

CITY OF ALBUQUERQUE

BOARD OF ETHICS AND CAMPAIGN PRACTICES

NERI HOLGUIN,

Complainant,

v.

CASE NO. BOE 02-2021

MANUEL GONZALES, III,

Respondent.

**COMPLAINANT'S AMENDED LIST OF ISSUES TO BE CONSIDERED
BY THE BOARD OF ETHICS AND CAMPAIGN PRACTICES**

Neri Holguin, by and through her counsel of record, provides the following list of issues to be considered by the Board of Ethics and Campaign Practices at the hearing on September 10, 2021:

1. Whether Manuel Gonzales III submitted Qualifying Contribution receipts that were not signed by the contributors, in violation of Section 3(P) of the Open and Ethical Election Code and Part(C)(6) of the 2021 Regulations of the Albuquerque City Clerk for the Open and Ethical Elections Code.

2. Whether Manuel Gonzales III violated the OEEC Regulations Part (C)(6) by submitting Qualifying Contributions in which the identified contributors were not the actual source of the contribution.

3. Whether Manuel Gonzales III violated the 2021 Regulations of the Albuquerque City Clerk for the Election Code Part I(1) by making contributions in the name of persons who were not the actual source of funds for the contributions.

4. Whether, pursuant to Section 4(G) of the Rules and Regulations of the Board of Ethics and Campaign Practices, the Board should issue a public reprimand to Manuel Gonzales III.

5. Whether, pursuant to Section 4(G) of the Rules and Regulations of the Board of Ethics and Campaign Practices, the Board should issue a fine to Manuel Gonzales III.

6. To the extent the Board deems necessary or appropriate, whether the Board should make any findings required under Part(C)(15)(a) of the OEEC Regulations.

7. To the extent the Board deems necessary or appropriate, whether the Board should make any findings required under Part(C)(17) of the OEEC Regulations.

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 31st day of August, 2021, the foregoing was sent via email to ewatson@cabq.gov, mdiemer@cabq.gov, Aschultz@rodey.com, carter@harrisonhartlaw.com and daniel@harrisonhartlaw.com.

KEEFE LAW FIRM

By: /s/ Lauren Keefe
Lauren Keefe