



Office of the City Clerk
P.O. Box 1293
Albuquerque, NM 87103
Phone (505) 924-3650
Fax (505) 924-3333
www.cabq.gov/cclerk

RECEIVED

By Cristobal Rocha at 3:39 pm, Dec 15, 2025

State of New Mexico)

) s.s.

County of Bernalillo)

COMPLAINT FORM

All complaint 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 Candelaria	First Name Jacob		
Mailing Address 510 Slate Ave NW	City Albuquerque	State NM	Zip Code 87102
Daytime Phone Number (include area code) 505-295-5118	Email Address jacob@jacobcandelaria.com		

2. Respondent's Information			
Last Name Garcia	First Name Teresa		
Mailing Address 3030 Erratic St SW	City Albuquerque	State NM	Zip Code 87121
Daytime Phone Number (include area code) 505-903-2570	Email Address Teresa@TeresaforDistrict3.com		

3. If Respondent is a Candidate, the office or position sought			
Candidate, City Council District 3; 2025 Local Regular Election			

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.

5. Describe in reasonable detail the alleged violation(s). Please specify 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. Please 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 and the underlying facts. Include the date or date range of the alleged violation(s) and any other pertinent information. Continue on next page.

Ms. Garcia was represented by David Ring, of Aequitas Law, LLC, in a nominating petition challenge action in District Court case D-202-CV-2025-07791. This case was filed by my law firm on September 2, 2025. Mr. Ring represented Ms. Garcia at a seven (7) hour evidentiary hearing on September 12, 2025. Prior to this hearing, Mr. Ring filed a fifty-two (52) Motion to Dismiss/Motion for Summary Judgment on Ms. Garcia's behalf.

Upon information and belief, Ms. Garcia also received professional legal services benefiting her campaign for City Council in connection with this same petition challenge action from Katy Duhigg.

Ms. Garcia never reported any expenditure for Mr. Ring or Ms. Duhigg's legal services.

Ms. Garcia never reported either of these persons or their law firms making an in-kind contribution to Ms. Garcia's campaign.

By contrast, Stephanie Telles--candidate for City Council in District 1--who was also represented in a nominating petition challenge by Mr. Ring and Ms. Duhigg reported their services as an expenditure (Ring) or in-kind contribution (Duhigg).

Ms. Garcia's willful failure to report legal services provided to her city council campaign in connection with the nominating petition challenge identified herein as either an expenditure or in-kind contribution is a clear violation of the Election Code, Article XIII, Section 14 (d)(1)(A)-(C).

Additional space for details from #5.

6. 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.

Witnesses:

Teresa Garcia

Jacob R. Candelaria

David Ring
505-263-8929

Katy Duhigg
505-980-4933 or 505-263-1797

b. N/A

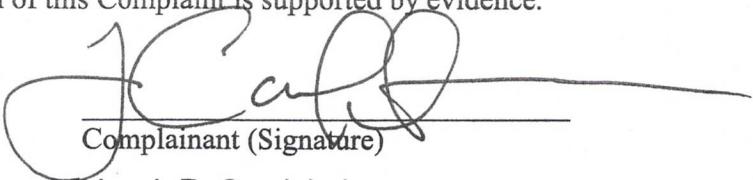
c. Ms. Garica's list of final contributions and expenditures, current through December 10, 2025, may be accessed Online at the City's Campaign Finance Reporting System website:

<https://campaignfinance.cabq.gov/#/exploreDetails/XeWKA9cv4TQvdg8MebI7A5P4048PFnxLXRUfdOLcQk01/3/33903/2/2025>

Copies of filings from the case docket in D-202-CV-2025-07791 will be provided upon request.



I, Jacob R. Candelaria, hereby swear and affirm under penalty of perjury that, to the best of my knowledge, information, and belief, formed after a reasonable inquiry under the circumstances, each factual contention of this Complaint is supported by evidence.



Complainant (Signature)

Jacob R. Candelaria

Print or type name of Complainant

Sworn or affirmed before me, the undersigned authority by Jacob Candelaria this
15 day of December 2025.



Notary Public

