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FEDERAL ELECTION
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June 27, 2014

VIA U.S. MAIL AND E-MAIL

Federal Election Commission
Office of Complaint Examination and Legal Administration
Attn: Frankie Hampton, Paralegal
999 E Street, NW
Washington, DC 20436
fhampton@fec.gov

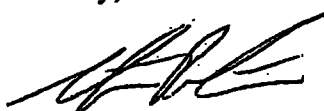
Re: **MUR 6818** – Colonel Allen Weh, Mr. Diego Espinoza, Dr. Jerry Bettman, and
CSI Aviation Services, Inc.

Dear Ms. Hampton:

Please accept the following Response filed on behalf of Colonel Allen Weh, Mr. Diego Espinoza, Dr. Jerry Bettman, and CSI Aviation Services, Inc. with respect to MUR 6818 – the Complaint submitted to the Federal Election Commission (“FEC” or the “Commission”) on May 2, 2014 by Ms. Erin Clements, wife of former New Mexico senatorial candidate David Clements. For the reasons set forth in the Response, the Named Parties do hereby request that the Commission either dismiss MUR 6818 in its entirety or, alternatively, make an affirmative determination that there is “no reason to believe” any violations have occurred in connection with the present matter.

Thank you in advance for your time and consideration of this request. Should the FEC have any questions regarding the Response or require additional information concerning the arguments or information presented therein, please do not hesitate to contact me by phone or e-mail.

Sincerely,


Stefan C. Passantino

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Before the
FEDERAL ELECTION COMMISSION

In the matter of:

Colonel Allen Weh; Mr. Diego Espinoza;
Dr. Jerry Bettman; and CSI Aviation
Services, Inc.

MUR No. 6818

**RESPONSE OF COLONEL ALLEN WEH, MR. DIEGO ESPINOZA, DR.
JERRY BETTMAN, AND CSI AVIATION SERVICES, INC. TO THE
COMPLAINT OF ERIN CLEMENTS IN MUR NO. 6818**

June 27, 2014

STEFAN C. PASSANTINO
MCKENNA LONG & ALDRIDGE LLP
*Designated Counsel for Colonel Allen Weh,
Mr. Diego Espinoza, Dr. Jerry Bettman, and
CSI Aviation Services, Inc.*

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Before the
FEDERAL ELECTION COMMISSION

In the matter of:

Colonel Allen Weh; Mr. Diego Espinoza; Dr.
Jerry Bettman; and CSI Aviation Services, Inc.

MUR No. 6818

**RESPONSE OF COLONEL ALLEN WEH, MR. DIEGO ESPINOZA, DR. JERRY
BETTMAN, AND CSI AVIATION SERVICES, INC. TO THE COMPLAINT OF
MS. ERIN CLEMENTS**

The following response ("Response") is submitted on behalf of Colonel Allen Weh, Mr. Diego Espinoza, Dr. Jerry Bettman, and CSI Aviation Services, Inc. (collectively, "Respondents" or the "Named Parties") with respect to the complaint (MUR No. 6818; the "Complaint") filed by Ms. Erin Clements ("Complainant"). As discussed in further detail within this Response, the Complaint authored by Ms. Clements¹ against the Named Parties has no basis in either law or fact. Rather, it amounts to nothing more than a conveniently-timed, politically-motivated attack, which was designed solely to drain the time and resources of the Named Parties, and to generate negative media coverage of Colonel Weh in the weeks leading up to New Mexico's Republican primary election. Based wholly on circumstantial evidence and unfounded speculation, the Complainant accuses Respondents of violating the Federal Election Campaign Act of 1971 (the "Act") and asks the Federal Election Commission ("FEC" or the "Commission") to investigate and pursue an enforcement action against the Named Parties. Given the baseless nature of the

¹ Ms. Clements is the wife of Mr. David Clements, Colonel Allen Weh's Republican primary opponent in the New Mexico 2014 U.S. Senate race.

instant Complaint, the Commission should reject Complainant's request and move to dismiss the present matter under review against Respondents.

I. Introduction

Allen Weh for Senate ("AWS") is the principal federal campaign committee of Colonel Allen Weh, a retired U.S. Marine Corps Reserve Colonel and the Republican Party's current nominee for U.S. Senate in the State of New Mexico. Complainant, unsurprisingly, is the wife of Colonel Weh's chief opponent during the Republican primary, Mr. David Clements. In the midst of a heated battle for the Republican nomination and approximately one month before the June 3, 2014 primary election, Complainant filed the present Complaint with the Commission alleging that the Named Parties violated various provisions of the Act and its associated regulations by "fail[ing] to file" periodic FEC disclosure reports, "using corporate resources to run a campaign", "hiding payroll expenditures", and "exceeding contribution limits". (Complaint, pg. 1-3). From the timing of the submission, the utter lack of substantiation for its allegations, and the degree to which the Complaint was actively promoted in the news media² by Ms. Clements and other individuals affiliated with her husband's campaign, one can only conclude that this action was filed as a political ploy designed to embarrass Colonel Weh in the weeks before the primary rather than as a means through which to redress actual violations of the Act.

Even a cursory review of Complainant's allegations compels one to reach the conclusion that the Complaint is wholly without merit. Its contents assert that the Named Parties committed "numerous FEC violations" and generated the "appearance" of other potential regulatory abuses by engaging or failing to engage in various forms of conduct. (Complaint, pg. 1). Specifically,

² An example of Complainant's media promotion of her claims against the Named Parties is attached hereto as EXHIBIT #1.

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the Complaint contains four separate accusations: (1) that AWS should have registered as a federal campaign committee with the Commission at some point in late 2013, and as such, "failed to file ... [a] End of Year FEC report" in January 2014; (2) that conduct undertaken by Colonel Weh and his Campaign Manager – Mr. Diego Espinoza – in October 2013 somehow indicated that "Respondent[s] [were] trying to hide corporate donations and campaign expenditures from the public"; (3) that AWS' 2014 first quarter FEC disclosure report "failed to itemize" payroll expenditures in a way that constituted an "attempt[] to hide behind a vendor to avoid disclosing campaign salary expenditures"; and (4) that AWS accepted excessive campaign contributions from Dr. Jerry W. Bettman. (Complaint, pg. 1-3). These claims, however, are based entirely on unfounded assumptions, incomplete circumstantial evidence, and erroneous research. As such, there is no compelling justification for Complainant's assertions or reasonable foundation for asking the Commission to pursue an investigation against Respondents.

As is demonstrated fully below, the claims advanced by Complainant against the Named Parties are fundamentally false. At no time since the establishment of AWS has the committee failed to meet its disclosure obligations with the FEC, nor have Respondents taken any action on behalf of the committee to obscure contributions to or expenditures by the campaign. Likewise, at no time since the establishment of AWS have Respondents accepted excessive political contributions from individual donors or improper in-kind or monetary donations from corporations. To these points, the Named Parties have taken all relevant and necessary precautions to ensure that each of AWS' campaign disclosure filings comply with the Act, FEC regulations, and relevant Commission advisory opinions. As such, any assertions that AWS failed to meet its campaign finance reporting obligations, accepted excessive or improper

contributions, or sought to avoid disclosing committee expenditures is altogether inaccurate. Consequently, there is no foundation upon which to initiate an investigation of the Named Parties and their activities, nor is there any reason to conclude that the Act, its implementing regulations, or any other laws have been violated.

II. Argument

A. Allen Weh for Senate Was Not Required to File a 2013 Year-End Disclosure Report Because It Did Not Qualify As A Candidate Committee Under the Act and Register As Such with the FEC Until January 2014.

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“Section 1” of the present Complaint asserts that Respondents failed to meet their public disclosure obligations under the Act and its associated rules and regulations by not submitting a “end of year FEC report” on January 31, 2014. Essentially, Complainant alleges that AWS should have submitted a 2013 year-end disclosure report to the FEC because she believes Colonel Weh became a candidate for the U.S. Senate in New Mexico at some point prior to the start of 2014. To support this baseless contention, Complainant sets forth a number of unsubstantiated claims concerning the conduct of Colonel Weh in the months leading up to his formal Statement of Candidacy, which was filed with the Commission on January 15, 2014. (attached hereto as EXHIBIT #2). Specifically, Complainant accuses Colonel Weh of engaging in various actions during the fall of 2013 that she believes qualified him as a candidate for federal office as opposed to a prospective candidate “testing the waters” on a potential run. These highlighted actions include the following: (1) “publicly announc[ing] that he was considering a United States Senate run” in December 2012; (2) attending a Republican Party fundraiser in October 2013 and “introduc[ing] himself to several people in the room as a candidate for the United States Senate”; (3) authorizing individuals at a Republican Party meeting in December 2013 to announce that “he was certainly in the race for United States

Senate"; and (4) "circulating nominating petitions to qualify for the ballot under New Mexico State Law as early as October 2013." (Complaint, pg. 1). None of these pieces of "factual support" for Complainant's claims provide any legal or factual basis for the FEC to believe that Colonel Weh failed to register as a federal candidate at the appropriate time or fell short of his public disclosure obligations. Nevertheless, Respondents will address and rebut each claim in greater detail below to establish the misguided nature of Complainant's assertions. Based upon those forthcoming facts and arguments, it should be clear that Colonel Weh and the Named Parties are in full compliance with federal campaign registration and disclosure requirements, and that this particular assertion by Ms. Clements is wholly without merit.

The legal provisions at the crux of the Complaint's first allegation are the provisions of the Act setting forth the FEC registration and reporting threshold for federal candidates. Under the requirements of 11 C.F.R. §§ 100.3(a)(3) and 102.13(a)(2), an individual must register as a federal candidate once: (1) he or she (or persons he or she has authorized to conduct campaign activity) receives over \$5,000 in contributions or makes over \$5,000 in expenditures; or (2) he or she fails to disavow unauthorized campaign activity by writing a letter to the FEC within 30 days after being notified by the agency that another person or group has received contributions or made expenditures of more than \$5,000 on the individual's behalf. After crossing the \$5,000 contribution or expenditure threshold, an individual is obligated to file a Form 2 Statement of Candidacy, or a letter with the same information, with the Commission within a period of 15 days. See 11 C.F.R. § 101.1(a) and 102.12(a). The candidate is also required to use his or her Form 2 (or letter) filing to designate a principal campaign committee. Within 10 days of being designated by the candidate, such principal campaign committee is likewise obligated to register with the FEC by submitting a Form 1 Statement of Organization. See 11 C.F.R. § 102.1(a).

Following its registration, the newly-registered committee is required to comply with the appropriate FEC disclosure schedule for candidate committees.

When interpreting the above regulatory framework, it is also important to take note of how the "testing the waters" exemption in the Act and FEC regulations affects the need for a candidate to register and begin reporting with the Commission. Under the "testing the waters" exemption, an individual may raise and expend funds to determine whether or not it is advisable for he or she to become a candidate for federal office without such funds counting toward the \$5,000 registration threshold. All funds taken in and spent during this period of time must comply with the requirements of the Act and be accounted for by the potential candidate (in future FEC reports), but they do not count toward qualifying as a federal candidate until such time as the individual begins to "campaign" or officially decides to become a candidate. Once either of those activities occur, the "testing the waters" period ends, and any funds raised or spent apply toward the candidacy threshold. *See* 11 C.F.R. §§ 100.72(a) and 100.131(a).

Under FEC rules and regulations, "testing the waters" activities can encompass a broad range of activities, including (but not limited to) conducting polls, traveling and meeting with potential constituents, making telephone calls to prospective voters, and other similar behavior. *See* 11 C.F.R. §§ 100.72(a) and 100.131(a). Certain activities, however, indicate that an individual has officially decided to become a candidate and is no longer "testing the waters" of potential candidacy. These "campaign" activities include the following: (1) making or authorizing statements that refer to themselves as formal candidate; (2) using general public political advertising to publicize one's intention to campaign; (3) raising more money than what is reasonably needed to test the waters or amassing funds (seed money) to be used after candidacy is established; (4) conducting activities over a protracted period of time or shortly

before the election; or (5) taking action to qualify for the ballot. *See* 11 C.F.R. §§ 100.72(b) and 100.131(b). Once an individual engages in any of these types of "campaign" activities in association with weighing whether or not to run for federal office, he or she will be adjudged to have moved beyond "testing the waters" and will be required to register with the FEC as a federal candidate within 15 days of raising or expending \$5,000.

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In the present matter, it is readily apparent that Colonel Weh's conduct in registering and reporting as a federal candidate was wholly in compliance with the obligations of 11 C.F.R. §§ 100.3(a)(3) and 102.13(a)(2). Complainant, however, contends that Colonel Weh was required to file a Statement of Candidacy and a Form 1 Statement of Organization for AWS prior to the start of 2014 because his activities no longer met the "testing the waters" exemption in the Act. Such an assertion represents a fundamental misunderstanding of the nature of the "testing the waters" exemption as well as the requirements of federal campaign finance law. While the Complaint is correct when it states that an individual cannot consider himself or herself to be "testing the waters" when he or she undertakes "campaign" activities, merely falling outside of the exemption (in and of itself) does NOT compel an individual to have to register as a federal candidate. As covered at length above, an individual is not required to register as a federal candidate with the FEC until such time as he or she becomes a candidate AND raises or expends over \$5,000 in conjunction with this effort. Only after meeting both requirements is an individual obligated to file a Form 2 Statement of Candidacy with the Commission and subsequently submit a Form 1 Statement of Organization for his or her principal campaign committee.

As can be readily ascertained from reviewing AWS' 2014 first-quarter disclosure with the FEC, Colonel Weh did not surpass the \$5,000 contribution/expenditure threshold for federal

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candidate registration until approximately January 9, 2014. On that date, Colonel Weh and AWS spent in excess of \$5,000 on campaign-related expenditures connected to election startup costs, including software, office space, website design, insurance, and administrative supply expenses. (See EXHIBIT #3 attached hereto). In accordance with the requirements of 11 C.F.R. §§ 100.3(a)(3) and 102.13(a)(2), Colonel Weh was obligated to submit a Form 2 Statement of Candidacy to the FEC within 15 days on incurring these expenditures. He did so only 6 days later – on January 15, 2014. Subsequent to filing his Form 2 on January 15, Colonel Weh then had another 10 days in which to file a Form 1 Statement of Organization for AWS, his newly-designated, principal campaign committee. AWS fulfilled this obligation a mere 8 days later – on January 23, 2014. (See EXHIBIT #4 attached hereto). As such, it is abundantly clear that Colonel Weh and AWS were in full compliance with the registration requirements of the Act when they submitted their candidate and campaign committee paperwork in mid-January 2014. Given this registration timeframe, it is equally apparent why no 2013 year-end disclosure report was submitted to the Commission in January 2014. Since AWS was not a registered federal candidate committee in calendar year 2013 (and NOT required to be so), it had no obligation to file a 2013 year-end disclosure report with the FEC. Instead, AWS' periodic disclosure responsibilities did not take hold until the first quarter of 2014, following its January registration with the Commission.

These facts, in and of themselves, clearly indicate why Complainant's first allegation is devoid of any merit. Regardless of the applicability of the "testing the waters" exemption to Colonel Weh's conduct in the fall of 2013, he (and those associated with him) did not accept over \$5,000 in contributions or make over \$5,000 in expenditures in connection with his prospective campaign until January 2014. In turn, he had no obligation to register and report as a

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federal candidate during the 2013 calendar year. Complainant, however, wrongly conflates the “testing the waters” exception with the requirement to register. In her mind, any activity that crosses the line into campaigning from “testing the waters” obligates a prospective candidate to register and report with the Commission. That is an erroneous interpretation of law and does not bear further consideration by the FEC. Nevertheless, Respondents would like to take the opportunity to comment on each of the unsubstantiated claims raised in the Complaint and explain why they offer no justification for additional investigation by the Commission.

The first claim highlighted in the Complaint as evidence of Colonel Weh’s need to register with the Commission as a federal candidate is a news article published in *Roll Call* on December 5, 2012. In that article, Colonel Weh is depicted as “considering a challenge to Democratic Sen. Tom Udall in 2014.” (See EXHIBIT #5 attached hereto). Likewise, Colonel Weh is quoted as saying he would do his “homework ... and gather enough information to make a sound decision” as to whether or not to challenge Senator Udall. (EXHIBIT #5, pg. 1). None of this information provides any support for Complainant’s contention that Colonel Weh failed to meet his obligations under the Act. At best, the contents of the referenced article indicate that Colonel Weh was beginning the process of deciding whether or not he wanted to join the 2014 U.S. Senate race in New Mexico. Nothing in the article provides any evidence to establish that Colonel Weh was engaged in any “testing the waters” conduct, or accepting any contributions or expending any funds for such activities. In turn, the report does nothing to provide any foundation for Complainant’s assertion that Colonel Weh was required to register as a candidate in 2013, nor does it offer any support for Ms. Clements’ claim that Colonel Weh was outside of the “testing the waters” exemption and actively campaigning prior to 2014. In fact, the contents

of the article seem to directly undermine the Complaint's primary allegations and establish why there is no basis for the Commission to proceed with any additional investigation.

The second claim highlighted in the Complaint as evidence of Colonel Weh's need to register with the Commission as a federal candidate is an unsupported assertion that he was identifying himself as a "candidate for the United States Senate" at a Republican fundraiser in October 2013. (Complaint, pg. 1). According to Complainant's description of events, Colonel Weh appeared at a fundraising event, which was purportedly hosted at the Albuquerque Marriot Pyramid Hotel, and "introduced himself to several people in the room" as a formal senatorial candidate. (Complaint, pg. 1). Among those Colonel Weh allegedly addressed in this fashion was a Mr. Mike Nagel, who the Complainant described as a "GOP member." (Complaint, pg. 1). Regardless of Complainant's description of the fundraiser (which is wholly unsupported by any evidence), it is clear that the scenario she described offers absolutely no legal or factual basis for believing Colonel Weh was required to register as a federal candidate under the Act in the fall of 2013. The Complaint, which makes broad and unfounded claims about the nature of Colonel Weh's private conversations at the aforementioned fundraiser, offers no evidence (or even claims) that he crossed the \$5,000 contribution or expenditure threshold in conjunction with or prior to the event. The reason for this absence of evidence is simple – Colonel Weh undertook no action in conjunction with or prior to the October 2013 Republican fundraiser that would require him to submit a Form 2 Statement of Declaration with the Commission. While it is true that he attended the fundraiser in question and held dozens of conversations with fellow Republicans at the event, none of those discussions involved the collection or expenditure of over \$5,000 in funds in support of his potential candidacy. In fact, setting aside the candidacy registration trigger contained in the Act, none of those conversations ever involved any formal

statement of candidacy by Colonel Weh. As such, even if the \$5,000 contribution/expenditure trigger had been crossed at the time of the October 2013 fundraiser, Colonel Weh's actions at the event would not have risen to the level of "campaigning" rather than "testing the waters" such that federal candidate registration would be necessary.

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The third claim highlighted in the Complaint as evidence of Colonel Weh's need to register with the Commission as a federal candidate is an unsupported assertion that two Republican officials announced that he "was certainly in the race for the United States Senate" during a December 2013 local party meeting. (Complaint, pg. 1). According to Complainant's description of events, Mr. Russell Allen and Ms. Caren Lulich made an announcement at a Republican Party meeting in Las Cruces, NM where they assured a crowd of approximately 100 people at the event that Colonel Weh was running against Senator Udall in 2014. Complainant substantiates this claim by asserting that she was an attendee at the meeting and a witness to the statements made by Mr. Allen and Ms. Lulich. Regardless of the Complainant's description of the Las Cruces Republican meeting (which is wholly unsupported by any evidence other than Ms. Clements' personal verification), it is clear that the scenario described offers absolutely no legal or factual basis for believing Colonel Weh was required to register as a federal candidate under the Act in the fall of 2013. The Complaint, which attempts to attribute unsubstantiated comments made by others to Colonel Weh, offers no evidence (or even claims) that the \$5,000 contribution or expenditure threshold had been triggered at the time of the December meeting. The reason for this absence of evidence is simple – Colonel Weh undertook no action prior to or in conjunction with the December 2013 Republican meeting that would require him to submit a Form 2 Statement of Candidacy with the Commission. While it may be true that Mr. Allen and Ms. Lulich spoke to the likelihood of Colonel Weh's candidacy at the described Republican Party

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meeting, none of their comments offer any reason to believe that Colonel Weh was involved in the the collection or expenditure of over \$5,000 in funds in support of a formal candidacy. In fact, setting aside the specifics of the candidacy registration trigger contained in the Act, none of the comments made by Mr. Allen and Ms. Lulich at the event had been authorized by Colonel Weh, and thus could not be characterized as some sort of formal statement of candidacy by him. As such, even if the \$5,000 contribution/expenditure trigger had been crossed prior to or at the time of the November 2013 GOP meeting, the actions of third parties at the event would not have forced Colonel Weh to fall outside of the "testing the waters" exemption such that federal candidate registration was necessary.

The fourth claim highlighted in the Complaint as evidence of Colonel Weh's need to register with the Commission as a federal candidate is an assertion that he "was known to have been circulating nominating petitions to qualify for the ballot under New Mexico State Law as early as October, 2013 in Lea, Dona Ana and Bernalillo Counties." (Complaint, pg. 1). According to the contents of the Complaint, those activities can be substantiated by Lea County Republican Party Chairwoman Ann Batson, Mr. Mike Nagel, and the Complainant herself. In making the proclamation that this conduct required Colonel Weh to register with the FEC as a federal candidate, Ms. Clements is again confusing the application of the "testing the waters" exemption with the application of the candidate registration triggers set forth in 11 C.F.R. §§ 100.3(a)(3) and 102.13(a)(2). While the act of circulating nominating petitions or authorizing others to do so on one's behalf does qualify as "campaign" activity under 11 C.F.R. §§ 100.72(b) and 100.131(b), such conduct does not trigger candidate registration obligations with the Commission unless it is accompanied by the acceptance of over \$5,000 in contributions or the disbursement of over \$5,000 in expenditures.

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In the present matter, individuals did begin circulating nominating petitions on behalf of Colonel Weh in October 2013 in order to aid in his effort to qualify for the 2014 Republican primary ballot for U.S. Senate. Although Colonel Weh had not come to an affirmative personal decision as to whether he wanted to pursue the Senate seat at that point in time and certainly had not formally announced his candidacy, he was nevertheless aware that close friends and family members were beginning to undertake a voluntary effort to gather nomination petition signatures from New Mexico electors. This effort, although not expressly authorized by Colonel Weh, was undertaken with his knowledge and the tacit understanding that gathering signatures in advance of his formal decision whether to run would ease the ballot access process if he indeed chose to challenge Senator Udall. According to records kept by Colonel Weh's friends and family during this period, the costs of copying nominating petition forms and circulating them in various counties fell well below the \$5,000 contribution/expenditure threshold. As such, Colonel Weh had no regulatory obligation to register as a federal candidate at the time his family and friends began circulating Republican primary nominating petitions on his behalf. Such conduct could potentially have taken Colonel Weh outside of the confines of the "testing the waters" exemption under the Act, but this debatable point has no bearing on his obligation to register and report as a federal candidate. The simple truth remains that Colonel Weh had no such obligation until January 2014.

Given the above facts, it is abundantly clear that the allegation included in "Section 1" of the Complaint has no evidentiary foundation and provides no basis for further Commission investigation. Respondents did not fail to file a 2013 year-end FEC disclosure report because Colonel Weh was not required to register as a federal candidate during calendar year 2013. As discussed in great detail above, an individual is not required to register with the Commission as a

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federal candidate under 11 C.F.R. §§ 100.3(a)(3) and 102.13(a)(2) until he or she falls outside of the "testing waters exemption" and either accepts more than \$5,000 in contributions or makes more than \$5,000 in expenditures toward their candidacy. At such point, an individual is then required to file a Form 2 Statement of Candidacy with the FEC and subsequently submit to the Commission a Form 1 Statement of Organization for his or her principal campaign committee. In the present matter, Colonel Weh precisely followed those obligations by submitting a Statement of Candidacy to the Commission a mere six days after he crossed the \$5,000 registration threshold, and likewise, by submitting a Statement of Organization for AWS eight days later. In light of these facts, the Commission should consider Complainant's initial allegation wholly meritless, moot, and cause it to be summarily dismissed without further investigation.

B. Allen Weh for Senate Has NOT Accepted Any Contributions from Corporate Donors or Inappropriately Utilized Corporate Resources in Association with Campaign Activities.

"Section 2" of the present Complaint asserts that Respondents failed to meet their legal and regulatory obligations under the Act by creating the "appearance of using corporate resources to run a campaign". (Complaint, pg. 2). To this point, Complainant makes a number of unsubstantiated declarations about the dual role played by Mr. Diego Espinoza, Colonel Weh's current campaign manager, with both AWS and CSI Aviation Service, Inc. ("CSI"). Specifically, Complainant asserts that "there is an appearance of impropriety in that unreported corporate funds are being used to pay a part time salary to a campaign manager while he is running the Respondent's campaign and has been placed on a leave of absence from his regular job." (Complaint, pg. 2). Furthermore, Complainant alleges that Mr. Espinoza is "very likely handling campaign business [in CSI's corporate offices]" and therefore "creating an appearance

that the Respondent is trying to hide corporate donations and campaign expenditures from the public." (Complaint, pg. 2). Such pronouncements are not only wholly without merit, but they are also absolutely uncorroborated by any evidence presented by the Complainant. As such, "Section 2" of the Complaint reads more like an overstated and unfounded political attack on Colonel Weh rather than a verified allegation for Commission consideration. In turn, upon review of the facts and arguments set forth below, it should be clear that Colonel Weh and the Named Parties are in full compliance with the requirements of federal campaign finance law, and that this particular portion of the Complaint bears no further consideration or investigation.

As set forth in the language of the Act and 11 C.F.R. 114.2(a), (b) and (d), federal candidates and their campaign committees may not accept contributions made from the general treasury funds of corporations. This prohibition applies to all incorporated organizations, including nonstock corporations, trade associations, incorporated membership organizations, and incorporated cooperatives. 11 C.F.R. § 114.12(a). Regardless of the type of corporate organization involved, the ban applies equally to both direct contributions of money as well as in-kind contributions of goods and services made by corporations through their employees. As such, corporations and their employees are required to be mindful of utilizing corporate facilities, equipment, and resources in any manner that might qualify such conduct as an in-kind donation to a federal candidate or campaign committee. Examples of clearly prohibited behavior include utilizing corporate printers and paper to publish campaign materials, or making use of corporate telephones for periodic political phone banking.

Despite the breadth of the ban on corporate contributions under federal campaign finance law, a wide range of behavior by employees is expressly not considered to be a prohibited corporate donation under the Act. For example, the following types of conduct by corporate

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employees do not meet the definition of a prohibited contribution under the Act: (1) free legal and accounting services provided to a campaign³; (2) volunteer personal services provided to a campaign outside of work hours without the use of corporate resources; (3) incidental volunteer activity provided to a campaign by an employee during work hours using minimal corporate resources⁴; and (4) certain volunteer internet or computer activity provided by an employee to a campaign⁵. As such, actions taken by employees that qualify under these exceptions do not subject corporations to any potential violations of federal campaign finance law.

In the present matter, Complainant bases the entirety of her second allegation against the Named Parties on a general accusation that AWS' campaign manager was either improperly using corporate resources to support Colonel Weh's candidacy or creating the appearance of such misuse. In support of this accusation, Complainant offer absolutely no factual evidence of note. Rather, the Complaint simply highlights two tangential items about Mr. Espinoza that have no bearing on whether corporate resources were used to support Colonel Weh or AWS. First, Complainant alleges the fact that Mr. Espinoza was present at a meeting between Colonel Weh

³ Free legal and accounting services from corporate employees are not considered a prohibited corporate contribution under the Act so long as: (1) the services are provided only for the purpose of ensuring the campaign's compliance with the Act; (2) the entity paying for the services is the regular employer of the individuals performing the services; (3) the employer does not hire additional employees to render the services or to free regular employees to perform the services; and (4) the campaign reports the value of the services, as well as the name of each person who performed the services and the date the services were provided. *See* 11 C.F.R. §§ 100.86, 100.146 and 114.1(a)(2)(vii). *See also* FEC AO 2006-22.

⁴ Generally, if an individual provide services to a campaign during paid work hours, the employer is subject to making a contribution to the campaign. *See* 11 C.F.R. § 100.54. However, an employee, stockholder or member of a corporation may make occasional, isolated or incidental use of corporate facilities for his or her own individual volunteer activities on behalf of a campaign. "Incidental use" is defined by the Commission as equal to or less than one hour per week or four hours per month.

⁵ A corporation may permit its employees, shareholders, officials and members to use its facilities for individual volunteer Internet activity, without making a prohibited contribution. The individual volunteer must comply with the corporation's internal policies for computer and Internet use, and must complete the normal amount of work for which the employee is paid, or expected to perform. Also, the activity must not increase the overhead or operating costs of the corporation, and the activity must not be coerced. *See* 11 C.F.R. § 114.9(a) and (b). Paid web communications never fit within this exception, however. *See* 11 C.F.R. § 100.26.

and Mr. Clements where political matters involving the New Mexico senate race were discussed. Second, Complainant makes reference to a civil lawsuit filed by Mr. Espinoza, which asserts that he took a "leave of absence from his full-time employment at CSI Aviation Services" to begin working on a political campaign. Even if true, neither of these observations establish the use of corporate resources in any way, shape or form, nor do they come close to raising the appearance of impropriety.

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In spite of the tangential nature of the supporting facts provided by the Complainant, the crux of her allegation in this section of the Complaint seems to be centered on concerns about Mr. Espinoza holding dual roles with both CSI and AWS. Ms. Clements appears to believe that the mere existence of such joint responsibilities for Mr. Espinoza means that he must be receiving corporate pay for campaign activities. Nothing could be further than the truth. While it is true that Mr. Espinoza currently serves as both a site supervisor for CSI and campaign manager for AWS, those roles are completely separate in both pay and responsibility. (See Declaration of Diego Espinoza, ¶¶ 1-7, attached hereto as EXHIBIT #6). Since January 15, 2014, Mr. Espinoza has functioned in a part-time capacity with CSI. (See EXHIBIT #6, ¶¶ 1-2). In that capacity, he has worked reduced hours and received reduced pay commensurate with his part-time role. (Id. at ¶¶ 2-3). None of that pay, however, is in any way associated with any employment activities other than those associated with CSI. (Id. at ¶4). Since January 2014, Mr. Espinoza has also functioned as campaign manager for AWS. (Id. at ¶1). In that role, he has overseen the operations of Colonel Weh's campaign for U.S. Senate and been paid in accordance with those responsibilities. (Id. at ¶¶ 5-6). All of the salary he has received in his capacity as AWS campaign manager has come from Colonel Weh's authorized committee and has not been supplemented in any way by CSI resources. (Id. at ¶¶ 6-8).

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It is also important to note that since assuming his position with AWS, Mr. Espinoza has taken extra care to ensure that his job responsibilities and conduct on behalf of the campaign and CSI remain separate and distinct. (See EXHIBIT #6, ¶7). For example, while working in CSI's offices and using CSI resources, Mr. Espinoza has made all reasonable efforts to focus exclusively on CSI-related duties and to follow the company's established protocols for utilizing corporate assets only for CSI-related undertakings. (*Id.* at ¶7). Likewise, when performing campaign-related activities for AWS, Mr. Espinoza has done so during non-CSI work hours using resources owned by either the campaign or himself. At no point in time has Mr. Espinoza improperly utilized CSI-owned facilities, materials or equipment for the political purposes of AWS or Colonel Weh.⁶ (*Id.* at ¶¶7-8). Nor has he improperly co-mingled activities associated with both positions in a way that would create the appearance that CSI is providing corporate support for AWS.

In light of the above facts, the Complaint's allegations regarding CSI, AWS and Mr. Espinoza simply cannot withstand scrutiny. The Complainant offers absolutely no documentary or testimonial evidence to support her accusations that Mr. Espinoza was improperly utilizing CSI resources to support AWS. Nor does she articulate any cognizable reason to believe that Mr. Espinoza's campaign activities were being improperly funded by CSI. Mr. Espinoza's attendance at a meeting between Colonel Weh and Mr. Clements, combined with a politically-motivated and unsubstantiated accusation of "gross impropriety" is simply not enough to sustain

⁶ Although the Act and its associated regulations prohibit Mr. Espinoza from using CSI facilities, materials, equipment for federal campaign purposes, he would be permitted to undertake personal volunteer activities on behalf of a political campaign utilizing minimal CSI resources provided such use was "incidental in nature" (less than an hour per week and four hours per month). Likewise, he would be permitted to use CSI computer resources for personal volunteer Internet activity provided such conduct was *de minimis* and did not increase CSI costs or violate internal CSI policies. Mr. Espinoza's use of CSI resources for personal volunteer political activities has never run afoul of either of these legal maxims, and as such, no improper corporate contributions have accrued to AWS from CSI. (See EXHIBIT #6, ¶¶7-8).

a viable claim before the Commission. Since Complainant has failed to present a cognizable allegation upon which relief can be granted and unsuccessfully identified any reasonable basis for additional investigation, the FEC should consider "Section 2" of the Complaint wholly meritless, moot, and cause it to be summarily dismissed without further consideration.

C. Allen Weh for Senate Did NOT Improperly Itemize Expenditures Made to Its Third-Party Payroll Vendor for Staff Salary Costs, Nor Did the Campaign Seek to Hide Such Expenditures from Public Disclosure.

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"Section 3" of the Complaint alleges that AWS inappropriately "hid[] payroll expenditures" in its 2014 first quarter FEC disclosure report by failing to provide sub-itemized memo entries for payments made to its third-party payroll vendor for staff salaries. (See Complaint, pg. 2). Specifically, Complainant asserts that AWS' disclosure of \$81,300 in campaign payments to the Payroll Company (located at 10433 Montgomery Parkway Loop NE, Suite 100, Albuquerque, NM 871007) was inappropriate under FEC regulations because it represented an "attempt[] to hide behind a vendor to avoid disclosing campaign salary expenditures." (Complaint, pg. 2-3). The Complaint fails to elaborate further on the nature of this particular assertion and sets forth no statutory or regulatory basis for the violation purportedly perpetrated by Respondents. As such, it is difficult for the Named Parties to directly address what claims (if any) are being lodged against them. It is Respondents' assumption, however, that Complainant takes issue with AWS' description of the referenced payroll expenditures in its 2014 first quarter FEC disclosure report. Specifically, Respondents assume that Complainant's allegations are designed to question whether AWS properly disclosed payroll expenditures under the Act and its associated regulations. Based upon the facts and arguments presented below, it should be clear that the Named Parties are in full compliance with federal

campaign disclosure requirements and that this particular assertion by Ms. Clements is wholly without merit.

From a statutory and regulatory perspective, the principal campaign committee of a candidate for federal office is required to report all receipts and disbursements in accordance with 2 U.S.C. § 434(b)(4) and 11 C.F.R. § 104.9. As part of this obligation, a campaign committee must itemize certain disbursements as required by 11 C.F.R. § 104.3(b)(4). Specifically, a campaign committee must itemize all disbursements that qualify as transfers, loan repayments, and contributions to other federal candidates regardless of the amount of money disbursed. 11 C.F.R. § 104.3(b)(4)(ii), (iii) and (v). All other campaign committee disbursements (including operating expenditures) need only be itemized if they exceed \$200 or aggregate over \$200 when added to other disbursements (within the same category) made to the same payee during a particular election cycle. 11 C.F.R. § 104.3(b)(4)(i) and (vi). For the purposes of itemization, expenditures that meet the above monetary threshold or fall into the aforementioned disbursement categories must be disclosed on a committee's FEC disclosure report. Proper disclosure requires the provision of clear and accurate information regarding the name and address of the payee and the purpose, category, date and amount of the disbursement. 11 C.F.R. § 104.3(b)(4) and 104.9.

Upon review of the disbursement identified as problematic in the Complaint, there is no reason to believe that Respondents have failed to meet their disclosure obligations under the Act and its associated regulations. The expenditure cited by Complainant as "evidence" of disclosure violations by the Named Parties reveals nothing other than substantial compliance with federal law governing the reporting of itemized operating expenditures by a federal campaign committee. As the Commission can clearly discern upon review of the identified disbursements

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in AWS 2014's first quarter FEC disclosure report (attached hereto as EXHIBIT #7), the expenditures at issue stand in substantial compliance with the requirements of 11 C.F.R. §§ 104.3(b)(4) and 104.9. Each expenditure made by AWS during the relevant reporting period for staff payroll purposes that aggregated in excess of \$200 was appropriately disclosed and itemized on Schedule B of the campaign's report. As required by Commission regulations, each itemized entry included clear and specific information regarding the purpose, category, date and amount of the particular disbursement, as well as data regarding the name and address of the payee. Through these candid, itemized disclosures, Respondents substantially met all their reporting and itemization obligations under federal law.

Complainant argues, however, that Respondents fell short of mandatory disclosure and itemization requirements by not itemizing or identifying the particular recipients of payroll expenditures. As set forth in 11 C.F.R. §§ 104.3(b)(4) and 104.9 and highlighted above, each disbursement made by a campaign committee that aggregates in excess of \$200 must be itemized on Schedule B of the campaign's reports and include clear and specific information regarding the purpose, category, date and amount of the disbursement, and contact information for the payee. Despite assertions to the contrary by Complainant or FEC staff members, existing federal law and Commission regulations require no further itemization with respect to payroll expenditures. Thus, all disbursements made by AWS for payroll purposes during the first quarter of 2014 have been disclosed in a manner that is substantially compliant with the requirements of current Commission regulations.⁷ (See also Declaration of Rebecca Sanchez, attached hereto at EXHIBIT #8). In spite of this legal conclusion, however, AWS remains fully dedicated to

⁷ At present, AWS is continuing to review its first quarter 2014 FEC disclosure filing for technical defects and clerical errors. To the extent that any particular campaign expenditures during the disclosure period were mislabeled as a result of such defects or errors, AWS will correct them in due course through the FEC amendment process.

transparency in its operations and is more than willing to provide both the Commission and the public with additional information concerning the nature of its payroll disbursements during the first quarter of 2014. As such, the campaign has chosen to voluntarily amend its April 2014 quarterly FEC filing to reflect the end-user payroll expenditures made to AWS staff during the appropriate reporting period.

Given the above facts, it is abundantly clear that the allegation included in "Section #3" of the Complaint has no evidentiary foundation and provides no basis for further Commission investigation. Respondents not only gave their "best efforts" to comply with 11 C.F.R. §§ 104.3(b)(4) and 104.9 and the other disbursement disclosure requirements set forth in the Act, but they also made sure AWS **actually met** its specific obligations. (See EXHIBIT #8, ¶5). Furthermore, Respondents are in the process of going above and beyond their legal responsibilities in this area by self-amending AWS' April 2014 quarterly FEC disclosure report to reflect additional itemized information concerning the end recipients of all campaign payroll disbursements during the highlighted period. In light of these facts, the Commission should consider this claim wholly meritless, moot, and cause it to be summarily dismissed without further investigation.

D. Allen Weh for Senate Did NOT Accept Excessive Political Contributions from Dr. Jerry Bettman.

"Section #4" of the Complaint alleges that AWS accepted \$15,000 in political donations from a single individual in violation of the campaign contribution limits set forth in the Act and its associated rules and regulations. Specifically, Complainant asserts that Dr. Jerry W. Bettman made a single donation of \$15,000 to AWS on January 23, 2014, which was designated as a \$10,000 contribution for the primary election and a \$5,000 contribution for the general election. (See Complaint, pg. 3). Although the Complaint fails to provide any evidentiary foundation for

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this particular assertion, Complainant actively declares that AWS has violated the Act by either accepting contributions in excess of the \$2,600 per election limit or failing to adequately disclose the refund of excess donations made by Dr. Bettman. (See Complaint, pg. 3). Nothing could be further from the truth. In fact, such allegations border on the illogical and absurd. AWS has neither accepted excess campaign contributions from Dr. Bettman, nor refunded (and subsequently failed to disclose) excess donations made by him. As such, and upon consideration of the facts and arguments presented below, it should be clear to the Commission that the Named Parties are in full compliance with federal campaign finance law, and that Ms. Clements' final allegation is wholly without merit.

Under the Act and its associated rules and regulations, individuals may contribute a maximum of \$2,600 per election to the principal campaign committee of a candidate for federal office. See 11 C.F.R. §§ 110.1(a) and (b)(1). For the purposes of this donation cap, each primary election, general election, run-off election or special election is considered a separate election, and therefore subject to an independent contribution limit. See 11 C.F.R. § 100.2. As such, an individual seeking to make donations to a federal candidate running in both a primary and general election could presumptively donate a total of \$5,200 to the candidate's authorized committee during a given election cycle. In jurisdictions where run-off elections are possible, an individual could potentially donate even more to a federal candidate's campaign.

When donating to the campaign of a federal candidate, an individual may (but is not required to) designate his or her contribution for a particular election (primary, general, *etc.*). Under such circumstances, an individual can give in excess of \$2,600 to a federal candidate in a single check (or written instrument) assuming the donor expressly designate how the funds should be allocated between elections, and provided the total amount designated per election .

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does not exceed \$2,600. In cases where a donor makes no designation in association with his or her contribution, the donation is automatically counted against the contributor's limits for the next upcoming election. *See* 11 C.F.R. § 110.1(b)(2). For example, an undesignated contribution of \$2,600 made before the primary election in a given jurisdiction will be automatically attributed to the donor's giving limit for the primary election cycle. When an undesignated contribution made during the primary exceeds the \$2,600 per election limit, however, the excessive amount must either be refunded to the donor or presumptively redesignated to another election cycle.⁸ If redesignation occurs, the campaign committee is also required to notify the contributor in writing of the reallocation within 60 days of the receipt of the donation, and must offer the contributor the option of receiving a refund instead. *See* 11 C.F.R. 110.1(b)(5)(ii)(C).

Throughout the 2014 campaign cycle, AWS has undertaken all relevant and necessary precautions to ensure that the committee has remained in full compliance with the requirements of the above FEC rules and regulations. (*See* EXHIBIT #8, ¶¶1-5). As such, despite the allegations set forth in the Complaint, it is wholly inaccurate to assert that AWS ever accepted excess contributions from individual donors, or refunded excess donations to such contributors without properly disclosing such reimbursements on its FEC disclosure reports. Such conduct never occurred. AWS never received a \$15,000 donation check from Dr. Jerry W. Bettman, never designated \$10,000 of such funds to Colonel Weh's primary election campaign, and never allocated \$5,000 of such funds to Colonel Weh's general election campaign. Nor did AWS

⁸ Under 11 C.F.R. § 110.1(b)(5)(ii)(B)(1)-(4), when an individual makes an excessive contribution to a candidate's authorized committee, the campaign may presumptively redesignate the excessive portion to the general election if the contribution: (1) is made before that candidate's primary election; (2) is not designated in writing for a particular election; (3) would be excessive if treated as a primary election contribution; and (4) as redesignated, does not cause the contributor to exceed any other contribution limit.

refund (and fail to disclose) an excessive contribution from Dr. Bettman during the primary campaign cycle. The allegations raised by the Complainant are simply untrue and unsupported by any evidence (within the Complaint or otherwise). In fact, Complainant's accusations in this setting are so nonsensical that it is difficult for Respondents to ascertain how or why Ms. Clements believes an FEC violation has occurred. Most likely, Ms. Clements wrongfully attributed to AWS a February 5, 2010 contribution in the amount of \$10,000 that Dr. Bettman made to Colonel Weh's *gubernatorial campaign*. (See EXHIBIT #9 attached hereto). If that is not the case, the Named Parties must assume that Complainant is either mistaken as to her facts, erroneous in her mathematics, or willing to raise false accusations in order to serve a misguided political agenda. Whatever the explanation, there is simply no reason for the Commission to believe AWS either accepted or failed to report excessive contributions from Dr. Bettman in January 2014.

As can be readily ascertained from reviewing AWS' 2014 first quarter FEC disclosure report, Dr. Jerry W. Bettman made a contribution totaling \$5,000 to Colonel Weh's campaign on January 23, 2014. (See EXHIBIT #10 attached hereto). This single \$5,000 contribution came in the form of a personal check from Dr. Bettman that was undesignated for either the primary or general election cycle. (See EXHIBIT #8, ¶6). As required by 11 C.F.R. § 110.1(b)(2) and permitted under 11 C.F.R. § 110.1(b)(5)(ii)(B)(1)-(4), AWS accepted the \$5,000 undesignated contribution, allocated \$2,600 to Colonel Weh's primary election account, and allotted the remaining \$2,400 to Colonel Weh's general election account. (Id. at ¶6). In light of AWS' decision to presumptively redesignate \$2,400 of Dr. Bettman's \$5,000 contribution to Colonel Weh's general election account, the committee notified Dr. Bettman in writing of its action and offered him the option of receiving a refund for that amount. (See EXHIBIT #11 attached

hereto). When he chose not to request such a refund, AWS kept the presumptively-redesignated remainder and disclosed such funds as a \$2,400 general election donation from Dr. Bettman on its 2014 first quarter FEC report. (See EXHIBIT #10). The above activities undertaken by AWS were overtly transparent⁹ and wholly compliant with the provisions of the Act and its associated regulations. As such, there is no reason to believe AWS has violated any tenet of federal campaign finance law with regard to the Dr. Bettman contribution.

Given the above facts and analysis, it is abundantly clear that the fourth and final allegation raised by the Complainant has no evidentiary foundation and provides no basis for further Commission investigation. The Complaint provides absolutely no support for the assertion that Respondents either accepted excessive individual contributions or failed to disclose the refund of such contributions on FEC disclosure reports. Likewise, the explanation provided here clearly illustrates that AWS' behavior with respect to Dr. Bettman's contribution was in full compliance with the Act and its associated rules and regulations. In turn, the Commission should consider this claim wholly meritless and cause it to be summarily dismissed without further investigation.

III. Conclusion

As the information contained within this Response clearly sets forth, Respondents have done nothing to run afoul of the legal requirements federal campaign finance law. Despite this fact, however, Complainant has seen fit to make unsubstantiated allegations and present ineffectual "evidence" against Respondents, presumably for the purpose of political advantage in

⁹ AWS' 2014 first quarter FEC disclosure report clearly illustrates the fact that the campaign committee received a single \$5,000 contribution check from Dr. Bettman on January 23, 2014 that was allocated between both the primary and general elections as required by 11 C.F.R. § 110.1(b)(2) and 11 C.F.R. § 110.1(b)(5)(ii)(B)(1)-(4). The individual "memo entries" provide such details and demonstrate that \$2,400 of the original \$5,000 donation was presumptively redesignated to AWS' general election account.

the midst of a heated primary campaign. As a result of these actions and the meritless nature of Ms. Clements' claims, the Commission should summarily dismiss the Complaint against the Named Parties and find that there is no reason to believe that Respondents have violated the Act or its associated rules and regulations.

Moreover, the Commission should take additional steps to ensure that the FEC complaint process is not abused in a similar manner moving forward. As stated above, the allegations contained within the present Complaint, and verified under oath as being accurate by Ms. Clements, are inherently false and have no basis in either law or fact. The Complaint itself, it seems, is nothing more than a thinly-veiled political ploy on the part of a political opponent to attack Colonel Weh, his campaign, and those associated with it.

In light of this fact, Respondents hereby respectfully request an Order from the Commission obligating Ms. Clements to reimburse the Named Parties for the attorneys fees they incurred in responding to the present Complaint.

62-10407-1

Designated Counsel for Colonel Allen Weh, Mr. Diego Espinoza, Dr. Jerry Bettman, and CSI Aviation Services, Inc.

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EXHIBIT #1

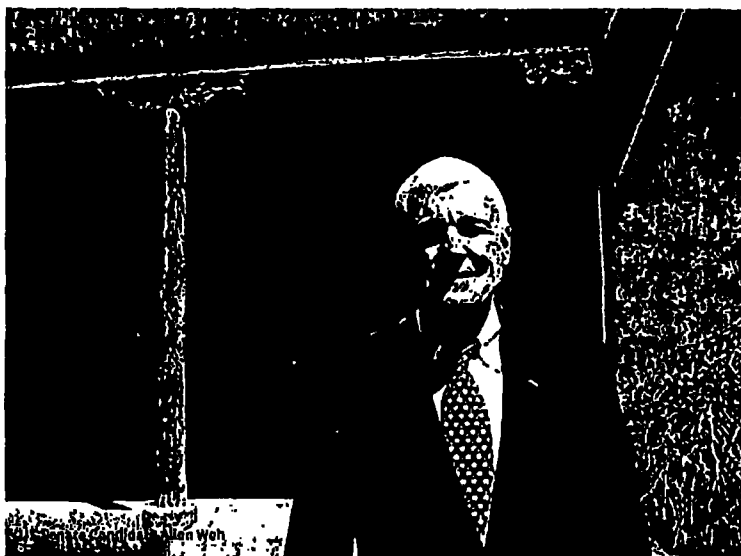
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FEC Complaint Filed Against Allen Weh

The complaint, filed by his opponent's wife, accuses Weh of several campaign violations

May 21, 2014, 1:00 pm
By Joey Peters

Erin Clements, whose husband David Clements is running for the GOP nomination for US Senate, is alleging Allen Weh violated multiple Federal Election Commission rules in his campaign for the same seat.

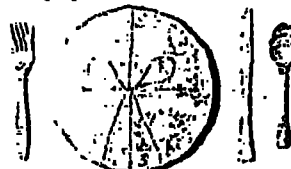
Erin Clements filed a complaint earlier this month alleging that Weh violated four of the federal agency's election guidelines. The most egregious, she says, is her accusation that Weh improperly used corporate resources from CSI Aviation, a military contracting firm where he serves as CEO, to help his campaign.

In the complaint, she refers to a defamation lawsuit filed against David Clements by Weh's campaign manager, Diego Espinoza (for more on that lawsuit, click here). The lawsuit states that Espinoza, who works as a site supervisor at Weh's firm, "was recently granted a leave of absence from his full-time employment at CSI Aviation" to manage Weh's campaign. But it also says Espinoza "continues to be a part-time paid employee" at CSI.



The FEC complaint calls this "an appearance of gross impropriety," where unreported corporate money is being used to pay Espinoza's part-time salary to run Weh's campaign.

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"He states in his own words that he's been relieved from his duties at CSI but is still collecting his paycheck," she tells SFR. "That's a blatant violation of federal law."

Espinoza dismisses the complaint as "exactly the kind of tactic used by people who have nothing left to lose."

"Such desperation is unfortunate and unbecoming of someone seeking to become a U.S. Senator," Espinoza writes in a statement provided to SFR.

But he adds that the FEC has contacted the Weh campaign "about a couple of issues" that are now being handled by their attorneys. Espinoza says the Weh campaign is "confident" that they haven't violated any election rules.

The complaint also mentions that Weh met with David Clements at his CSI office last October—two months before Weh officially announced his candidacy for US Senate—and stated that he had already spent \$26,000 on a poll. It notes that Espinoza was present at that meeting "very likely handling campaign business."

The complaint cites incidents, including an October Republican Party fundraiser where Weh allegedly introduced himself as a US Senate candidate, to charge that Weh broke a "testing the waters" FEC exemption and failed to file an end-of-the-year campaign finance report.

The complaint also takes Weh to task for not disclosing who \$81,300 of the payroll cited in his campaign finance report is paid to and for accepting \$15,000 from one donor, which the complaint says breaks the \$2,600 limit.

The FEC complaint is the latest in a series of bad blood between the two US Senate GOP primary candidates: In March, Clements accused Espinoza of hacking his campaign emails. The allegations have led to a defamation suit from Espinoza against Clements and an investigation by the Doña Ana Sheriff's Office.

Weh, who in his press releases has been referring to himself as the "presumptive nominee" to take on Democratic Sen. Tom Udall this fall, narrowly edged out Clements in delegate support during the March GOP preprimary convention.

Weh has much more money, raising roughly \$400,000 compared to Clements' \$40,000, according to the latest FEC reports. But a March poll by Public Policy Polling found them each garnering 33 percent of the vote in hypothetical match-ups against the heavily favored Udall. Though the poll didn't look at specifically at the Weh-Clements race, Clements' campaign referred to the numbers as evidence of a "dead heat" between him and Weh.

View the complaint below:

To print the document, click the "Original Document" link to open the original PDF. At this time it is not possible to print the document with annotations.

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FEC FORM 2
STATEMENT OF CANDIDACY

RECEIVED
SECRETARY OF THE SENATE
PUBLIC AFFAIRS

14 JAN 20 AM 9:17

1. (a) Name of Candidate (in full) Allen E. Weh			2. Identification Number		
(b) Address (number and street) 6722 Rio Grande NW			<input type="checkbox"/> Check if address changed		
(c) City, State, and ZIP Code Los Ranchos NM 87107			3. Is This Statement <input checked="" type="checkbox"/> New (N) OR <input type="checkbox"/> Amended (A)		
4. Party Affiliation Republican	5. Office Sought U.S. Senator	6. State & District of Candidate New Mexico			

DESIGNATION OF PRINCIPAL CAMPAIGN COMMITTEE

7. I hereby designate the following named political committee as my Principal Campaign Committee for the 2014 election(s).
(year of election)

NOTE: This designation should be filed with the appropriate office listed in the instructions.

(a) Name of Committee (in full) Allen Weh For Senate
(b) Address (number and street) PO Box 26086
(c) City, State, and ZIP Code Albuquerque, NM 87125-6086

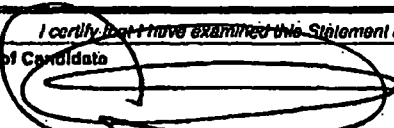
DESIGNATION OF OTHER AUTHORIZED COMMITTEES

(Including Joint Fundraising Representatives)

8. I hereby authorize the following named committee, which is NOT my principal campaign committee, to receive and expend funds on behalf of my candidacy.

NOTE: This designation should be filed with the principal campaign committee.

(a) Name of Committee (in full)
(b) Address (number and street)
(c) City, State, and ZIP Code

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.	
Signature of Candidate 	Date 15 Jan 2014

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to penalties of 2 U.S.C. §437g.

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FEC FORM 2 (REV. 12/2008)

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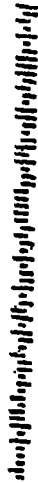
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UPS	_____	<input type="checkbox"/>
DHL	_____	<input type="checkbox"/>
AIRBORNE EXPRESS	_____	<input type="checkbox"/>

RECEIVED FROM FEDERAL ELECTION COMMISSION _____
Date of Receipt

POSTMARK ILLEGIBLE ☐ NO POSTMARK ☐

FAX _____
Date of Receipt

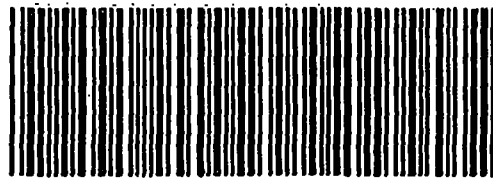
OTHER _____
Date of Receipt or Postmark

PREPARER MN DATE PREPARED 1/28/14

14020014012

14020014012

1700444255



14020014013

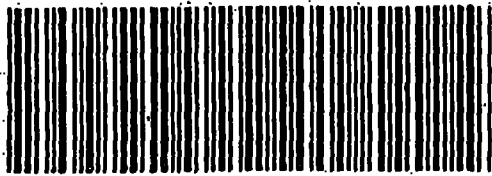


EXHIBIT #3

1-204444-1036

FEC
FORM 3REPORT OF RECEIPTS
AND DISBURSEMENTS
For An Authorized CommitteeRE
SECRETARY OF
PUBLIC RECORDS

14 APR 17 PM 2:22

Office Use Only

1. NAME OF
COMMITTEE (In full)

TYPE OR PRINT ▼

Example: If typing, type
over the lines.

12FE4M5

Allen Weh for Senate

ADDRESS (number and street)

PO Box 26086

Check if different
than previously
reported. (ACC)

Albuquerque

NM

87125-6086

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

STATE ▼ DISTRICT

C00555573

3. IS THIS
REPORT☒ NEW
(N)

OR

☐ AMENDED
(A)

NM

00

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

☒ April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

October 15 Quarterly Report (Q3)

January 31 Year-End Report (YE)

Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

Primary (12P)

☐ General (12G)☐ Runoff (12R)☐ Convention (12C)☐ Special (12S)

Election on

In the
State of

(c) 30-Day POST-Election Report for the:

General (30G)

☐ Runoff (30R)☐ Special (30S)

Election on

In the
State of

5. Covering Period

01 / 01 / 2014

through

03 / 31 / 2014

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Rebecca Sanchez

Signature of Treasurer Rebecca Sanchez

Date

04 / 09 / 2014

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office
Use
OnlyFEC FORM 3
(Revised 02/2003)

FESAND18

14020253651

14020253651

SUMMARY PAGE

of Receipts and Disbursements

Write or Type Committee Name
Allen Weh for Senate

Report Covering the Period:

From:

01 / 01 / 2014

To:

03 / 31 / 2014

	COLUMN A This Period	COLUMN B Election Cycle-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e)) ..	263938.71	263938.71
(b) Total Contribution Refunds (from Line 20(d)) ..	0	0
(c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a)) ..	263938.71	263938.71
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17) ..	208398.47	208398.47
(b) Total Offsets to Operating Expenditures (from Line 14) ..	26.81	26.81
(c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a)) ..	208369.66	208369.66
8. Cash on Hand at Close of Reporting Period (from Line 27) ..	205569.05	
9. Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D) ..	0	
10. Debts and Obligations Owed BY the Committee (itemize all on Schedule C and/or Schedule D) ..	150000	

For further information contact:

Federal Election Commission
 999 E Street, NW
 Washington, DC 20463

Toll Free 800-424-9530
 Local 202-694-1100

DETAILED SUMMARY PAGE of Receipts

FEC Form 3 (Revised 12/2003)

PAGE 3 / 145

Write or Type Committee Name

Allen Weh for Senate

Report Covering the Period:

From:

01 01 2014

To:

03 31 2014

I. RECEIPTS

COLUMN A Total This Period

COLUMN B Election Cycle-to-Date

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

(i) Itemized (use Schedule A)...

219228.81

219228.81

(ii) Unitemized

34408.44

34408.44

(iii) TOTAL of contributions from Individuals ..

253637.25

253637.25

(b) Political Party Committees...

0

0

(c) Other Political Committees (such as PACs) ..

0

0

(d) The Candidate

10301.46

10301.46

(e) TOTAL CONTRIBUTIONS

(other than loans)

(add Lines 11(a)(iii), (b), (c), and (d))..

263938.71

263938.71

12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES ..

0

0

13. LOANS:

(a) Made or Guaranteed by the Candidate...

150000

150000

(b) All Other Loans...

0

0

(c) TOTAL LOANS

(add Lines 13(a) and (b))...

150000

150000

14. OFFSETS TO OPERATING EXPENDITURES

(Refunds, Rebates, etc.) ..

26.81

26.81

15. OTHER RECEIPTS

(Dividends, Interest, etc.)

0

0

16. TOTAL RECEIPTS (add Lines

11(a), 12, 13(c), 14, and 15)
(Carry Total to Line 24, page 4)...

413965.52

413965.52

1402025555

1402025555

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3 (Revised 02/2003)

PAGE 4 / 145

II. DISBURSEMENTS

COLUMN A
Total This Period

COLUMN B
Election Cycle-to-Date

17. OPERATING EXPENDITURES...

208396.47

208396.47

18. TRANSFERS TO OTHER
AUTHORIZED COMMITTEES ..

0

0

19. LOAN REPAYMENTS:

(a) Of Loans Made or Guaranteed
by the Candidate...

0

0

(b) Of All Other Loans

0

0

(c) TOTAL LOAN REPAYMENTS
(add Lines 19(a) and (b))...

0

0

20. REFUNDS OF CONTRIBUTIONS TO:

(a) Individuals/Persons Other
Than Political Committees...

0

0

(b) Political Party Committees...

0

0

(c) Other Political Committees
(such as PACs)...

0

0

(d) TOTAL CONTRIBUTION REFUNDS
(add Lines 20(a), (b), and (c))...

0

0

21. OTHER DISBURSEMENTS ..

0

0

22. TOTAL DISBURSEMENTS

(add Lines 17, 18, 19(c), 20(d), and 21) ►

208396.47

208396.47

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD...

0

24. TOTAL RECEIPTS THIS PERIOD (from Line 16, page 3)...

413965.52

25. SUBTOTAL (add Line 23 and Line 24)...

413965.52

26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22)...

208396.47

27. CASH ON HAND AT CLOSE OF REPORTING PERIOD
(subtract Line 26 from Line 25)...

205569.05

14020255654

14020255654

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 85 OF 145

☒ 17 ☐ 18 ☐ 19a ☐ 19b
20a 20b 20c 21

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Allen Weh for Senate

Full Name (Last, First, Middle Initial)

A. Aristotle International, Inc.

Date of Disbursement

MM/DD/YYYY
01/09/2014

Mailing Address 205 Pennsylvania Avenue SE

City State Zip Code
Washington DC 20003-1164

Amount of Each Disbursement this Period

950

Purpose of Disbursement
Campaign Software

001

Transaction ID : B-E-3016

Candidate Name

Category/
Type

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For: 2014

☒ Primary ☐ General
☐ Other (specify)

State: District:

Full Name (Last, First, Middle Initial)

B. Far North, LLC

Date of Disbursement

MM/DD/YYYY
01/09/2014

Mailing Address 2424 Louisiana Boulevard NE
Suite 300

City State Zip Code
Albuquerque NM 87110-4370

Amount of Each Disbursement this Period

1200

Purpose of Disbursement
Security Deposit

001

Transaction ID : B-E-2885

Candidate Name

Category/
Type

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For: 2014

☒ Primary ☐ General
☐ Other (specify)

State: District:

Full Name (Last, First, Middle Initial)

c. Far North, LLC

Date of Disbursement

MM/DD/YYYY
01/09/2014

Mailing Address 2424 Louisiana Boulevard NE
Suite 300

City State Zip Code
Albuquerque NM 87110-4370

Amount of Each Disbursement this Period

1200

Purpose of Disbursement
Administrative/Salary/Overhead: Rent

001

Transaction ID : B-E-2887

Candidate Name

Category/
Type

Office Sought:

☐ House
☐ Senate
☐ President

Disbursement For: 2014

☒ Primary ☐ General
☐ Other (specify)

State: District:

SUBTOTAL of Disbursements This Page (optional).....

3350.00

TOTAL This Period (last page this line number only).....

14020253735

14020253735

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 86 OF 145

☒ 17 ☐ 18 ☐ 19a ☐ 19b
☐ 20a ☐ 20b ☐ 20c ☐ 21

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NAME OF COMMITTEE (In Full)

Allen Weh for Senate

Full Name (Last, First, Middle Initial)

A. Heritage Audio

Mailing Address 5551 Midway Park Place NE

City Albuquerque State NM Zip Code 87109-5826

Purpose of Disbursement
Campaign Event: Audio Services

Candidate Name

007
Category/
Type

Office Sought: ☐ House ☐ Senate ☐ President
Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

Date of Disbursement

01 / 09 / 2014

Amount of Each Disbursement this Period

256.8

Transaction ID : B-E-2888

B. Innovative Research and Data Solutions, LLC

Mailing Address 611 Pennsylvania Avenue SE
238

City Washington State DC Zip Code 20003-4303

Purpose of Disbursement
Advertising: Tele Town Hall Svcs

Candidate Name

004
Category/
Type

Office Sought: ☐ House ☐ Senate ☐ President
Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

Date of Disbursement

01 / 09 / 2014

Amount of Each Disbursement this Period

1680

Transaction ID : B-E-3017

C. PNM

Mailing Address PO Box 17970

City Denver State CO Zip Code 80217-0970

Purpose of Disbursement
Administrative/Salary/Overhead: Deposit

Candidate Name

001
Category/
Type

Office Sought: ☐ House ☐ Senate ☐ President
Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

Date of Disbursement

01 / 09 / 2014

Amount of Each Disbursement this Period

152.95

Transaction ID : B-E-2883

SUBTOTAL of Disbursements This Page (optional).....

2089.75

TOTAL This Period (last page this line number only).....

14020253736

14020253736

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 87 OF 145

☒ 17 ☐ 18 ☐ 19a ☐ 19b
20a 20b 20c 21

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NAME OF COMMITTEE (In Full)

Allen Weh for Senate

Full Name (Last, First, Middle Initial)

A. Upstream Communications

Mailing Address 1609 Shoal Creek Boulevard
Suite 203

City Austin State TX Zip Code 78701-1022

Purpose of Disbursement
Website Design

Candidate Name

001

Category/
Type

Office Sought: ☐ House
☐ Senate
☐ President

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

Date of Disbursement

01 09 2014

Amount of Each Disbursement this Period

10000

Transaction ID : B-E-2882

B. Wells Fargo Insurance Services

Mailing Address 320 Osuna Road NE
Suite 1G

City Albuquerque State NM Zip Code 87107-5954

Purpose of Disbursement
Liability Insurance

Candidate Name

001

Category/
Type

Office Sought: ☐ House
☐ Senate
☐ President

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

Date of Disbursement

01 09 2014

Amount of Each Disbursement this Period

1000

Transaction ID : B-E-2886

C. Mrs. Deborah W. Maestas

Mailing Address 7512 Rio Grande Boulevard NW

City Los Ranchos State NM Zip Code 87107-6434

Purpose of Disbursement
Carpet/Office Supplies

Candidate Name

001

Category/
Type

Office Sought: ☐ House
☐ Senate
☐ President

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

Date of Disbursement

01 09 2014

Amount of Each Disbursement this Period

1754.92

Transaction ID : B-E-2889

Original vendors exceeding reporting threshold itemized
as memo transactions.

SUBTOTAL of Disbursements This Page (optional)

12754.92

TOTAL This Period (last page this line number only)

14020253757

14020253757

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 68 OF 145

☒ 17 ☐ 18 ☐ 19a ☐ 19b
20a 20b 20c 21

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)

Allen Weh for Senate

Full Name (Last, First, Middle Initial)

A. Cash & Carry Flooring

Mailing Address 5125 Phoenix Ave NE

City Albuquerque State NM Zip Code 87110

Purpose of Disbursement
Carpet

Candidate Name

Office Sought: ☐ House ☐ Senate ☐ President

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

Date of Disbursement

01 09 2014

Amount of Each Disbursement this Period

1147.04
Transaction ID : B-S-661

[MEMO ITEM]

Subitemization of Deborah Maestas(01/09/14)

B. OfficeMax

Mailing Address 3301 Menaul Boulevard NE
Suite A

City Albuquerque State NM Zip Code 87107-1853

Purpose of Disbursement
Office Supplies

Candidate Name

Office Sought: ☐ House ☐ Senate ☐ President

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

Date of Disbursement

01 09 2014

Amount of Each Disbursement this Period

388.23
Transaction ID : B-S-660

[MEMO ITEM]

Subitemization of Deborah Maestas(01/09/14)

C. Target

Mailing Address 6100 Paseo Del Norte NE

City Albuquerque State NM Zip Code 87113-1512

Purpose of Disbursement
Office Supplies

Candidate Name

Office Sought: ☐ House ☐ Senate ☐ President

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

Date of Disbursement

01 09 2014

Amount of Each Disbursement this Period

89.11
Transaction ID : B-S-659

[MEMO ITEM]

Subitemization of Deborah Maestas(01/09/14)

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

0.00

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 89 OF 145

☒ 17 ☐ 18 ☐ 19a ☐ 19b
☐ 20a ☐ 20b ☐ 20c ☐ 21

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Allen Weh for Senate

Full Name (Last, First, Middle Initial)

A. Col Allen E. Weh

Date of Disbursement

01 09 2014

Mailing Address 6722 Rio Grande Boulevard NW

City State Zip Code
Los Ranchos NM 87107-6330

Amount of Each Disbursement this Period

452

Purpose of Disbursement
In kind: Airfare

Transaction ID : B-I-3894

Candidate Name

Category/
Type

Office Sought: ☐ House ☐ Senate ☐ President
Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

Full Name (Last, First, Middle Initial)

B. Col Allen E. Weh

Date of Disbursement

01 09 2014

Mailing Address 6722 Rio Grande Boulevard NW

City State Zip Code
Los Ranchos NM 87107-6330

Amount of Each Disbursement this Period

1007.58

Purpose of Disbursement
In kind: Lodging

Transaction ID : B-I-3897

Candidate Name

Category/
Type

Office Sought: ☐ House ☐ Senate ☐ President
Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

Full Name (Last, First, Middle Initial)

C. Col Allen E. Weh

Date of Disbursement

01 09 2014

Mailing Address 6722 Rio Grande Boulevard NW

City State Zip Code
Los Ranchos NM 87107-6330

Amount of Each Disbursement this Period

559.35

Purpose of Disbursement
In kind: Lodging

Transaction ID : B-I-3903

Candidate Name

Category/
Type

Office Sought: ☐ House ☐ Senate ☐ President
Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

SUBTOTAL of Disbursements This Page (optional).....

2018.83

TOTAL This Period (last page this line number only).....

14020253739

14020253739

17044421697

EXHIBIT #4

For help completing Form 1, please double-click the  icon next to each line number.

**FEC
FORM 1**

**STATEMENT OF
ORGANIZATION**

RECEIVED
SECRETARY OF THE SENATE
PUBLIC AFFAIRS

14 JAN 28 AM 11:06

Office Use Only.

1. NAME OF
COMMITTEE (in full)

☐

(Check if name
is changed)

Example: If typing, type
over the lines.

12FE4M5

Allen Weh for Senate

ADDRESS (number and street)

6300 San Mateo Blvd NE

Suite C4

☐

(Check if address
is changed)

Albuquerque

NM

87109

CITY

STATE

ZIP CODE

COMMITTEE'S E-MAIL ADDRESS (Please provide only one e-mail address)

☐

(Check if address
is changed)

debbiel@gotspaceusa.com

COMMITTEE'S WEB PAGE ADDRESS (URL)

☐

(Check if address
is changed)

www.allenweh.com

2. DATE 01 23 2014

3. FEC IDENTIFICATION NUMBER C

4. IS THIS STATEMENT ☒ NEW (N) OR ☐ AMENDED (A)

I certify that I have examined this Statement and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer

Rebecca Sanchez

Signature of Treasurer

Rebecca Sanchez

Date

01 23 2014

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Statement to the penalties of 2 U.S.C. §437g.

ANY CHANGE IN INFORMATION SHOULD BE REPORTED WITHIN 10 DAYS.

Office
Use
Only

For further information contact:
Federal Election Commission
Toll Free 800-424-9530
Local 202-684-1100

FEC FORM 1

STICKER
OFFICE OF THE SECRETARY OF THE SENATE
PUBLIC AFFAIRS
ERROR: undefined

14020014663

5. TYPE OF COMMITTEE

Candidate Committee:

- (a) ☒ This committee is a principal campaign committee. (Complete the candidate information below.)
- (b) ☐ This committee is an authorized committee, and is NOT a principal campaign committee. (Complete the candidate information below.)

Name of Candidate

Allen Weh

Candidate Party Affiliation

Rep

Office Sought:



House



Senate



President

State

District

- (c) ☐ This committee supports/opposes only one candidate, and is NOT an authorized committee.

Name of Candidate

Party Committee:

- (d) ☐ This committee is a ☐ (National, State or subordinate) committee of the ☐ (Democratic, Republican, etc.) Party.

Political Action Committee (PAC):

- (e) ☐ This committee is a separate segregated fund. (Identify connected organization on line 6.) Its connected organization is a:

Corporation

Corporation w/o Capital Stock

Labor Organization

Membership Organization

Trade Association

Cooperative

In addition, this committee is a Lobbyist/Registrant PAC.

- (f) ☐ This committee supports/opposes more than one Federal candidate, and is NOT a separate segregated fund or party committee. (i.e., nonconnected committee)

In addition, this committee is a Lobbyist/Registrant PAC.

In addition, this committee is a Leadership PAC. (Identify sponsor on line 6.)

Joint Fundraising Representative:

- (g) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, at least one of which is an authorized committee of a federal candidate.
- (h) ☐ This committee collects contributions, pays fundraising expenses and disburses net proceeds for two or more political committees/organizations, none of which is an authorized committee of a federal candidate.

Committees Participating in Joint Fundraiser

1.		FEC ID number	C
2.		FEC ID number	C
3.		FEC ID number	C
4.		FEC ID number	C

14020014664

14020014664

Write or Type Committee Name

Allen Web for Senate

6. Name of Any Connected Organization, Affiliated Committee, Joint Fundraising Representative, or Leadership PAC Sponsor

Mailing Address

CITY

STATE

ZIP CODE

Relationship: ☐ Connected Organization ☐ Affiliated Committee ☐ Joint Fundraising Representative ☐ Leadership PAC Sponsor

7. Custodian of Records: Identify by name, address (phone number -- optional) and position of the person in possession of committee books and records.

Full Name

Deborah W Maestas

Mailing Address

PO Box 26086

Albuquerque

NM

87125

- 6086

Title or Position

CITY

STATE

ZIP CODE

Deputy Campaign Manager

Telephone number 505 - 301 - 3030

8. Treasurer: List the name and address (phone number -- optional) of the treasurer of the committee; and the name and address of any designated agent (e.g., assistant treasurer).

Full Name
of Treasurer

Rebecca Sanchez

Mailing Address

PO Box 26086

Albuquerque

NM

87125

- 6086

Title or Position

CITY

STATE

ZIP CODE

Treasurer

Telephone number 505 - 999 - 8376

ERROR: undefined
OFFENDING COMMAND:

14020014665

14020014665

Full Name of
Designated
Agent

Mailing Address

Title or Position

Telephone number

CITY

STATE

ZIP CODE

9. Banks or Other Depositories: List all banks or other depositories in which the committee deposits funds, holds accounts, rents safety deposit boxes or maintains funds.

Name of Bank, Depository, etc.

Bank of America

Mailing Address

PO Box 3050

Albuquerque

NM

87190

CITY

STATE

ZIP CODE


Name of Bank, Depository, etc.

Mailing Address

CITY

STATE

ZIP CODE

To print and file this form, select "Print" from the "File" menu above. In the "Print" window, select "Document" from the drop down menu labeled "Comments and Forms" Doing so will ensure that the  icons and other instructions will not appear on your filing. Click here for a video printing demonstration.

11072444701

14020014666

NANCY ERICKSON
SECRETARY

DANA K. MCCALLUM
SUPERINTENDENT
HART SENATE OFFICE BUILDING
SUITE 232
WASHINGTON, DC 20510-7116
PHONE: (202) 224-0322

United States Senate

OFFICE OF THE SECRETARY

OFFICE OF PUBLIC RECORDS

THE PRECEDING DOCUMENT WAS:

HAND DELIVERED _____
Date of Receipt

USPS FIRST CLASS MAIL _____
Postmark

USPS REGISTERED/CERTIFIED _____
Postmark

USPS PRIORITY MAIL _____
Postmark

DELIVERY CONFIRMATION OR SIGNATURE CONFIRMATION LABEL ☐

USPS EXPRESS MAIL 1-23-14
Postmark

OVERNIGHT DELIVERY SERVICE:

	SHIPPING DATE	NEXT BUSINESS DAY DELIVERY
FEDERAL EXPRESS	_____	<input type="checkbox"/>
UPS	_____	<input type="checkbox"/>
DEL	_____	<input type="checkbox"/>
AIRBORNE EXPRESS	_____	<input type="checkbox"/>

RECEIVED FROM FEDERAL ELECTION COMMISSION _____
Date of Receipt

POSTMARK ILLEGIBLE ☐ NO POSTMARK ☐

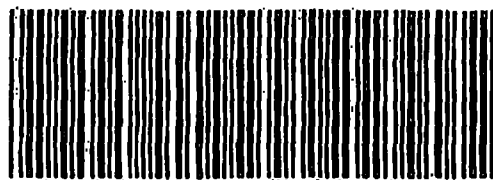
FAX _____
Date of Receipt

OTHER _____
Date of Receipt or Postmark

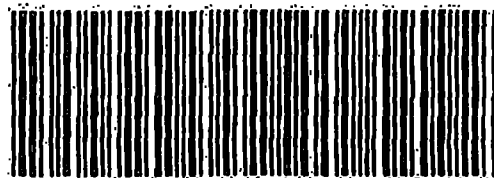
PREPARER DH DATE PREPARED 1-28-14

17044421100

14020014658



17044421704



14020014669

EXHIBIT #5

17044421705

ROLL CALL

June 24, 2014

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INFLUENCE

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HILL LIFE

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TOPIC A

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New Mexico: Weh Considering 2014 Senate Bid

By Kyle Trygstad

Posted at 11:12 a.m. on Dec. 5, 2012

1

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Udall is up for re-election in 2014. (Tom Williams/CQ Roll Call File Photo)

New Mexico business executive Allen Weh is considering a challenge to Democratic Sen. Tom Udall in 2014.

The former New Mexico Republican Party chairman and 2010 gubernatorial candidate said in a telephone interview with CQ Roll Call on Tuesday that he expects to decide by spring of next year.

"As anybody should do when considering a move like this, you do your homework ... and gather enough information to make a sound decision," Weh said.

Weh, 70, is CEO of CSI Aviation Services Inc., an aviation logistics firm he founded in 1979. Weh is capable of self-funding his campaign but said he would not plan to do that.

Udall reported having \$294,000 in the bank as of Sept. 30. In his first election to the Senate in 2008, Udall spent more than \$7.4 million and defeated GOP Rep. Steve Pearce by 22 points.

Weh said he is not concerned about the state's apparent trend toward Democrats, despite big losses for Republicans at the presidential and Senate levels in 2008 and 2012. President Barack Obama carried the state last month by 10 points, and Rep. Martin Heinrich topped former Rep. Heather A. Wilson by 6 points in the open-seat Senate race.

Calling it a "moderate/conservative" state, Weh said, "I personally don't believe New Mexico is as blue as it's been depicted in the last presidential election."

Weh is a retired Marine Corps Reserve colonel and served in combat several times, including in Vietnam and Iraq during the 1990s and the 2000s. He said that upon returning in 2004 from a

ROLL CALL VIDEO PICKS



2014 PRIMARY ELECTION RESULTS

2014 Primary Season

DETAILS HERE

TOP 5 POSTS

- 6 Things to Watch in Tuesday's Primaries
- Pick Your Clinton: Democrats Want Duo on Trail
- Travis Childers Awaits Cochran, McDaniel Primary Finals
- Iowa GOP Convention Picks Nominee for Top House Race (Video)
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Open Seat
Primaries
Special Election
On the Trail
People

year of active duty in Iraq, several people, including Wilson and then-Sen. Pete V. Domenici, approached him to take over the state party — despite no prior political activism.

After chairing the party for four and a half years, Weh jumped into the gubernatorial race in 2009. He finished second in the five-candidate GOP primary, losing only to the eventual winner, Gov. Susana Martinez.

1 comment

Share 27

Tweet 18

N.M. Senate

More from Roll Call

From Around the Web

- Man Who Assaulted Dad After Finding Him in Bed With His Wife Gets Off Easy (Stirring Daily)
- Amazing, Hard-to-Believe, Perfectly Timed Pictures — Taken at Just the Right Moment! (Amazingly Timed Photos)
- Woman Named Crystal Metheny Arrested for the Unbelievable (Hint: Not Drugs) (Stirring Daily)
- Meet the Vigilante Prisoner Who Beats Up Jail Rapists (VICE)
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17044421707

17044421708

EXHIBIT #6

Before the
FEDERAL ELECTION COMMISSION

In the matter of:

Allen Weh for Senate; and Ms. Rebecca
Sanchez, in her capacity as Treasurer of
Allen Weh for Senate

MUR No. 6818

DECLARATION OF DIEGO ESPINOZA

I, Diego Espinoza, make the following statement to the Federal Election Commission ("FEC" or "Commission") in connection with the above-referenced matter:

1. I am a part-time site supervisor with CSI Aviation Services, Inc. ("CSI") in Albuquerque, New Mexico, and also serve as the present Campaign Manager for Allen Weh for Senate ("AWS"), the principal federal campaign committee of Colonel Allen Weh, who is the Republican nominee for the U.S. Senate in the State of New Mexico. I have worked for CSI since November 1, 2010 and have held my current part-time site supervisor position with the company since January 15, 2014. I have held my role with AWS since the committee's initial formation in January 2014. Based upon my positions with both CSI and AWS, I have personal knowledge of the facts stated herein.

2. As a part-time site supervisor with CSI, I am fundamentally responsible for directly supervising sub-contractors, overseeing negotiations with vendors, and managing daily operations in the special contracts division of CSI. I became a part-time site supervisor in January 2014 following a multi-year stint as a full-time employee in the same role. My decision to shift from full-time status to part-time status with CSI was the direct result of my desire to free up additional time to participate in personal political activities outside of work, including helping Colonel Allen Weh explore a potential campaign for U.S. Senate.

3. At the time of my decision to shift from full-time to part-time employment status with CSI, I earned an annual salary of \$55,000 and was responsible for working over 40 hours per week on behalf of the company. Upon becoming a part-time employee, my annual salary with CSI was reduced by 50% and my weekly work responsibilities with the company were lessened to approximately 15-20 hours per week. At the time of this formal shift in my employment, my change in status was memorialized through administrative paperwork that was prepared and signed by both CSI and myself. Upon information and belief, that paperwork remains in the possession of CSI's human resources department and clearly articulates the degree of reduction in my salary and workload.

4. The salary provided to me by CSI is solely remuneration for work activities provided to the company in my capacity as a site supervisor. I do not receive any pay or benefits from CSI for activities performed on behalf of any entity other than CSI. To this point, none of the salary or benefits I receive from CSI are in any way compensation for work performed for AWS or any other political organization.

5. As Campaign Manager for AWS, I am fundamentally responsible for overseeing and directing Colonel Allen Weh's campaign for U.S. Senate. In that capacity, I coordinate AWS' fundraising, advertising, polling, policy, outreach, strategy and administrative operations. I likewise manage the day-to-day activities and conduct of dozens of campaign employees, contractors, vendors and volunteers.

6. As remuneration for my responsibilities as AWS' Campaign Manager, I receive a monthly salary from the committee. This salary is the only compensation I receive from AWS or any other source in conjunction with my work on Colonel Allen Weh's campaign for the U.S. Senate. No entities or individuals other than AWS pay or reimburse me for any work performed to benefit Colonel Weh or any other political candidates or committees.

7. As an employee of both CSI and AWS, I take immense care to ensure that the work I perform on behalf of both entities is wholly separate and distinct. While working in CSI's offices and using CSI's corporate resources, I perform only CSI-related tasks and undertake all reasonable efforts to ensure that I refrain from performing any political activities related to either AWS or Colonel Weh. I also strive to respect and adhere to CSI's internal protocols on resource use, which mandate that corporate assets only be used for CSI-related undertakings. When performing campaign-related activities or tasks for AWS, I do so only on non-CSI time and utilizing only personal resources or those owned by AWS. In sum, at no time since becoming Campaign Manager of AWS have I improperly utilized CSI-owned facilities, materials or equipment to the political benefit of Colonel Weh or his campaign.

8. In my joint capacity as both Campaign Manager for AWS and site supervisor for CSI, I have never encountered or discovered any data or information that would cause me to believe that unreported corporate funds from CSI are being used to pay a portion of my salary with AWS or the salary of any other campaign personnel. Similarly, I am not aware of any conduct or behavior undertaken by myself or anyone else associated with AWS or CSI that could reasonably be interpreted as evidence that either entity has engaged in improper conduct under federal campaign finance law.

I declare under penalty of perjury that the foregoing is true and correct.


Diego Espinoza

Date: 6/25/14

EXHIBIT #7

17044421711

FEC
FORM 3REPORT OF RECEIPTS
AND DISBURSEMENTS
For An Authorized CommitteeRE
SECRETARY OF
PUBLIC RECORDS

14 APR 17 PM 2:22

Office Use Only

1. NAME OF
COMMITTEE (in full)

TYPE OR PRINT ▼

Example: If typing, type
over the lines.

12FE4M5

Allen Weh for Senate

ADDRESS (number and street)

PO Box 28086

Check if different
than previously
reported. (ACC)

Albuquerque

NM

87125-8088

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

STATE ▼ DISTRICT

C. C00555573

3. IS THIS
REPORTNEW
(N)

OR

AMENDED
(A)

NM

00

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:



April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

October 15 Quarterly Report (Q3)

January 31 Year-End Report (YE)

Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

Primary (12P)



General (12G)



Runoff (12R)



Convention (12C)



Special (12S)

Election on

In the
State of

(c) 30-Day POST-Election Report for the:

General (30G)



Runoff (30R)



Special (30S)

Election on

In the
State of

5. Covering Period

01

01

2014

through

03

31

2014

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Rebecca Sanchez

Signature of Treasurer

Rebecca Sanchez

Date

04

09

2014

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office
Use
OnlyFEC FORM 3
(Revised 02/2003)

14020253651

14020253651

SUMMARY PAGE

of Receipts and Disbursements

Write or Type Committee Name

Allen Weh for Senate

Report Covering the Period:

From:

01 / 01 / 2014

To:

03 / 31 / 2014

	COLUMN A This Period	COLUMN B Election Cycle-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e))..	283938.71	283938.71
(b) Total Contribution Refunds (from Line 20(d))..	0	0
(c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a))...	283938.71	283938.71
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17) ..	208398.47	208398.47
(b) Total Offsets to Operating Expenditures (from Line 14)...	26.81	26.81
(c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a))...	208369.66	208369.66
8. Cash on Hand at Close of Reporting Period (from Line 27)...	205569.05	
9. Debts and Obligations Owed TO the Committee (itemize all on Schedule C and/or Schedule D)...	0	
10. Debts and Obligations Owed BY the Committee (itemize all on Schedule C and/or Schedule D) ..	150000	

For further information contact:

Federal Election Commission
999 E Street, NW
Washington, DC 20463

Toll Free 800-424-9530
Local 202-694-1100

DETAILED SUMMARY PAGE of Receipts

FEC Form 3 (Revised 12/2003)

PAGE 3 / 145

Write or Type Committee Name
Allen Weh for Senate

Report Covering the Period: From: **01 01 2014** To: **03 31 2014**

I. RECEIPTS	COLUMN A Total This Period	COLUMN B Election Cycle-to-Date
11. CONTRIBUTIONS (other than loans) FROM:		
(a) Individuals/Persons Other Than Political Committees		
(i) Itemized (use Schedule A)...	219228.81	219228.81
(ii) Unitemized	34408.44	34408.44
(iii) TOTAL of contributions from individuals	253637.25	253637.25
(b) Political Party Committees...	0	0
(c) Other Political Committees (such as PACs) ..	0	0
(d) The Candidate	10301.46	10301.46
(e) TOTAL CONTRIBUTIONS (other than loans) (add Lines 11(a)(iii), (b), (c), and (d))..	263938.71	263938.71
12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES ..	0	0
13. LOANS:		
(a) Made or Guaranteed by the Candidate...	150000	150000
(b) All Other Loans...	0	0
(c) TOTAL LOANS (add Lines 13(a) and (b))...	150000	150000
14. OFFSETS TO OPERATING EXPENDITURES (Refunds, Rebates, etc.) ..	26.81	26.81
15. OTHER RECEIPTS (Dividends, Interest, etc.)	0	0
16. TOTAL RECEIPTS (add Lines 11(a), 12, 13(c), 14, and 15) (Carry Total to Line 24, page 4)...	413965.52	413965.52

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3 (Revised 02/2003)

PAGE 4 / 145

II. DISBURSEMENTS

COLUMN A Total This Period

COLUMN B Election Cycle-to-Date

17. OPERATING EXPENDITURES...

208396.47

208396.47

18. TRANSFERS TO OTHER
AUTHORIZED COMMITTEES..

0

0

19. LOAN REPAYMENTS:

(a) Of Loans Made or Guaranteed
by the Candidate...

0

0

(b) Of All Other Loans

0

0

(c) TOTAL LOAN REPAYMENTS
(add Lines 19(a) and (b))...

0

0

20. REFUNDS OF CONTRIBUTIONS TO:

(a) Individuals/Persons Other
Than Political Committees...

0

0

(b) Political Party Committees...

0

0

(c) Other Political Committees
(such as PACs)...

0

0

(d) TOTAL CONTRIBUTION REFUNDS
(add Lines 20(a), (b), and (c))...

0

0

21. OTHER DISBURSEMENTS..

0

0

22. TOTAL DISBURSEMENTS

(add Lines 17, 18, 19(c), 20(d), and 21) ►

208396.47

208396.47

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD...

0

24. TOTAL RECEIPTS THIS PERIOD (from Line 16, page 3)...

413965.52

25. SUBTOTAL (add Line 23 and Line 24)...

413965.52

26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22)....

208396.47

27. CASH ON HAND AT CLOSE OF REPORTING PERIOD
(subtract Line 26 from Line 25)...

205569.05

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 92 OF 145

☒ 17 ☐ 18 ☐ 19a ☐ 19b
20a 20b 20c 21

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NAME OF COMMITTEE (In Full)

Allen Weh for Senate

Full Name (Last, First, Middle Initial)

A. Mrs. Deborah W. Maestas

Mailing Address 7512 Rio Grande Boulevard NW

City Los Ranchos State NM Zip Code 87107-6434

Purpose of Disbursement
Chairs/Domainis

Candidate Name

001
Category/
Type

Date of Disbursement

MM/DD/YYYY
01/12/2014

Amount of Each Disbursement this Period

468.39

Transaction ID : B-E-3020

Office Sought: ☐ House ☐ Senate ☐ President

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

Original vendors exceeding reporting threshold itemized as memo transactions.

State: District:

Full Name (Last, First, Middle Initial)

B. Walmart

Mailing Address 8000 Academy Road NE

City Albuquerque State NM Zip Code 87111-1159

Purpose of Disbursement
Chairs

Candidate Name

001
Category/
Type

Date of Disbursement

MM/DD/YYYY
01/12/2014

Amount of Each Disbursement this Period

423.54

Transaction ID : B-S-666

(MEMO ITEM)

Subitemization of Deborah Maestas(01/12/14)

Office Sought: ☐ House ☐ Senate ☐ President

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

Full Name (Last, First, Middle Initial)

C. Payroll Company

Mailing Address 10433 Montgomery Parkway Loop NE
Suite 100

City ABQ State NM Zip Code 87107

Purpose of Disbursement
Salaries & Fees

Candidate Name

001
Category/
Type

Date of Disbursement

MM/DD/YYYY
01/16/2014

Amount of Each Disbursement this Period

5736.31

Transaction ID : B-E-3045

Office Sought: ☐ House ☐ Senate ☐ President

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

Original vendors exceeding reporting threshold itemized as memo transactions.

State: District:

SUBTOTAL of Disbursements This Page (optional)

6202.70

TOTAL This Period (last page this line number only)

14020255742

14020255742

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

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☒ 17 ☐ 18 ☐ 19a ☐ 19b
☐ 20a ☐ 20b ☐ 20c ☐ 21

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NAME OF COMMITTEE (In Full)
Allen Weh for Senate

Full Name (Last, First, Middle Initial)

A. Payroll Company

Mailing Address 10433 Montgomery Parkway Loop NE
Suite 100

City State Zip Code
ABQ NM 87107

Purpose of Disbursement
Fees

001
Category/
Type

Candidate Name

Office Sought: ☐ House
☐ Senate
☐ President

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

Date of Disbursement

01 16 2014

Amount of Each Disbursement this Period

59.65

Transaction ID : B-S-879

[MEMO ITEM]

Subitemization of Payroll Company(01/16/14)

B. Payroll Company

Mailing Address 10433 Montgomery Parkway Loop NE
Suite 100

City State Zip Code
ABQ NM 87107

Purpose of Disbursement
Salaries

001
Category/
Type

Candidate Name

Office Sought: ☐ House
☐ Senate
☐ President

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

Date of Disbursement

01 16 2014

Amount of Each Disbursement this Period

5676.88

Transaction ID : B-S-680

[MEMO ITEM]

Subitemization of Payroll Company(01/16/14)

C. US Postmaster

Mailing Address 1135 Broadway Boulevard NE

City State Zip Code
Albuquerque NM 87101-9998

Purpose of Disbursement
Administrative/Salary/Overhead: Postage

001
Category/
Type

Candidate Name

Office Sought: ☐ House
☐ Senate
☐ President

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

Date of Disbursement

01 16 2014

Amount of Each Disbursement this Period

55.2

Transaction ID : B-E-3021

SUBTOTAL of Disbursements This Page (optional)

55.20

TOTAL This Period (last page this line number only)

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 101 OF 145

☒ 17 ☐ 18 ☐ 19a ☐ 19b
20a 20b 20c 21

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NAME OF COMMITTEE (In Full)

Allen Weh for Senate

Full Name (Last, First, Middle Initial)

A. Payroll Company

Mailing Address 10433 Montgomery Parkway Loop NE
Suite 100

City ABQ State NM Zip Code 87107

Purpose of Disbursement
Salaries & Fees

Candidate Name

Office Sought: ☐ House
☐ Senate
☐ President

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

Date of Disbursement

01 / 31 / 2014

Amount of Each Disbursement this Period

10151.53

Transaction ID : B-E-3046

Original vendors exceeding reporting threshold itemized
as memo transactions.

B. Payroll Company

Mailing Address 10433 Montgomery Parkway Loop NE
Suite 100

City ABQ State NM Zip Code 87107

Purpose of Disbursement
Salaries

Candidate Name

Office Sought: ☐ House
☐ Senate
☐ President

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

Date of Disbursement

01 / 31 / 2014

Amount of Each Disbursement this Period

10090

Transaction ID : B-S-681

(MEMO ITEM)

Subitemization of Payroll Company(01/31/14)

C. Payroll Company

Mailing Address 10433 Montgomery Parkway Loop NE
Suite 100

City ABQ State NM Zip Code 87107

Purpose of Disbursement
Fees

Candidate Name

Office Sought: ☐ House
☐ Senate
☐ President

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

Date of Disbursement

01 / 31 / 2014

Amount of Each Disbursement this Period

61.53

Transaction ID : B-S-682

(MEMO ITEM)

Subitemization of Payroll Company(01/31/14)

SUBTOTAL of Disbursements This Page (optional)

10151.53

TOTAL This Period (last page this line number only)

14020253751

14020253751

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

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☒ 17 ☐ 18 ☐ 19a ☐ 19b
☐ 20a ☐ 20b ☐ 20c ☐ 21

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NAME OF COMMITTEE (In Full)

Allen Weh for Senate

Full Name (Last, First, Middle Initial)

A. Payroll Company

Date of Disbursement

MM / DD / YY
02 / 15 / 2014

Mailing Address 10433 Montgomery Parkway Loop NE
Suite 100

City ABQ State NM Zip Code 87107

Purpose of Disbursement
Payroll Fees

001

Candidate Name

Category/
Type

Office Sought: ☐ House
☐ Senate
☐ President

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

Amount of Each Disbursement this Period

61.53
Transaction ID : B-E-3204

B. Payroll Company

Date of Disbursement

MM / DD / YY
02 / 15 / 2014

Mailing Address 10433 Montgomery Parkway Loop NE
Suite 100

City ABQ State NM Zip Code 87107

Purpose of Disbursement
Administrative/Salary/Overhead: Salaries

001

Candidate Name

Category/
Type

Office Sought: ☐ House
☐ Senate
☐ President

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

Amount of Each Disbursement this Period

10370
Transaction ID : B-E-3205

C. Print Mart

Date of Disbursement

MM / DD / YY
02 / 17 / 2014

Mailing Address 6804 4th Street NW

City Los Ranchos State NM Zip Code 87107-8117

Purpose of Disbursement
Thank You Cards

001

Candidate Name

Category/
Type

Office Sought: ☐ House
☐ Senate
☐ President

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

Amount of Each Disbursement this Period

883.79
Transaction ID : B-E-3189

SUBTOTAL of Disbursements This Page (optional).....

TOTAL This Period (last page this line number only).....

11095.32

17044421719

14020253764

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 119 OF 145

☒ 17 ☐ 18 ☐ 19a ☐ 19b
☐ 20a ☐ 20b ☐ 20c ☐ 21

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NAME OF COMMITTEE (In Full)
Allen Weh for Senate

Full Name (Last, First, Middle Initial)

A. Payroll Company.

Date of Disbursement

Mailing Address 10433 Montgomery Parkway Loop NE
Suite 100

02 28 2014

City ABQ State NM Zip Code 87107

Amount of Each Disbursement this Period

Purpose of Disbursement
Payroll Fees

001

63.4
Transaction ID : B-E-3206

Candidate Name

Category/
Type

Office Sought: ☐ House
☐ Senate
☐ President

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

Full Name (Last, First, Middle Initial)

B. Payroll Company

Date of Disbursement

Mailing Address 10433 Montgomery Parkway Loop NE
Suite 100

02 28 2014

City ABQ State NM Zip Code 87107

Amount of Each Disbursement this Period

Purpose of Disbursement
Administrative/Salary/Overhead: Salaries

001

11097.5
Transaction ID : B-E-3207

Candidate Name

Category/
Type

Office Sought: ☐ House
☐ Senate
☐ President

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

Full Name (Last, First, Middle Initial)

C. Starboard Communications

Date of Disbursement

Mailing Address 1043 Barr Road

02 28 2014

City Lexington State SC Zip Code 29072-8648

Amount of Each Disbursement this Period

Purpose of Disbursement
Travel: Lodging

002

120
Transaction ID : B-E-3694

Candidate Name

Category/
Type

Office Sought: ☐ House
☐ Senate
☐ President

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

SUBTOTAL of Disbursements This Page (optional).....

11280.90

TOTAL This Period (last page this line number only).....

170044421720

14020253769

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 130 OF 145

☒ 17 ☐ 18 ☐ 18a ☐ 19b
20a 20b 20c 21

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Allen Weh for Senate

Full Name (Last, First, Middle Initial)

A. Col Allen E. Weh

Mailing Address 6722 Rio Grande Boulevard NW

Date of Disbursement

03 12 2014

City Los Ranchos State NM Zip Code 87107-6330

Amount of Each Disbursement this Period

141.77

Purpose of Disbursement
In kind: Lodging

Transaction ID : B-4-3938

Candidate Name

Category/
Type

Office Sought: ☐ House
☐ Senate
☐ President

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

Full Name (Last, First, Middle Initial)

B. Col Allen E. Weh

Mailing Address 6722 Rio Grande Boulevard NW

Date of Disbursement

03 12 2014

City Los Ranchos State NM Zip Code 87107-6330

Amount of Each Disbursement this Period

651

Purpose of Disbursement
In kind: Airfare

Transaction ID : B-4-3940

Candidate Name

Category/
Type

Office Sought: ☐ House
☐ Senate
☐ President

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

Full Name (Last, First, Middle Initial)

C. Payroll Company

Mailing Address 10433 Montgomery Parkway Loop NE
Suite 100

Date of Disbursement

03 14 2014

City ABQ State NM Zip Code 87107

Amount of Each Disbursement this Period

11690

Purpose of Disbursement
Administrative/Salary/Overhead: Salaries

Transaction ID : B-E-3605

Candidate Name

001
Category/
Type

Office Sought: ☐ House
☐ Senate
☐ President

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

SUBTOTAL of Disbursements This Page (optional).....

12482.77

TOTAL This Period (last page this line number only).....

14020253780

14020253780

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 131 OF 145

☒ 17 ☐ 18 ☐ 19a ☐ 19b
20a 20b 20c 21

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NAME OF COMMITTEE (In Full)
Allen Weh for Senate

Full Name (Last, First, Middle Initial)

A. Payroll Company

Date of Disbursement

Mailing Address 10433 Montgomery Parkway Loop NE
Suite 100

03 / 14 / 2014

City Albuquerque State NM Zip Code 87107

Amount of Each Disbursement this Period

Purpose of Disbursement
Administrative/Salary/Overhead: Salaries

738.67

Candidate Name

001
Category/
Type

Transaction ID : B-E-3806

Office Sought: ☐ House ☐ Senate ☐ President

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

Full Name (Last, First, Middle Initial)

B. Payroll Company

Date of Disbursement

Mailing Address 10433 Montgomery Parkway Loop NE
Suite 100

03 / 14 / 2014

City Albuquerque State NM Zip Code 87107

Amount of Each Disbursement this Period

Purpose of Disbursement
Payroll Fees

63.4

Candidate Name

001
Category/
Type

Transaction ID : B-E-3607

Office Sought: ☐ House ☐ Senate ☐ President

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

Full Name (Last, First, Middle Initial)

C. Walmart

Date of Disbursement

Mailing Address 8000 Academy Road NE

03 / 15 / 2014

City Albuquerque State NM Zip Code 87111-1159

Amount of Each Disbursement this Period

Purpose of Disbursement
Poster Supplies

12.26

Candidate Name

001
Category/
Type

Transaction ID : B-E-4113

Office Sought: ☐ House ☐ Senate ☐ President

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

State: District:

SUBTOTAL of Disbursements This Page (optional).....

812.33

TOTAL This Period (last page this line number only).....

14020255781

14020255781

**SCHEDULE B (FEC Form 3)
ITEMIZED DISBURSEMENTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 142 OF 145

☒ 17 ☐ 18 ☐ 19a ☐ 19b
☐ 20a ☐ 20b ☐ 20c ☐ 21

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (In Full)

Allen Web for Senate

Full Name (Last, First, Middle Initial)

A. GOP Connect Inc

Mailing Address PO Box 723

City Halley State ID Zip Code 83333-0723

Purpose of Disbursement
Advertising: Website

Candidate Name

Office Sought: ☐ House ☐ Senate ☐ President

State: District:

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

Date of Disbursement

03/31/2014

Amount of Each Disbursement this Period

2500
Transaction ID: B-E-4076

B. Payroll Company

Mailing Address 10433 Montgomery Parkway Loop NE
Suite 100

City ABQ State NM Zip Code 87107

Purpose of Disbursement
Administrative/Salary/Overhead: Salaries

Candidate Name

Office Sought: ☐ House ☐ Senate ☐ President

State: District:

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

Date of Disbursement

03/31/2014

Amount of Each Disbursement this Period

15340
Transaction ID: B-E-3933

C. Payroll Company

Mailing Address 10433 Montgomery Parkway Loop NE
Suite 100

City ABQ State NM Zip Code 87107

Purpose of Disbursement
Payroll Fees

Candidate Name

Office Sought: ☐ House ☐ Senate ☐ President

State: District:

Disbursement For: 2014
☒ Primary ☐ General
☐ Other (specify)

Date of Disbursement

03/31/2014

Amount of Each Disbursement this Period

67.14
Transaction ID: B-E-3934

SUBTOTAL of Disbursements This Page (optional)

TOTAL This Period (last page this line number only)

17907.14

14020255792

14020255792

17044421724

EXHIBIT #8

Before the
FEDERAL ELECTION COMMISSION

In the matter of:

Allen Weh for Senate; and Ms. Rebecca
Sanchez, in her capacity as Treasurer of
Allen Weh for Senate

MUR No. 6818

DECLARATION OF REBECCA SANCHEZ

I, Rebecca Sanchez, make the following statement to the Federal Election Commission ("FEC" or "Commission") in connection with the above-referenced matter:

1. I serve as the official Treasurer for Allen Weh for Senate ("AWS"), the principal federal campaign committee of Colonel Allen Weh, who is the Republican nominee for the U.S. Senate in the State of New Mexico. I have held this position with AWS since its official formation and was designated as committee Treasurer on January 23, 2014, when a FEC Form 1 Statement of Organization was submitted to the Federal Election Commission ("FEC" or the "Commission"). Based upon my role with AWS, I have personal knowledge of the facts stated herein.

2. As Treasurer of AWS, I am fundamentally responsible for ensuring that it complies with the reporting and disclosure requirements of the Federal Election Campaign Act of 1971 (the "Act") and its associated regulations. In that capacity, I work in conjunction with AWS Campaign Manager Diego Espinoza, AWS Deputy Campaign Manager Deborah Maestas, Finance Manager Chelsea Stallings, and other committee staff to document the campaign's receipts and disbursements, and file its periodic FEC financial disclosures.

3. At present, it is my understanding that AWS utilizes comprehensive campaign finance software to assist with the maintenance of its committee financial records and the preparation of its periodic FEC disclosure reports. It is also my understanding that, when necessary, AWS seeks comprehensive legal support from outside counsel so as to keep the campaign committee compliant with all federal record-keeping and disclosure requirements.

5. In my capacity as Treasurer for AWS, I was responsible for ensuring the accuracy and completeness of the committee's 2014 first-quarter FEC disclosure report, which was electronically filed with the Commission on April 14, 2014. As required by the Act and its associated regulations, I utilized my "best efforts" (in conjunction with the aforementioned campaign staff) to accurately report all receipts taken, disbursements made, and debts held by AWS during the relevant disclosure period – January 1, 2014 through March 31, 2014. Similar

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17044421725
"best efforts" were taken to ensure that all receipts, disbursements and debts that were required to be itemized in accordance with federal law were reported in such fashion. Prior to filing, I also examined all data contained in this first-quarter FEC disclosure report, and it was, to the best of my knowledge and belief, true, correct, and complete.

6. On Schedule A of AWS' 2014 year-end FEC disclosure report, the campaign committee disclosed a monetary contribution of \$5,000 received from Dr. Jerry W. Bettman of Albuquerque, New Mexico on January 23, 2014. This contribution was made by Dr. Bettman via a personal check, which was undesignated for either the 2014 primary or the 2014 general election cycle. As required by campaign protocols and FEC regulations, AWS automatically allocated \$2,600 of the \$5,000 in undesignated funds to the next election cycle - the primary election. The remaining \$2,400 donated was then, in accordance with guidance from campaign counsel, presumptively redesignated to the general election cycle. In conjunction with this action, the committee notified Dr. Bettman in writing of the presumptive redesignation and offered him the alternative of receiving a refund in the amount of \$2,400. When Dr. Bettman refused such refund, AWS disclosed the presumptive redesignation of funds via itemized memo entries on Schedule A of its 2014 first-quarter FEC disclosure report. Upon information and belief, it is my understanding that AWS considers those particular memo entries as proper in light of the federal regulatory requirements for the itemization of presumptively-redesignated contributions.

7. In my capacity as Treasurer for AWS, I have neither encountered nor discovered any data or information that would cause me to believe that the campaign committee has improperly received excess contributions from individual donors, including Dr. Jerry W. Bettman. Additionally, I have neither encountered nor discovered any data or information regarding contributions made by individual donors, including Dr. Bettman, that would cause me to believe that AWS has failed to disclose any refunds of excess donations made by the committee's contributors.

8. On Schedule B of AWS' first-quarter 2014 FEC disclosure report, the campaign committee disclosed a number of payroll expenditures made between January 2014 and March 2014 in the amounts of \$5,736.31, \$59.65, \$5676.66, \$10,151.53, \$10,090.00, \$61.53, \$61.53, \$10,370.00, \$63.40, \$11,097.50, \$11,690.00, \$736.67, \$63.40, \$15,340.00, and \$67.14. Upon information and belief, it is my understanding that AWS considers these particular disclosures as proper in light of the federal regulatory requirements for the itemization of such payroll disbursements.

9. In my capacity as Treasurer for AWS, I have neither encountered nor discovered any data or information that would cause me to believe that the campaign committee has improperly accepted monetary or in-kind contributions from any corporate source, including CSI Aviation Services, Inc. ("CSI"). Specifically, I have neither encountered nor discovered any data or information concerning the activities of Mr. Diego Espinoza that would cause me to believe that AWS wrongfully utilized the corporate resources of CSI to benefit the campaign committee.

I declare under penalty of perjury that the foregoing is true and correct.


Rebecca Sanchez

Date: 26 June 2014

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EXHIBIT #9

State of New Mexico
Office of the Secretary of State
Ethics Administration
325 Don Gasper Suite 300
Santa Fe, New Mexico 87503
(800) 477-3832/(505) 827-3800

SECRETARY OF STATE

Dianna J. Duran

Candidate

Campaign Reporting Act
Report of Expenditures and Contributions

Official Time Stamp

FORM A

2010

Candidate's Name Weh, Allen

Date Submitted: 4/13/2010 8:25:51 PM Date Run: 4/13/2010 6:25:51 PM Date Due: 4/12/2010 12:00:00 AM

1. FILING DEADLINES (Check the box that indicates the report being filed)			2. Filing Officer	
<input checked="" type="checkbox"/> 4/12/2010 Before 5PM	7/1/2010 Before 5PM	10/28/2010 Before 5PM	<input checked="" type="checkbox"/> Secretary Of State	
5/10/2010 Before 5PM	9/13/2010 Before 5PM	12/2/2010 Before 5PM	County Clerk	
5/27/2010 Before 5PM	10/12/2010 Before 5PM		County Name	
3. Full name of Candidate: Weh, Allen Office Sought or Held: Governor Of New Mexico				
Mailing Address: 6722 Rio Grande NW City, State & Zip Code: Los Ranchos, NM 87107				
Phone #: 5057619000 Fax #:				
4. Full name of Campaign Committee: Allen Weh 2010 Phone #: 5053449220				
Mailing Address: PO Box 26086 City, State, Zip Code: Albuquerque, NM 87125 Fax #: 5053449322				
5. Full Name of Treasurer: Perea, Brandi Phone #: 5058890900				
Mailing Address: PO Box 26086 City, State, Zip Code: Albuquerque, NM 87125 Fax #:				
Name & Street Address of Financial Institution Where bank account is maintained (Bank Account Located in New Mexico): Bank of America. 303 Roma NW, Albuquerque, NM 87102				

6. FINANCIAL SUMMARY		
a.	OPENING BALANCE for reporting period (“0” if first report, or CLOSING BALANCE FROM LAST REPORT)	\$372,184.30
b.	Total Monetary Contribution this Reporting Period (Form B1 + Form B3)	\$691,103.23
c.	Total Expenditures this Reporting Period (Form C + Form C1)	\$519,125.63
d.	Closing Balance this Reporting Period (6a + 6b - 6c)	\$544,141.90
e.	Total Loans To the Committee this Reporting Period (Form A1)	\$500,000.00
f.	Total unpaid Campaign Debt (Form A1)	\$750,000.00
g.	Total In-Kind Contributions this Reporting Period (Form B 2)	\$0.00
7.	Special Event Work sheet Attached Yes X No	

State of New Mexico
Ethics Administration

Campaign Reporting Act
Report of Expenditures and Contributions

2010

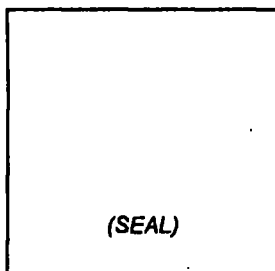
Candidate's Name Weh, Allen

Date Submitted: 4/13/2010 6:25:51 PM Date Run: 4/13/2010 6:25:51 PM Date Due: 4/12/2010 12:00:00 AM

1.	TOTAL DEBT CARRIED FORWARD	\$250,000.00
2.	TOTAL LOAN CONTRIBUTIONS	\$500,000.00
3.	TOTAL DEBT PAID	\$0.00
4.	TOTAL LOANS FORGIVEN	\$0.00
5.	TOTAL UNPAID DEBT	\$750,000.00

CERTIFICATION OF REPORT

I here by swear or affirm, under penalty of perjury, that all the information on this form and any attachments is true, correct and complete to the best of my knowledge, and I further swear or affirm that if this is a final report the candidate named herein has been dissolved or no longer exists and that the committee bank account has been closed.



Attested this _____ day of _____

(Signature of Treasurer)

(Printed Name)

State of New Mexico

Campaign Reporting Act

Ethics Administration

Report of Expenditures and Contributions

2010

2/5/2010	Penny Lauer - 853 Vanderbilt Bch Road, Suite 304, Naples FL 34108-8746		\$200.00
2/5/2010	George Swift - 645 Old Plantation Road, Jekyll Island GA 31527-0725		\$100.00
2/5/2010	James Busbee - 10705 Clyburn Park Drive NE, Albuquerque NM 87123-4842	Retired	\$100.00
2/5/2010	Virginia Ely - 6400 Dorado Beach NE, Albuquerque NM 87111-6403	Retired	\$100.00
2/5/2010	Jerry Bettman - PO Box 70125, Albuquerque NM 87187-0125	Ophthalmologist	\$10,000.00
2/4/2010	Randall Gose - 1814 N Cactus Street, Silver City NM 88061-5709		\$25.00
2/4/2010	Dorothy Bokan - 10709 Malaguena Lane NE, Albuquerque NM 87111-6819		\$25.00
2/4/2010	James McDaniel - 1000 N Newby Lane, Bloomfield NM 87413-6768		\$5.00
2/4/2010	Violet Burnam - 5304 Hayes Drive NW, Albuquerque NM 87120-2291	Retired	\$50.00
2/3/2010	Rodney Kontny - 1228 Sasebo Street NE, Albuquerque NM 87112-6328	Retired USAF	\$25.00
2/3/2010	Bella Mamuzich - 201 E Walnut Street, Deming NM 88030-5124	Independent Beauty Consultant	\$10.00
2/3/2010	Billy Dugger - 1119 Broken Arrow Drive, Silver City NM 88061-6669		\$25.00
2/3/2010	Robert Campbell - 5425 Evergreen Drive, Farmington NM 87402-4872	Retired	\$25.00
2/3/2010	Jerome Bettman - PO Box 298, Sandia Park NM 87047-0298	Retired	\$1,030.00
2/3/2010	James Earl - 987 Professional Parkway, Heath OH 43056-1641	Retired	\$100.00
2/3/2010	Ron Alley - 223 Monte Largo Drive NE, Albuquerque NM 87123-2316	Training Director	\$100.00
2/3/2010	Nova Vick - 9551 San Diego Avenue NE, Albuquerque NM 87122-3809	Contractor	\$100.00
2/3/2010	Joseph Romero - 975 Sandia Drive, Bosque Farms NM 87068-9253	Retired	\$100.00
2/3/2010	Monte Newsom - 2817 Chama Street NE, Albuquerque NM 87110-3554	Retired	\$100.00
2/3/2010	Gordon Gannon - 19 Saddlebrook Pointe, Hamburg NY 14075-5892	Attorney	\$150.00
2/3/2010	Jacob Bartholomew - 8309 Calle Adolanto NE, Albuquerque NM 87113-1770	Airplane/Helicopter Pilot	\$300.00
2/2/2010	Norma Shaeffer - PO Box 157, Winston NM 87943-0157	Retired	\$250.00
2/2/2010	Celina Bussey - 8120 Long Mesa Place NW, Albuquerque NM 87114-6124		\$25.00
2/2/2010	Paul Gallagher - 11701 Holiday Avenue NE, Albuquerque NM 87111-5231	NM concealed handgun instructor	\$25.00
2/2/2010	Billy Watson - 4412 La Paloma Road NW, Albuquerque NM 87120-5359	Retired	\$25.00
2/1/2010	Wayne Wright - 991 Glenmore Avenue, Newark OH 43055-2545		\$25.00
2/1/2010	Gordon Dalen - 3701 N Melrose Drive, Farmington NM 87401-4008		\$50.00

EXHIBIT #10

170444421732

FEC
FORM 3REPORT OF RECEIPTS
AND DISBURSEMENTS
For An Authorized CommitteeRECEIVED
SECRETARY OF
PUBLIC RECORDS

14 APR 17 PM 2:22

Office Use Only

1. NAME OF
COMMITTEE (In full)

TYPE OR PRINT ▼

Example: If typing, type
over the lines.

12FE4M5

Allen Weh for Senate

ADDRESS (number and street)

PO Box 28086

Check if different
than previously
reported. (ACC)

Albuquerque

NM

87125-6086

2. FEC IDENTIFICATION NUMBER ▼

CITY ▲

STATE ▲

ZIP CODE ▲

STATE ▼ DISTRICT

C00555573

3. IS THIS
REPORT☒NEW
(N)

OR

☐AMENDED
(A)

NM

00

4. TYPE OF REPORT (Choose One)

(a) Quarterly Reports:

☒ April 15 Quarterly Report (Q1)

July 15 Quarterly Report (Q2)

October 15 Quarterly Report (Q3)

January 31 Year-End Report (YE)

Termination Report (TER)

(b) 12-Day PRE-Election Report for the:

Primary (12P)

General (12G)

Runoff (12R)

Convention (12C)

Special (12S)

Election on

In the
State of

(c) 30-Day POST-Election Report for the:

General (30G)

Runoff (30R)

Special (30S)

Election on

In the
State of

5. Covering Period

01 / 01 / 2014

through

03 / 31 / 2014

I certify that I have examined this Report and to the best of my knowledge and belief it is true, correct and complete.

Type or Print Name of Treasurer Rebecca Sanchez

Signature of Treasurer

Rebecca Sanchez

Date

04 / 09 / 2014

NOTE: Submission of false, erroneous, or incomplete information may subject the person signing this Report to the penalties of 2 U.S.C. §437g.

Office
Use
OnlyFEC FORM 3
(Revised 02/2003)

FESAN018

14020255651

14020255651

SUMMARY PAGE

of Receipts and Disbursements

Write or Type Committee Name
Allen Weh for Senate

Report Covering the Period:

From:

01 / 01 / 2014

To:

03 / 31 / 2014

	COLUMN A This Period	COLUMN B Election Cycle-to-Date
6. Net Contributions (other than loans)		
(a) Total Contributions (other than loans) (from Line 11(e)) ..	283938.71	283938.71
(b) Total Contribution Refunds (from Line 20(d)) ..	0	0
(c) Net Contributions (other than loans) (subtract Line 6(b) from Line 6(a))...	283938.71	283938.71
7. Net Operating Expenditures		
(a) Total Operating Expenditures (from Line 17) ..	208396.47	208396.47
(b) Total Offsets to Operating Expenditures (from Line 14)...	26.81	26.81
(c) Net Operating Expenditures (subtract Line 7(b) from Line 7(a))...	208369.66	208369.66
8. Cash on Hand at Close of Reporting Period (from Line 27)...	205568.05	
9. Debts and Obligations Owed TO the Committee (Itemize all on Schedule C and/or Schedule D) ..	0	
10. Debts and Obligations Owed BY the Committee (Itemize all on Schedule C and/or Schedule D) ..	150000	

For further information contact:

Federal Election Commission
 999 E Street, NW
 Washington, DC 20463

Toll Free 800-424-9530
 Local 202-694-1100

DETAILED SUMMARY PAGE of Receipts

FEC Form 3 (Revised 12/2003)

PAGE 3 / 145

Write or Type Committee Name

Allen Weh for Senate

Report Covering the Period:

From:

01 01

2014

To:

03 31 2014

I. RECEIPTS

COLUMN A Total This Period

COLUMN B Election Cycle-to-Date

11. CONTRIBUTIONS (other than loans) FROM:

(a) Individuals/Persons Other Than Political Committees

(i) Itemized (use Schedule A)...

219228.81

219228.81

(ii) Unitemized

34408.44

34408.44

(iii) TOTAL of contributions from individuals

253637.25

253637.25

(b) Political Party Committees...

0

0

(c) Other Political Committees (such as PACs) ..

0

0

(d) The Candidate

10301.46

10301.46

(e) TOTAL CONTRIBUTIONS

(other than loans)

(add Lines 11(a)(iii), (b), (c), and (d))..

263938.71

263938.71

12. TRANSFERS FROM OTHER AUTHORIZED COMMITTEES ..

0

0

13. LOANS:

(a) Made or Guaranteed by the Candidate...

150000

150000

(b) All Other Loans...

0

0

(c) TOTAL LOANS

(add Lines 13(a) and (b))...

150000

150000

14. OFFSETS TO OPERATING EXPENDITURES

(Refunds, Rebates, etc.) ..

26.81

26.81

15. OTHER RECEIPTS

(Dividends, Interest, etc.)

0

0

18. TOTAL RECEIPTS (add Lines

11(e), 12, 13(c), 14, and 15)

(Carry Total to Line 24, page 4)...

413965.52

413965.52

17044421735

14020253555

DETAILED SUMMARY PAGE of Disbursements

FEC Form 3 (Revised 02/2003)

PAGE 4 / 145

II. DISBURSEMENTS

COLUMN A
Total This Period

COLUMN B
Election Cycle-to-Date

17. OPERATING EXPENDITURES...

208396.47

208396.47

18. TRANSFERS TO OTHER
AUTHORIZED COMMITTEES ..

0

0

19. LOAN REPAYMENTS:

(a) Of Loans Made or Guaranteed
by the Candidate...

0

0

(b) Of All Other Loans

0

0

(c) TOTAL LOAN REPAYMENTS
(add Lines 19(a) and (b))...

0

0

20. REFUNDS OF CONTRIBUTIONS TO:

(a) Individuals/Persons Other
Than Political Committees ...

0

0

(b) Political Party Committees...

0

0

(c) Other Political Committees
(such as PACs)...

0

0

(d) TOTAL CONTRIBUTION REFUNDS
(add Lines 20(a), (b), and (c))...

0

0

21. OTHER DISBURSEMENTS ..

0

0

22. TOTAL DISBURSEMENTS

(add Lines 17, 18, 19(c), 20(d), and 21) ►

208396.47

208396.47

III. CASH SUMMARY

23. CASH ON HAND AT BEGINNING OF REPORTING PERIOD...

0

24. TOTAL RECEIPTS THIS PERIOD (from Line 16, page 3)...

413965.52

25. SUBTOTAL (add Line 23 and Line 24)...

413965.52

26. TOTAL DISBURSEMENTS THIS PERIOD (from Line 22)...

208396.47

27. CASH ON HAND AT CLOSE OF REPORTING PERIOD
(subtract Line 26 from Line 25)...

205569.05

14020255654

14020255654

**SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS**

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:		PAGE 9 OF 145	
<input checked="" type="checkbox"/> 11a	<input type="checkbox"/> 11b	<input type="checkbox"/> 11c	<input type="checkbox"/> 11d
<input type="checkbox"/> 12	<input type="checkbox"/> 13a	<input type="checkbox"/> 13b	<input type="checkbox"/> 14
<input type="checkbox"/> 15			

Any information copied from such Reports and Statements may not be sold or used by any person for the purpose of soliciting contributions or for commercial purposes, other than using the name and address of any political committee to solicit contributions from such committee.

NAME OF COMMITTEE (in Full)
Allen Weh for Senate

Full Name (Last, First, Middle Initial)
Mrs. Marie P. Sorensen

Mailing Address **7308 Appomattox Place NE**

City **Albuquerque** State **NM** Zip Code **87109-5015**

FEC ID number of contributing federal political committee.

Name of Employer
None

Occupation
Retired

Receipt For: 2014

☒ Primary ☐ General
☐ Other (specify)

Election Cycle-to-Date

300

Date of Receipt

01 21 2014

Transaction ID: **A-CF2897**

Amount of Each Receipt this Period

100

Full Name (Last, First, Middle Initial)
Mrs. Margaret A Rhoades

Mailing Address **13519 Pino Canyon Place NE**

City **Albuquerque** State **NM** Zip Code **87111-7102**

FEC ID number of contributing federal political committee.

Name of Employer
PeopleInk

Occupation
President

Receipt For: 2014

☒ Primary ☐ General
☐ Other (specify)

Election Cycle-to-Date

750

Date of Receipt

01 22 2014

Transaction ID: **A-CF4078**

Amount of Each Receipt this Period

1500

Full Name (Last, First, Middle Initial)
Dr. Jerry W. Bettman

Mailing Address **PO Box 70125**

City **Albuquerque** State **NM** Zip Code **87197-0125**

FEC ID number of contributing federal political committee.

Name of Employer
None

Occupation
Retired

Receipt For: 2014

☒ Primary ☐ General
☐ Other (specify)

Election Cycle-to-Date

5000

Date of Receipt

01 23 2014

Transaction ID: **A-CF4072**

Amount of Each Receipt this Period

5000

SUBTOTAL of Receipts This Page (optional)

6800.00

TOTAL This Period (last page this line number only)

140444247

14020253659

SCHEDULE A (FEC Form 3)
ITEMIZED RECEIPTS

Use separate schedule(s)
for each category of the
Detailed Summary Page

FOR LINE NUMBER:
(check only one)

PAGE 10 OF 145

☒ 11a ☐ 11b ☐ 11c ☐ 11d
☐ 12 ☐ 13a ☐ 13b ☐ 14 ☐ 15

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NAME OF COMMITTEE (In Full)
Allen Weh for Senate

A. Full Name (Last, First, Middle Initial)
Dr. Jerry W. Bettman

Mailing Address **PO Box 70125**

City **Albuquerque** State **NM** Zip Code **87197-0125**

FEC ID number of contributing federal political committee. **C**

Name of Employer **None** Occupation **Retired**

Receipt For: 2014
☒ Primary ☐ General
☐ Other (specify)

Election Cycle-to-Date **5000**

Date of Receipt
MAY 01 2014

Transaction ID : **A-MCNF12**

Amount of Each Receipt this Period
-2400

Redesignation from

(MEMO ITEM)

B. Full Name (Last, First, Middle Initial)
Dr. Jerry W. Bettman

Mailing Address **PO Box 70125**

City **Albuquerque** State **NM** Zip Code **87197-0125**

FEC ID number of contributing federal political committee. **C**

Name of Employer **None** Occupation **Retired**

Receipt For: 2014
☐ Primary ☒ General
☐ Other (specify)

Election Cycle-to-Date **5000**

Date of Receipt
MAY 01 2014

Transaction ID : **A-MCNF13**

Amount of Each Receipt this Period
2400

Redesignated to

(MEMO ITEM)

C. Full Name (Last, First, Middle Initial)
Mr. Holm O. Bursum III

Mailing Address **PO Box 1457**

City **Socorro** State **NM** Zip Code **87801-1457**

FEC ID number of contributing federal political committee. **C**

Name of Employer **First State Bank** Occupation **Banker**

Receipt For: 2014
☒ Primary ☐ General
☐ Other (specify)

Election Cycle-to-Date **2600**

Date of Receipt
MAY 01 2014

Transaction ID : **A-CF2941**

Amount of Each Receipt this Period
2600

SUBTOTAL of Receipts This Page (optional).....

TOTAL This Period (last page this line number only).....

2600.00

14020253660

14020253660

EXHIBIT #11

1-204444-1-230



January 23, 2014

Mr. Jerry Bettman
PO Box 70125
Albuquerque, NM 87197

Dear Jerry,

Thank you for your support of Allen Weh for Senate.

Federal election law limits contributions from individuals to \$2,600 per election. Because you have reached your contribution limits for the 2014 Primary Election, we have attributed the contribution received on January 23, 2014 toward the 2014 General Election. We appreciate the financial support for Allen Weh for Senate.

If you prefer to have the excessive contribution amount refunded, please notify us.

Once again, thank you for your generous financial support.

Sincerely,

A handwritten signature in cursive script that reads "Chelsea Stallings".

Chelsea Stallings
Finance Manager
(575) 365-6463
Chelsea@AllenWeh.com