

COMPLAINT DESCRIPTION

Please use the following format for your description of each alleged violation: 1) Law(s) violated and relevant section(s) or provision(s) of the law; 2) Description of alleged violation; 3) Facts that substantiate the alleged violations including the date, place, and time of the Respondent's conduct; 4) Names and contact information of any witnesses; 5) What action(s) or relief you seek from the Commission; and 6) Description of supporting document(s) included with this complaint, if any.

1) *Law(s) violated and relevant sections(s) or provision(s) of the law;*

1-19-31. Contents of report.

A. the name and address of the person or entity to whom an expenditure was made or from whom a **contribution** was received, except as provided for anonymous contributions or contributions received from special events as provided in Section [1-19-34](#) NMSA 1978; provided that for contributors, the name of the entity or the first and last names of any individual shall be the full name of the entity or individual, and initials only shall not constitute a full name unless that is the complete legal name;

B. the occupation, name and type of business, as applicable, of any individual or entity making contributions of two hundred dollars (\$200) or more in the aggregate per election;

C. the amount of the expenditure or contribution or value thereof;

D. the purpose of the expenditure;

E. the date that the expenditure was made, or the contribution was received; ...

2 & 3) Description of the alleged violation and Facts that substantiate the alleged violations including the date, place, and time of the Respondent's conduct;

Failure to file contribution or contribution -in-kind for mass communication (text **opposition ad** to benefit Frida Susana Vasquez) provided by Truth in Politics PAC a Contribution or Coordination committee, on Thursday May 16, 9:01 am.

Failure to file contribution or contribution -in-kind for mass communication (text **opposition ad** to benefit Frida Susana Vasquez) provided by Truth in Politics PAC a Contribution or Coordination committee, Thursday May 23, at 10:40 am.

Failure to file contribution or contribution -in-kind for mass communication (text **opposition ad** to benefit Frida Susana Vasquez) provided by Truth in Politics PAC a Contribution or Coordination committee, mass mailer received on May 23, 2024.

There are also reports alleging receipt of a second mass mailer within Senate dist. 9 (the ad featured in the may 23rd text) by Truth in Politics Pac, but I do not have an actual copy of the mailer.

AD in support paid for by Sandoval Conservatives Pac, (Independent expenditure and coordinated committee). Sandoval Conservative PAC only reported paying for an IE Opposition ad. This ad is in support of Ms. Vasquez.

Complainant has significant questions about the listing of Winred expense listed as “Fundraising events”. These expenses should probably be listed as “online contribution processing fees” to be truly transparent in the Respondents filing.

4) Names and contact information of any witnesses;

Frida Susana Vasquez, candidate Sen.9, 2415 Southern Blvd SE, Rio Rancho, NM 87124; Ph:505-414-6899; email vasquez4nm@gmail.com.

Kyle Robertson, treasurer Committee to Elect Frida Susana Vasquez for State Senate, 840 Rio Hondo Rd NE, Rio Rancho, NM 87144; Ph: 505-891-4282; email robertsonaccnm@gmail.com

Patrick Monroe Brenner, Treasurer, PO Box 1746, Bernalillo, NM 87004; Ph 505-386-1139; email: pbrenner@advocatesforliberty.org .

Craig Brandt, Treasurer Sandoval Conservative PAC, 7070 Crystal Dr. NE, Rio Rancho, NM 87144; Ph: 505-503-5001; email Sandovalconservative@gmail.com

Audrey Trujillo, candidate for Sen. 9, 677 W. Meadowlark Lane, Corrales, NM 87048; Ph: 505-720-0315; email AudreyTrujillom@gmail.com

5) What action(s) or relief you seek from the Commission;

1-19-35. Reports and statements; late filing penalty; failure to file.

B. If any reporting individual fails to file or files a late report of expenditures and contributions due on the Thursday prior to the election, the reporting individual or

political committee shall be liable and pay to the secretary of state five hundred dollars (\$500) for the first working day and fifty dollars (\$50.00) for each subsequent working day after the time required for the filing of the report until the complete report is filed, up to a maximum fine as provided in Subsection H of this section.

1-19-36. Criminal penalties.

A. Any person who knowingly and willfully violates any provision of the Campaign Reporting Act is guilty of a misdemeanor and shall be punished by a fine of not more than one thousand dollars (\$1,000) or by imprisonment for not more than one year or both.

B. The Campaign Reporting Act may be enforced by the attorney general or the district attorney in the county where the candidate resides, where a political committee has its principal place of business or where the violation occurred.

Complainant requests Respondent correct campaign finance reports to reflect the opposition ads and the include all of the costs associated with each of the ads.

Complaint requests the Ethics Commission provide all relief legally appropriate to include but not limited to the relief listed above.

6) *Description of supporting document(s) included with this complaint, if any.*

A. Screenshot of Text message received by citizen in Sen. Dist. 9 on May 16, at 9:01am from Truth in Politics Pac.

B. Screenshot of Patrick M. Brenner (TINPAC Treasurer) social media post on May 16, 2024.

C. Screenshot of Text received by citizen in Sen. Dist. 9 on May 23, at 10:40am, sent by Truth in Politics Pac.

D. Second screenshot from concerned citizen in Sen. Dist. 9 on May 23rd sent by Truth in Politics Pac

E. Screenshot of Patrick M. Brenner (TINPAC treasurer) social media post on May 23rd.

F. Scan of flyer received in the mail on May 23rd by Trujillo Household or Current Resident sent by Truth in Politics Pac.

G. Second Primary Report for Ms. Frida Susana Vasquez.

H. Third Primary Report for Ms. Frida Susana Vasquez.

I. Text Advertisement paid for by Sandoval Conservative Pac May 30, 2024.

**By submitting this complaint, I attest under oath and subject to penalty of perjury that the information in the complaint, and any attachments provided with the complaint, are true and accurate.*

FULL NAME (Print): Ramona Goolsby

DATE: 06/24/2024

SIGNATURE: /s/ Ramona Goolsby