

CITY OF ALBUQUERQUE

BOARD OF ETHICS AND CAMPAIGN PRACTICES

NERI HOLGUIN,

Complainant,

v.

CASE NO. BOE 02-2021

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 22, 2021 hearing or by lawful, sworn declaration. Given the ongoing nature of the investigation into the misconduct of the Gonzales Campaign, Complainant reserves the right to supplement this list as needed.

1. Frances Flores

Ms. Flores is expected to testify regarding her examination of Qualifying Contribution acknowledgement forms submitted by the Gonzales Campaign.

2. Chris Rocha

Mr. Rocha is expected to testify regarding his examination of Qualifying Contribution acknowledgement forms submitted by the Gonzales Campaign.

3. Neri Holguin

Ms. Holguin is expected to testify regarding the allegations of the Complaint and her examination of Qualifying Contribution acknowledgement forms submitted by the Gonzales Campaign.

4. David Keylon

Mr. Keylon is expected to testify regarding his investigation into the allegations in the Complaint and his contact with individuals whose names appear on acknowledgement forms submitted by the Gonzales Campaign.

5. John Cordova

Mr. Cordova is expected to testify regarding his investigation into the allegations in the Complaint and his contact with individuals whose names appear on acknowledgement forms submitted by the Gonzales Campaign.

6. Jack Blair

Mr. Blair is expected to testify regarding his investigation into the allegations in the Complaint and his contact with individuals whose names appear on acknowledgement forms submitted by the Gonzales Campaign.

7. Laurie Hoeltzel, PhD

Ms. Hoeltzel is a forensic document examiner. She is expected to offer opinions based on her examination of the signatures appearing on Qualifying Contribution acknowledgement forms submitted by the Gonzales Campaign.

8. Jan Wright

Ms. Wright is expected to testify regarding the authenticity of the signature appearing on the Qualifying Contribution acknowledgement form submitted in the name of her mother, Dorothy Wright.

9. Charles Cox

Mr. Cox is expected to testify regarding the authenticity of the signature appearing on a Qualifying Contribution acknowledgement form submitted in his name.

10. Joylene Cox

Ms. Cox is expected to testify regarding the authenticity of the signature appearing on a Qualifying Contribution acknowledgment form submitted in her name.

11. Other Persons Identified on Qualifying Contribution Cards

Other individuals identified on the acknowledgment forms for the Qualifying Contribution Cards submitted by the Gonzales Campaign are expected to testify regarding the authenticity of the signatures appearing on those forms.

12. Any witnesses listed by the Respondent.
13. 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 8th 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