



Office of the City Clerk  
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**RECEIVED**

By Cristobal Rocha at 1:02 pm, Aug 13, 2025

## REQUEST ADVISORY OPINION FORM

City of Albuquerque  
Board of Ethics & Campaign Practices

**All request forms must be submitted by email to [cityclerk@cabq.gov](mailto:cityclerk@cabq.gov)  
The Office of the City Clerk does not accept paper submissions.**

1. Complainant's Information			
Last Name	First Name		
Uballez	Alexander		
Mailing Address	City	State	Zip Code
P.O. Box 26421	Albuquerque	NM	87102-2142
Daytime Phone Number (include area code)	Email Address		
505-508-6423	alexuballez@gmail.com		

2. Please briefly explain the nature of the real or potential conflict with which you are requesting an advisory opinion

Dear Members of the Board of Ethics & Campaign Practices,  
I write with a request for clarification about whether the Election Code or other City campaign regulations allow a privately-financed candidate accept contributions from an individual who prefers not to disclose a residential address for one of the following reasons:

- they reasonably fear that disclosure of their residential address could endanger them or their families because of the nature of their employment; or
- they are a member of the U.S. military stationed overseas who uses a "PSC" box as their military mailing address; or
- they are traveling internationally for an extended period and prefer to use a local PO Box address?

Additionally, may a privately-financed mayoral candidate accept contributions from either an individual contributor whose employer uses a PO Box address, or a business who uses only a PO Box address due to the nature of their work?

### 3. Please provide all material facts regarding the real or potential conflict.

The following contributors initially provided a PO Box address associated with their contributions to mayoral candidate Alex Uballes's campaign. All have either been refunded or ultimately provided a street address for inclusion in an amended disclosure report. However, given that these questions and issues will likely impact other campaigns and future contributors, I respectfully request guidance from the Board on how best to proceed in order to proactively ensure compliance should these scenarios arise again.

Contributor A is a person employed as a prosecutor in another state who donated \$192.30. They expressed a concern that disclosing their residential address could pose a threat to theirs or their families' personal safety.

Contributor B is a person employed locally as a criminal defense attorney who donated three times, totaling approximately \$85. They expressed a concern that disclosing their residential address could pose a threat to theirs or their families' personal safety. They suggested a state law exception such as the Inspection of Public Records Act, NMSA 1978 Section 1-1-27.1 or 1.10.37 NMAC would protect their residential address from public disclosure if there is a privacy risk.

Contributor C is a retired individual traveling internationally who does not have a residential address. They contributed \$96, personally know the candidate, and would prefer to use their local P.O. box address.

Contributor D is an individual employed as a U.S. Air Force Judge Advocate based overseas who contributed \$240.45. They would prefer to use their military mailing address, which is a "PSC Box" (not a typo).

Contributors E, F, and G (up to \$967) are employed by entities who prefer to use a PO Box as their address, in some cases due to the sensitive nature of their work. The rules are unclear about whether employer addresses must be residential or street addresses, or if a PO Box address is acceptable.

The campaign team inquired with the City of Albuquerque Manager about any statutory or administrative exception(s) that would permit use of a P.O. Box or PSC Box rather than a residential address or employer address. The Manager advised that: "City Charter (Article XIII, Section 4(d)(1)(B)) requires contributors to list their residential address," and that residential addresses should also be used for employers. Under the scenarios described above, the Manager responded that: "A P.O. Box or employer address doesn't meet the requirement, and unfortunately, there's no exception process in place. If the form doesn't include an address, we have to treat it as incomplete."

Additional space for details from #3. Attach documentation of the material facts listed in #2 to this form and mark each separate document with a separate exhibit number.

Excerpt of the Relevant City of Albuquerque Charter provision:

Article XIII. Election Code

Section 4. Campaign Financing

(d) Disclosure of Campaign Financing.

(1) Each candidate for the office of Mayor or Councilor and each Measure Finance Committee, shall file with the City Clerk the statements required in Section 4(d)2 of this Election Code, each of which shall be cumulative, signed under oath by the candidate or the candidate's treasurer or by the chairperson or treasurer of the Measure Finance Committee, setting forth through 5:00 p.m. of the day preceding the filing of each statement.

[. . .]

B. When the contributor is an individual, the name and address of the contributor, the contributor's principal business or occupation, the name and address of the contributor's employer, if self-employed, the address of the contributor's business, and the nature of the contributor's or the contributor's employer's business. If the contributor is retired or not employed, the residential address of the contributor shall be disclosed. When the contributor is an entity other than an individual, the name and address of the contributor, the business or activities conducted by the contributor and the owners and managers of the contributor. The amount of each contribution and the cumulative value of all contributions contributed by the contributor shall be disclosed. . . .