

BEFORE THE HEARING SUBCOMMITTEE
OF THE INTERIM LEGISLATIVE ETHICS COMMITTEE

In re: Representative Carl Trujillo.

**CHARGING PARTY'S MOTION TO COMPEL ANSWERS TO INTERROGATORIES
AND DEPOSITION QUESTIONS AND FOR ATTORNEYS' FEES**

Pursuant to the Scheduling Order in this matter, which adopts the New Mexico Rules of Civil Procedure for prehearing discovery, the Charging Party moves to compel answers to Interrogatory Nos. 12-15 directed to Representative Carl Trujillo ("Rep. Trujillo") in accordance with Rules 1-033(C)(5) and 1-037(A)(2) NMRA, and to compel answers to deposition questions directed to Rep. Trujillo in accordance with Rules 1-030 and 1-037(A)(2) NMRA. Charging party also moves for attorney's fees and costs incurred in filing this motion and bringing back Rep. Trujillo for a continuation of his deposition.

Introduction

On September 19, 2018 and October 8, 2018 members of the legislature received provocative letters signed by "Martha Trujillo," a "Concerned New Mexican." *See Letters from Martha Trujillo* (attached as Exhibits B and C). The letters confusingly alternate between the first and third person and are riddled with false information regarding the Special Counsel, Charging Party, House Leadership, and this process in general. The letters contain information that (1) is not publicly-available (such as the content of Special Counsel's interview questions to Rep. Trujillo) and (2) closely track arguments made by Rep. Trujillo throughout this process.¹ *Compare*

¹ The Charging Party notes that Martha Trujillo has the same last name as Rep. Trujillo but is unaware of whether a familial relationship exists.

Respondent's Motion to Dismiss at 5 (“Bonar did not provide a signed complaint, much less one sworn under oath, which is a basic threshold requirement...”) with *Letter from Martha Trujillo* dated 9/19/18 (“**I shall** be required to... give my statement in writing, under oath or affirmation of the allegations. **But I’m not going to do that.**”) (emphases in originals).

The Charging Party served Rep. Trujillo with interrogatories on October 31, 2018. Interrogatories #12-15 (included in Exhibit A) seek to discover relevant information concerning Rep. Trujillo’s potential involvement in inappropriate attempts to influence and intimidate members of the subcommittee and taint this process. Rep. Trujillo objects to these interrogatories, arguing that they are “not relevant to the sexual harassment claims.” *See Respondent’s Responses* (attached as Exhibit A). Furthermore, on November 8, 2018, Rep. Trujillo’s counsel objected to deposition questions on this subject and instructed Rep. Trujillo not to answer.

Here, the Charging Party’s discovery requests and deposition questions regarding Rep. Trujillo’s involvement in these matters are highly relevant. And irrespective of the relevance, such an instruction not to answer a deposition question is patently improper. The Charging Party seeks to learn Rep. Trujillo’s involvement with the dissemination of two letters to members of the Legislature that make a series of false claims – and which closely track arguments made by Rep. Trujillo throughout the prehearing stage of this matter. The information sought - both in the interrogatories and through the deposition questions - directly bears on Rep. Trujillo’s credibility, defenses, and a potential attempt to improperly influence legislators who will serve as jurors in this matter. To safeguard the integrity of this process and uphold the procedural rules, Rep. Trujillo should be compelled to answer these questions.²

² Pursuant to the Scheduling Order written discovery in this matter is governed by Rule 1-033 and depositions are governed by Rule 1-030.

Argument

The obvious implication is that Rep. Trujillo had some hand in crafting these letters – which would be gravely improper and an attack on the impartiality of the subcommittee. Rep. Trujillo, at the very least, has a track record of attempting to incite his supporters to influence this process. In a lengthy May 2, 2018 Facebook post, Rep. Trujillo attacked Ms. Bonar’s allegations as “politically motivated,” he then urged his followers to “Please share far and wide!!” One of the several comments was from Martha Trujillo, who wrote “Carl, people can try to ruin your reputation but they can’t touch your character. We love you and your family.” (attached as Exhibit D).

All of this troubling evidence bears directly on Rep. Trujillo’s credibility. And “evidence that reflects on a witness’s credibility is relevant.” *State v. Johnson*, 2010-NMSC-016, ¶ 7, 148 N.M. 50; *see also Letter from Hearing Subcommittee Co-Chairs* (“[T]he content of both letters is clearly based on a false narrative...”) (attached as Exhibit E). If he has, in fact, resorted to such underhanded tactics, his testimony is questionable at best. In this matter, Rep. Trujillo is one of only two eyewitnesses to the alleged harassment – making this concern pressing.

The extent of Rep. Trujillo’s involvement in crafting Ms. Trujillo’s letters is also relevant to his defenses – as are the letters themselves. He has argued repeatedly throughout this process that a lack of confidentiality has unfairly prejudiced him. *See, e.g., Respondent’s Motion to Dismiss* at 6 (“Ms. Bonar ignored the procedures for filing a complaint because she had no intent of honoring this system’s confidentiality protections.”). If Rep. Trujillo’s conduct itself breached the confidentiality of the investigation – by disclosing the substance of Special Counsel’s interview with him, that fact would substantially undercut this defense. Ms. Trujillo’s second letter, for example, states with accuracy when Special Counsel first contacted Rep. Trujillo and the fact that

Special Counsel's interview with him did not include a disclosure of the particular allegations made against him. *See* Ex. C. At the very least then, Rep. Trujillo's contact with Martha Trujillo is relevant, as are the letters themselves, to discover if and when Rep. Trujillo breached the confidentiality of the investigation.

Also, Rep. Trujillo has argued that this process has been irregular and "political." *Id.* at 1 (arguing that the procedures for protecting legislators from political abuse have been ignored). Again, if Rep. Trujillo has orchestrated a smear against House Leadership and the Charging Party, completely outside of the agreed-on procedure, this argument would ring hollow. And, as a potential attempt to improperly influence this proceeding, Rep. Trujillo's connection to Martha Trujillo has inherent relevance to the integrity of this body and proceeding. It would be a complete anomaly if such a brazen attack on this entire process by a party to the proceeding could not meet the relatively low standard of relevance in discovery.³

Finally, it is fundamental in civil practice that an objection based on relevancy is not a proper ground to instruct a witness not to answer a deposition question.⁴ *See Handbk. Fed. Civ. Disc. & Disclosure* § 5:40 (4th ed.) ("It is improper to instruct a witness not to answer a question based on form and relevancy objections."); *Resolution Trust Corp. v. Dabney*, 73 F.3d 262, 266 ("It is inappropriate to instruct a witness not to answer a question on the basis of relevance."). This conduct is completely contrary to law and to the purpose of discovery. *See* Rule 1-030(C) ("All objections...shall be noted...but the examination shall proceed."); *Griego v. Grieco*, 1977-

³ The relevance of discoverable information is "subject to a broad interpretation." *United Nuclear Corp. v. General Atomic Co.*, 1980-NMSC-094, ¶ 70, 96 N.M. 155. "Objections based on alleged irrelevancy must, therefore, be viewed in light of the broad and liberal discovery principle consciously built into the rules civil procedure." *Id.* quoting *Independent Productions Corp. v. Loew's, Incorporated*, 22 F.R.D. 266, 271 (S.D.N.Y. 1958).

NMCA-018, ¶ 23, 90 N.M. 174 (“We find no rule of law, and none has been presented, that allows a district court to limit the examination of a witness, absent a motion by the opposing party...”).

In addition to instructing Rep. Trujillo not to answer questions on the subject of the Martha Trujillo letters, Rep. Trujillo’s counsel would not even allow Rep. Trujillo to identify the letters tendered as deposition exhibits. Counsel also instructed him not to answer whether Rep. Trujillo believes that the Legislature has the authority to conduct the investigation, after Rep. Trujillo stated that this entire matter is “political,” and explained that the appropriate procedures have not been followed as a basis for this contention. Rep. Trujillo’s counsel informed the Charging Party that questions concerning Rep. Trujillo’s understanding of the Legislature’s authority to conduct the investigation would not be answered because they sought a legal conclusion. This refusal to answer is blatantly improper, especially since Rep. Trujillo has steadfastly challenged the Legislature’s investigative authority throughout this proceeding. *See Equal Employment Opportunity Commission v. Bok Financial Corporation*, 2013 WL 12045019 *1 (“It has long been the law in the Tenth Circuit Court of Appeals and elsewhere that instructions not to answer during the course of a deposition are improper...”); Rule 1-026(B)(1) NMRA (“The information sought need not be admissible at the trial...”).

Rep. Trujillo has not made any claim that any of these deposition questions are in bad faith or calculated to unreasonably annoy or embarrass him – he cannot now retroactively make this argument to cover up for the improper refusals to answer. *See* Rule 1-030(D)(3) (listing the grounds for limiting deposition testimony); *Bok*, 2013 WL 12045019 at *17 (explaining that a party seeking to avoid answering deposition questions should move for a protective order); *see also Redwood v. Dobson*, 476 F.3d 462, 467-68 (7th Cir. 2007) (explaining that the proper course

of action if a witness is being harassed is to halt the deposition and seek a protective order rather than instructing the witness not to answer).

Pursuant to the inherent authority of this body to manage the discovery process, an award of attorney's fees and costs is therefore warranted based on this flagrant and unsupported violation of the rules. See *Weiss v. THI of New Mexico at Valle Norte, LLC*, 2013-NMCA-054, ¶ 14, (published after Volume 150 of *New Mexico Reports*) (sanctions are appropriated for dilatory discovery practices; courts retain the inherent power to manage the proceedings before them and citing cases); *Bok*, 2013 WL 12045019 at *17 (awarding sanctions for refusing to answer deposition questions); *Dabney*, 73 F.3d 262 at 269 (upholding sanctions imposed for refusing to answer deposition questions). In addition to answering the interrogatories, Rep. Trujillo should be compelled to return for a second deposition, to answer the questions his counsel prohibited him from answering, and he should pay for the costs and attorneys' fees incurred by Special Counsel for doing so.

Conclusion

Because of the high relevance of the information sought in Interrogatories #12-15, and the impropriety of instructing Rep. Trujillo not to answer the deposition questions, Respondent should be compelled to answer the interrogatories immediately; similarly, Respondent should be ordered to answer deposition questions exploring the subjects described in this motion at a new deposition; and ordered to pay the costs and attorney's fees incurred in filing this motion, and the costs of the second deposition.

Respectfully Submitted,

HINKLE SHANOR LLP

By: /s/ Thomas M. Hnasko

Thomas M. Hnasko

Post Office Box 2068

Santa Fe, NM 87504-2068

(505) 982-4554

thnasko@hinklelawfirm.com

RODEY, DICKASON, SLOAN, AKIN
& ROBB, P.A.

Theresa W. Parrish

Post Office Box 1888

Albuquerque, NM 87102

(505) 765-5900

tparrish@rodey.com

Special Counsel and Charging Party

CERTIFICATE OF SERVICE

I hereby certify that on November 8, 2018, I caused a true and correct copy of the foregoing *Charging Party's Motion to Compel Answers to Interrogatories and Deposition Questions and for Attorneys' Fees* to be served via electronic communication on the following:

Travis G. Jackson
Eric Loman
Jackson Loman Stanford & Downey, P.C.
201 3rd Street, Suite 1500
Post Office Box 1607
Albuquerque, NM 87103-1607
travis@jacksonlomanlaw.com
eric@jacksonlomanlaw.com

Hearing Subcommittee of the Interim
Legislative Ethics Committee
c/o Raul Burciaga, Director
Legislative Council Service
State Capitol Building, 4th Floor
Santa Fe, NM 87503
raul.burciaga@nmlegis.gov

Staff to the Hearing Subcommittee of the
Interim Legislative Ethics Committee
c/o Jon Boller
Amy Chavez-Romero
Legislative Council Service
State Capitol Building, 4th Floor
Santa Fe, NM 87503
jon.boller@nmlegis.gov
amy.chavez-romero@nmlegis.gov

Honorable Wendy E. York
Sheehan & Sheehan PA
P.O. Box 271
Albuquerque, NM 87103
wey@sheehansheehan.com

/s/ Thomas M. Hnasko
Thomas M. Hnasko

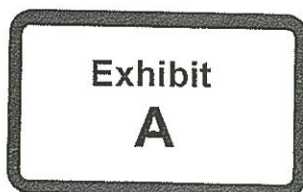
document(s) appointing them to act as Special Counsel so that any question about the scope of appointment can be resolved.

Interrogatory No. 12: Describe all communications between you and Martha Trujillo regarding the correspondence dated September 19, 2018, attached as Exhibit 1 to these discovery requests. Your answer should include the manner and method of communication, whether written (by letter, e-mail or text message) or oral (by in-person meeting or telephonic), the date of the communication and the substance of the communication.

Answer: Respondent objects to Interrogatory No. 12 on grounds that it seeks information that is not relevant to the sexual harassment claims made by Ms. Bonar against him.

Interrogatory No. 13: Identify the person or persons who participated in the decision to send the correspondence dated September 19, 2018, attached as Exhibit 1 to these discovery requests, to members of the New Mexico Legislature. For each person identified in your narrative, please provide his or her name, present or last known address, and relationship to you, and the nature and extent of his or her participation in that decision.

Answer: Respondent objects to Interrogatory No. 13 on grounds that it seeks information that is not relevant to the sexual harassment claims made by Ms. Bonar against him.



Interrogatory No. 14: Describe all communications between you and Martha Trujillo regarding the correspondence dated October 8, 2018, attached as Exhibit 2 to these discovery requests. Your answer should include the manner and method of communication, whether written (by letter, e-mail or text message) or oral (by in-person meeting or telephonic), the date of the communication and the substance of the communication.

Answer: Respondent objects to Interrogatory No. 14 on grounds that it seeks information that is not relevant to the sexual harassment claims made by Ms. Bonar against him.

Interrogatory No. 15: Identify the person or persons who participated in the decision to send the correspondence dated October 8, 2018, attached as Exhibit 2 to these discovery requests, to members of the New Mexico Legislature. For each person identified in your narrative, please provide his or her name, present or last known address, and relationship to you, and the nature and extent of his or her participation in that decision.

Answer: Respondent objects to Interrogatory No. 15 on grounds that it seeks information that is not relevant to the sexual harassment claims made by Ms. Bonar against him.

REQUESTS FOR PRODUCTION

Request for Production No. 1: Produce all documents you contend support your assertion that you have never sexually harassed Loura Bonar, as asserted in your undated letter to the Interim Ethics Investigative Subcommittee which is Charging Party's Exhibit #66.

Response: Responsive documents in Respondent's possession have already been produced in this matter *via* the letter identified as Charging Party Exhibit 66 and its exhibits and

Dear Senator,

09/19/18

Just this past January, you signed a brand-new Legislative Anti-Harassment policy in response to the #metoo movement. The political winds suggested this is the right thing to do. But just like with any policy or law, there are those who look to exploit it.

I have witnessed the fall out in my community from those who decided to exploit your new Anti-Harassment policy against our State Representative and it has wreaked havoc. It will make you feel sick to your stomach when you see how easy this policy could be used as a political weapon against you!

The following are the facts of the Legislature's first implementation of your new policy. Pray that leadership never uses it against you!

As an example and to make my point.

I'm (an outsider) going to accuse you of harassing me (sexual or not) in the social media world and copy every media outlet when I do so. I'm not even going to send my open letter to the Legislature. I will reference your new policy in my open letter, but I will not follow your policy. Afterall, my only goal is for you to lose your election. I'm going to breach your confidentiality at every turn so the media drags your name through the mud. Oh, by the way, I will do this 4 weeks before your election and **your own Legislature is not going to follow their own policy or existing laws!** I'm going to release scathing allegations against you without any reasonable particularity, just generalities. This will send you scrambling, how would you react? Now, you are going to expect the Legislature and your leadership to follow its own rules and laws, but that's not what is going to happen.

To be **compliant** with your Anti-Harassment Policy, Legislative Council Policy No. 16 and Sections 2-15-7 through 2-15-12 NMSA 1978, I shall be required to do the following:

- 1 File with Legislative Council, who I am, and be willing to give my statement in writing, under oath or affirmation of the allegations. **But I'm not going to do that.**
- 2 I shall state, with "reasonable particularity" as to what I'm accusing you of, not generalities. **But I'm not going to do that.**
- 3 I shall keep your confidentiality as required by your new policy. **But I'm not going to do that.**

Exhibit
B

- 4 Your going to expect a copy of my complaint or referral immediately, so you know what I'm accusing you of. **But your Legislative Leadership is not going to give you that either.**
- 5 Your Legislative Leadership acknowledges my social media statement immediately and publicly but decides to take 6 days to convene 3 members (Speaker, Majority Leader and Minority Leader) to discuss the social media statement that was never accompanied by a sworn statement or "reasonable particularity". **And now, the Legislative Leadership is going to breach your confidentiality by releasing this all to the media, violating their own rule. You will now be tried and convicted in the media for 6 straight days because of Leadership's inaction. The timing is everything and with the wait evokes suspicion and doubt of your behavior and character.**
- 6 Six days after the open letter is released to the media, Legislative Leadership finally meets and decides this open letter without "reasonable particularity" is enough to refer to ethics subcommittee. In this case, your Speaker of the House Brian Egolf is the only vote to move forward to the ethics subcommittee (only one vote is required by your policy). **Speaker Egolf and Legislative Council release a statement to the media that House Leadership found enough merit in the open letter to refer to the ethics subcommittee, thus violating your confidentiality yet another time. And now, your opposition can message the allegations have merit.**

This is just the beginning of how your life will be turned upside down. As days pass, you're going to feel more sick to your stomach because the implementation of your new Anti-Harassment Policy will be so far removed from the true intent of the policy, which was to protect people from legitimate claims.

Your story does not end here, this is just the beginning (Part I).

The intent of my letter, is to provide how the first case of your new policy was implemented, create dialogue, increase awareness, and bring insightful improvements to the Anti Sexual Harassment Policy.

Concerned New Mexican and Community Member of District 46,


Martha Trujillo
39 El Callejoncito Road
Santa Fe, NM 87506

Dear Representative,
10/07/18

As I mentioned in my previous letter, you have now been referred to the House Ethics Subcommittee because your new Anti-Harassment Policy requires only one vote from House Leadership (Speaker, Majority and Minority) to do so, and without a sworn affidavit by your accuser. In this case, you have now been referred to the ethics subcommittee because Speaker Brian Egolf was that one vote. Brian Egolf will now work to control this new undefined process. And you will have pay to defend yourself.

Interesting enough, a court of law requires a sworn affidavit from the accuser when making a such a serious allegation, but your new policy does not.

Your new policy requires that the ethics subcommittee (composed of 2 Democrats and 2 Republicans) hire the outside counsel. Instead, Legislative Council hires Tom Hnasko to be the special counsel for the new Anti-Harassment Policy without checking for any conflicts.

Tom Hnasko contributed to Speaker Egolf's campaign account (April 2018) recently. Tom Hnasko recently filed a case in Santa Fe District Court on 04/11/2018 representing Egolf firm (D-101-CV-2018-01157). This case is where Egolf is suing one of his previous clients, Donald Moya who was a whistle blower on Albuquerque Public Schools. Tom Hnasko represents Egolf in this case. So now the special counsel hired in multiple roles has several conflicts with Speaker Egolf, the lone person who voted to move you to this new process that now Tom Hnasko controls.

Tom Hnasko who is supposed to be independent is asked to play multiple roles in your new Anti-Harassment Policy:

- Tom Hnasko will serve as **advising** attorney to the subcommittee
- Tom Hnasko will serve as **investigator** of the allegations
- Tom Hnasko will serve as the **recommending** attorney to the subcommittee
- Tom Hnasko will be the **charging (prosecuting)** attorney against you to the full ethic committee

To remember back, you were referred to the ethics subcommittee without a sworn affidavit or knowing what the "reasonable particularity" of what you are being accused of because there was never a formal complaint filed. Six weeks after Hnasko was hired and now after you lost your election, Hnasko finally contacts you for an interview. At this point, you still do not know what the particulars of allegations against you and have no way of defending yourself. At your interview with the investigating attorney and special council (Tom Hnasko, one in the same), he refuses to tell you what you are being accused of even though he has interviewed your accuser. You finally learn of the particulars of the allegations against you eleven weeks from the time the allegations were made.

Was it the intent of the Legislature to pass a new Anti-Harassment policy that:

1. does not have any checks for conflicts of hired attorneys
2. allows one person in Leadership to use the policy as a political weapon
3. allows a letter in social media to be enough or equal to a formal complaint

**Exhibit
C**

4. allows special counsel to serve multiple roles – investigator, council to committee, and prosecutor
5. retroactively enforces a policy
6. Does not let a Legislator know what they are being accused of almost three months later

On week twelve, Tom Hnasko recommends to the sub committee two findings of “probable cause”.

1. On January 28th, 2014 - your accuser alleges that in a full committee room in session, there is an empty seat in the front row by you. Your accuser alleges she/he asks “Can I sit next to you, Mr./Mrs. Representative” and she/he alleges you say “anytime by the fireplace or by the pool”
2. On February 5th, 2014 – your accuser alleges coming off the floor of the house that in the hallway adjacent the chambers you grab her/his elbow and say “When can we meet?”

The other two more serious allegations are dismissed because you brought credible physical evidence to show your accuser (me) was not being honest.

You know in your heart that you did not do what your accuser said you did. How sick do you feel to your stomach? Who is the victim? Yes, because I made up the allegations.

The new Anti-Harassment Policy should be re-written with enough checks and balances and not deter legitimate complaints. The current version is so vague that it can be used as a political weapon against you by a special interest group, political party and/or from leadership. Or any combination as in this case.

The intent of my letter, is to provide how the first case of your new policy was implemented, create dialogue, increase awareness, and bring insightful improvements to the Anti Sexual Harassment Policy.

Concerned New Mexican and Community Member of District 46,

Martha Trujillo
39 El Callejoncito Road
Santa Fe, NM 87506



Carl Trujillo's Campaign for Change

May 2 ·

You all are amazing! Thanks to your research, here is what we've gathered in terms of disputing the veracity of her story (which is categorically false). We have also provided this to the media, but to be sure that the info gets out without distortion, we're going to post it here as well.

1. Ms. Bonar writes, "In 2013 and 2014, you sponsored bills that were important to my organization, then used your sponsorship to sexually harass me on multiple occasions." She also writes, "I was afraid to speak up for fear of not being believed; for fear of retaliation, whether I was believed or not..." Okay, so...

The attached screenshot was taken today by a supporter. Two things to note:

a. Ms. Bonar sent me a friend request in October 2013, which was six months AFTER the 2013 session, which she claims was when all of this happened. She would have had to proactively look me up on Facebook and send the friend request to make this happen, all while she was "afraid" of me. Who sends a friend request to someone if they feel threatened or harassed by them?

b. She then remained my FB friend through the 2014 session (when she again said all of this happened, and only unfriended me sometime after 3 p.m. today, May 2, 2018.

2. She claims that I killed an animal welfare bill in committee. Putting aside that animal welfare is one of my top priorities and I would never do that, the fact is that every animal welfare bill I sponsored during 2013-2014 sessions made it through every House committee (HB20 looks like it died, but it didn't. We just found the money another way, and anyone at APV would know that.) Every animal welfare bill I've heard in my committee (Tax & Rev) during 2013-2014 passed. This bill got funded and was used as a pilot program to fund low cost spay/neuter. This successful pilot program is what allowed APV to boast and brag for the past two years and was touted in all the committees which helped HB123 (low cost spay/neuter) pass both chambers this past session.

3. I meet thousands of voters and advocates every session. If I am being honest, I literally had to look her up to figure out if I'd ever met her. To my recollection, we have had no significant interactions, and certainly nothing even close to the level of interaction that she is alleging.

4. Then there's the timing. Do I have to say that if this has been festering since 2013, it's beyond suspicious that she waits until weeks before election day? This is politically motivated.

5. With regard to it being a politically motivated lie, I've been told by supporters (though I haven't verified) that her lawyer is good friends with Julianne Koob. (Julianne being the director of Santa Fe Planned Parenthood and a supporter of Andrea Romero's.)

6. I have recorded evidence from multiple people that someone hired a private detective with a reputation for dishonest tactics to dig up exactly this kind of dirt. Two different women have told me that they were approached by someone who tried to pressure them into saying that they had a complaint about my conduct. Both of them told him No in no uncertain terms and then passed the info on to me. So you can see that this isn't some random out of the blue occurrence of a woman who is coming forward of her own conviction and volition. This is someone using the #MeToo movement as a political weapon. (Also my question about that is, who is paying for the private detective? Is it Andrea Romero's campaign? Or is it someone doing it on her behalf? This guy isn't working for free.)

7. It's worth noting that someone sent me a photo of her with Bill Richardson. I'm sure I don't have to tell you that Bill Richardson represents the old guard corrupt establishment that has always been and still is my main political enemy.

Exhibit

D

8. She concludes her statement by saying she doesn't want justice or legal action or an apology. She just wants me to resign and end my re-election bid. This is very specifically political -- wouldn't someone who has been treated this way want an apology? Or justice? Or to prevent other women from being abused? Instead, just wants me to drop out of the race. Hmm...

There is almost certainly more, but that's what we have so far.



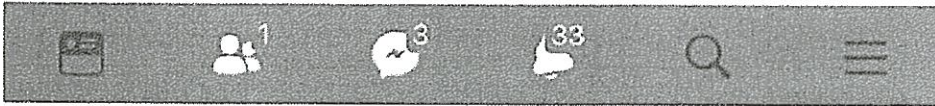
Carl Trujillo's Campaign for Change

May 2 ·

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1. Ms. Bonar writes, "In 2013 and 2014, you sponsored bills that were important to my organization, then used your sponsorship to sexually harass me on multiple occasions." She also writes, ...

[Continue Reading](#)



You and Laura Bonar

81 mutual friends including Pete Dinelli and Sharon Clahchischilliage

Your friend since October 2013

Carl and Laura have no posts in common.



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Peter Cerreta, Lopez D Tracy, Shaniya Chavez and 11 others like this.

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Carl Trujillo's Campaign for Change

May 2 ·

Please share far and wide!!

From: Carl Trujillo's Campaign for Change

Date: May 2, 2018

...See More

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Vicente Roybal, John Hogden, Anthony Taylor and 16 others like this.

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Jerry Vasilik Take the high ground! Do not allow them to get away with lies. We out here support you and do not believe these lies.

[Manage](#)

[26w](#)



Jake Trujillo We support you, Carl! These charges are nonsense and we will not be swayed by these false charges and the exploitation of the very important MeToo movement. Charges like this only reduce the Power of the movement, and by standing up to the false accusations you maintain the integrity of your own candidacy as well as the integrity of the MeToo movement. Stay strong and truth will prevail.

[Manage](#)

[26w](#)



Diane Pattara We stand with you and I and my friends plan to show up and show our support at the neighborhood party on May 5. Your opponents really are out to get you but we know you are a fighter and we will fight beside you even stronger after this.

[Manage](#)

[26w](#)



Cathy McCachren Carl, you are your constituents answer to their heavenly pleas. Your relentless and tenacious fight for them is imperative to a successful fight in the challenges they face. Keep working to make a better community for everyone. Blessings and prayers for your success.

[Manage](#)

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Stella Shelburn Carl, I don't know the position of this crazy, but anyone who knows you, knows it is politically motivated. I have messaged her about my opinion. Not complimentary to her for sure..let's hope the masses don't buy into this bu__sh__... People can be sooo gullible..Stand Tall as you always do, You will prevail..

[Manage](#)

26w



Martha Trujillo Carl, people can try to ruin your reputation but they can't touch your character. We love you and your family.

[Manage](#)

26w



New Mexico State Legislature

—•—•—•—
Santa Fe

October 15, 2018

File No. 202.211369

The Honorable Brian Egolf
brian.egolf@nmlegis.gov

The Honorable Stuart Ingle
stuart.ingle@nmlegis.gov

The Honorable Nate Gentry
nateformn@gmail.com

The Honorable Mary Kay Papen
marykay.papen@nmlegis.gov

The Honorable Sheryl Williams Stapleton
sheryl.stapleton@nmlegis.gov

The Honorable Peter Wirth
peter.wirth@nmlegis.gov

Dear Madam President, Mr. Speaker and Leaders:

Many if not all of you, along with several members of the house and senate, have received letters from a Martha Trujillo of Santa Fe, describing in one letter a "hypothetical" situation through which she claims a legislator could be the subject of a harassment complaint, and how the Interim Legislative Ethics Committee's process is fraught with political machinations and manipulation. While couched in hypothetical terms, the content of both letters is clearly based on a false narrative involving the current investigation of one legislator. In the process, the letters impugn the integrity of the hearing subcommittee, house leadership, counsel to the subcommittee and committee staff, as well as the legislature as a whole. Such erroneous characterization of the current process as described in the letters, and the use of innuendo, personal attacks and falsehoods regarding the hearing subcommittee's current work, should not be allowed to interfere with the ethics committee's important work.

Legislative Council Service staff have advised the hearing subcommittee to ignore these letters; that the false accusations contained therein have been dealt with; and that the subcommittee members must proceed to carry out their function under the established rules and procedures. We can assure you that the subcommittee members are continuing to do just that.

Exhibit
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The Honorable Brian Egolf
The Honorable Nate Gentry
The Honorable Sheryl Williams Stapleton
October 15, 2018
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The Honorable Stuart Ingle
The Honorable Mary Kay Papen
The Honorable Peter Wirth

We therefore advise you of these developments and urge that you exercise your authority to also advise your caucuses to restrain comment, to leave the subcommittee free to perform its duties, with due regard for the legislatively established hearing process, and to protect the deliberative security of the Interim Legislative Ethics Committee's important institutional role.

Sincerely,



D. WONDA JOHNSON
State Representative, District 5
Co-Chair, Interim Legislative Ethics
Hearing Subcommittee



GAIL ARMSTRONG
State Representative, District 49
Co-Chair, Interim Legislative Ethics
Hearing Subcommittee

DWJ/GA:ar