jay C. Haynes</i>	JAY C. HAYNES	[REDACTED]	[REDACTED]	[REDACTED] 8240 10/31/19
2. <i>Linda Mueller</i>	LINDA MUELLER	[REDACTED]	[REDACTED]	[REDACTED] 78240 10/31/19
3. <i>Louros Bird</i>	LOUROS BIRD	[REDACTED]	[REDACTED]	[REDACTED] 78240 11/1/19
4. <i>Shirley J. Lutz</i>	Shirley J Lutz	[REDACTED]	[REDACTED]	78240 11/2/19
5. <i>Stephen Sperber</i>	Stephen Sperber	[REDACTED]	[REDACTED]	78238 11/2/19
6. <i>Crystal Sperber</i>	CRYSTAL SPERBER	[REDACTED]	[REDACTED]	78238 11/2/19
7. <i>Maria Collazo</i>	Maria Collazo	[REDACTED]	[REDACTED]	78238 11/2/19
8. <i>Aurelio R. Collazo</i>	Aurelio R. Collazo	[REDACTED]	[REDACTED]	78238 11-2-19
9. <i>Angela H. Valadez</i>	ANGELA H. VALADEZ	[REDACTED]	[REDACTED]	78238 11-2-19
10. <i>Amanda Costanzi</i>	AMANDA COSTANZI	[REDACTED]	[REDACTED]	78238 11/2/19

STATE OF TEXAS
COUNTY OF BEXAR

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Sworn and subscribed before me this 12th day of Nov, 2019.



Signature *Erick Matto*
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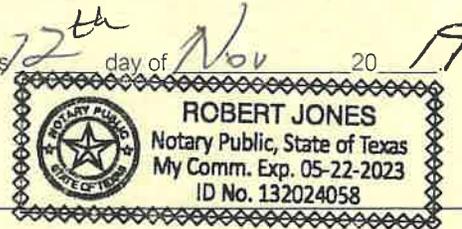
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Signature	Printed Name	DOB or Voter ID #	Residence Address	Date Signed
	Dora E Delgado	[REDACTED]	[REDACTED]	SATX 78240 10/5/19
	Carlos Delgado Jr.	[REDACTED]	[REDACTED]	S.A. TX 78240 10/6/19
	Carlos Delgado III	[REDACTED]	[REDACTED]	SA TX 78240 10/7/19
	Edward Estrada	[REDACTED]	[REDACTED]	78240 10/20/19
	Cathy Lewis	[REDACTED]	[REDACTED]	SA TX 78240 10/20/19
	Jeremy Lewis	[REDACTED]	[REDACTED]	SATX 78240 10/20/19
	Adrian Beltraz	[REDACTED]	[REDACTED]	78240 10/20/19
	Vanessa Bernal	[REDACTED]	[REDACTED]	78240 10/20/19
	PAUL G. OTTAVIO	1069426113	[REDACTED]	L.V. 78240 10-20-19
	JOYCE OTTAVIO	1069426121	[REDACTED]	LV 78240 10-20-19

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COUNTY OF BEXAR

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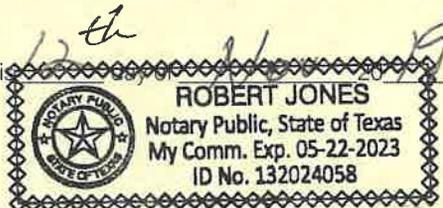
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Signature	Printed Name	DOB or Voter ID #	Residence Address	Date Signed
	BETTY Woodside Heyl		SA, TX 78240	23 OCT 19
	YOLANDA JAMES		78240 RD	23 OCT 19
	Roberto Garcia		78240 Rd	23 Oct 19
	Briana L. Garcia		78240	10/23/19
	Valerie Garcia		78240	10/23/19
	Aurora T. Garcia		78240 SA TX	10/23/19
	ELVIRA HERRERA		SA TX 78240	10-24-19
	Jennifer Key		SA TX 78240	10/25/19
	Carlos Vera		78238	10/26/19
	Darcy Vera		78238	10/26/19

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Sworn and subscribed before me this 13th day of October, 2019.



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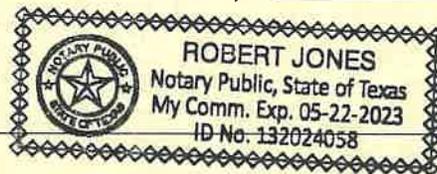
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	Roland Talamantes	[REDACTED]	[REDACTED]	78240 11/2/19
	Delaine Matos	[REDACTED]	[REDACTED]	78240 11/2/19
	Shania Meredith	[REDACTED]	[REDACTED]	78240 11/2/19
	Anna Hernandez	[REDACTED]	[REDACTED]	78240 11/2/19
	Chandra Wickham	[REDACTED]	[REDACTED]	78240 11/2/19
	Christian Zamora	[REDACTED]	[REDACTED]	78240 11/2/19
	Winona Wickham	[REDACTED]	[REDACTED]	78240 11/2/19
	Ralph Henriquez	[REDACTED]	[REDACTED]	78240 11/2/19
	Richard Yruegas	[REDACTED]	[REDACTED]	78240 11/3/19
	Nicholas Trumbly	[REDACTED]	[REDACTED]	78240 11-5-19

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	Luz M. Yruegas	[REDACTED]	[REDACTED]	78240 11/3/19
	Erika L. Yruegas	[REDACTED]	[REDACTED]	78240 11/3/19
	Ronald Garza	[REDACTED]	[REDACTED]	78240 11/5/19
	Christina Gonzalez	[REDACTED]	[REDACTED]	78240 11/3/19
	Argentina Espinoza	[REDACTED]	[REDACTED]	78240 11/3/19
	Louis Espinoza	[REDACTED]	[REDACTED]	78240 11/3/19
	Vicente J. Campos	[REDACTED]	[REDACTED]	78240 11/3/19
	Debbie Mann	[REDACTED]	[REDACTED]	78240 11/3/19
	Blanca Aguirre	[REDACTED]	[REDACTED]	78240 HT 11/3/19
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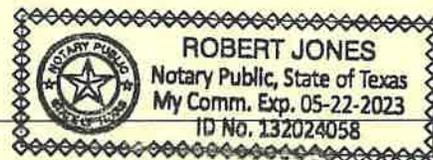
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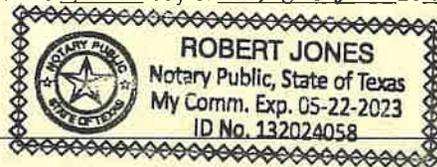
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Signature	Printed Name	DOB or Voter ID #	Residence Address	Date Signed
1. <i>R Saldana</i>	Robert Saldana	[REDACTED]	[REDACTED]	78240 10/28/19
2. <i>M Saldana</i>	Maricarmen Saldana	[REDACTED]	[REDACTED]	78240 10/29/19
3. <i>Linda Gieraghty</i>	Linda Gieraghty	[REDACTED]	[REDACTED]	78240 11/3/19
4. <i>Meri Ann Christopher</i>	Meri Ann Christopher	[REDACTED]	[REDACTED]	78240 11/3/19
5. <i>Jonathan Godsey</i>	Jonathan Godsey	[REDACTED]	[REDACTED]	78240 11/3/19
6. <i>Virginia Godsey</i>	Virginia Godsey	[REDACTED]	[REDACTED]	78240 11/3/19
7. <i>Leslie Bacon Knopf</i>	Leslie Bacon Knopf	[REDACTED]	[REDACTED]	78240 11/7/19
8. <i>Juan Gonzalez</i>	JUAN GONZALEZ	[REDACTED]	[REDACTED]	78240 11-8-19
9. <i>Richard Perce</i>	Richard Perce	[REDACTED]	[REDACTED]	78240 11/8/19
10. <i>Palmina Niblett</i>	PALMINA Niblett	[REDACTED]	[REDACTED]	78240 11-8-19

STATE OF TEXAS
COUNTY OF BEXAR

I, Erick Matto, being first duly sworn, on oath depose and say that I am one of the signers of the above petition, and that the statements made therein are true, and that each signature appearing thereto was made in my presence on the day and date it purports to have been made, and I solemnly swear that the same is the genuine signature of the person it purports to be.

Sworn and subscribed before me this 12th day of Nov 2019.



Signature *Erick Matto*

Robert Jones
NOTARY PUBLIC, STATE OF TEXAS
My commission expires: 05-22-2023

Dear Leon Valley City Council, as qualified electors of the City of Leon Valley, we, the undersigned, demand the removal of Leon Valley City Council Member, Donna Charles, and demand that the City Council to order and hold an election to determine where such officer shall be removed from office by recall pursuant to Article VI of the Home Rule Charter.

The grounds for removal, including the alleged action(s) and factual circumstance(s) surrounding such action(s) are:

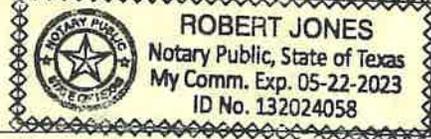
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Signature	Printed Name	DOB or Voter ID #	Residence Address	Date Signed
1. <i>Kaitlin M. Hassall</i>	Kaitlin Hassall	[REDACTED]	[REDACTED]	78238 11/9/19
2. <i>Sabrina G. Scrimpsner</i>	Sabrina Scrimpsner	[REDACTED]	[REDACTED]	78238 11/9/19
3. <i>Danon L. Hassall</i>	Danon L. Hassall	[REDACTED]	[REDACTED]	78238 11-9-19
4. <i>Don C. Hassall Jr</i>	Don C. Hassall Jr	[REDACTED]	[REDACTED]	78238 11-10-19
5. <i>Olivia Hassall</i>	Olivia Hassall	[REDACTED]	[REDACTED]	78238 11-10-19
6. <i>Daven Flores</i>	Daven Flores	[REDACTED]	[REDACTED]	78238 11-10-19
7. <i>Martin Gonzalez</i>	Martin Gonzalez	[REDACTED]	[REDACTED]	78238 11-11-19
8. <i>Joann Moore</i>	Joann Moore	[REDACTED]	[REDACTED]	78238 11-11-19
9. <i>Bob Moore</i>	Bob Moore	[REDACTED]	[REDACTED]	78238 11-11-19
10. <i>Marvin S. Boubel</i>	MARVIN S. Boubel	[REDACTED]	[REDACTED]	78238 11-11-19

STATE OF TEXAS
COUNTY OF BEXAR

I, Erick Matta, being first duly sworn, on oath depose and say that I am one of the signers of the above petition, and that the statements made therein are true, and that each signature appearing thereto was made in my presence on the day and date it purports to have been made, and I solemnly swear that the same is the genuine signature of the person it purports to be.

Sworn and subscribed before me this 13th day of Nov, 2019.



Signature *Erick Matta*

NOTARY PUBLIC, STATE OF TEXAS
My commission expires: 05-22-2023

Dear Leon Valley City Council, as qualified electors of the City of Leon Valley, we, the undersigned, demand the removal of Leon Valley City Council Member, Donna Charles, and demand that the City Council to order and hold an election to determine where such officer shall be removed from office by recall pursuant to Article VI of the Home Rule Charter,

The grounds for removal, including the alleged action(s) and factual circumstance(s) surrounding such action(s) are:

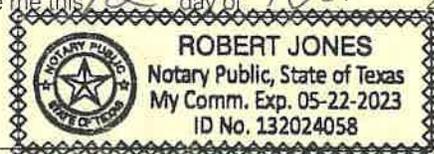
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Signature	Printed Name	DOB or Voter ID #	Residence Address	Date Signed
1. Carol A Cadena	CAROL A CADENA (Cadena)	[REDACTED]	[REDACTED]	78240 11-8-19
2. Dixie Cooks	Dixie Cooks	[REDACTED]	[REDACTED]	78238 11.09.19
3. Heather Wear	Heather Wear	[REDACTED]	[REDACTED]	78238 11.09.19
4. Matt Kimrey	Matt Kimrey	[REDACTED]	[REDACTED]	78238 11/9/19
5. Dan Gardner	Dan Gardner	[REDACTED]	[REDACTED]	78238 11/9/19
6. David Gardner	David Gardner	[REDACTED]	[REDACTED]	78238 11-9-19
7. Michael Gardner	Michael Gardner	[REDACTED]	[REDACTED]	78238 11-9-19
8. Brenda Dunkley	Brenda Dunkley	[REDACTED]	[REDACTED]	78238 11-9-19
9. W Dunkley	W Dunkley	[REDACTED]	[REDACTED]	78238 11-9-19
10. Lynette Brails	Lynette Brails	[REDACTED]	[REDACTED]	78238 11-9-19

STATE OF TEXAS
COUNTY OF BEXAR

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Sworn and subscribed before me this 12th day of Nov, 2019.



Signature [Signature]

[Signature]
NOTARY PUBLIC, STATE OF TEXAS
My commission expires: 05-22-2023

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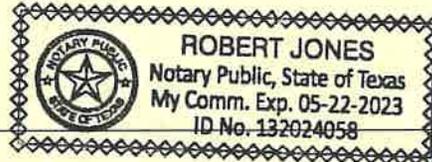
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Signature	Printed Name	DOB or Voter ID #	Residence Address	Date Signed
	Matthew Gonzalez	[REDACTED]	[REDACTED]	78238 11-10-19
	JULIO GOMEZ JR.	[REDACTED]	[REDACTED]	78238 11/10/19
	CHARLES WIMER	[REDACTED]	[REDACTED]	78238 11-10-19
	JIMMY D. BAKER	[REDACTED]	[REDACTED]	78238 11/10/19
	BERNICE DAVIS	[REDACTED]	[REDACTED]	78238 11/10/19
	MARIAN BOUBEL	[REDACTED]	[REDACTED]	78238 11-11-19
	JOSE V. CHAVARRIA	[REDACTED]	[REDACTED]	78238 11-11-19
	SANDRA P. CHAVARRIA	[REDACTED]	[REDACTED]	78238 11/11/19
	Troy Booker	[REDACTED]	[REDACTED]	78238 11/11/19
	Alexis Booker	[REDACTED]	[REDACTED]	SA TX 78238 11/10/19

STATE OF TEXAS
COUNTY OF BEXAR

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Sworn and subscribed before me this 12th day of Nov 2019.



Signature Erick Matta

NOTARY PUBLIC, STATE OF TEXAS

My commission expires: 05-22-2019 MJ
2023

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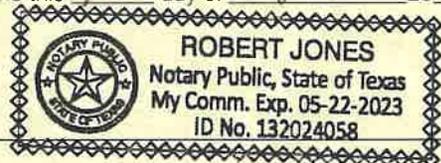
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Signature	Printed Name	DOB or Voter ID #	Residence Address	Date Signed
	Irving Washington	[REDACTED]	[REDACTED]	78238 11/9/19
	MARVIN W. JONES	[REDACTED]	[REDACTED]	78238 11/9/19
	Elaine C. Jones	[REDACTED]	[REDACTED]	78238 11/9/19
	Orlando Pios	[REDACTED]	[REDACTED]	78240 11/9/19
	Zeinab Alhili	12103139117	[REDACTED]	78238 11-9-19
	Wouroud Alhili	[REDACTED]	[REDACTED]	78238 11-9-19
	Bobetra AlRubei	[REDACTED]	[REDACTED]	78238 11-9-19
	Veronica Figueroa	[REDACTED]	[REDACTED]	78238 11-10-19
	Colby Figueroa	[REDACTED]	[REDACTED]	78238 11-10-19

STATE OF TEXAS
COUNTY OF BEXAR

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Signature Erick Matta
 Signature [Signature]
 NOTARY PUBLIC, STATE OF TEXAS
 My commission expires: 05-22-2023 2023 [Signature]

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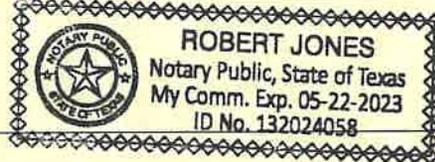
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Signature	Printed Name	DOB or Voter ID #	Residence Address	Date Signed
	HARRIET PARKS	[REDACTED]	[REDACTED]	78238 11/11/19
	Cecilia Trevino	[REDACTED]	[REDACTED]	78238 11-11-19
	CEVALLOS DAVID	[REDACTED]	[REDACTED]	(78238) 11-11-19
	Linda Cuallios	[REDACTED]	[REDACTED]	78238 11-11-19
	Elizabeth A. Sparrow	[REDACTED]	[REDACTED]	78238 11-11-19
	Sara Fields	[REDACTED]	[REDACTED]	78238 11-11-19
	Jessé J. Ortiz	[REDACTED]	[REDACTED]	78238 11-11-19
	Lisa Lashley	[REDACTED]	[REDACTED]	78238 11-11-19
	Robert Lashley	[REDACTED]	[REDACTED]	78238 11/11/19
10.				

STATE OF TEXAS
COUNTY OF BEXAR

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Robert Jones
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My commission expires: 05-22-2023

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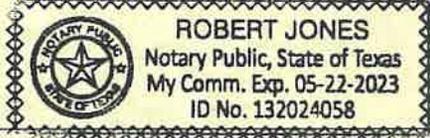
1. Abdicating responsibilities of constituent services by failing to allow "Citizens to be Heard" during the special council meetings on July 2-3, 2019; July 18-19, 2019; August 8-9, 2019; August 13-14, 2019 AND voting to shorten, place excessive limitations, and censor constituents voices during "Citizens to be Heard" as evidenced by passage of the "Rules of Conduct and Decorum for Public Meetings" on September 17, 2019.
2. Voting to continue allow, via definitions of "junked vehicle" in Section 8.08.001 of the Leon Valley Code of Ordinances, police to continue overly zealous practice of towing motor vehicles with expired registrations only, including vehicles contained on private property. This was evidenced by councilmember Charles's vote to leave things "as-is" despite Councilor Bradshaw pointing out the inconsistencies with Leon Valley ordinances and Texas Law in the council meeting on June 18, 2019.
3. Malfeasance during the administrative hearing of Councilor Benny Martinez, including poor application of Leon Valley Home Rule Charter regarding allegations against accused council member; inability to differentiate what evidence should be considered subjective versus objective and thus, disregarded; improperly displaying partiality, and improperly allowing bias to dictate decision making, as evidenced by dialogue during deliberations on August 14, 2019 council meeting.
4. Failure to vote and appoint unbiased, disinterested, and qualified, "Designated Officer" in accordance with Section 1.04.006 of the Leon Valley Code of Ordinances, Section (1)(A)(2) during the months of April, May, June, July, or August 2019, deemed necessary to "promote neutrality in the process" of the formal 3-12 administrative hearing.
5. Defiance of citizens' ability to participate in fair democratic process as well as violation of Home Rule Charter Section 3.08 (E)(4) and Section 3.09 (E) by attempting to forfeit the seat of the duly elected official with only a total of three (3) members of City Council allowed to vote, with blatant disregard of the requirement that 2/3 vote of City Council must vote to forfeit the seat of a council member. The Leon Valley Home Rule Charter approved by voters of Leon Valley in 2017 defines City Council as five council members and a mayor--- contrary to the word crafting of "those who may deliberate and vote" intentionally placed into the ordinance containing the 3-12 procedures by the biased legal counsel retained by the City Manager. This was evidenced by the vote for forfeiture on August 14, 2019 council meeting and evidenced by vote on meeting of August 20, 2019 in which the vote was made for a non-duly elected official to take over Leon Valley Council Seat 4.
6. Spending over \$100,000 of taxpayer money and wasting thousands of hours of city staff, employee, and official's time in effort to cancel the votes of the citizens of Leon Valley, as evidenced by financial reports from agenda packets for council meetings in 2019, Attorney Ryan Henry's billing statements, content presented and discussed at 2019 special council meetings, and staff/ employee/ official presence at 2019 special council meetings.

Signature	Printed Name	DOB or Voter ID #	Residence Address	Date Signed
1. <i>Kevin B. Cooley</i>	Kevin B. Cooley	[REDACTED]	[REDACTED]	Leon Valley, TX 78238 11/1/19
2. <i>Brigid Cooley</i>	Brigid Cooley	[REDACTED]	[REDACTED]	Leon Valley, TX 78238 11/1/19
3. <i>Karol Cooley</i>	Karol Cooley	[REDACTED]	[REDACTED]	Leon Valley, TX 78238 11/2/19
4. <i>Rebecca T. Cooley</i>	Rebecca T. Cooley	[REDACTED]	[REDACTED]	Leon Valley, TX 78238 11/2/19
5. <i>Cecilia R. Ho</i>	Cecilia R. Ho	[REDACTED]	[REDACTED]	78238 11/12/19
6. <i>Thomas B Bowers</i>	THOMAS B BOWERS	[REDACTED]	[REDACTED]	78238 11/12/19
7. <i>Hertlinda Latin</i>	Hertlinda Latin	[REDACTED]	[REDACTED]	78238 11-12/19
8. <i>Daniel Sezik</i>	DANIEL SEZIK	[REDACTED]	[REDACTED]	78238 11-12/19
9. <i>Ricardo Olivari</i>	RICARDO OLIVARI	[REDACTED]	[REDACTED]	78234 11/12/19
10.				

STATE OF TEXAS
COUNTY OF BEXAR

I, Erick Mata, being first duly sworn, on oath depose and say that I am one of the signers of the above petition, and that the statements made therein are true, and that each signature appearing thereto was made in my presence on the day and date it purports to have been made, and I solemnly swear that the same is the genuine signature of the person it purports to be.

Sworn and subscribed before me this 12th day of Nov 2019.



Signature *Erick Mata*

Robert Jones
NOTARY PUBLIC, STATE OF TEXAS
My commission expires: 05-22-2023