



**OFFICE OF INTERNAL AUDIT**  
*City of Albuquerque*

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**TO:** Ethan Watson, City Clerk, Office of the City Clerk

**FROM:** Marisa Vargas, Interim City Auditor, Office of Internal Audit

**SUBJECT:** Final Memorandum –  
Qualifying Contributions Examination (No. 23-403)

**DATE:** July 21, 2023

**Introduction**

On December 5, 2022, Albuquerque's City Council unanimously passed Bill O-22-40<sup>1</sup>, amending Articles, XII, XIII, And XVI of the City Charter relating to Elections and Public Campaign Financing. The ordinance, which took effect on December 27, 2022, requires the City of Albuquerque's (City) Office of Internal Audit (OIA) to conduct audits on a percentage of qualifying contributions submitted by candidates to the City Clerk's Office throughout the qualifying period.

Each qualifying contribution and related receipt filed with the City Clerk, by or on behalf of a political candidate, is subject to examination to determine whether the submittal conforms to City and State law and to the truth (Articles XII, XIII, and XVI of the City Charter Relating to Elections and Public Campaign Financing). These examinations, often referred to as audits, are performed by the City's Office of Internal Audit, whose staff are subject to §2-10-5 of the Accountability in Government Ordinance (prohibiting engaging in partisan political activities or the political affairs of the City).

In order to qualify to receive public campaign financing, an applicant candidate for mayor is required to obtain qualifying contributions from a minimum of 1 percent of registered City voters and an applicant candidate for council is required to obtain qualifying contributions from a minimum of 1 percent of the City voters registered in the district that the applicant candidate desires to represent.

The scope of this examination was the five-week qualifying contribution period of June 5, 2023 through July 10, 2023 for the city council race. Council Districts 2, 4, 6, and 8 were elected for the 2023 Regular Location Election. Of the 11 candidates participating in public campaign financing, 11 were examined.

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<sup>1</sup> Amending Articles XII, XIII, and XVI of the City Charter Relating to Elections and Public Campaign Financing.



## OFFICE OF INTERNAL AUDIT *City of Albuquerque*

### **Background**

Qualifying contributions can be submitted electronically through a website managed by the Office of the City Clerk, or by paper-qualifying contribution signature booklets. Registered voters are only allowed to donate once to the same candidate, either electronically or physically on a paper form, not both. In order for an electronic or physical qualifying contribution signature to be placed in an “accepted” state, the individual must meet certain criteria, such as be a registered voter in the City of Albuquerque, not be a convicted felon, not be deceased, legibly complete and sign the qualifying contribution receipt of their own free will and contribute \$5.00.

Because electronic contributions are automatically verified at the time of submittal via an application programming interface through the Secretary of State’s voter registration database, the Office of Internal Audit’s examination only included paper-qualifying contribution receipts submitted by applicant candidates during the qualifying period.

The books contain three pages for each receipt: the pink page is the contributor’s receipt, the white original is for the City Clerk, and the yellow is the candidate’s copy. Each page contains: the name of the candidate, the name and home address of the registered voter, the registered voter’s signature; and the representative’s name and signature. Applicant candidates must obtain books from the City Clerk and they, or their representative, must sign an Acknowledgement of Receipt for the number of books received. Applicant candidates shall submit books back to the Clerk with original white pages intact. All books must be returned by the end of the qualifying period, though candidates should return completed books on Tuesdays by noon, so that the Clerk’s office can verify contributions on a rolling basis.



**OFFICE OF INTERNAL AUDIT**  
*City of Albuquerque*

**Results**

The below table represents all samples verified for each respective candidate.

Candidate Name	District	Samples Verified <sup>2</sup>					Total
		Week 1	Week 2	Week 3	Week 4	Week 5	
Naranjo-Lopez	2	3	5	3	2	2	15
Baca	2	5	5	5	0 <sup>3</sup>	5	20
Gonzalez	2	5	5	4	2	3	19
Bassan	4	5	4	5	3	2	19
Otero	6	5	4	4	1	3	17
Hoehn	6	5	5	4	0 <sup>4</sup>	0	14
Greene	6	5	3	4	2	1	15
Alonzo	6	5	4	3	1	0 <sup>5</sup>	13
Rogers	6	5	4	3	2	1	15
Lechuga-Tena	8	6	6	4	3	2	21
Champine	8	6	6	5	3	2	22
<b>Total</b>		<b>55</b>	<b>51</b>	<b>44</b>	<b>19</b>	<b>21</b>	<b>190</b>

Overall, out of a total of 211 samples randomly selected, 190 or 90 percent were verified through the efforts of 373 attempts.

Auditors made three attempts to contact the remaining 21 over different days and weeks, however, these individuals either did not answer the door to their residence or attempt to contact

<sup>2</sup> Per the 2023 Regulations of the Albuquerque City Clerk, Part 11, Rehabilitation of Petitions Signatures and QCs, Section 2, each candidate, if applicable, was given the opportunity to rehabilitate any qualifying contribution that auditors observed to be questionable. It should be noted that two of these instances did occur with one candidate and once rehabilitated, no other issues were present with those samples.

<sup>3</sup> This candidate did not have any paper-qualifying contributions to select from, thereby, increasing their weekly sample in the following week.

<sup>4</sup> This candidate shifted from public campaign financing to private.

<sup>5</sup> This candidate dropped from the city council race.



**OFFICE OF INTERNAL AUDIT**  
*City of Albuquerque*

OIA for verification. Due to the deadline of this examination, OIA did not have the flexibility to make any additional attempts to contact the remaining samples or select replacement samples.

No other abnormalities or anomalous activity was identified.

**Audit Examination Methodology**

For each week during the five-week period, OIA selected a percentage<sup>6</sup> of paper-qualifying contributions that were verified by the City Clerk based on the week's submittal for each applicant candidate.

Teams of two staff visited the home address listed on the qualifying contribution receipt for the sample of contributions selected for examination.

Each individual (contributor) was asked questions to determine the following:

- a) Verified the contributor's name
- b) Verified the contributor lives at the address listed on the paper-qualifying contribution
- c) Determined the validity of the contributor's signature
- d) Ensured the contributor themselves provided the \$5 qualifying contribution

Auditors made three attempts to verify the selected paper-qualifying contributions. If attempts were unsuccessful in the earlier weeks for reasons such as the individual did not answer the door to their residence or if the individual resided in a gated community that could not be accessed, auditors selected replacement samples for verification based on the same parameters. Auditors also placed custom doorknob hangers with call back information on residences should individuals verify qualifying contributions via telephone.

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<sup>6</sup> Percentages differentiate based on qualifying contribution thresholds specific to each unique district.



**OFFICE OF INTERNAL AUDIT**  
*City of Albuquerque*

**Sampling Overview**

The required sample for each applicant candidate was not to exceed 5 percent of the minimum qualifying contributions required in the candidate's district. See details below:

**Proposed Sampling Plan per Candidate and District**

<b>Candidate Name</b>	<b>Race</b>	<b>District Number</b>	<b>QC Threshold</b>	<b>5% of QC Threshold</b>	<b>Scheduled Sample</b>
Loretta Naranjo-Lopez	City Council	2	381	19	20
Joaquin Baca	City Council	2	381	19	20
Moises Gonzalez	City Council	2	381	19	20
Brook Bassan	City Council	4	403	20	21
Abel Otero	City Council	6	333	17	18
Jeff Hoehn	City Council	6	333	17	18
Kristin Greene	City Council	6	333	17	18
Jonathan Alonzo	City Council	6	333	17	18
Nichole Rogers	City Council	6	333	17	18
Idalia Lechuga-Tena	City Council	8	446	22	23
Daniel Champine	City Council	8	446	22	23
<b>Total</b>				<b>206</b>	<b>217</b>

While OIA made these efforts to expand the overall sample size by 5 percent during Week 4 and Week 5 due to resource availability, one candidate shifted from public campaign financing to private and another dropped from the city council race. See a breakdown of weekly sample selections below:



**OFFICE OF INTERNAL AUDIT**  
*City of Albuquerque*

**Actual Weekly Sample Selection Overview<sup>7</sup>**

<b>Candidate Name</b>	<b>District Number</b>	<b>Week 1</b>	<b>Week 2</b>	<b>Week 3</b>	<b>Week 4</b>	<b>Week 5</b>	<b>Total</b>
Loretta Naranjo-Lopez	2	5	6	4	2	3	20
Joaquin Baca	2	5	5	5	0	5	20
Moises Gonzalez	2	5	5	5	2	3	20
Brook Bassan	4	5	5	5	3	3	21
Abel Otero	6	5	4	4	2	3	18
Jeff Hoehn	6	5	5	4	0	0	14
Kristin Greene	6	5	5	4	2	2	18
Jonathan Alonzo	6	5	5	4	2	0	16
Nichole Rogers	6	5	5	4	2	2	18
Idalia Lechuga-Tena	8	6	6	5	3	3	23
Daniel Champine	8	6	6	5	3	3	23
<b>Total</b>		<b>57</b>	<b>57</b>	<b>49</b>	<b>21</b>	<b>27</b>	<b>211</b>

<sup>7</sup> The total minimum per district is divided by four to arrive at a sample number needed per week per candidate. Weeks 3– 5 then had the quarter amount subdivided to spread out the average to arrive at the total sample numbers.