

CITY OF ALBUQUERQUE

BOARD OF ETHICS AND CAMPAIGN PRACTICES

NERI HOLGUIN,

Complainant,

v.

CASE NO. BOE 01-2021

MANUEL GONZALES, III,

Respondent.

REQUEST FOR REFERRAL TO THE OFFICE OF INSPECTOR GENERAL

Neri Holguin, by and through her counsel of record, hereby requests that the Board of Ethics and Campaign refer this matter to the City of Albuquerque's Office of Inspector General so that it can investigate the allegations in Ms. Holguin's Complaint and the practices employed by Mr. Gonzales when collecting Qualifying Contributions. Ms. Holguin notes that in a prior matter that also involved allegations that a candidate submitted Fraudulent Qualifying Contributions, BOE 02-2017, the Board asked the Office of Inspector General to investigate the allegations and the candidate's collection practices. Ms. Holguin believes that a similar investigation would assist the Board in this matter and that the Office of Inspector General, as a neutral body, is best suited to investigate whether Mr. Gonzales has engaged in pattern and practice of submitting Fraudulent Qualifying Contributions. Ms. Holguin therefore requests that the Board ask the Office of Inspector General to conduct an investigation before the evidentiary hearing scheduled in this matter.

Respectfully submitted,

KEEFE LAW FIRM

By: /s/ Lauren Keefe

Lauren Keefe

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Attorney for Complainant

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 16th day of June, 2021, the foregoing was sent via email to ewatson@cabq.com, Aschultz@rodey.com, and manny@mannyforabq.com.

KEEFE LAW FIRM

By: /s/ Lauren Keefe

Lauren Keefe