

CITY OF ALBUQUERQUE

BOARD OF ETHICS AND CAMPAIGN PRACTICES

NERI HOLGUIN,

Complainant,

v.

CASE NO. BOE 01-2021

MANUEL GONZALES, III,

Respondent.

COMPLAINANT'S WITNESS LIST

Neri Holguin, by and through her counsel of record, provides the following list of witnesses she may elicit testimony from, either in person at the July 16, 2021 hearing or by lawful, sworn declaration. Given the ongoing nature of the investigation into Mr. Gonzales's willful submission of Fraudulent Qualifying Contributions, Complainant reserves the right to supplement this list as needed.

1. Heidi Brooks

Ms. Brooks is expected to testify as to how she learned that Mr. Gonzales had submitted Fraudulent Qualifying Contributions.

2. Neri Holguin

Ms. Holguin is expected to testify as to how she learned that Mr. Gonzales had submitted Qualifying Contributions, the investigation she conducted, and her campaign's practices for ensuring that contributions are collected in accordance with all governing laws and regulations.

3. Dean Zantow

Mr. Zantow is expected to testify in accordance with the allegations in the Complaint and his previously submitted statement.

4. Kari Brandenburg

Ms. Brandenburg is expected to testify regarding her observations at the May 27, 2021 meeting of the Salvation Army Advisory Board.

5. Other Members of the Salvation Army Advisory Board

Other members of the Salvation Army Board, and/or other individuals who attended the May 27, 2021 meeting of the Salvation Army Advisory Board.

6. Manuel Gonzales III

Mr. Gonzales is expected to testify regarding the events that occurred during the meeting of the Salvation Army Advisory Board.

7. Sid Covington

Mr. Covington is expected to testify regarding the events that occurred during the meeting of the Salvation Army Advisory Board.

8. Any witnesses listed by the Respondent.

9. Any witnesses necessary to provide rebuttal testimony.

Respectfully submitted,

KEEFE LAW FIRM

By: /s/ Lauren Keefe

Lauren Keefe

P.O. Box 40693

Albuquerque, NM 87196-0693

(505) 307-3447

keefelawoffice@gmail.com

Attorney for Complainant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 2nd day of July, 2021, the foregoing was sent via email to ewatson@cabq.gov, Aschultz@rodey.com, and carter@harrisonhartlaw.com.

KEEFE LAW FIRM

By: /s/ Lauren Keefe

Lauren Keefe