

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 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 September 10, 2021 hearing or by lawful, sworn declaration.

1. Frances Flores may testify regarding her examinations of Qualifying Contribution receipts submitted by the Gonzales Campaign.
2. Cris Rocha may testify regarding his examination of Qualifying Contribution receipts submitted by the Gonzales Campaign.
3. Neri Holguin may testify regarding the allegations of the Complaint and her examination of Qualifying Contribution receipts submitted by the Gonzales Campaign.
4. David Keylon may testify regarding the investigation into the allegations in the Complaint and contact with individuals whose names appear on receipts submitted by the Gonzales Campaign.

5. John Cordova may testify regarding his investigation into the allegations in the Complaint and his contact with individuals whose names appear on receipts submitted by the Gonzales Campaign.

6. Jack Blair may testify regarding his investigation into the allegations in the Complaint and his contact with individuals whose names appear on receipts submitted by the Gonzales Campaign.

7. Laurie Hoeltzel, PhD, a forensic document examiner, may offer opinions based on her examination of the Qualifying Contribution receipts submitted by the Gonzales Campaign.

8. Jan Wright may testify regarding the authenticity of the signature appearing on the Qualifying Contribution receipt submitted in the name of her mother, Dorothy Wright.

9. Charles Cox may testify regarding the authenticity of the signature appearing on a Qualifying Contribution receipt submitted in his name.

10. Joylene Cox may testify regarding the authenticity of the signature appearing on a Qualifying Contribution receipt submitted in her name.

11. Jillian Shane may testify regarding the results of the investigation conducted by the Office of Inspector General.

12. Megan McMillan may testify regarding the Qualifying Contributions receipts submitted by the Gonzales Campaign.

13. Michele Martinez may testify regarding the Qualifying Contributions receipts submitted by the Gonzales Campaign.

14. Any witnesses listed by the Respondent.

15. Any witnesses necessary to provide rebuttal testimony.

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

KEEFE LAW FIRM

By: /s/ Lauren Keefe

Lauren Keefe