

Office of the City Clerk P.O. Box 1293 Albuquerque, NM 87103 Phone (505) 924-3650 Fax (505) 924-3660 www.cabq.gov/clerk

State	of	New	Mexico)	
) s.s.

County of Bernalillo)

COMPLAINT FORM

Complainant's Information Last Name Katz	First Name Jason		
Mailing Address 1530 Dennison Rd. SW	City Albuquerque	State NM	Zip Code 87105
Daytime Phone Number (include area code) 505-975-5021	Email Address bcsd \$ 10@comcas	st.net	

2. Respondent's Information Last Name Keller	First Name Timothy		
Mailing Address 1609 Park Ave. SW	City Albuquerque	State NM	Zip Code 87104
Daytime Phone Number (include area code) 505-266-5809	Email Address mayortim@keepk	eller.com	

3. If Respondent is a Candidate, the office or position sought
Mayor of Albuquerque

4. Has this complaint been filed with any law enforcement agencies? If so, list all agencies and attach copies of all complaints submitted. Additional pages may be attached to this form if the space provided below is not adequate.
No complaints filed with any law enforcement agencies yet.
5. Describe in reasonable detail the alleged violation(s), including the Section(s) or Part(s)
of the Election Code, Code of Ethics, Open and Ethical Elections Code, or Rules and Regulations of the Board of Ethics or City Clerk that you believe were violated, explain how you believe the Election Code, Code of Ethics, Open and Ethical Elections Code, or Rules and Regulations of the Board of Ethics or City Clerk were violated, the date of the alleged violation(s), and include any other pertinent information. Additional pages may be attached to this form if the space provided below is not adequate. See attached.

 6. Describe the inquiry undertaken regarding the alleged violation. Additional pages may be attached to this form if the space provided below is not adequate. I have attempted to identify by the documents attached as many examples as possible the violation of the rules, but I am certain a more thorough effort would identify more 	
the violation of the rules, but I am certain a more thorough effort would identify more	of
violations.	

- 7. List and attach evidence that supports your allegations, including but not limited to:
 - a. The names/telephone numbers of persons whom you believe may be witnesses to the facts:
 - b. A copy or picture of any political advertisement(s) Complainant references;
 - c. A copy of each document the Complainant references; and
 - d. Any other evidence supporting your allegations.

Additional pages may be attached to this form if the space provided below is not adequate.

I am not able to attach all possible evidence of violations, only a portion of the documents submitted by the Keller Campaign.

Exhibit 1: sworn declaration concerning how Keller supporters did not collect the \$5 donation from as many as 150 people who signed the Qualifying Contributions receipts.

Exhibit 2: samples of the 150 Qualifying Contributions receipts with the Albuquerque Fire Department's Union President's signature.

Exhibit 3: fraudulent Qualifying Contributions receipts signed by Neri Holguin, Keller's campaign manager and person filing the complaint against Manny Gonzales.

Exhibit 4: fraudulent or clearly questionable signatures on petitions and the Qualifying Contribution forms which the City Clerk is obligated to check but did not do so.

I, Jason Katz , hereby s	swear and affirm under penalty of perjury that, to the
best of my knowledge, information, and be	elief, formed after a reasonable inquiry under the
circumstances, each factual contention of t	his Complaint is supported by evidence
	The second of th
	Complainant (Signature)
	Jason Katz
	Print or type name of Complainant
S	
Sworn or affirmed before me, the unders	signed authority by Jason Katz this
day of July20 21	
	Notary Public
If after a reasonable in anima	1 41
ii, after a reasonable inquiry un	der the circumstances, you are unable to
certify that certain specifically idea	ntified factual contentions of the Complaint
are supported by evidence, you ma	v certify as follows:
· · · · · · · · · · · · · · · · · ·	
I, Jason Katz , hereby sy	wear and affirm under penalty of perjury that, to the
best of my knowledge, information, and bel	lief, there are grounds to conclude that the specifically
identified factual contentions of this Compl	aint are likely to be supported by evidence after a
reasonable opportunity for further inquiry	and are mery to be supported by evidence after a
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	Complainant (Signature)
	ĺ
	JASON KATZ
	Print or type name of Complainant
	Time of type hame of Complaniant
Sworn or affirmed before me, the undersi	igned authority by Tag Isaka
14th day of July 2021	igned authority by Jason Katz this
2021	
	Mag to a good or
	Martina Jatoge Jana Notary Public
	Notary Public
Mc Commission Expires	S' 7 130104
my Commission Expires	
All exhibits or attachments reference	ced in the complaint must be included with
the Complaint.	

Statement of Allegations

Describe in reasonable detail the alleged violation(s), including the Section(s) or Part(s) of the Election Code, Code of Ethics, Open and Ethical Elections Code, or Rules and Regulations of the Board of Ethics or City Clerk that you believe were violated, explain how you believe the Election Code, Code of Ethics, Open and Ethical Elections Code, or Rules and Regulations of the Board of Ethics or City Clerk were violated, the date of the alleged violation(s), and include any other pertinent information. Additional pages may be attached to this form if the space provided below is not adequate.

The Keller campaign has engaged in a pattern of unlawful behavior by submitting as many as (or more than) 150 Qualifying Contributions in violation of § 1-19-34.3(A) NMSA 1978, and Part I(1) and Part C (6) Regulations for the Open and Ethical Elections Code.

I am not able to attach all possible evidence of violations, only a portion of the documents submitted by the Keller Campaign.

Exhibit 1: sworn declaration concerning how Keller supporters did not collect the \$5 donation from as many as 150 people who signed the Qualifying Contributions receipts.

Exhibit 2: samples of the 150 Qualifying Contributions receipts with the Albuquerque Fire Department's Union President's signature.

Exhibit 3: fraudulent Qualifying Contributions receipts signed by Neri Holguin, Keller's campaign manager and person filing the complaint against Manny Gonzales. Signing blank forms that a contribution has been received, is false and creates the opportunity for false statements and fraudulent practices.

Exhibit 4: fraudulent or clearly questionable signatures on petitions and the Qualifying Contribution forms that the City Clerk is obligated to check and match but did not do so.

This¹ evidence attached reflects that the Keller Campaign has engaged in a pattern of fraud in its efforts to obtain over \$650,000 in taxpayer money. In preparing and submitting these receipts, the Keller Campaign committed numerous acts of criminal forgery, in violation of NMSA 1978 § 30-19-10. In addition, the submission of these receipts violated the 2021 Regulations of the Albuquerque City Clerk for Open and Ethical Elections Code Part C(6), which provides "the contributor himself or herself must sign the receipt."

It is also likely that the Keller Campaign violated the law by submitting these forged receipts without collecting \$5 contributions from these voters. If that is the case, the Keller Campaign

¹ I am requesting that the Keller Campaign be held to the <u>exact</u> same standards as demanded in the complaint filed against Manny Gonzales. To that end, I have substituted "Keller Campaign" for "Gonzales Campaign" from the Keller/Neri Olguin Compliant filed against the Gonzales Complaint, and *italicized* portions are directly from the Keller complaint against Manny Gonzales.

violated NMSA 1978, § 1-19-34.3(A), which provides that "[i]t is unlawful for a person to make a contribution in the name of another person, and no person shall knowingly accept a contribution made by any person in the name of another person. This conduct would also violate the 2021 Regulations of the Albuquerque City Clerk for the Open and Ethical Elections Code Part I(1), which provides that "[n]o person may make a Contribution in the name of another person ... The Contributor identified in reports to . . . the City Clerk must be the actual source of the funds for the Contribution." It further violates Part C(6), which provides that "[a]ll qualifying contributions must be paid by the contributor; if the funds are provided by any person other than the contributor who is listed on the receipt, the Qualify Contribution will be deemed fraudulent."

These criminal and fraudulent actions by the Keller Campaign justify the denial of the *Certification pursuant to Part C(15) of the Regulations of the Albuquerque City Clerk for the Open* and Ethical Elections Code, which provides that the City Clerk shall determine whether an Applicant Candidate has "been found to have made a materially false statement in ta report or other document submitted to the City Clerk" or "been found to have submitted any fraudulent Qualifying contributions or any falsified acknowledgment forms for the Qualifying Contributions . . ., where the Applicant Candidate knew or should have known of the fraudulence or falsification." In the alternative, it is grounds for revocation of certification pursuant to Part C(17)(c), which provides that "the certification of a Participating Candidate may be revoked at any time if the City Clerk determines that the candidate or an agent of the candidate . . . [s]ubmitted any fraudulent Qualifying Contributions . . . and the Participating Candidates knew or should have known of the fraudulence." It is also grounds for revocation of certification pursuant to Part (C)(17)(f), which provides that "the certification of a Participating Candidate may be revoked at any time if the City Clerk determines that the candidate or an agent of the candidate . . . [k]knowingly made a false statement or material misrepresentation in any report or any other document required to be filed under the OEEC or the EC."

The Open and Ethical Elections Code was approved in 2005 with 69% of the public vote. Its integrity and its future are dependent on candidates earning the right to spend hundreds of thousands of taxpayer dollars for their campaigns, in exchange for the honest and diligent satisfaction of the robust requirements to access these dollars. When a candidate commits fraud in an attempt to circumvent this public trust and clear requirements of this law, that candidate should be disqualified from the benefits of public financing for violating the intent, and trust, of the overwhelming majority of the City's voters.

Whether the Keller Campaign will be held to the same standards presents a serious question and may have a huge impact on the public's perception of the entire process. The decision to provide public funding for the Keller Campaign and deny same to the Gonzales Campaign will harm not just the Gonzales Campaign but all the voters in Albuquerque.

DECLARATION OF SHAWN McDONALD

Shawn McDonald makes this Declaration under penalty of perjury of the laws of the State of New Mexico and states:

- 1. My name is Shawn McDonald. I am over the age of eighteen (18) years and competent to testify to the matters stated in this Declaration.
- 2. While on duty with the Albuquerque Fire Department on June 1, 2021, the Albuquerque Fire Rescue Union President (IAFF Local 244) visited the station and discussed contract matters, negotiations, and the mayoral election.
- 3. The Union President asked people to sign Keller's \$5 donation cards. One of the members asked him, "What is this \$5 deal? You didn't say anything about five bucks."
- 7. In response, the Union President told everybody at the meeting, "I got that, don't worry about it. It's too hard for me to go around and ask people to sign this and donate five dollars. I only have three books. It's a hundred and fifty bucks, and I'm going to cover it for all the guys who want to sign it."
- 8. I spoke up and told him and everyone present that "You're not allowed to do that."
- 9. The room went silent for a bit, but members then continued to review the donation cards.
- 10. I was talking to some members and could not see how many cards were signed, as I was distant from the table and the cards.
- 11. This is my complete statement.

I make this declaration under penalty of perjury in accordance with the laws of the State of New Mexico.

Shawn McDonald

Date: July 10, 2021

EXHIBIT 1

Exhibit 2

Samples Of The Possible 150 Fraudulent Qualifying Contribution Receipts Submitted By The Keller Campaign.

And Review And Comparison Of The Alleged Signatures Of The Contributors Strongly Suggests That Many Of These Samples Were Not Signed By The Alleged Contributors



Qualifying \$5 Contribution Receipt Make \$5 check payable to CAOEE Fund. Cash is accepted.

Timothy M Keller

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Name of Candi	date (Please pr	rint)
Check one	Mayor	□ Council #

Contributor (Pink)

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Signature of Contributor	Contributor as shown on Vote	Registration Rous (No P.	O. Box) Council District
Tugtin Representative Collecting C	Contribution (Print Name)	Signature	of Representative
Amount Contributed	\$5.00	Date of Co	1,2/
	City Clerk (White)	Candidate (Yellow)	Contributor (Dink)



Qualifying \$5 Contribution Receipt Make \$5 check payable to CAOEE Fund. Cash is accepted.

City Clerk (White)

Timothy M. Keller

Name of Candi	date (Please pr	int)
Check one	Mayor	□ Council #

	Contribution of \$5 only, is m. I will not be compensated. Brelfwire	nade from my funds to qualify the above in any way for this contribution.
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1911 Hoffm	ian Dr NE ABO	NM 87/10 V
Albuquerque Address o	f Contributor as shown on Voter Regi	stration Rolls (No P.O. Box) # Council District
/ //	1/	Council District
Signature of Contributor		
Just in	Channet	2
Representative Collecting	Contribution (Print Name)	Signature of Representative
mount Contributed	\$5.00	5,29,21
		Date of Contribution



Qualifying \$5 Contribution Receipt Make \$5 check payable to CAOEE Fund. Cash is accepted.

City Clerk (White)

Timothy M. Keller

Name of Candidate (Please print)

Check one

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P	Mayor	

Contributor (Pink)

☐ Council #____

Nonrefundable Contribution of \$5 only, is made from my finamed candidate. I will not be compensated in any way for a self will not be compensated in any way for a self will not be compensated.	funds to qualify the above or this contribution.
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2912 Indian form lare	#
Albuquerque Address of Contributor as shown on Voter Registration Rolls (No	P.O. Box) Council District
(0)	
Signature of Contributor	
Jistin Cheney	e of Representative
Amount Contributed \$5.00 Date of	Contribution



Qualifying \$5 Contribution Receipt

Timothy M. Keller

M	Take \$5 check payable to CAOEE Fund.	Name of Candidate (Please print)
	*	Check one ✓ Mayor ☐ Council #
Nonrefundal named candi	ble Contribution of \$5 only, is made idate. I will not be compensated in	e from my funds to qualify the above any way for this contribution.
Layrdon	fontaine	
Name of Contribu	tor (Please print)	
10601 5	ole ROSSOC+ NW 8	7114 V
Albuquerque Add	ress of Contributor as shown on Voter Registrat	tion Rolls (No P.O. Box) # Council District
-	7 9 3	Council District
Signature of Contri	butor	_
Camara or contri		
tu		
Representative Colle	ecting Contribution (Print Name)	
	cong Contribution (Print Name)	Signature of Representative
Amount Contributed	\$5.00	2901
	72.00	Date of Council of
		Date of Contribution
	City Clerk (White) Candidat	e (Yellow) Contributor (Pink)



Qualifying \$5 Contribution Receipt Make \$5 check payable to CAOEE Fund. Cash is accepted.

City Clerk (White)

Timothy M. Keller

Contributor (Pink)

Nonrefundable Contribution of \$5 only, is made from named candidate. I will not be compensated in any	om my funds to qualify the above way for this contribution.
JOSEPH GARCIA	
Name of Contributor (Please print)	^/
53.1 Candelania RD NE 87	110 #
Albuquerque Address of Contributor as shown on Voter Registration	Rolls (No P.O. Box) Council District
1-97	
Signature of Contributor	
Justin Chenry	
Representative Collecting Contribution (Print Name)	Signature of Representative
Amount Contributed \$5.00	Date of Contribution 2/



Qualifying \$5 Contribution Receipt Make \$5 check payable to CAOEE Fund. Cash is accepted.

City Clerk (White)

Contributor (Pink)

Name of Candidate (Please print)

Check one

Mayor □ Council #____

named candidate. I	thorne	rom my funds to qualify the above by way for this contribution.
1005 Kana	111	
Representative Collecting Con	htribution (Print Name)	Signature of Representative
Amount Contributed	\$5.00	5 ,27,21 Date of Contribution



Qualifying \$5 Contribution Receipt Make \$5 check payable to CAOEE Fund. Cash is accepted.

City Clerk (White)

Timothy M. Keller

Contributor (Pink)

Name of Candidate (Please print)

Cash is accepted.	Check one
named candidate. I will not be compensa	s made from my funds to qualify the above ted in any way for this contribution.
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BOZ LEAD AVE SW	07107
Albuquerque Address of Contributor as shown on Voter	# //
A A A A A A A A A A A A A A A A A A A	Registration Rolls (No F.O. Box) Council District
ignature of Contributor	
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epresentative Collecting Contribution (Print Name)	Signature of Representative
nount Contributed \$5.00	Date of Contribution





Qualifying \$5 Contribution Receipt Make \$5 check payable to CAOEE Fund. Cash is accepted.

Timothy M. Keller

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Name of Candio	date (Please print) Mayor Council #	

	a 1	
Nonrefundable Contribution of \$5 only, is made from named candidate. I will not be compensated in any	y way for this contribution.	
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Albuquerque Address of Contributor as shown on Voter Registration Rolls (No P.O. Box) # Council District		
Signature of Contributor		
Representative Collecting Contribution (Print Name)	Signature of Representative	
Amount Contributed \$5.00	<u>Le , 1 , 21</u> Date of Contribution	



Qualifying \$5 Contribution Receipt Make \$5 check payable to CAOEE Fund. Cash is accepted.

City Clerk (White)

Timothy M. Keller

Contributor (Pink)

Name of Candidate (Please print)

Cash is accepted.	Check one Mayor Council #
Nonrefundable Contribution of \$5 only, is made named candidate. I will not be compensated in a	from my funds to qualify the above any way for this contribution.
Name of Contributor (Please print)	
Albuquerque Address of Contributor as shown on Voter Registration	tion Rolls (No P.O. Box) # Council District
Signature of Contributor	
Representative Collecting Contribution (Print Name)	Signature of Representative
Amount Contributed \$5.00	Date of Contribution



LEAVE WHITE COPY IN BUCIR

CITY OF ALBUQUERQUE

Qualifying \$5 Contribution Receipt Make \$5 check payable to CAOEE Fund. Cash is accepted.

Timothy M. Keller

Name of Candi	date (Please pr	int)	
Check one	Mayor	□ Council #	

Contributor (Pink)

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Nonrefundable Contribution of \$5 only, is made finamed candidate. I will not be compensated in an	y way for this contribution.
Brandon Maloney	A :
Name of Contributor (Please print)	114 2711/1 X
Name of Contributor (Please print) 5320 Irving BCVD WW ABQ, Albuquerque Address of Contributor as shown on Voter Registratio	0W 81119 #
Albuquerque Address of Contributor as shown on Voter Registratio	n Rolls (No P.O. Box) Council District
Bu	
Signature of Contributor	
Justin Cheney	
Representative Collecting Contribution (Print Name)	Signature of Representative
Amount Contributed \$5.00	le, 1, 3/ 25
	Date of Contribution



CITY OF ALBUQUERQUE

Qualifying \$5 Contribution Receipt Make \$5 check payable to CAOEE Fund Cash is accepted.

Timothy M. Keller

Make \$5 check payable to CAOEE Fund. Cash is accepted.	Name of Candidate (Please print) Check one
Nonrefundable Contribution of \$5 only, is manamed candidate. I will not be compensated	ade from my funds to qualify the above in any way for this contribution.
Richard Marguez	
Name of Contributor (Please print)	V
3215 Painted Rock Dr. NW	# A District
Albuquerque Address of Contributor as shown on Voter Regi	istration Rolls (No P.O. Box) Council District
Pll and	
Signature of Contributor	
Representative Collecting Contribution (Print Name)	Signature of Representative
Amount Contributed \$5.00	Date of Contribution



Signature of Contributor

Amount Contributed

CITY OF ALBUQUERQUE

Qualifying \$5 Contribution Receipt Make \$5 check payable to CAOEE Fund. Cash is accepted.

Timothy M. Keller

Name of Candidate (Please print)

Cash is accepted.	Check one ☐ Mayor ☐ Council #
Nonrefundable Contribution of \$5 only, is made named candidate. I will not be compensated in	from my funds to qualify the above any way for this contribution.
Alejandro Marrufa	
Name of Contributor (Please print)	* X
Albuquerque Address of Contributor as shown on Voter Registrate	tion Rolls (No P.O. Box) Council District
Tastin Cheney	- Res
epresentative Collecting Contribution (Print Name)	Signature of Representative
nount Contributed \$5.00	Date of Contribution



Qualifying \$5 Contribution Receipt Make \$5 check payable to CAOEE Fund. Cash is accepted.

City Clerk (White)

Timothy M. Keller

Contributor (Pink)

Name of Candidate (Please print)

Cash is accepted.	Check one □ Mayor □ Council #
Nonrefundable Contribution of \$5 only, is manamed candidate. I will not be compensated	ade from my funds to qualify the above in any way for this contribution.
Patrik Merill	
Name of Contributor (Please print) 9047elstar Loop NW	gtration Polls (No PO. Box) # Council District
Albuquerque Address of Contributor as shown on Voter Regi	Stration Rolls (140 1.0. Box)
JUSTIN Chery	Del
Representative Collecting Contribution (Print Name)	Signature of Representative
Amount Contributed \$5.00	Date of Contribution



Qualifying \$5 Contribution Receipt Make \$5 check payable to CAOEE Fund. Cash is accepted.

Timothy M. Keller

Name of Candidate (Please print)

Contributor (Pink)

Cash is accepted.	Check one
Nonrefundable Contribution of \$5 only, is renamed candidate. I will not be compensated Movery II Name of Contributor (Please print) Albuquerque address of Contributor as shown on Voter Reg	d in any way for this contribution.
Signature of Contributor	
Representative Collecting Contribution (Print Name)	Signature of Representative
Amount Contributed \$5.00	Date of Contribution
City Clerk (White)	andidate (Yellow) Contributor (Pink)





Qualifying \$5 Contribution Receipt Make \$5 check payable to CAOEE Fund. Cash is accepted.

City Clerk (White)

Timothy M. Keller

R RR R R C	an in		
Name of Candidate (Please print)			
Check one	Mayor	□ Council #	

Contributor (Pink)

Nonrefundable Contribution of \$5 only, is made f named candidate. I will not be compensated in an	rom my funds to qualify the above by way for this contribution.
Zack Nichols	
Name of Contributor (Please print)	V
7416 Molas RD NW 87114	# /
Albuquerque Address of Contributor as shown on Voter Registration	on Rolls (No P.O. Box) Council District
Justin Cheney	A
Representative Collecting Contribution (Print Name)	Signature of Representative
Amount Contributed \$5.00	Date of Contribution



Qualifying \$5 Contribution Receipt Make \$5 check payable to CAOEE Fund. Cash is accepted.

Timothy M. Keller

Name of Candi	date (Please pr	int)
Check one	Mayor	□ Council #

Nonrefundable Contribution of \$5 only, is made named candidate. I will not be compensated in a	
Michael Pandazis	
Name of Contributor (Please print)	
9528 Iron Rock Dr NW	87114 #X
Albuquerque Address of Contributor as shown on Voter Registrat	ion Rolls (No P.O. Box) Council District
_ M	
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Amount Contributed \$5.00	Date of Contribution



Qualifying \$5 Contribution Receipt Make \$5 check payable to CAOEE Fund.

Timothy M. Keller

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Representative Coll Amount Contributed	ecting Contribution (Print Name) \$5.00	Signature of Representative
	City Clerk (White)	5,29,21 Date of Contribution



Qualifying \$5 Contribution Receipt
Make \$5 check payable to CAOEE Fund. Cash is accepted.

City Clerk (White)

Name of Candidate (Please print)

Check one

Contributor (Pink)

Mayor □ Council #____

Nonrefundable Contribution of \$5 only, is made named candidate. I will not be compensated in	from my funds to qualify the above any way for this contribution.
Diane Sevier	
Name of Contributor (Flease Print) 10328 Andalusian QVe Abuquerque Address of Contributor as shown on Voter Registra	ation Rolls (No P.O. Box) Council District
Signature of Contributor	2
Representative Collecting Contribution (Print Name)	Signature of Representative
Amount Contributed \$5.00	Date of Contribution



Qualifying \$5 Contribution Receipt
Make \$5 check payable to CAOEE Fund. Cash is accepted.

City Clerk (White)

Timothy M. Keller

Name of Candidate (Please print)

Check one

Mayor □ Council #____

Cash is accepted.	
Nonrefundable Contribution of \$5 only, is made named candidate. I will not be compensated in	from my funds to qualify the above any way for this contribution.
Name of Contributor (Please print) 5001 West Lea Dr. S.W. Albuquerque Address of Contributor as shown on Voter Registre	# X_
Signature of Contributor Nepresentative Collecting Contribution (Print Name)	Signature of Representative
Amount Contributed \$5.00	Date of Contribution Contributor (Pink)



Qualifying \$5 Contribution Receipt Make \$5 check payable to CAOEE Fund. Cash is accepted.

City Clerk (White)

Timothy M. Keller

Name of Candidate (Please print)

Check one

Contributor (Pink)

Mayor □ Council #____

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Nonrefundable Contribution of \$5 only, is made from my funds to qualify the above named candidate. I will not be compensated in any way for this contribution.		
Name of Contributor (Please print)		
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Signature of Contributor		
Justin Cheney	The	
Representative Collecting Contribution (Print Name)	Signature of Representative	
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Qualifying \$5 Contribution Receipt Make \$5 check payable to CAOEE Fund. Cash is accepted.

Timothy M. Keller

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Contributor (Pink)

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Nonrefundable Contribution of \$5 only, is made named candidate. I will not be compensated in	e from my funds to qualify the above any way for this contribution.
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Name of Contributor (Please print)	
6823 Candelia Ave. nw. ak	09. NM. 87114 V
Albuquerque Address of Contributor as shown on Voter Registrat	##
anon J. I	Council District
Signature of Contributor	
Representative Collecting Contribution (Print Name)	
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Amount Contributed \$5.00	Date of Contribution
City Clerk (White) Candidate	(V-III)



Qualifying \$5 Contribution Receipt Make \$5 check payable to CAOEE Fund. Cash is accepted.

Timothy M. Keller

Name of Candidate (Please print)

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Mayor Council #___

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Nonrefundable Connamed candidate. I	tribution of \$5 only, is will not be compensate	made from my funds to q	ualify the above tribution.
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Representative Collecting	Contribution (Print Name)	Signature of Repres	entative
Amount Contributed	\$5.00	Date of Contribution	$\frac{21}{2}$

City Clerk (White)

Candidate (Yellow)

Contributor (Pink)



Qualifying \$5 Contribution Receipt
Make \$5 check payable to CAOEE Fund. Cash is accepted.

Timothy M. Keller

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Name of Candid		
Check one	Mayor	□ Council #

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Amount Contributed \$5.00	Date of Contribution





CITY OF ALBUQUERQUE

Qualifying \$5 Contribution Receipt Make \$5 check payable to CAOEE Fund. Cash is accepted.

Timothy M. Keller

Make \$5 check payable to CAOEE Fun Cash is accepted.	Name of Candidate (Please print) Check one □ Mayor □ Council #
Nonrefundable Contribution of \$5 only, is mamed candidate. I will not be compensated Ralph Waldes Name of Contributor (Please print) Albuquerque Address of Contributor as shown on Voter Reg Signature of Contributor	In any way for this contribution.
Representative Collecting Contribution (Print Name)	Signature of Representative
Amount Contributed \$5.00	Date of Contribution

City Clerk (White)

Candidate (Yellow)

Contributor (Pink)



Qualifying \$5 Contribution Receipt Make \$5 check payable to CAOEE Fund. Cash is accepted.

Timothy M.	. Keller	-
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Name of Candidate (Please print)

Check one

Contributor (Pink)

✓ Mayor ☐ Council #____

named candidate.	I will not be compensate	made from my funds to qualify the above ed in any way for this contribution.
J +6001	In JAKEN	
Name of Contributor (Ple	ase print)	
1526100	Jardines Pl	ILLY X TIOY X
Albuquerque Address of	Contributor as shown on Voter Re	egistration Rolls (No P.O. Box) # Council District
Signature of Contributor		
1	\cap	
JYSTIN	Chenen	
Representative Collecting	Contribution (Print Name)	Signature of Representative
		The presentative
A	\$5.00	1 1 - +
Amount Contributed	\$5.00	9,1,21

Exhibit 3 Blank contribution form pre-signed and dated by Keller Campaign Manager Neri Holguin

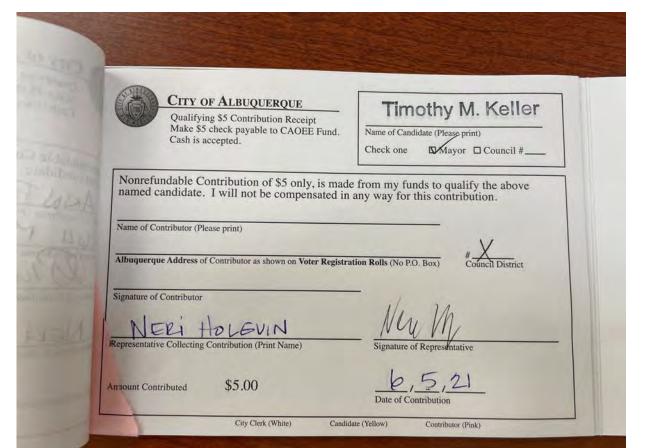
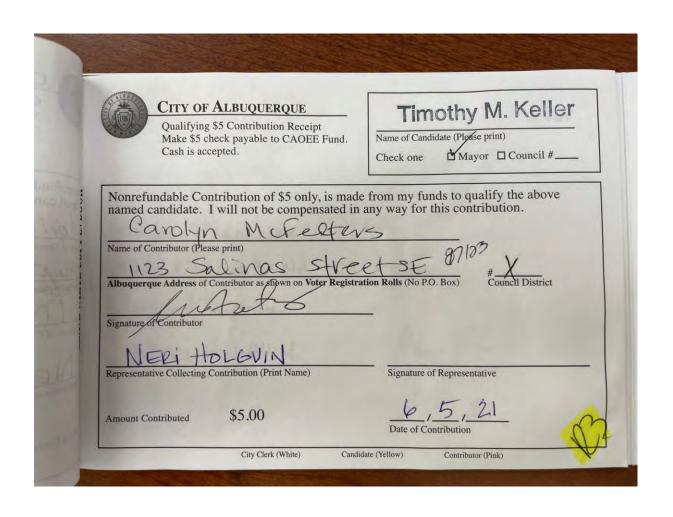
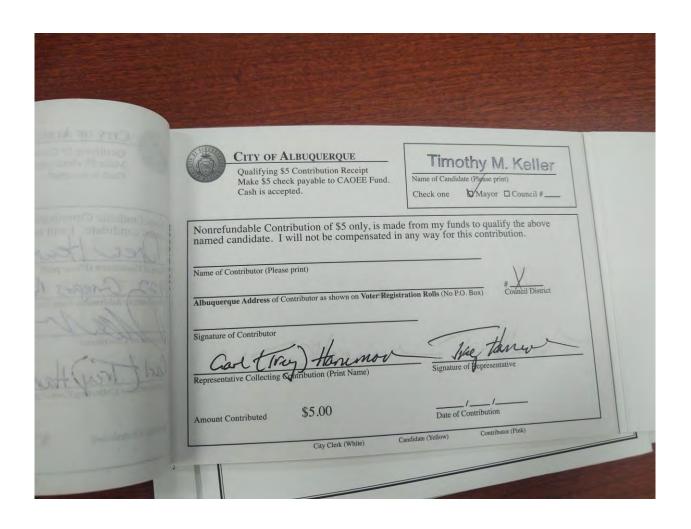


EXHIBIT 3

Contribution form by Neri Holguin as agent but not signed by her

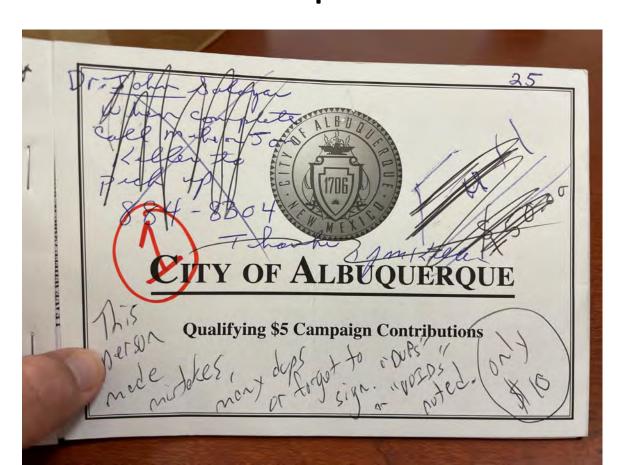


Contribution form pre-signed by another agent for the Keller Campaign



Irregularities in Keller Petitions & Qualifying Contributions

Contribution book listed \$150 in contributions — only \$10 accepted



Questionable authenticity of similar signatures

I, the undersigned, a registered voter of who resides at 1609 Park Ave SW		rehu pominate Timothy M Keller	
AND SW	Albuquerque	Ne	w Mexico.
for the office of Mayor of the City of declare that I am a registered voter of petition for more persons than the nur	Albuquerque, to be voted for at the	e Regular Local Election, to be held on	November 2, 2021.
1. Wah Warene	1713742	13809 PX-SED DELSOL	
(usual signature)	(name printed as registered)	(address as registered, including quadrant)	6/6/21 (date)
2. elu War in	1729418 NU. NGUY=	13809 PASED DELSO	6/6/2 (date)
(usup apparer)	(name printed as registered)	(address as registered, including quadrant)	(date)
3. Thu BO	Thomas Borst	1908 SELWAY PL (address as registered; including quadrant)	6-6-2,
	1 Caal S		
Frances a human	FRANCES 14 LUJA	N 7711 BRENDAN CI	6-6-
(usual signature)	(name printed as registered)	(address as registered, sactuding quadrant)	
111/62	499913	4100 LAS CLESTER	n 6-
5. (usual signature)	Hecker Bulder	ALB TOTAL NO (address as registered, including quadrant)	(date)
(Constant)	11054596	7	
6. Jan Vale	TOAME VA	118 50 20 Enrance (address as registered, including quadrant)	VISTA (dase)
0 1 23	1069302		
3 St. Junio de	SACA JAVNE C	ele 6813 Armantka	1VW 6
(usug sityature)	(name printed as registered)	(address as registered, including quadrant)	(date)
2 7 1	1688015	1 1 N D	87120
8. Leslie Kene the	(name printed as regulated)	ene Horvell 6515Pa	Lom. No Pr (date)
(usual signature)	1593104	2	
· Carolland	Allen masser vierd	SPINETHA SLAD A.	
9. Marias Vales Jenes	(name printed as registered)	Servicion Stor & Ly (address as registered, including quadrant)	(day
(RZM) v(Summa)	163092	6	4
D. a P. Wirtus	er Paulu+Morre	(address as registered, including quadrant	ano 6
10. Junual signature)	(name printed as registered)	(address as registered, including quadrant	(da
Rev. 2021 NMSA 1978, § 1-8-30			
Rev. 2021 NMSA 1711			



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1. Janes (usual signatu
2. Curnal signa
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4. (weed sign

who resides at 1609 Park Ave SV	V, Albuquerque		te's rasme)
for the office of Mayor of the City o	(candidate's address) f Albuquerque, to be voted for at the I	Regular Local Election, to be held on N	Mexico,
petition for more persons than the n	amber of candidates necessary to fill s	such office at the next ensuing regular l	ocal election.
Jan XCL (usual signature)	Bul Elfin	2205 W/LORE CANA	6/1/21
	BAJ. D GARLIN	BIG TULAWE DP	611/21
(usual signature)	(name printed as registered)	(address as registered, including quadrant)	(date)
· X NX	To cal Martinez	(address as registered, including quadrant)	6/1/21
3. (Qual signature)	(name printed as registered)	(address as registered, including quadrant)	(date)
The state of the s		(address as registered, including quadrant)	
4. (went signature)	(name printed as registered)	(address as registered, including quadrant)	(date)
5(usual signature)	(name printed as registered)	(address as registered, including quadrant)	(date)
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(0.000)			
9. (anul signature)	(name printed as registered)	(address as registered, including quadrant)	(date)
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10	(name printed as registered)	(address as registered, including quadrant)	(date)
(neual signature)			
Rev. 2021 NMSA 1978, § 1-8	30		

a registered v	Oter of All	N NOMINATING P	
who resides at 1609 Park Ave	SW Albuquerque, New Mexico, he	reby nominate	w Mexico,
declare that I am dayor of the Cit	by of Albuquerque, to be voted for at the city of Albuquerque. I also	e Regular Local Election, to be held on declare that I have not signed, and will	November 2, 202 not sign, any non local election.
1. Symbola (yang) signature)	Suzanne Froke	4412 Inspiration by	8E 5/2
2. Hatthen Fr.	de George M. Fr	(address as registered, including quadram)	5/21/ (date)
(usual signature)	(name printed as registered)	(address as registered, including quadrant)	
3. The M. Level	MARY & McLEO (name printed as registered)	2734 EL TESORO Esco.	(date)
4. Or many mack	ad Ann-mary marche	d 1509 Mantoun Ro	(NW 5/
5. Mm. (usual signature)	(came printed as registered)	(address as registered, including quadrant)	5/28 (date)
		Z 433 Fagang)a St (address as registered, including quadrant)	
7. (asual signature)	(name printed as registered)	(address as registered, including quadrant)	(date)
8. (usual signature)	(name printed as registered)	(address as registered, including quadrant)	(date
9. (usual signature)	(same printed as registered)	(address as registered, including quadrant)	(dat
10(usual signature)	(name printed as registered)	(address as registered, including quadrant)	

W 2021 REGULAR LOCAL ELECTION NOMINATING PETITION I, the undersigned, a registered voter of Albuquerque, New Mexico, hereby nominate Timothy M Keller who resides at 1609 Park Ave SW, Albuquerque for the office of Mayor of the City of Albuquerque, to be voted for at the Regular Local Election, to be held on Movember 2, 2021, and 1 declare that I am a registered voter of the City of Albuquerque, I also declare that I have not signed, and will not sign, any nominating petition for more persons than the number of candidates necessary to fill such office at the next ensuing regular local election. Bola Enemchakura Abdulschman Ketr 6048 malpais PKAve 05/18/21 NAOMI RANKIN (name printed na registered) (address as rejestered, including quadram) (date) (address as registered, including quadrant)

Situra Haynes (name printed assegistered) 9504 Corsice PINW (address as registered, including quadrant) (name printed as registered) (address as registered, including quadrant) (name printed as registered) (address as registered, including quadrant) (name printed as registered) (address as registered, including quadrant) (name printed as registered) (address as registered, including quadrant) (address as registered, including quadrant) Rev. 2021 NAISA 1978, § 1-8-30

I, the undersigned, a registered voter of	Albuquerque, New Mexico, hereb	nominate Tirriothy M Keller		
	esides at 1609 Park Ave SW, Albuquerque		(condidate's name) , New Mexico,	
for the office of Mayor of the City of declare that I am a registered voter of petition for more persons than the nur	Albuquerque, to be voted for at the R	egular Local Election, to be held on Nature that I have not signed, and will nuch office at the next ensuing regular	ovember 2, 2021, a ot sign, any nomina local election.	
(usual signature)	Veronica Wasque Florio (name printed as registered)	8900 Silverado Ave SN (address as registered, including quadrant)	0/21/20	
Claudia Pleset	Claudia Klesert	929 Adams St. ME _ (address as registered, including quadrant)	5/24/20	
(usual signature)	Mary Tvy (name pylinted as registered)	310 Hermoson NE (address as registered, including quadrant)	- >/2 4 (date)	
(usual signature)	Charlie Try (name printed as registered)	(address as registered, including quadrant)	5/2 4 (date)	
Herdindron (cossal signature)	Iteidi M Sway) (name printed as registered)	(address as registered, including quadrans)	5/24 (date)	
Roger Language (usual signature)	Roger W. Kennett	(address as registered, including quadrant)	5/28/2 UU	
Rochelle S. Lleub	lad Roch elle Grad (name printed as registered)	(address as registered, including quadrant)	5-2: (date)	
Ann Leberra	- Aun Lieberman		NW S/	
(usual signature) Marin Juliu - (usual signature)	(name printed as registered) Marcus Liebura (name printed as registered)	(address as registered, including quadrant) (2300 Heade Nu (address as registered, including quadrant)	1/25	
Wichel Benda-	Michele Benton (name printed as registered)	(address as registered, including quadran	NE 5/2	

2021 REGULAR LOCAL ELECTION NOMINATING PETITION 1, the undersigned, a registered voter of Albuquerque, New Mexico, hereby nominate Timothy M Keller who resides at 1609 Park Ave SW, Albuquerque (condudate's name) New Mexico, for the office of Mayor of the City of Albuquerque, to be voted for at the Regular Local Election, to be held on November 2, 2021, and I declare that I am a registered voter of the City of Albuquerque. I also declare that I have not signed, and will not sign, any nominating petition for more persons than the number of candidates necessary to fill such office at the next ensuing regular local election. 10448 Montgomery 10501 GAGRIAA de OVO # 286 712 Turner Du. NE Phristopher Desiderio Albuquerque Rev. 2021 NMSA 1978, § 1-8-30 ML

20-	TOUT ELECTIONS	10 mm
2021 REGULAR	STOCALET	N NOMINATING PETITION Timothy M Kolley
I, the undersigned a register !		
who resides at 1609 Park Ave	voter of Albuquerque, New Mexico, her	eby nominate Timothy M Keller
for the offer one	(condidate's address)	(considute's name)
declare that I am a registered we petition for more persons than the	ity of Albuquerque, to be voted for at the other of the City of Albuquerque. I also do number of candidates necessary to fill 1008570	New Mexico, e Regular Local Election, to be held on November 2, 2021, and leclare that I have not signed, and will not sign, any nominatin I such office at the next ensuing regular local election.
1. (usual signature)	(name printed as registered)	Steller Rd 22 May 16, 207/
1/-1/1/1-6/	2106632	, and
(usual signature)	(name printed as registered)	(address as registered, including, (audrant) (date)
Jable Went P.		
(usual signature)	(name printed as registered)	(address as registered, including quadrant) (date)
	1565765	
4.1	Danielle Sork (name printed as registered)	9 of Matthew Ave over SIG /2021 (address as registered, including quadrant) (dage)
TosuN signature)	(name printed as registered)	(address as registered, including quadrant) (date)
1 5	Fric Sorte	galmiti. a No silia
(usual signature)	Eric Sorta (name printed as registered)	(date) (date)
6.	1660224	
6.	Sarah Kaimon	710 Switche has 5/16/3 (address as registered, including quadrant) (date)
(undergrasture)	(name printed as registered)	(address as registered, including quadrant) (date)
41 1.	7, 1504924	01 6 5/16
7. 1000	These Hina (name printed as registered)	910 Sarte pe Alasa 5/16/
(usual signature)	9279817	(address as registered, including quadrant)
8. Churtia Wellia		1107 8th Street NW 5/14
(usual signature)	(name printed as registered)	(address as registered, including quadrant)
9.		
(usual signature)	(name printed as registered)	(address as registered, including quadrant)
10		(address as registered, including quadrant)

Rev. 2021 NMSA 1978, § 1-8-30

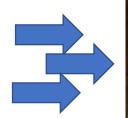
I, the undersigned, a registered to	C LOCAL ELECTIO	by nominate Timothy M Kelle	PETITION
who resides at 1609 Park Ave		The second secon	New Mexico,
for the office of Mayor of the Ci declare that I am a registered vo petition for more persons than th	ty of Albuquerque, to be voted for at the ter of the City of Albuquerque. I also d e number of candidates necessary to fill	Regular Local Election, to be held eclare that I have not signed, and w such office at the next ensuing reg	on November 2, 2021, and ill not sign, any nominating alar local election.
(usual signame)		263 Gene Ac	
2. Degalia M. Hurri	ELIZABETH M. Kalson (Name printed as registered)	Carli Amone as Ave V	5/9/21
(man rightness)	(marrie printed as registered)		
(usual s(gnispec)	Experient Consult (name printed as registered)	100 Euton & Blue NE 49+ B (address as registered, including quadrant)	5/1/es
Em/	EVAN WIENS	13100 Paseo Utsta	5/9/21
(usual signature)	(name printed as registered)	(address as registered, including quadrant)	(date)
5. Via Lovelle	Rian Sprendle	325V Month Ln NE (address as registered, including quadrant)	5/9/24 (date)
MA	tropa Valas	Alan circles of man	- Mare
(mile) signa(urr)	(name printed as registered)	(address as registered, including quadrant)	(date)
Andrewive a	Manus printed as registered)	121 Hunford HM	5+9-21
4 Am Ahal	Northwester 1 Aces	25th 1-PGDOM ICH	ms-9-1
(usual aigetrure)	(name printed as Agistered)	3841 PEDPONUGU Goddress as registered, including quadrant	(date)
	Marketaudh	3529 Agrendur	K 56/21

who resides at 1609 Park Ave St for the office of Mayor of the Cincollegate that a	W. Albuquerque	NOMINATING PETIT	ION
petition for more persons the	of Albuquerque, to be voted for at the I	y nominate Timothy M Keller New Mexic Regular Local Election, to be held on Novemb lare that I have not signed, and will not sign uch office at the next ensuing regular local of	0,
COULD than the n	umber of candidates necessary to fill s	New Mexic Regular Local Election, to be held on Novembelare that I have not signed, and will not sign uch office at the next ensuing regular local election 17045W	er 2, 2021, and 1 , any nominating oction
(usual regulacy)	Dan Cur ley	SVZ 120 St SW ABO 87102 5	17/21
(ganal signature)	Melvin Palmon (mane primed to represent)	5059489346 51	17/2/Pl (date)
Man Man	Macto C, Machaet (mane penaled as reposeed)	2425 Margo FAAU	5/7/2/4
Sund Michael Land	Giovanna Bryl	6401 Santa Main soll	5/7/21
Canal significat	Cecilia Perez	1009 15th Street	5/7/21
15	Bernard Peter		15/2/
(busing transfer)	Lanne Protect de registrato) Lanne Protect Va. (name protect da registrato)	(beforess as registered, including quadrant)	5/7/21
(mad signales)	(name printed as registered)	(address as registered, including quadrant)	(dase)
(utual seguatore)	(name printed as registered)	(address as registered, including quadrant)	(date)
THE RESERVE TO THE PERSON NAMED IN COLUMN TWO IS NOT THE PERSON NAMED IN COLUMN TO THE PERSON NA	(name printed as registered)	(address as registered, including quadrant)	(da

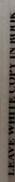
2021 REGULAR LOCAL ELECTION NOMINATIN	NG PETITION
I, the undersigned, a registered voter of Albuquerque, New Mexico, hereby nominate Timothy M	Keller (consider x name)
who resides at 1609 Park Ave SW, Albuquerque	, New Mexico,
for the office of Mayor of the City of Albuquerque, to be voted for at the Regular Local Election, to be declare that I am a registered voter of the City of Albuquerque, I also declare that I have not signed, petition for more persons than the number of candidates necessary to fill such office at the next ensuited to the control of th	and will not sign, any nominating ng regular local election.
2. Manufacturer Amelia by the miles and supported coupling of reparent, actioning our	6/7/11
3. July 3512 Chands H (some priced as regioned) 3512 Chands H (submer) (sold signature)	WE 8716 5/7/2(P3)
4 Attain Rand Vottlesm Wil Lead Ave 91 (address as regioned, solution qui	3 17/2 B3
5. ACCUER Anangle Claricht 21 Glempte VIVO (subres su regented) (subres su regented) (subres su regented) including qu	7123 5 7 2 R3
6. Parmy SWY RMMUUD SAUAF 434 13TH SS A (manu printed as registered) (softens as registered, including que	2m S/7/21 V adrant)
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8. Challed Hay Fil I have Are (name printed a regulator) (uldress as registered, including q	8 577 j 2 / V undrant)
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10. Minum Thomas (Are (Minum) (Mare registered) (Mare registered, we hading a	to OA ST Louis
Rev. 2021 NMSA 1978, § 1-8-30	

2021 REGULAR LOCAL ELECTION NOMINATING PETITION

	ter of Albuquerque, New Mexico, h	ereby nominate Timothy M Keller	
I, the undersigned, a registered vo	SW Albuquerque		date's name)
who resides at 1609 Park Ave	(candidate's address)		
		he Regular Local Election, to be held on declare that I have not signed, and will fill such office at the next ensuing regular	
1. (usual signature)	CHRISTOHER TO FLEHE III	(address as registered, including quadrant)	24/A 202
2. S.J. S. I. J. (usual signature)	Samuel A. Sundo. (name printed as registered)	5608 Camino Pa Su Espenara (address as registered, including quadrant)	4/24/2021 R3
3. Sar Que (usual signature)	Kennelly Owns (name printed as registered)	1709 Posped Aw (address as registered, including quadrant)	4/24/2/ (date)
Lati V	Kathyn Gree	2717 Chelwood Park Blvd M (address as registered, including quadrant)	2//24/21 (date)
Eyrllu Selffy	Esperanza Galle	1305 Dickerson 2005 Dr SE Apt D	4/24/21
(usual signature)	(name printed as registered)	(address as registered, including quadrant) April 10 800 V: Sta Del North (address as registered, including quadrant)	(date) 4-2(-2)
Hauling States	(name printed as registered)	(lajes by North 1817) Gaddress as registered, including quadrant)	4-24-21 (date)
(usual signature)	Dantine Mageli (name printed as registered)	(address as registered, including quadrant)	4-24-21 (date)
Laules Hun (usual signature)	KATHUEN IBARCA (name printed as registered)	126 ALEZ ST NE	4/24/21 23
(usual signatus)	ALYSSH ARCE (name printed as registered)	(address as registered, including quadrant) 507 Factor of Pow (address as registered, including quadrant)	(date) 4 · 24 · 21
		(was east as registered, mendaing quadrant)	(date)



who resides at 1609 Park Ave S	r of Albuquerque, New Mexico, hereb		e's nome) Mexico,
for the office of Mayor of the City of	f Albuquerque, to be voted for at the	Regular Local Election, to be held on N clare that I have not signed, and will no such office at the next ensuing regular l	ovember 2, 2021, an
1. August (usual signature)	Robyn Ray (name printed sayregistered)	3300 Silver And SE_ (address as registered, including quadrant)	5/30120 (date)
2. Quisial signature)	Ein Capener	7412 (Oddagy Dr	5/30/1
3. O (usual signature)	Mary Maestas (napre printed as registered)	1244 Side winder D (address as registered, including quadrans)	1.NE 5/30
4. A faille flats	Marich Harris (name printed as refishered)	722 USIKIW noch DUNZ (uddress as registered, including quadram)	5/30/21 (date)
5(usual signature)	(name printed as registered)	(address as registered, including quadrant)	(date)
6. Kinten a frafissen	KPESINE ELHARISMI (name printed as registered) 1559398	1030 Chancele PL (address as registered, including quadrant)	5/20/01 (date)
7	Marie Quesa,	address as registered, including quadrant)	5-30-01
8. June (usual signature)	Ocupy Desch	13104 Darontusu (address as registered, including quadrant)	06/6/2 (tate)
9 BOLLON 14 (usual signature)	Black Melshlan (name printed as registered)	(address as registered, including quadrant)	616/21 (date)
10(usual signature)	(name printed as registered)	(address as registered, including quadrant)	(date)
Rev. 2021 NMSA 1978, § 1-8-30			





Qualifying \$5 Contribution Receipt Make \$5 check payable to CAOEE Fund. Cash is accepted.

Timothy M. Keller

Name of Candidate (Please print)

Check one

Mayor □ Council #____

Nonrefundable Contribution of \$5 only, is made from my funds to qualify the above
named candidate. I will not be compensated in any way for this contribution.
17-11
+ATRICIA GARRIA
Name of Contributor (Please print)

R-3

Signature of Contributor

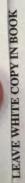
Representative Collecting Contribution (Print Name)

\$5.00

Amount Contributed

Candidate (Yellow) City Clerk (White)

Contributor (Pink)





Qualifying \$5 Contribution Receipt Make \$5 check payable to CAOEE Fund. Cash is accepted. Timothy M. Keller
Name of Candidate (Please print)

Check one

Mayor □ Council #____

Nonrefundable Contribution of \$5 only, is made from my funds to qualify the above named candidate. I will not be compensated in any way for this contribution.

Name of Contributor (Please print)

Albuquerque Address of Contributor as shown on Voter Registration Rolls (No P.O. Box)

Council District

Signature of Contributor

TOSEMBLY JANUA

Representative Collecting Contribution (Print Name)

Amount Contributed

Date of Contribution

Candidate (Yellow)

Contributor (Pink)

Signature of Representative

\$5.00



Qualifying \$5 Contribution Receipt
Make \$5 check payable to CAOEE Fund.
Cash is accepted.

City Clerk (White)

Timothy M. Keller

Contributor (Pink)

Name of Candidate (Please print)

0	1 1		
	hecl	K O	ne
-		NU	110

Mayor □ Council #____

TRUE TO SERVICE TO SER	
Nonrefundable Contribution of \$5 only, is mamed candidate. I will not be compensated	ade from my funds to qualify the above in any way for this contribution
I leresa uni	manulo
Name of Contributor (Please print)	
507 Monte Alto	QUE "
Albuquerque Address of Contributor as shown on Voter Regi	stration Rolls (No P.O. Box) "Council District
JULIO TO HOME	Council District
Signature of Contributor	
Catherine Jarani 110	Caramelo
Representative Collecting Contribution (Print Name)	
(1 lint Name)	Signature of Representative
Amount Contributed \$5.00	Date of Contribution

Candidate (Yellow)



Qualifying \$5 Contribution Receipt
Make \$5 check payable to CAOEE Fund.
Cash is accepted.

Timothy M. Keller

rame of Candidate (Flease print)						
Check one	Mayor	□ Council #_				

named candidate. I will not be compensated in any way for this contribution.
- Frická Padille-Isamtel
Name of Contributor (Please print)
12200/Gordgomeny Blyd# elolo 87111 # (23)
Albuquerque Address of Contributor as shown on Voter Registration Rolls (No P.O. Box) Council District
Jula gaille Fraguel
S(gnature of Contributor
The state of the s
Catherine Jaramillo Romello
Representative Collecting Contribution (Print Name) Signature of Representative
J. 3 21
Amount Contributed \$5.00
Date of Contribution
City Clerk (White) Candidate (Yellow) Contributor (Pink)