



Office of the City Clerk
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RECEIVED

By Cristobal Rocha at 4:16 pm, Aug 27, 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

The Office of the City Clerk does not accept paper submissions.

1. Complainant's Information

Last Name Sonntag	First Name Carla		
Mailing Address POB 95735	City Albuquerque	State NM	Zip Code 87199
Daytime Phone Number (include area code) (505) 836-4223	Email Address carla@nmbizcoalition.org		

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

New Mexico Business Coalition (NMBC) is seeking an advisory opinion on whether it can use communication mediums like billboards, social media, and print and digital ads to encourage nonpartisan voter registration and election participation for the upcoming November 4th municipal election in Albuquerque, without registering as a MFC. The cost for these ads will exceed \$250 and will be paid for out of NMBC general operating funds. NMBC GOTV paid ads will be independent, not coordinated with or authorized by any candidate, candidate committee or MFC. The ads will not mention any candidate, measure or ballot issue that will be on the November 4th election.

NMBC is a 501[c][4] non-profit organization registered with the Internal Revenue Service, the NM Tax and Revenue, and the New Mexico Secretary of State. NMBC has been in operation since 2009 and was neither formed nor operates for the sole purpose of influencing municipal, state, or national elections to benefit or oppose any specific candidates, ballot questions, or referendums. NMBC relies on member dues and donations to its general fund for operations and does not solicit money to influence elections.

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

Relating to Part 8 of the published 2025 Rules by the Albuquerque City Clerk for the Election Code and the Open and Ethical Election Code of the City Charter please clarify the following:

1. In general, please confirm that expenditures of more than \$250 from NMBC's General Fund for GOTV ads that are limited strictly to nonpartisan voter participation and do not mention any candidate or ballot issue will, or will not require NMBC to register as a Measure Finance Committee.

2. Specifically, please confirm that the ad in Exhibit #1 will, or will not require NMBC to register as a Measure Finance Committee based on the 2025 Rules by the Albuquerque City Clerk for the Election Code and the Open and Ethical Election Code of the City Charter. Note: more than \$250 will be spent out of the NMBC general fund to publish the ad, (Exhibit #1).

3. If the determination is that NMBC would not be required to register as an MFC, please confirm the disclaimer in Exhibit #1 is sufficient, and NMBC is not required to expand the disclaimer to include top five donors and secondary donors.

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.

See attached page marked Exhibit #1.

REQUEST ADVISORY OPINION

Submitted by Carla Sonntag

Exhibit #1

