



Office of the City Clerk  
 P.O. Box 1293  
 Albuquerque, NM 87103  
 Phone (505) 924-3650 Fax (505) 924-3660 2019 OCT 25 AM 10: 02  
 www.cabq.gov/clerk

Katy Duhigg, City Clerk

RECEIVED  
 ALBUQUERQUE CITY CLERK

State of New Mexico )  
 ) s.s.  
 County of Bernalillo )

**COMPLAINT FORM**

1. Complainant's Information			
Last Name Holguin		First Name Neri	
Mailing Address [REDACTED]		City Albuquerque	State NM
			Zip Code [REDACTED]
Daytime Phone Number (include area code) [REDACTED]		Email Address neriholguin@gmail.com	

2. Respondent's Information			
Last Name Strong		First Name John	
Mailing Address [REDACTED]		City Albuquerque	State NM
			Zip Code [REDACTED]
Daytime Phone Number (include area code) [REDACTED]		Email Address JOHNBSTRONG@YAHOO.COM	

3. If Respondent is a Candidate, the office or position sought
NA

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.

**VIOLATION #1: A 6x11 mailer arrived in mailboxes in City Council District 2 on Friday, October 18, 2019, "Paid for by Abq United for District 2, Melissa Ontiveros Treasurer" lacking the other disclosure information required for MFC's.**

**VIOLATION #2: A 6x11 mailer arrived in mailboxes in City Council District 2 on Wednesday, October 23, 2019, "Paid for by Abq United for District 2, Melissa Ontiveros Treasurer, 123 15th St. SW Albuquerque, NM 87104" also lacking the full disclosure information required for MFC's.**

The MFC is out of compliance with:

(1) Rules & Regulations of the Board of the the Ethics & Campaign Practices for the Election Code of the City Charter. Section 4, C. Campaign Materials, says each candidate or MFC must specify the name and address of the establishment that printed the campaign materials. That is missing.

(2) 2019 Regulations of the Albuquerque City Clerk for the Election Code. Part F, Section 2 Not Authorized by Candidate says communication says the MFC must include the name and address of who financed the communication, the specific language "NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE" in print that is equal to or greater than 4% of teh vertical picture height, Times New Roman font. This is missing in both mailers received to date.

(3) 2019 Regulations of the Albuquerque City Clerk for the Election Code. Definitions, Electioneering Communication, Independent Expenditures; definition, 4. Disclosure rquires MFC's to include on literature "an internet addresss that links to the entity's campaign finance reports." This is missing in both mailers received to date.

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 attached pdf's.**

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.

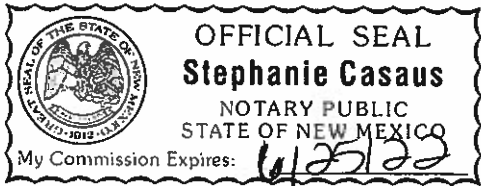
**See attached.**

**a. I should suffice as a witness, many people received the mailing.**

**b. see attached**

**c. see attached.**

I, Neri Holguin, 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.



Neri Holguin  
Complainant (Signature)

Neri Holguin  
Print or type name of Complainant

Sworn or affirmed before me, the undersigned authority by Neri Holguin this 25 day of October 2019.

Stephanie 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, Neri Holguin, 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 \_\_\_\_\_ day of \_\_\_\_\_ 20\_\_.

\_\_\_\_\_  
Notary Public

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

**RULES & REGULATIONS  
OF THE  
BOARD OF ETHICS  
&  
CAMPAIGN PRACTICES**



**FOR THE  
ELECTION CODE  
OF THE  
CITY CHARTER**

**OFFICE OF THE CITY CLERK  
P.O. Box 1293  
ALBUQUERQUE, NM 87103**

## Section 4 Advertising C

3 In the case of billboards, a notarized statement from the person or business providing the billboard specifying the fair market value of the sign together with a statement of the actual cost, if any, of the sign to the Candidate or Measure Finance Committee. The difference between the fair market value of the sign and the actual cost to the Candidate or the Measure Finance Committee shall be considered an in-kind contribution and shall be accounted for and reported as such.

### C Campaign Materials

1 Each Candidate and each chairperson of each Measure Finance Committee shall ensure that all campaign materials specify the name of the sponsor who authorized the printing or distribution of such campaign material and the name and address of the establishment that printed or otherwise created the campaign materials; provided, that the name and address of the printing establishment is not required to be specified in a newspaper advertisement.

2 Each Candidate and each chairperson of each Measure Finance Committee shall promptly file with the Board a copy of each campaign material used in the campaign upon such material being printed or distributed.

## Section 5 ADVISORY OPINIONS

A The Board shall issue advisory opinions to any Official pursuant to the following procedures.

1 The Subcommittee A subcommittee of the Board shall review advisory opinion requests from Officials. The subcommittee shall consist of the Chair and Vice Chair of the Board and a third member of the Board who shall be designated by the Chair on an ad hoc basis. The subcommittee shall make recommendations to the entire Board on each opinion request.

2 The Official shall file a request for advisory opinion with the City Clerk on a form approved by the City Clerk.

3 The subcommittee may require the Official requesting an opinion to provide additional information and to appear before the subcommittee to respond to questions related to the request.

4 The Board shall review all recommendations from the subcommittee. The Official requesting an opinion may attend such review hearing. The Board may require the Official requesting the opinion to answer questions or provide additional information or documentation at the review hearing. The Board may modify the recommended advisory opinion submitted by the subcommittee.

## **2019 REGULATIONS OF THE ALBUQUERQUE CITY CLERK FOR THE ELECTION CODE**

**PURPOSE:** In 2018, following the implementation of the State Local Election Act, the City Council passed Election Code Reform. The purpose of this reform was to bring the City in line with the Local Election Act, to ensure that the Election Code is administered fairly and consistently, and to provide transparency for voters and accountability to candidates and Officials. The purpose of these Regulations is to provide guidance and instruction in keeping with the reform passed by Council, and to establish clear procedures that candidates shall follow under the Election Code, Albuquerque City Charter Article XIII (hereinafter referred to as “the Code”, with all citations referring to the Code unless otherwise noted). The City Clerk shall create forms, election calendars, timelines and all other documents necessary to implement these Regulations. In conformance with the Code and these Regulations, the documents and forms created by the City Clerk are not part of these Regulations.

**AUTHORITY:** Section 9 of the Code authorizes the City Clerk to adopt rules to insure the effective administration of the Code.

**APPLICABILITY:** These Regulations apply to all candidates for the offices of Mayor and City Council, and should be read in combination with the Regulations for the Open and Ethical Elections Code (“OEEC”) by candidates who seek eligibility to receive public funds or become Participating Candidates under the OEEC.

**EFFECTIVE DATE:** These Regulations shall be effective upon the approval and signature of the Chief Administrative Officer. Once effective, the City Clerk shall publish these Regulations on the Office of the City Clerk website.

**DATES AND DEADLINES:** Should a deadline fall on a City observed holiday or a weekend, the deadline is automatically moved to the next City working day, unless otherwise published by the City Clerk.

### **PART A     DEFINITIONS**

All terms utilized herein shall have the same meaning as defined by the Code, unless the regulation specifically notes otherwise. This Part also contains new definitions and clarified definitions for terms contained within the Code.

**Broadly Distributed:** Any communication delivered by a campaign, candidate, Measure Finance Committee, or their agents, that is sent, delivered or transmitted to more than 100 people.

**Campaign Materials:** Any published, printed or Broadly Distributed advertising or communications including but not limited to paid or donated advertisements, handbills, petitions,



circulars, letters, radio, television or internet broadcasts, cable distributions, electronic or telephonic transmissions, or similar communication materials or methods used in a campaign either for or against any candidate.

**Contribution:** In addition to the definition in City Charter Article XIII, § 2(g), please see Part H, below.

**Coordinated Expenditure:** In addition to the definition in City Charter Article XIII, § 2(o), if an Expenditure is made to promote or support the nomination or election of a candidate, or to oppose or defeat the candidate's opponent(s), and the Expenditure is made in cooperation, consultation or concert with, or at the request or suggestion of, the candidate, the Expenditure is considered to be a Contribution from the spender to the candidate. As used within this definition, the term "candidate" includes a committee authorized by the candidate to promote or support his or her election, and all agents of the candidate or the authorized committee. For more information regarding coordination, please refer to Part C.

**Covered Office:** City Council or Mayor

**Electioneering Communication:** Any audio or visual communication broadcasted by any means that:

1. unambiguously refers to any candidate; and
2. is broadcasted, printed, mailed, delivered or distributed within 60 days of a regular or special election, or 45 days of a runoff election; and
3. is broadcasted to, printed in a newspaper distributed to, mailed to, delivered by hand to or otherwise distributed to an audience that includes members of the electorate for a Covered Office.
4. Electioneering Communication does not include:
  - a. any news articles, editorial endorsements, opinion or commentary, writings or letters to the editor printed in a newspaper, magazine or other periodical not owned or controlled by a candidate or political party;
  - b. any editorial endorsements or opinions aired by a broadcast facility not owned or controlled by a candidate or political party;
  - c. any communication by Persons made in the regular course and scope of their business or any communication made by a membership organization solely to members of such organization and their families; or
  - d. paid for by a candidate or candidate's campaign committee.

**Expenditure:** In addition to the definition included in Article XIII, Section 2(j), please see Part B, below.

**Express Advocacy.** An Expenditure made by a Person or group, other than a candidate or a candidate's committee, that advocates the election or defeat of a candidate or ballot measure, including all costs of designing, producing or disseminating a communication that contains

1. **Independent Expenditures; definition.** For the purposes of this Part, an "Independent Expenditure" is presumed to be:
  - a. Any funds spent on Express Advocacy or Electioneering Communications that are made without the cooperation, consultation or coordination with, or at the request or suggestion of, a candidate, a candidate's authorized committee or an agent thereof. An Independent Expenditure may include materials already distributed to the public or broadcast by a candidate, the candidates authorized committee or an agent thereof.
  - b. Independent Expenditures may consist of materials previously made public by the campaign without implying coordination by the campaign.
2. **Rebutting presumption.** A person presumed under this Part to have made an Independent Expenditure may rebut the presumption by filing a signed written statement with the Board of Ethics within 48 hours of making the Expenditure stating:
  - a. The cost was not an Expenditure, supported by any additional evidence the person chooses to submit; or
  - b. That the Expenditure was made in cooperation, consultation or coordination with, or at the request or suggestion of, a candidate, a candidate's authorized committee or an agent thereof, supported by any additional evidence the person chooses to submit.
3. **Report required; content; rules.** A person, party committee, political committee or political action committee, or measure finance committee that makes any Independent Expenditure in excess of \$100 during any one candidate's election, or in support or opposition of any one issue before the voters, shall file a report with the City Clerk in compliance with Article XIII, Section 4 of the City Charter.
  - a. A report required by this subpart must contain an itemized account of each Expenditure in excess of \$100 in any one candidate's election, the date and purpose of each Expenditure and the name of each payee or creditor. The report must state whether the Expenditure is in support of or in opposition to the candidate and must include, under penalty of perjury, a statement under oath or affirmation whether the Expenditure is made in cooperation, consultation or concert with, or at the request or suggestion of, a candidate or an authorized committee or agent of a candidate.
4. **Disclosure.** Any literature or advertisement that is purchased with monies from a person, measure finance committee, corporation, limited liability company, organization or other entity making an Independent Expenditure in an attempt to influence the outcome of an election shall disclose the name of the person, measure finance committee, corporation, limited liability company, organization or other entity making the Expenditure. Any disclosure statement required by this Part shall be printed clearly and legibly in a conspicuous manner. The disclosure statement shall include the words "paid for by" followed by the name of the entity making the Expenditure and shall state that it is not authorized by any candidate or candidate's campaign committee. The disclosure statement shall include an

internet address that links to the entity's campaign finance reports. Disclosure statements shall also comply with the following:

- a. If the communication is communicated via audio broadcast by any means, the disclosure shall be spoken at the end of the communication.
- b. If the communication is communicated via visual broadcast by any means, the disclosure shall be printed clearly and legibly in a conspicuous manner. Text must appear in letters equal to or greater than 4% of the vertical picture height, be visible for the entirety of the communication, and be in a color that has a reasonable degree of contrast with the background of the communication.
- c. All disclosures must be clear and conspicuous regardless of the medium in which the communication is transmitted. A disclosure is not clear and conspicuous if it is difficult to read or hear, or if the placement is easily overlooked.

**5. Exclusions.** An Independent Expenditure does not include:

- a. An Expenditure made by a person in cooperation, consultation or concert with, or at the request or suggestion of, a candidate, a candidate's political committee or their agents;
- b. A telephone survey that meets generally accepted standards for polling research and that is not conducted for the purpose of changing the voting position of the call recipients or discouraging them from voting;
- c. A telephone call naming a clearly identified candidate that identifies an individual's position on a candidate, ballot question or political party for the purpose of encouraging the individual to vote, as long as the call contains no advocacy for or against any candidate; and
- d. A voter guide that consists primarily of candidates' responses to surveys and questionnaires and that contains no advocacy for or against any candidate.

**Allegations and Complaints:** Persons wishing to report an allegation that an Independent Expenditure is a suspected Coordinated Expenditure must file a Complaint with the City Clerk in accordance with the Complaint Diversion Rule in Part I, below.

## **PART E IN-KIND CONTRIBUTIONS**

1. "In-Kind Contributions" are goods and services, other than money, that are donated or provided to the campaign at no cost or at a 20% or higher discount from the usual and customary charge. The following activities are examples of In-Kind Contributions:
  - a. A supporter of a candidate purchases campaign signs for distribution by the campaign and is not reimbursed by the campaign;
  - b. A supporter of a candidate pays for some of the candidate's advertising in a community newspaper and is not reimbursed by the campaign;
  - c. A copy shop owner provides the campaign with a discount of 20% or more on printing services;
  - d. A volunteer who is making signs to give to the candidate buys plywood and paint and is not reimbursed by the campaign;

- e. The owner of a local business provides the campaign, free of charge, some of their paid staff members to work for the campaign on company time;
  - f. A commercial vendor extends credit to the campaign under terms that are not substantially similar to the terms extended in the ordinary course of business to nonpolitical customers.
2. Contributors seeking to make an In-Kind Contribution of goods by paying for those goods must pay the vendor directly. If a contributor gives a monetary Contribution to a candidate, campaign, or MFC directly, even if the intent is that the monetary Contribution be used to pay for specific goods, the Contribution must be reported as a monetary Contribution to the candidate, campaign, or MFC, not an In-Kind Contribution.
  3. If a campaign receives an In-Kind Contribution, the campaign must report the fair market value of the Contribution, which is what the goods or services would have cost the campaign if it had paid cash for the donated goods or services. If the campaign received a discount of 20% or more on goods or services, the discount is the amount of the In-Kind Contribution.
  4. Professional services, including legal services, accounting services, consulting services and similar services provided directly from the professional to the Candidate are permitted, provided no single In-Kind Contributor exceeds the limits set in the Charter.
    - a. If a professional provides free of charge or at a discount of 20% or more, the kind of occupational services that the professional otherwise provides for compensation, that is an In-Kind Contribution. However, if a professional volunteers their time providing services that they do not otherwise provide for compensation, that is not an In-Kind Contribution. By way of example only:
      - i. If an accountant provides a campaign with free accounting services, that is an In-Kind Contribution that must be reported and will count against In-Kind Contribution limits.
      - ii. If an accountant volunteers their time going door-to-door for a candidate, that is volunteer work, does not need to be reported, and does not count against In-Kind Contribution limits.
      - iii. If a graphic designer provides a campaign with free design services, that is an In-Kind Contribution that must be reported and will count against In-Kind Contribution limits.
      - iv. If a graphic designer volunteers their time assisting a candidate with speech preparation, that is volunteer work, does not need to be reported, and does not count against In-Kind Contribution limits.
  5. Other In-Kind Contributions
    - a. *Food, Drink and Office Supplies.* Contributions of food, drinks, and/or office supplies that have a cumulative fair market value of one hundred dollars (\$100.00) per election cycle or more must be reported as In-Kind Contributions.
    - b. *Volunteer Services vs. Paid Assistance.* Individuals are permitted to provide their services for free to the campaign as volunteers. However, if the volunteer provides their services

with the knowledge of their employer during their paid work-time, then the employer has made a Contribution to the campaign.

- c. *Appearing in Advertising Sponsored by Third-Parties.* If an individual or organization invites the candidate to appear in a paid advertisement, and the advertisement airs within one hundred (100) days of an election and primarily features the candidate, the value of the advertising *could* be considered a Contribution to their campaign. If the advertisement qualifies as a Contribution, the candidate would be required to report receiving the value of the Contribution. It would count toward the Contribution limit. Contact the City Clerk to receive advice on what factors the Board of Ethics might consider in determining whether the advertisement would be a Contribution.
- d. *Polling and Research.* If an individual or organization provides a campaign or MFC with polling and research at no cost, or at a discount of 20% or more, that is an In-Kind Contribution that must be disclosed.
- e. *Services Contributed Through a Candidate's Business Entity.* If a candidate has a business entity, and that entity provides goods or services to the campaign without charge, or at a discount of 20% or more, those contributions are In-Kind Contributions that must be disclosed.
- f. *Coordinated Expenditures v. Independent Expenditures.* Coordinated Expenditures must be reported as In-Kind Contributions. Independent Expenditures are not In-Kind Contributions. A candidate is allowed to ask others not to spend money in support of their candidacy. Even if another person or organization were to spend money subsequently, merely making a request *not* to make an Independent Expenditure would not by itself constitute coordination.

## **PART F PUBLICATION OR DISTRIBUTION OF POLITICAL COMMUNICATIONS**

**1. Authorized by candidate.** Whenever a person makes an Expenditure to finance a audio or visual communication advocating the election or defeat of a candidate or ballot measure through broadcasting stations, cable television systems, newspapers, magazines, campaign signs or other outdoor advertising facilities, publicly accessible sites on the Internet, email, text messages, direct mails or other similar types of general public political advertising or through flyers, handbills, bumper stickers and other nonperiodical publications, the communication, if authorized by a candidate, a candidate's authorized political committee or their agents, must clearly and conspicuously state that the communication has been so authorized and must clearly state the name and address of the person who made or financed the Expenditure for the communication. A communication financed by a candidate or the candidate's committee is not required to state the address of the candidate or committee that financed the communication. If a communication that is financed by someone other than the candidate or the candidate's authorized committee is broadcast only by audio means, only the city and state of the address of the person who financed the communication must be stated.

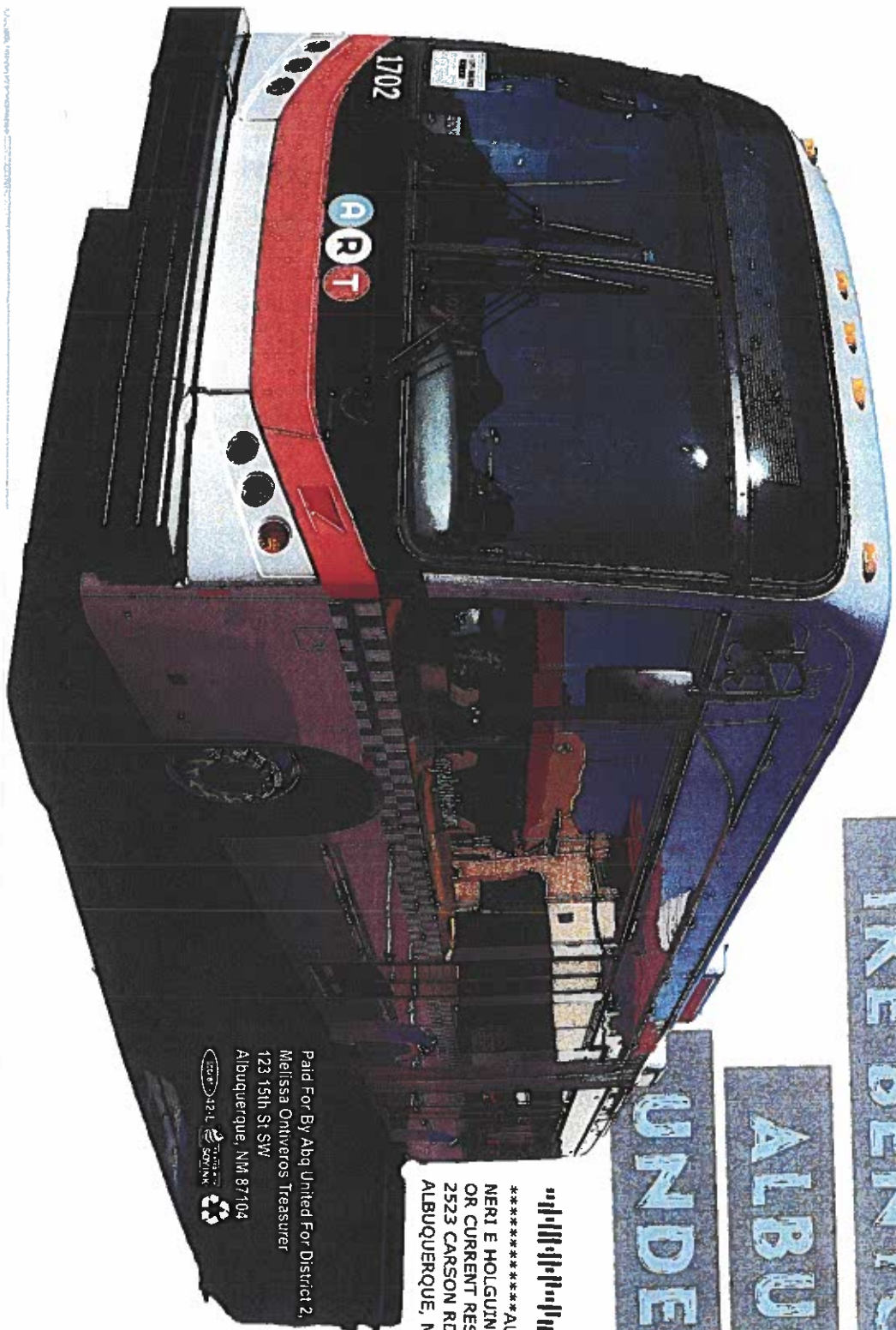
**2. Not authorized by candidate.** If the communication described in subpart 1 is not authorized by a candidate, a candidate's authorized committee or their agents, the communication must clearly and conspicuously state that the communication is not authorized by any candidate and state the name and address of the person who made or financed the Expenditure for the communication, except that a communication broadcast only by audio means is only required to state the city and state of the address of the person that financed the communication. If the communication is in visual form, the communication must contain at the bottom of the communication in print that is equal to or greater than 4% of the vertical picture height, Times New Roman font, the words "NOT PAID FOR OR AUTHORIZED BY ANY CANDIDATE." These words must be visible for the entirety of the communication, and be in a color that has a reasonable degree of contrast with the background of the advertisement.

**3. Other communications.** Whenever a person makes an Expenditure to finance a communication that is made for the purposes of influencing the election or defeat of a candidate or ballot measure and that is disseminated during the 60 days before a regular or special election, or 45 days before a runoff election, through the media described in subpart 1, the communication must state the name and address of the person who made or financed the communication and a statement that the communication was or was not authorized by the candidate, except that a communication broadcast only by audio is only required to state the city and state of the address of the person that financed the communication. The disclosure is only required if the communication was made for the purpose of influencing the election.

**4. In-Kind Contributions of printed materials.** A candidate, measure finance committee, political committee or political action committee shall report on the campaign finance report as a Contribution to the candidate, measure finance committee, political committee or political action committee any Contributions of In-Kind printed materials to be used in the support of a candidate or in the support or defeat of a ballot question. Any In-Kind Contributions of printed materials used or distributed by a candidate, measure finance committee, political committee or political action committee must include the name or title of that candidate, measure finance committee, political committee or political action committee as the authorizing agent for the printing and distribution of the In-Kind Contribution.

**5. Broadcasting prohibited without disclosure.** No person operating a broadcasting station or cable television system within the City of Albuquerque may broadcast any communication, as described in subparts 1 to 3, without an oral or written visual announcement of the disclosure required by this rule.

**6. Newspapers.** A newspaper may not publish a communication described in subparts 1 to 3 without including the disclosure required by this Part. For purposes of this subpart, "newspaper" includes any printed material intended for general circulation or to be read by the general public, including a version of the newspaper displayed on a website owned or operated by the newspaper. When necessary, a newspaper may seek the advice of the City Clerk regarding whether or not the communication requires the disclosure.



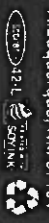
IKE BENTON THREW

ALBUQUERQUE

UNDER THE BUS

\*\*\*\*\*AUTO\*\*SCH 5-DIGIT 87104 3  
NERI E HOLGUIN  
OR CURRENT RESIDENT  
2523 CARSON RD NW  
ALBUQUERQUE, NM 87104-1903

Paid For By Abq United For District 2,  
Melissa Ontiveros Treasurer  
123 15th St SW  
Albuquerque, NM 87104



10/23/11  
wed/ans

Robert STD  
US Postage  
PAID  
Professional  
Marketing  
Services

10/23/11 10:23 AM

# \$133 MILLION WASTED. ENOUGH IS ENOUGH.

Ike Benton doesn't care about jobs. His A.R.T. buses have **cost Albuquerque hundreds of jobs**. Fifty-eight businesses have left Albuquerque since Ike Benton drove his bus plan down our throats.

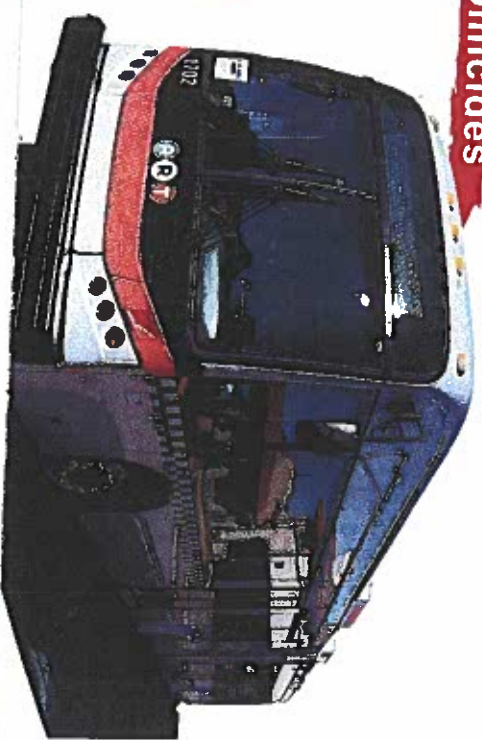
Our police **need more resources to keep us safe** and we need to be creating jobs, **not killing them.**

## LOOK AT THE FACTS:

-  \$133 million diverted away from law enforcement
-  17% increase in aggravated assault
-  48% increase in auto thefts
-  45% increase in homicides

TELL IKE BENTON THAT HE AND HIS BUSES CAN HIT THE ROAD

CHECK THE FACTS: City of Albuquerque, Uniform Crime Reports, 2008-2016





# IKE BENTON'S TRACK RECORD SHOULD BE A SIGN

**58 Closed** or Relocated Businesses

Ike's \$133 million rapid transit experiment has **killed hundreds of local jobs** and has driven businesses out of our community.

As ART spending increased, so did crime. Allocating even more money into the failed ART project means **fewer officers on the street** keeping our community safe.

**Ike is destroying Albuquerque's historic Route 66.** It's only a matter of time before there's nothing left.



**CLOSED**

**MAKE THE RIGHT DECISION FOR ALBUQUERQUE.**

**VOTE IKE BENTON OUT.**



A.R.T. IS DRIVING

JOBS AWAY FROM

ALBUQUERQUE



Paid For By Abq United For District 2,  
Melissa Ontiveros Treasurer  
\*\*\*\*\*AUTO\*\*SCH 5-DIGIT 87104 1  
NERI HOLGUIN  
OR CURRENT RESIDENT  
2523 CARSON RD NW  
ALBUQUERQUE, NM 87104-1903



FR 10/18

Presorted STD  
U. S. Postage  
PAID  
Glen Ellyn, IL  
Permit #198