



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

REC'D
PRO-CLERK
2021 OCT 18 PM 1:55

State of New Mexico)

) s.s.

County of Bernalillo)

COMPLAINT FORM

1. Complainant's Information			
Last Name Baca	First Name Joaquin		
Mailing Address 100 Gold Ave, sw #408	City Albuquerque	State NM	Zip Code 87102
Daytime Phone Number (include area code) 505 417-6689	Email Address bacaqaquin9@gmail.com		

2. Respondent's Information			
Last Name Hampton	First Name Rebecca		
Mailing Address	City	State	Zip Code
Daytime Phone Number (include area code) 505 545-8578	Email Address rebecca.c.hampton@gmail.com		

3. If Respondent is a Candidate, the office or position sought
No

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), 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 Stop the Stadium Campaign (SSC) actively opposes the proposed \$50 million Stadium Bond question on this year's ballot. A phone number and email on an SSC media release lists Bex Hampton as the contact for the campaign. She is a well-known organizer for the Party for Socialism and Liberation (PSL). Neither SSC nor PSL have registered the campaign as a Measure Finance Committee (MFC) with the City of Albuquerque within five days of formation and spending more than \$250. Albuquerque voters have no idea who is funding their campaign.

If true, SSC and/or the Party for Socialism and Liberation would be in violation of the following sections of the City Charter:

- Section 6. MEASURE FINANCE COMMITTEES. (a) Each Measure Finance Committee shall register with the City Clerk within five days of formation by preparing and filing with the Board a statement, signed by the chairperson of the Committee... Section 2(f) defines a "Measure Finance Committee" as "a political committee or any person or combination of two or more persons acting jointly in aid of or in opposition to the effort of anyone seeking to have their name placed on the ballot for city office, a petition to place a measure on the ballot pursuant to Article III of this Charter, voter approval or disapproval of one or more measures on the ballot and/or the election to, or recall from, office of one or more candidates for office when such person or people have accepted contributions in excess of \$250 or make expenditures in excess of \$250 for any of the purposes listed heretofore."

- Section 4 lists the requirements for filing, what should be filed, and the campaign finance filing dates. SSC would also be in violation of this section.

It is worth noting Section 6(c), which states,

It is recognized that an affirmative duty rests on the officials of any such Measure Finance Committee to be aware of the provisions of this Election Code, and nothing contained in this Section shall exempt a Measure Finance Committee from filing its statement of formation or existence as required herein at the earliest possible date. Failure to so file according to the provisions of subsection (a) of this section shall subject the Committee to a fine not to exceed the maximum amount authorized by state law or public reprimand or both as provided in the Board's Rules and Regulations...

- It is difficult to see from these images but I do not think any of them have the proper disclosure requirement. If that is the case, SSC and/or the Party for Socialism and Liberation would be in violation of Section 5 of the Charter as well, regarding disclosure on campaign materials.

On social media and news stories, SSC consists of numerous individuals, the Party for Socialism and Liberation, and others. SSC actively opposes the bond measure, as evidenced by their materials and statements on social media and to the media. I believe they have expended in excess of \$250, which would require the filing of an MFC. Following is what I have learned:

Stop the Stadium began on or about August 29, 2021 with this initial Facebook post, showing that it formed almost two months ago (see word doc attachment for accompanying photo and text):

On September 20, 2021, Stop the Stadium canvassed neighborhoods with these placards printed in color. Depending on the quantity, these placards could easily have cost \$50-\$250 or more, toward the \$250 threshold.

On October 2, SSC was present at the Albuquerque Women's March, handing out what seemed like dozens of printed, color signs to the large crowd. I estimate these signs to be about 12" x 12" or so. I estimate these signs to cost at least \$1.50 per piece. With dozens printed, the cost of these signs could have been between \$100-\$500, based on quantity, toward the \$250 threshold.

On October 8 at the Albuquerque Art Walk, SSC was handing out flyers and had even more of the large color signs. The flyers may have been an additional \$50-\$100, again, based on quantity.

On October 10, SSC hosted a "movie night" at the Albuquerque Center for Peace and Justice in the University area. Either SSC rented the Center or the Center made an in-kind contribution. This expense or contribution could be at least \$100, at fair market value, if not much more.

On October 13, SSC held a media conference. KOAT's story included a shot of a large sign, which at minimum, included the cost of materials; a professionally made, color banner that I would estimate to be 4' x 6'; and large, black and white, vertically-oriented placards. On the FedEx Office website, the 4x6 banner alone would cost a minimum of \$160.

In summary, the evidence shows that SSC was formed on August 29 or before; that they consist of more than one person; and they had spent well over \$250 prior to and including October 13. Yet as of October 18, SSC has failed to register as a Measure Finance Committee and report its contributions and expenditures to Albuquerque voters.

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.

see above

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.

There is a Facebook post to the media from Stop the Stadium that lists Bex Hampton as the contact person, with her email and cell phone number. Bex Hampton is well known as an organizer with the Party for Socialism and Liberation (see attachment):

I, Joaquin Baca, 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.



J A
Complainant (Signature)

Joaquin Baca
Print or type name of Complainant

Sworn or affirmed before me, the undersigned authority by Joaquin Baca this 18 day of October 2021.

Stephan Casaus
Notary Public

If, after a reasonable inquiry under the circumstances, you are unable to certify that certain specifically identified factual contentions of the Complaint are supported by evidence, you may certify as follows:

I, Joaquin Baca, hereby swear and affirm under penalty of perjury that, to the best of my knowledge, information, and belief, there are grounds to conclude that the specifically identified factual contentions of this Complaint are likely to be supported by evidence after a reasonable opportunity for further inquiry

J A
Complainant (Signature)

Joaquin Baca
Print or type name of Complainant

Sworn or affirmed before me, the undersigned authority by _____ this _____ day of _____ 20__.

Notary Public

All exhibits or attachments referenced in the complaint must be included with the Complaint.

Attachment for question 5, 6 and 7

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.

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On September 20, 2021, Stop the Stadium canvassed neighborhoods with these placards printed in color. Depending on the quantity, these placards could easily have cost \$50-\$250 or more, toward the \$250 threshold:

 **Stop the Stadium**
September 20 at 4:32 PM · 🌐

DM us to get a file to print out and write your own message about why you don't want the stadium! Follow Stop The Stadium and DM the page to get involved!!

Organizers and residents hit the streets in Baretas this weekend to talk to neighbors about why we need to Stop the Stadium. Supporters of the stadium have been saying residents WANT the stadium, but after knocking on hundreds of doors we have discovered most residents don't even know about the plan to build a stadium in ... [See More](#)



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Nov. 2:



**STOP
— THE —
STADIUM**

Vote NO
on the
Stadium Bond

Affordable Housing, Not Stadiums!

City officials want you to give them permission to take out a \$50 million loan from rich "investors" so they can build a stadium. The loan, plus all of the interest, will be paid back by you, the hardworking taxpayer. That's what a "bond" is. New Mexico is ranked 49th in poverty. What else should we be spending \$50 million on? Education, affordable housing, healthcare?

The elites want to drive out low-income residents and move in high-income residents because it means more money. Stadiums are a perfect tool. They make rents go up, with no controls on rent, Albuquerque residents that can't afford rising prices will be forced out. Downtown's historic working class neighborhoods will be cleared out to make way for higher-income groups.

It's happened in other cities.
WE WON'T LET IT HAPPEN IN ALBUQUERQUE!


JOIN THE RALLY:


NOV. 1st | 5PM @ TRIANGLE PARK
— BARELAS & 4TH ST. —

TEXT "STADIUM" TO 221.6659
TO HELP STOP THE STADIUM

@StopTheStadium • 221.6659

On October 10, SSC hosted a "movie night" at the Albuquerque Center for Peace and Justice in the University area. Either SCC rented the Center or the Center made an in-kind contribution. This expense or contribution could be at least \$100, at fair market value, if not much more:


Stop the Stadium added an event.
...
 October 10 at 9:35 PM · 🌐



MOVIE NIGHT

BATTLE FOR BROOKLYN
TUES. OCT. 26 · 6PM

@Albuquerque Center for Peace & Justice
202 Harvard Dr. SE

Nov. 1: Rally · 5PM · 4th & Barelas
Nov. 2: Vote NO on the Stadium Bond

HOUSING FIRST! NOT A STADIUM!

TUE, OCT 26 AT 6 PM
Movie Night: Battle for Brooklyn
 Albuquerque

☆ Interested

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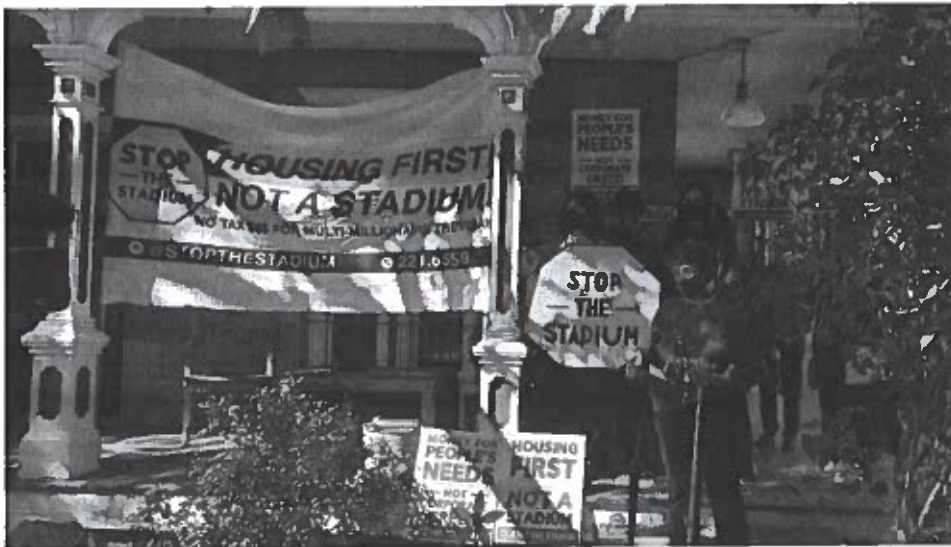


TECHNOLOGY CITY & POLICE POLICE & PRISON

Residents say new soccer stadium will raise rents and expand policing in Albuquerque

People organize to stop the city from borrowing millions to build the facility in historic neighborhoods

BY: AUSTIN FISHER - OCTOBER 14, 2021 6:00 AM



Frances Armijo said she has not seen any discussion about the economic or social impact the proposed stadium will have on the Bernal and South Broadway neighborhoods. "That's because, in my opinion, we simply don't matter. In my opinion, we are the sacrificial lambs for this vanity project. Please, when you vote, ask yourself 'Would I want this in my neighborhood?'" (Photo by Austin Fisher / Source NH)

In summary, the evidence shows that SSC was formed on August 29 or before; that they consist of more than one person; and they had spent well over \$250 prior to and including October 13. Yet as of October 18, SSC has failed to register as a Measure Finance Committee and report its contributions and expenditures to Albuquerque voters.

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Details: On Nov. 2, there will be a vote in Albuquerque on whether to funnel \$50 million in taxpayer money away from social spending and into building a stadium. Local politicians have teamed up with NM United's multi-millionaire CEO Peter Trevisani to deceptively market the stadium as a major job creator that will not cost local and statewide taxpayers anything. Private political lobbyists have spent thousands of dollars on a media blitz to give the false impression that "people all over Albuquerque" are yearning for a stadium.

In reality, the majority of Albuquerque residents, particularly those near the proposed stadium sites, are strongly opposed to using public resources to finance a wasteful sports stadium. The majority of Albuquerque residents know that in cities all across the United States, stadiums have been a massive gentrifying force that displace working class communities through the mechanism of uncontrolled increase in the cost of rent and housing.

Stop the Stadium believes these voices need to be heard, not just the paid advertisements of the NM United ownership group that stand to profit off the stadium.

Contact: Bex Hampton | (505) 545-9578 |
rebecca.hampton@gmail.com

@kbtv4 @koat7 @thepaperabc @kuminews
@anqjournal @krcq

