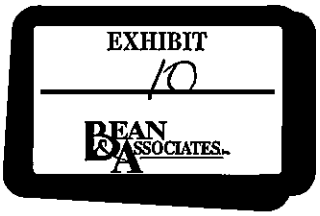

-----Original Message-----
From: Randi N. Valverde <rvalverde@montand.com>
Sent: Saturday, June 23, 2018 11:09 AM
To: Tom Hnasko <thnasko@hinklelawfirm.com>
Cc: Theresa Parrish <TParrish@rodey.com>
Subject: Re: Ethics Investigative Subcommittee; Carl Trujillo; New Issue

Please provide there authority you're relying upon, and documentation regarding your dual role.

Sent from my iPhone

On Jun 23, 2018, at 11:05 AM, Tom Hnasko <thnasko@hinklelawfirm.com<mailto:thnasko@hinklelawfirm.com>> wrote:

Confirming interview at your offices at 9:00 am on Thursday. We do not disclose the identities of witnesses. The investigation itself – and the subcommittee composition – are confidential. Do not contact members of the Subcommittee during its investigation. You may relay any questions, comments, or concerns to Ms. Parrish and me, as counsel.

<image004.jpg>

Thomas M. Hnasko
Partner
Hinkle Shanor LLP
P.O. Box 2068
Santa Fe, New Mexico 87504
505.982.4554 - office
505.930.5703 - direct
505.982.8623 - fax
505.660.3397 - mobile
thnasko@hinklelawfirm.com<mailto:thnasko@hinklelawfirm.com>

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From: Randi N. Valverde <rvalverde@montand.com<mailto:rvalverde@montand.com>>
Sent: Saturday, June 23, 2018 10:30 AM
To: Tom Hnasko <thnasko@hinklelawfirm.com<mailto:thnasko@hinklelawfirm.com>>; Theresa Parrish <TParrish@rodey.com<mailto:TParrish@rodey.com>>
Cc: Teresa Pacheco <tpacheco@montand.com<mailto:tpacheco@montand.com>>; trujillo4rep@gmail.com<mailto:trujillo4rep@gmail.com>
Subject: RE: Ethics Investigative Subcommittee; Carl Trujillo; New Issue

Mr. Hnasko,

The meeting can be held at Montgomery & Andrews.

Please provide the authority you rely upon for the proposition that we are not entitled to know what other witnesses are being interviewed. We cannot adequately identify witnesses, if we're not permitted to know who is being interviewed. Further, the article in The Santa Fe New Mexican on June 7, 2018, indicated that Ms. Bonar's counsel was privy to information about witnesses and interviews being conducted. We would like access to the same information that Ms. Bonar and her counsel are being provided.

In the meantime, we would like the following people interviewed:

* Senator Richard Martinez;
* Representative Patti Lundstrom;
* Charles Sallee;
* Representative Debbie Rodella; and,
* Representative Monica Youngblood.

We still plan on providing documentation and evidence in advance of the interview, which you indicated could not be scheduled until next week.

Please provide the authority you rely upon for the proposition that Representative Trujillo is not permitted to speak to the Subcommittee. Again, please provide a document that demonstrates your dual role.

We continue to look forward to all of our concerns raised to date being addressed. We remain concerned that the Anti-Harassment Policy, and its incorporated laws and policies, is not being followed, that the special legal counsel/investigators have a conflict, and that this process is not being conducted in a fair and neutral manner.

Thank you,
Randi

<image005.jpg>

Randi N. Valverde
Shareholder
Montgomery & Andrews, P.A.
Post Office Box 2307
Santa Fe, NM 87504-2307
Direct Line: (505) 986-2653
Fax: (505) 982-4289
rvalverde@montand.com<mailto:rvalverde@montand.com>

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From: Tom Hnasko [mailto:thnasko@hinklelawfirm.com]
Sent: Saturday, June 23, 2018 9:21 AM
To: Randi N. Valverde <rvalverde@montand.com<mailto:rvalverde@montand.com>>
Cc: Theresa Parrish <TParrish@rodey.com<mailto:TParrish@rodey.com>>
Subject: RE: Ethics Investigative Subcommittee; Carl Trujillo; New Issue

Thursday at 9:00 am is good. You chose the location.

The identity of witnesses who have been interviewed is confidential. We would be pleased to receive a list from Rep. Trujillo of people he believes have information relevant to the matter, if that's what you mean by being "permitted to identify witnesses in advance of his interview." His prior counsel, with whom we had a very constructive relationship, stated they intended to provide that information, as well as other information they believed was pertinent. We have not received it.

I have been informed by the Subcommittee members that Rep. Trujillo has contacted all of them and asked for their personal email address so he could communicate with each of them. Please advise him to cease all contact with them while the investigation is pending. Thank you.

<image007.jpg>

Thomas M. Hnasko
Partner

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From: Randi N. Valverde <rvalverde@montand.com<mailto:rvalverde@montand.com>>
Sent: Friday, June 22, 2018 11:39 AM
To: Tom Hnasko <thnasko@hinklelawfirm.com<mailto:thnasko@hinklelawfirm.com>>
Cc: Theresa Parrish <TParrish@rodey.com<mailto:TParrish@rodey.com>>; Teresa Pacheco <tpacheco@montand.com<mailto:tpacheco@montand.com>>; trujillo4rep@gmail.com<mailto:trujillo4rep@gmail.com>
Subject: RE: Ethics Investigative Subcommittee; Carl Trujillo; New Issue

Mr. Hnasko,

We are available for interview Wednesday, Thursday, or Friday of next week.

In the meantime, we would appreciate a list of witnesses that have been and will be interviewed, and we reiterate our request that Representative Trujillo be permitted to identify witnesses in advance of his interview. Also, we would appreciate a letter from the Subcommittee or some other documentation indicating your dual role as special legal counsel/investigator.

Additionally, please indicate what internal confidentiality protections have been put into place, if any, given that a current Representative is also a lawyer in your firm.

We continue to look forward to resolution of the concerns we have outlined to date.

Thank you,
Randi

From: Randi N. Valverde
Sent: Wednesday, June 20, 2018 12:17 PM
To: 'Tom Hnasko' <thnasko@hinklelawfirm.com<mailto:thnasko@hinklelawfirm.com>>
Cc: Theresa Parrish <TParrish@rodey.com<mailto:TParrish@rodey.com>>; Teresa Pacheco <tpacheco@montand.com<mailto:tpacheco@montand.com>>; 'trujillo4rep@gmail.com<mailto:trujillo4rep@gmail.com>' <trujillo4rep@gmail.com<mailto:trujillo4rep@gmail.com>>

Subject: RE: Ethics Investigative Subcommittee; Carl Trujillo; New Issue

Mr. Hnasko,

Please provide authority for your proposition that Representative Trujillo cannot discuss these non-substantive concerns with the Subcommittee. The argument that he cannot discuss non-substantive issues regarding the investigation with the Subcommittee because the entire investigative process is confidential is not sufficient:

1. These issues have nothing to do with the substance of the investigation or a probable cause determination; and,
2. Representative Trujillo is the respondent, and not an outside party – the confidentiality provisions are designed to protect the parties involved, not to prevent the parties involved from raising concerns regarding the process itself to the Subcommittee.

Also, we would note that the complainant has breached the applicable confidentiality provisions, causing harm and prejudice to Representative Trujillo, and this is one of the very issues we wish to discuss with the Subcommittee.

There is no basis for your allegation that the concerns raised are being fabricated. Nothing is being fabricated:

* The Anti-Harassment Policy regarding complaints against legislators incorporates House Rules 9-13-1 through 7; NMSA §§ 2-15-7 through 12 ("Interim legislative ethic committee"); and, Legislative Council Policy No. 16 ("Interim Legislative Ethics Committee"), and states that they "shall apply to the process regarding complaints against legislators."
* Representative Trujillo is a legislator; thus, these laws and policies apply to this process.

* It appears that the Anti-Harassment Policy, including incorporated laws and policies, is not being adhered to:

* House Rule 9-13-12 requires a complaint be made under oath and with reasonable particularity.
* Legislative Council Policy No. 16(F) requires that a complaint be made under oath and with reasonable particularity.
* The "complaint" in this case was not made under oath and with reasonable particularity.

* The Anti-Harassment Policy provides for "prompt" and "appropriate action."
* To our knowledge, the investigation just commenced last week – five weeks after the "complaint" was lodged, and you cannot interview Representative Trujillo until seven weeks after the complaint was lodged.
* The investigation does not appear to be "prompt."

* The House Rules provide that: "The complaint process shall be held confidential through the initial investigation phase unless waived in writing by the representative being charged. Breach of confidentiality by a complainant may result in dismissal of the complaint or the assessment of costs." See House Rules 9-13-2 (emphasis added)
* Legislative Council Policy No. 16(I)(2) provides that the investigative subcommittee "shall conduct a confidential investigation."
* Section 2-15-9(E)(1)provides that: [C]omplainant, the committee, and its staff shall not publicly disclose any information relating to the filing or investigation of a complaint, including the identity of the complainant or respondent, until after a finding of probable cause." (Emphasis added).

* The "complaint" in this case was issued to the media, and the complainant has made statements regarding the complaint to the media. There were also press releases made about the complaint. There are no exceptions to these confidentiality laws and policies.

* "Special legal counsel may be authorized by the full committee to advise and assist the subcommittee." House Rules, 9-13-4, at ¶ 5 (incorporated into the Anti-Harassment Policy).
* Also, a "member or members of the subcommittee or special legal counsel to the subcommittee shall become the charging party, and present the case against the member being charged." House Rules, 9-13-5, at ¶ 2 (incorporated into the Anti-Harassment Policy).
* On the other hand, the Anti-Harassment Policy provides that the "investigative subcommittee shall retain outside counsel to investigate the complaint and submit to the subcommittee a report containing the outside counsel's findings, conclusions and recommendations regarding further action."
* "Special legal counsel" and "outside counsel [hired] to investigate" a complaint serves two separate functions, and there appears to be a significant conflict between special legal counsel serving as the investigator.

We take exception to the statement accusing us of "fabricating" the above listed concerns, and the statement that our concerns are "grossly inaccurate." Please specify the alleged fabrications and inaccuracies Similarly, we take exception to the accusation that by raising our concerns we are "campaigning" or refusing to "cooperate with the investigative phase." Rather, we are simply requesting that the Anti-Harassment Policy, and its incorporated law and policy be followed, and that the investigation be fair. Finally, we take exception to the statement that by raising concerns that that Anti-Harassment Policy is not being followed, we are doing a "disservice to your client's stated intention to participate in and cooperate with the investigation." We have always stated that we are willing to participate in this process; however, the process does not appear to be fair, and we are concerned that the applicable policies and laws are not being adhered to. We should be able to address these concerns to the Subcommittee. Finally, we would note that all of these statements make it appear as though the special legal counsel/investigators are advocates, rather than advisors or investigators. This heightens our concern regarding a potential conflict in the dual role being served.

We look forward to our concerns being addressed.

Thank you,
Randi

From: Tom Hnasko [mailto:thnasko@hinklelawfirm.com]
Sent: Tuesday, June 19, 2018 8:44 PM
To: Randi N. Valverde <rvalverde@montand.com<mailto:rvalverde@montand.com>>
Cc: Theresa Parrish <TParrish@rodey.com<mailto:TParrish@rodey.com>>; Teresa Pacheco <tpacheco@montand.com<mailto:tpacheco@montand.com>>
Subject: Re: Ethics Investigative Subcommittee; Carl Trujillo; New Issue

Ms. Valverde - you are fabricating procedural issues. This matter is in the investigative phase, which is a confidential fact finding phase. The only procedure is the submission of a report on that investigation to the investigative subcommittee. If the committee finds probable cause, certain procedures are thereafter implemented. If it finds no probable cause, the complaint is dismissed. That's the procedure to which all legislators consented.

We cannot allow a meeting with the subcommittee because all matters preceding the decision relating to a finding of probable cause or no probable cause are confidential. So, I suggest you desist with your letter writing campaign and cooperate with the investigative phase. I will respond to your previous submittals because they are grossly inaccurate and do a disservice to your client's stated intention to participate in and cooperate with the investigation.

Also, I would appreciate it if you would blind cc your client on your communications so that I do not inadvertently send a response directly to him.

Sent from my iPhone

On Jun 19, 2018, at 6:12 PM, Randi N. Valverde <rvalverde@montand.com<mailto:rvalverde@montand.com>> wrote:
Mr. Hnasko,

You are correct, I do not dictate the process – the Anti-Harassment Policy, and incorporated law and policy dictate the process, and we are requesting that it be adhered to.

Also, my correspondence correlates to the concerns we have regarding non-adherence to the Anti-Harassment Policy and its incorporated law and policy – we certainly hope those concerns aren't "never-ending." We are requesting that the concerns raised be addressed.

Please note that my correspondence is not intended to delay the investigation, and there is no basis for such a claim. Rather, the purpose of the correspondence is to ensure that my client receives fair treatment through this process, and to ensure that the Anti-Harassment, including incorporated law and policy, is adhered to. The current delay of over six weeks cannot be attributed to me or my client.

Also, the deadline we requested was not arbitrary. Rather, you are requesting dates to interview Representative Trujillo the week of June 25, 2018, and as requested numerous times, we'd like to have the procedural issues that have arisen addressed prior to the investigation moving forward.

With regard to your statement that all legislators submit themselves to the constitutional right to be investigated by the body, please note that I'm sure all legislators expect that applicable law and policy will be followed with regard to those investigations.

Again, please let us know if the Subcommittee will meet with us regarding our concerns.

Thank you,
Randi

From: Tom Hnasko [mailto:thnasko@hinklelawfirm.com]
Sent: Tuesday, June 19, 2018 5:08 PM
To: Randi N. Valverde <rvalverde@montand.com<mailto:rvalverde@montand.com>>; Theresa Parrish <TParrish@rodey.com<mailto:TParrish@rodey.com>>
Cc: Teresa Pacheco <tpacheco@montand.com<mailto:tpacheco@montand.com>>
Subject: RE: Ethics Investigative Subcommittee; Carl Trujillo; New Issue

Ms. Valverde – you do not dictate the progress of the investigation, nor do you impose arbitrary deadlines as to when I will respond to your never-ending inquiries, which are clearly designed to delay and impede this investigation. At this point, suffice it to say that all legislators voluntarily and knowingly submit themselves to the constitutional right of the body to investigate claims in accordance with that mandate. As I mentioned to you, I will respond to your multiple letters as I deem appropriate, but I can assure you, it will not be by Friday, as I am in court all day on an unrelated matter. However, because time is extremely sensitive for the completion of this investigation, I would appreciate receiving available dates during the week of June 25 for Rep. Trujillo's interview.

<image002.jpg>

Thomas M. Hnasko
Partner
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From: Randi N. Valverde <rvalverde@montand.com<mailto:rvalverde@montand.com>>
Sent: Tuesday, June 19, 2018 4:34 PM
To: Tom Hnasko <thnasko@hinklelawfirm.com<mailto:thnasko@hinklelawfirm.com>>; Theresa Parrish <TParrish@rodey.com<mailto:TParrish@rodey.com>>
Cc: Teresa Pacheco <tpacheco@montand.com<mailto:tpacheco@montand.com>>; Trujillo, Carl <Carl.Trujillo@nmlegis.gov<mailto:Carl.Trujillo@nmlegis.gov>>
Subject: RE: Ethics Investigative Subcommittee; Carl Trujillo; New Issue

Mr. Hnasko,

I was not listed as a recipient on your email of June 16, 2018, so you are correct – I did not receive it.

As we have stated, we are willing to participate in a fair investigation and process. Accordingly, please respond to our correspondence of June 15, 2018, June 16, 2018, and our correspondence of today's date, by this Friday, June 22, 2018.

Also, during our conversation on June 15, 2018, you indicated that the Subcommittee would not meet with us pursuant to our request, and that you were going to advise them not to meet with us. Please confirm whether the Subcommittee has declined our request for a meeting regarding the procedural issues raised to date.

Thank you,
Randi

From: Tom Hnasko [mailto:thnasko@hinklelawfirm.com]
Sent: Tuesday, June 19, 2018 3:07 PM
To: Randi N. Valverde <rvalverde@montand.com<mailto:rvalverde@montand.com>>
Subject: Fwd: Ethics Investigative Subcommittee; Carl Trujillo; New Issue

You apparently did not receive my phone email from June 16. Mr. Burciaga is a member of the staff to the Investigative Subcommittee. As such, he is a client representative in this matter.

Sent from my iPhone

Begin forwarded message:
From: Tom Hnasko <thnasko@hinklelawfirm.com<mailto:thnasko@hinklelawfirm.com>>
Date: June 16, 2018 at 1:35:24 PM MDT
To: Theresa Parrish <TParrish@rodey.com<mailto:TParrish@rodey.com>>
Cc: "Raul.Burciaga@nmlegis.gov<mailto:Raul.Burciaga@nmlegis.gov>"
<Raul.Burciaga@nmlegis.gov<mailto:Raul.Burciaga@nmlegis.gov>>
Subject: Re: Ethics Investigative Subcommittee; Carl Trujillo; New Issue Ms. Valverde - I thought you understood after our conversation yesterday that you were not to directly contact our client. Mr. Burciaga is a member of the staff to the Investigative Subcommittee. Please desist immediately.
Sent from my iPhone

(505) 768-7202
Sent from my iPhone

Begin forwarded message:
From: "Randi N. Valverde" <rvalverde@montand.com<mailto:rvalverde@montand.com>>
Date: June 16, 2018 at 11:59:03 AM MDT
To: "raul.burciaga@nmlegis.gov<mailto:raul.burciaga@nmlegis.gov>"
<raul.burciaga@nmlegis.gov<mailto:raul.burciaga@nmlegis.gov>>
Cc: 'Tom Hnasko' <thnasko@hinklelawfirm.com<mailto:thnasko@hinklelawfirm.com>>, Theresa Parrish
<TParrish@rodey.com<mailto:TParrish@rodey.com>>, "Trujillo, Carl"
<carl.trujillo@nmlegis.gov<mailto:carl.trujillo@nmlegis.gov>>
Subject: Ethics Investigative Subcommittee; Carl Trujillo; New Issue Mr. Burciaga,

There is an additional issue that has arisen, and we have outlined it below. We are reiterating our request to meet with the Ethics Investigative Subcommittee regarding all issues raised to date, including those contained in our correspondence of June 13, 2018, and from earlier today, in addition to the issue outlined below. We are also requesting that a neutral investigator be assigned, in order for a fair investigation to take place.

1. Conflict between special legal counsel and outside counsel hired to investigate; and, potential issues of fairness or predetermination.

"Special legal counsel may be authorized by the full committee to advise and assist the subcommittee." House Rules, 9-13-4, at ¶ 5 (incorporated into the Anti-Harassment Policy). Also, a "member or members of the subcommittee or special legal counsel to the subcommittee shall become the charging party, and present the case against the member being charged." House Rules, 9-13-5, at ¶ 2 (incorporated into the Anti-Harassment Policy).

On the other hand, the Anti-Harassment Policy provides that the "investigative subcommittee shall retain outside counsel to investigate the complaint and submit to the subcommittee a report containing the outside counsel's findings, conclusions and recommendations regarding further action."

It is clear based on the House Rules and the Anti-Harassment Policy that "special legal counsel" and "outside counsel [hired] to investigate" a complaint serves two separate functions. Specifically, the special legal counsel is retained to act as general counsel to the Ethics Investigative Subcommittee, in order to advise them regarding legal issues that may arise during an investigation, and to potentially become the charging party if probable cause is found and a full hearing is needed. On the other hand, "outside counsel to investigate" is hired specifically to investigate the complaint, and submit a report with findings and recommendations to the Ethics Investigative Subcommittee and special legal counsel.

If for some reason the special legal counsel saw any issues with regard to the investigation, special legal counsel could request further investigation or provide unbiased advise to the Ethics Investigative Subcommittee regarding the quality of the investigation and the soundness of the recommendations.

Accordingly, there appears to be a significant conflict in having special legal counsel act as the outside counsel hired to investigate. Significantly, having the investigator serve as both special legal counsel and investigator creates a conflict where the investigators conduct their investigation and prepare their own recommendations, and then use their own investigation and recommendations to advise the committee, effectively making the investigator the judge and the jury. Further, if there are procedural and legal issues that arise, which should halt the investigation from occurring, the investigators could have financial and other interests that would preclude them from providing the Ethics Investigative Subcommittee with unbiased advice as to whether the investigation should continue. These conflicts are highlighted by the fact that the special legal counsel could then be tasked with prosecuting the charge that they investigated and advised the Ethics Investigative Subcommittee on, making the investigator the judge, the jury, and the prosecutor.

Yesterday, I was notified that Mr. Hnasko and Ms. Parrish are both special legal counsel and investigators. Mr. Hnasko and Ms. Parrish admonished us at least twice during a conversation today for not including them on our prior correspondence to the Ethics Investigative Subcommittee, and warning us not to send any correspondence directly to the Ethics Investigative Subcommittee because they are represented by Mr. Hnasko and Ms. Parrish; however, we were never previously notified of this dual role. Accordingly, I have not courtesy-copied the Ethics Investigative Subcommittee members on this email, however, I am specifically requesting that it be forwarded to them in its entirety.

Conclusion

The integrity of Anti-Harassment Policy will not remain intact if it is not followed. We are requesting that the Anti-Harassment Policy, including all incorporated policies and laws be adhered to and enforced, including a fair investigation. Also, as noted above, we are also requesting that neutral investigators (not already acting as special legal counsel) be assigned.

Thank you,
Randi

<image001.jpg>

Randi N. Valverde
Montgomery & Andrews, P.A.
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Santa Fe, NM 87504-2307
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Fax: (505) 982-4289
rvalverde@montand.com<mailto:rvalverde@montand.com>

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<image001.jpg>