



Office of the City Clerk
 P.O. Box 1293
 Albuquerque, NM 87103
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 www.cabq.gov/clerk

Katy Duhigg, City Clerk

State of New Mexico)

) s.s.

County of Bernalillo)

COMPLAINT FORM

1. Complainant's Information			
Last Name Hallinan		First Name James	
Mailing Address [REDACTED]		City Albuquerque	State Nm [REDACTED]
Daytime Phone Number (include area code) [REDACTED]		Email Address james@intersectionstrategies.com	

2. Respondent's Information			
Last Name Davis		First Name Pat	
Mailing Address [REDACTED]		City Albuquerque	State NM [REDACTED]
Daytime Phone Number (include area code) [REDACTED]		Email Address patdavis@cabq.gov	

3. If Respondent is a Candidate, the office or position sought
City Council President

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, but I emailed the full City Council, OIG and the Mayor

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.

On the afternoon of September 19, 2019 I met with Councilor Davis at Marble Downtown at about 3:30 PM on the upstairs level. The Councilor took a scooter to this meeting so he could drink alcohol, which he did. I however only had water. The Councilor and I traded niceties for a while and I had to interrupt a few times as I was communicating via text and call with former Lt. Governor Denish about a personal media issue she was dealing with which was unrelated. Shortly after my last interaction with the former Lt. Governor, Councilor Davis attempted to intimidate me and then threatened me on behalf of Mayor Keller, himself and others to the tune of pulling \$30,000 of taxpayer funding for the Somos ABQ festival next year. Davis informed me that I could not criticize Mayor Keller, himself and others on my social media tying it directly to the city money he and Keller give to Somos ABQ. The social media post they were angry about is still on all of my platforms, and I will not remove it despite their threats. I was robbed (both personal and business) and I made my thoughts public about it as countless residents and business owners of Albuquerque are doing too during this unprecedented crime crisis. We are fed up. The Councilor became quite embarrassed literally turning red and apologized (shamefully not for his threats of abusing taxpayer funds, but because he was uninformed about what he was trying to threaten me with) after his threats and bullying diatribe were over when I called him out for the abuse and his misinformation.

This came a short time after Mayor Keller expressed his displeasure with my social media post to a former boss of mine, and then to me directly outside of the Mayor's luxury VIP suite at a New Mexico United game. The suite is frequently filled with his political operatives and his appointed government employees, and what I presume to be his political donors for Isotopes and United games. I believe the suite is owned by the City of Albuquerque and I hope there is a record of who the Mayor allows to use this taxpayer-owned luxury suite.

I would request an investigation into this matter and I am happy to speak with the OIG, law enforcement, the Council, or anyone else publicly and/or under oath about these abuses by Council President Davis which he purported to carry out on behalf of himself, Mayor Keller and others. It is also quite concerning that Davis holds such a high ranking position appointed by Governor Lujan Grisham regarding the legalization and profiting of Marijuana in New Mexico.

I believe at the very least the Code of Ethics was violated by Council President Davis, and I am concerned far worse violations have been made by the Mayor using the taxpayer luxury suite.

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.

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.

I, James Ha nan, 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)

James Ha nan

Print or type name of Complainant

Sworn or affirmed before me, the undersigned authority by James Ha nan this
21st day of March 2020.

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, James Ha nan, 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



Complainant (Signature)

Print or type name of Complainant

Sworn or affirmed before me, the undersigned authority by _____ this
21st day of March 2020.

Notary Public

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