

OFFICE OF INTERNAL AUDIT

City of Albuquerque

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

FROM: Marisa C. Vargas, City Auditor, Office of Internal Audit

SUBJECT: Final Memorandum –
Qualifying Contributions Examination (No. 25-403)

DATE: October 14, 2025

Introduction

On December 5, 2022, the Albuquerque City Council unanimously approved Bill O-22-40, amending Articles XII, XIII, and XVI of the City Charter regarding elections and public campaign financing. The ordinance, which took effect on December 27, 2022, requires the City of Albuquerque's Office of Internal Audit (OIA) to audit a percentage of qualifying contributions submitted by candidates to the Office of the City Clerk (City Clerk) during the qualifying period.

Each qualifying contribution, along with its corresponding receipt filed with the City Clerk by or on behalf of a candidate, is subject to review to verify compliance with City and State law, as well as the accuracy of the submission (Articles XII, XIII, and XVI of the City Charter). These reviews are conducted by the OIA. Staff members performing these reviews must comply with §2-10-5 of the Accountability in Government Ordinance, which prohibits participation in partisan political activities or involvement in the political affairs of the City.

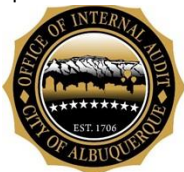
To qualify for public campaign financing, a candidate for mayor must obtain qualifying contributions from a minimum of one percent of registered City voters. A candidate for City Council must obtain qualifying contributions from a minimum of one percent of registered voters within the district they seek to represent.

The scope of this examination covered the review and verification of qualifying contributions submitted for the 2025 Regular Local Election, which included the mayoral and city council races in Districts 1, 3, 5, 7, and 9. The mayoral qualifying period extended over nine weeks, from April 19 through June 21, 2025, while the city council qualifying period covered five weeks, from June 2 through July 7, 2025.¹

In total, 22 candidates applied for public campaign financing, all of whom were included in this examination. This group consisted of eight mayoral candidates and 14 city council candidates. Of these, seven candidates ultimately qualified for public financing, totaling \$1,076,317.

The following table summarizes the maximum spending limits established for participating candidates

¹ For city council candidates, July 7, 2025, fell on a Monday, extending into a sixth calendar week but serving as the final date to submit qualifying contributions. That is why this review later records six (calendar) weeks of data collection period for what is officially five (seven-day) weeks of qualifying period.



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in the 2025 Regular Local Election.

Figure 1. Public Financing Spending Limits – 2025 Regular Location Election

Spending Limits ²	
Mayor	\$755,946.00
District 1	\$56,312.00
District 3	\$41,865.00
District 5	\$55,719.00
District 7	\$58,205.00
District 9	\$51,958.00

Background

Qualifying contributions may be submitted either electronically through a website managed by the City Clerk or by paper (in the form of qualifying contribution signature booklets). Registered voters may contribute only once to the same candidate, either electronically or by paper form, but not both. In order to be accepted by the City Clerk, a qualifying contribution must meet the following requirements: the contributor must be a registered voter in the City of Albuquerque; the contributor must not be a convicted felon or deceased; and the contributor must personally, legibly complete and sign the contribution receipt of their own free will and contribute \$5.00.

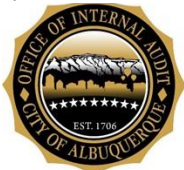
Each qualifying contribution signature booklet includes three copies of every receipt: the pink copy is for the contributor, the white original is for the City Clerk, and the yellow copy is for the candidate to keep. Each page documents the candidate's name, the contributor's name and home address, the contributor's signature, and name and signature of the representative who collected the contribution. Candidates must obtain booklets directly from the City Clerk and sign an acknowledgement of receipt for the number issued. At the close of the qualifying period, all booklets must be returned with the original white pages intact. While the official due date is the end of the qualifying period, candidates are encouraged to return completed booklets by noon each Tuesday to allow the Clerk's office to verify contributions on a rolling basis.

Electronic contributions are automatically verified at the time of submission through an application programming interface connected to the Secretary of State's voter registration database. Because paper contributions involve manual handling, multiple signatories, and a greater potential for error, OIA originally limited its examinations to paper qualifying contributions. However, during this examination, the City Clerk requested that the scope also include electronic qualifying contributions, as discussed in the following section.

Objectives and Scope

The purpose of this engagement was to determine whether qualifying contributions and related receipts filed with the City Clerk conform to City and State law, and are truthful, in accordance with Articles XII, XIII, and XVI of the City Charter Relating to Elections and Public Campaign Financing. Each week, OIA sampled a portion of qualifying contributions verified by the City Clerk submitted for the 2025 Regular Local Election. Two-person teams visited contributors' homes to confirm name, residency, signature validity, and that the \$5 contribution was

² Actual distribution amounts may be slightly reduced due to swipe fees and adjustments for seed money contributions.



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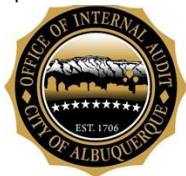
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personally provided. Up to three attempts were made, with doorknob hangers left for follow-up and replacement samples selected if needed. For paper receipts, phone calls alone were not sufficient and required in-person verification.

Verification of electronic contributions followed a slightly different process. Home visits were still conducted to verify contributor information; however, because no physical receipt exists and electronic contributions are subject to automated verification against the Secretary of State's voter registration database at the time of submission, OIA was also able to confirm them by telephone using Clerk data and Secretary of State voter registration records. Including electronic submissions ensured candidates who did not have paper receipts were represented in the weekly reviews. Because paper contributions were considered higher risk (since they require manual handling and multiple signatories), OIA initially sampled only paper contributions. However, midway through data collection, the City Clerk recommended that 25 percent of all contributions sampled should be collected from electronic contributions to ensure adequate coverage. OIA adopted this approach. This adjustment occurred midway through the qualifying period – specifically, during the seventh week for mayoral candidates and the first week for city council candidates – after which both paper and electronic contributions were incorporated into the review. As a result, this review's data collection for electronic contributions only sampled those that were made after this adjustment occurred on June 9, 2025.

Conclusion

OIA's verification procedures provided reasonable assurance over the accuracy of qualifying contributions and the integrity of public financing awards. Overall, of the 772 samples randomly selected, 645 or 84 percent were verified through the efforts of over 1,800 attempts. These efforts demonstrate OIA's continued commitment to ensuring transparency, accountability, and public confidence in the administration of the City's public financing program as administered by the City Clerk.



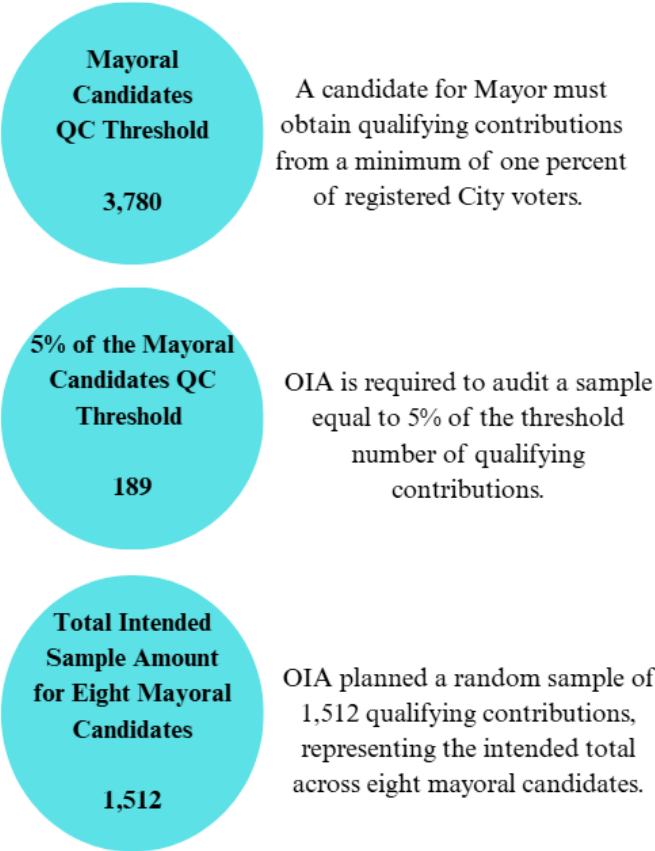
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RESULTS

Mayoral Candidates

The visuals below present the intended 5% random sample of contributions for each of the eight mayoral candidates. The actual number reviewed differs, since seven candidates either did not remain in the race or shifted from public to private financing, in which case their qualifying contributions were no longer within the scope of this review. These totals include both electronic³ and paper contributions.

Figure 2. Calculation of Total Intended Sample Number for Mayoral Candidates



³ Electronic qualifying contributions apply to only one mayoral candidate.

Figure 3. Total Intended Samples by Mayoral Candidate

Mayoral Candidate Name	Qualifying Contributions Intended Random Sample
Adeo Herrick	189
Alex Uballez	189
Alpana Adair	189
Darren White	189
Eddie Varela	189
Louie Sanchez	189
Patrick Sais	189
Timothy Keller	189
Total	1,512

Out of an intended sample of 1,512 qualifying contributions that OIA planned to randomly select across eight mayoral candidates, seven candidates either withdrew from the race or shifted from public to private financing. As a result, the final number of qualifying contributions sampled was significantly reduced to 531.

Out of the actual total of 531 samples randomly selected, OIA successfully contacted the contributors of 450 samples, verifying contributions totaling \$2,230 without issue. No instances of non-compliance or irregularities were identified for any of the eight mayoral candidates. The visuals below present the number of samples verified.

Figure 4. Paper vs. Electronic Verified Samples by Mayoral Candidate

Mayoral Candidate Name	Number of Samples Verified		Value of Contributions Verified
	Paper	Electronic	
Adeo Herrick ⁴	0	0	\$0.00
Alex Uballez ⁴	24	0	\$120.00
Alpana Adair ⁴	5	0	\$5.00
Darren White ⁴	44	0	\$220.00
Eddie Varela ⁴	10	0	\$50.00
Louie Sanchez ⁴	122	0	\$610.00
Patrick Sais ⁴	0	0	\$0.00
Timothy Keller	230 ⁵	15	\$1,225.00
Total	435	15	\$2,230.00

⁴ Candidate withdrew from the mayoral race or shifted from public to private financing.

⁵ Although 189 samples were intended per the necessary percentage of qualifying contributions needed, replacement samples and subsequent contributor callbacks increased the total verified to 230.

City Councilor Candidates

The visuals below present the intended 5% random sample of contributions for each of the 14 city councilor candidates. The actual number reviewed differs, since eight candidates did not remain in the race or shifted from public to private financing.

Figure 5. Calculation of Total Intended Sample Numbers for City Councilor Candidates

District Number	Qualifying Contribution Threshold	5% of Qualifying Contributions Threshold
District 1	450	23
District 2	335	17
District 3	446	22
District 4	466	23
District 5	416	21
Total	2,113	106

- A candidate for City Council must obtain qualifying contributions from a minimum of one percent of registered voters within the district they seek to represent.
- OIA is required to audit 5% of the qualifying contribution thresholds.
- Midway through the process, on June 9, 2025, the City Clerk directed OIA to begin including electronic contributions as 25 percent of all subsequently sampled qualifying contributions. Paper contributions still make up the remaining 75 percent of all subsequently sampled contributions because they are considered at higher risk for error due to manual collection and multiple signatories.

Figure 6. Total Intended Samples by City Councilor Candidate

City Councilor Candidate Name	Qualifying Contributions Intended Random Sample	
	Paper	Electronic
Ahren Griego	17	6
Daniel Leiva	17	6
Joshua Neal	17	6
Stephanie Telles	17	6
Christoper Sedillo	13	4
Klarissa Pena	13	4
Natalia Saldana	13	4
Teresa Garcia	13	4
Dan Lewis	17	6
Tammy Fiebelkorn	17	6
Anami Dass	16	5
Byron Powdrell	16	5
Colton Newman	16	5
Renee Grout	16	5
Totals	218	72
	290	

Out of an intended sample of 290 qualifying contributions that OIA planned to randomly select across 14 city councilor candidates, eight candidates either withdrew from the race or shifted from public to private financing. As a result, the final number of qualifying contributions sampled was significantly reduced to 241.

Out of a total of 241 samples randomly selected, OIA successfully made contact with the contributors of 195 samples, verifying contributions totaling \$975. No instances of non-compliance or irregularities were identified for 13 candidates; however, issues of non-compliance were identified for one candidate as detailed hereafter. The visuals below present the number of samples verified for each of the 14 city councilor candidates.

Figure 7. Verified Samples by City Councilor Candidate

City Councilor Candidate Name	Number of Samples Verified		Value of Contributions Verified
	Paper	Electronic	
Ahren Griego	17	9	\$130.00
Anami Dass ⁶	0	0	\$0.00
Byron Powdrell ⁶	0	0	\$0.00
Christopher Sedillo ⁶	2	4	\$30.00
Colton Newman ⁶	0	1	\$5.00
Dan Lewis	19	6	\$125.00
Daniel Leiva	25	11	\$180.00
Joshua Neal ⁶	0	6	\$30.00
Klarissa Pena	17	7	\$120.00
Natalia Saldana ⁶	0	0	\$0.00
Renee Grout	17	7	\$120.00
Stephanie Telles ⁶	10	3	\$65.00
Tammy Fiebelkorn	17	8	\$125.00
Teresa Garcia ⁶	3	6	\$45.00
Total	127	68	\$975.00

Issues Identified and Extended Sampling – City Councilor Candidate

As part of its initial sampling of qualifying contributions submitted by Candidate Daniel Leiva, OIA identified three instances of non-compliance. All three non-compliant contributions were recorded as having been collected by different representatives.

1. **Unverified Contribution, Booklet 19, Page 3** – Contributor A acknowledged signing the qualifying contribution form but did not recall making the \$5.00 contribution.
2. **Disputed Signature and Contribution, Booklet 56, Page 10** – Contributor B stated that the signature on the qualifying contribution form was not hers and also denied making any contribution.
3. **Insufficient Contribution, Booklet 85, Page 9** – Contributor C signed the required qualifying contribution form but did not donate the full \$5.00 contribution. Instead, Contributor C donated “pocket change” totaling no more than one dollar.

In response to these instances of non-compliance, OIA conducted extended sampling to assess the prevalence of similar issues among other qualifying contributions submitted. For each booklet in which these issues originated (Booklets 19, 56, and 85), OIA attempted to verify all contributors listed. To expand the sample and exercise additional due diligence, OIA also reviewed the immediately sequential booklets (Booklets 20-21, 57, and 86). Booklets 20 and 21 were included alongside 19 because each contained only a single contribution, and their review provided a more robust sample.

⁶ Candidate withdrew from the mayoral race or shifted from public to private financing.

The following visuals present the extended sample sizes in comparison to the number of contributions that were successfully verified; no further issues were identified within the extended sample.

Figure 8. Extended Samples: Councilor Contribution Booklets

Booklet Number	Contributions Selected for Extended Sample	Contributions Verified from Extended Sample
Book 19	6	4
Book 20	1	1
Book 21	1	0
Book 56	7	6
Book 57	2	1
Book 85	7	3
Book 86	2	2
Total	26	17

METHODOLOGY AND ASSURANCE PROVIDED

Methodologies used to accomplish the objectives include but are not limited to the following:

- From the population of qualifying contributions submitted for the 2025 Regular Local Election, contributions were randomly selected (unless non-compliance was noted and expanded sample selections were necessary) and the individuals were asked to confirm the following questions:
 - a. The contributor's name
 - b. That the contributor resides at the address listed
 - c. The validity of the contributor's signature
 - d. That the contributor provided the \$5 qualifying contribution

Figure 9 presents candidates who met the qualifying requirements and received full public financing, while Figure 10 presents candidates who did not qualify but whose submitted contributions were nonetheless reviewed and verified by OIA.

Figure 9. Candidates Receiving Public Financing

Election Race	Candidate Name	Qualifying Contributions Verified	Value of Contributions Verified	Public Financing Spending Limits ⁷
Mayoral	Timothy Keller	245	\$1,225.00	\$755,946.00
City Council – District 1	Ahren Griego	26	\$130.00	\$56,312.00
City Council – District 1	Daniel Leiva	36	\$180.00	\$56,312.00
City Council – District 3	Klarissa Pena	24	\$120.00	\$41,865.00
City Council – District 5	Dan Lewis	25	\$125.00	\$55,719.00
City Council – District 7	Tammy Fiebelkorn	25	\$125.00	\$58,205.00
City Council – District 9	Renee Grout	24	\$120.00	\$51,958.00
Total		405	\$2,025.00	\$1,076,317.00

⁷ Actual distribution amounts may be slightly reduced due to swipe fees and adjustments for seed money contributions.

Figure 10. Candidates Reviewed but Not Qualifying for Public Financing

Election Race	Candidate Name	Qualifying Contributions Verified	Value of Contributions Verified
Mayoral	Adeo Herrick	0	\$0.00
Mayoral	Alex Uballez	24	\$120.00
Mayoral	Alpana Adair	0	\$0.00
Mayoral	Darren White	44	\$220.00
Mayoral	Eddie Varela	10	\$50.00
Mayoral	Louie Sanchez	122	\$610.00
Mayoral	Patrick Sais	0	\$0.00
City Council – District 1	Joshua Neal	6	\$30.00
City Council – District 1	Stephanie Telles	13	\$65.00
City Council – District 3	Christopher Sedillo	6	\$30.00
City Council – District 3	Natalia Saldana	0	\$0.00
City Council – District 3	Teresa Garcia	9	\$45.00
City Council – District 9	Anami Dass	0	\$0.00
City Council – District 9	Byron Powdrell	0	\$0.00
City Council – District 9	Colton Newman	1	\$5.00
	Total	235	\$1,175.00

OIA's verification activities included testing randomly selected qualifying contributions, and expanding testing where exceptions were noted, submitted to the Office of the City Clerk. Based on the results of these test procedures the Office provides reasonable assurance for over \$1,076,317 in public financing for candidates who met the qualifying requirements and conducted additional verification procedures for \$1,175 in contributions submitted by candidates who did not qualify. These verification activities reflect OIA's ongoing commitment to ensuring accuracy, transparency, and accountability in the administration of the City's public financing program as administered by the City Clerk.