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EIGHTH JUDICIAL DISTRICT COURT
COUNTY OF COLFAX
STATE OF NEW MEXICO

No. D-809-CV-2015-00084

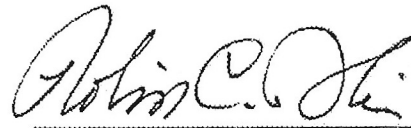
IN THE MATTER OF RECALL PETITIONS
FOR KATHY HONEYFIELD AND
THEODORE P. KAMP, RATON BOARD
OF EDUCATION.

**AMENDED APPLICATION FOR HEARING TO
DETERMINE SUFFICIENCY OF FACTS**

COMES NOW, the Clerk of Colfax County, New Mexico, Freda L. Baca, by and through her attorney, Robin C. Blair, Esquire pursuant to N.M.S.A. 1978, Section 22-7-9.1 (1987), and applies to this Court for a hearing to determine whether sufficient facts exist to allow the petitioners to continue the recall process. As grounds for this application, the Applicant shows to the Court.

1. The Applicant is the duly elected Clerk of Colfax County, New Mexico.
2. On May 11, 2015, the Applicant received in her office a Recall Petition presented by Petitioner, Citizens of Raton, whose mailing address is 700 North 2nd Street, Raton, New Mexico 87740, for the recall of Kathy Honeyfield. A true copy of said Recall Petition, marked Exhibit A, is attached hereto and by this reference incorporated herein.
3. On May 28, 2015, the Applicant received in her office a Recall Petition presented by Petitioner, Concerned Citizens, whose mailing address is 515 Roosevelt Street, Raton, New Mexico 87740, for the recall of Theodore P. Kamp. A true copy of

of the time and place of such hearing by mailing to the address listed on the face sheet of Exhibit A attached hereto and for such other and further relief as the Court may deem proper.

A handwritten signature in cursive script, appearing to read "Robin C. Blair". The signature is written in black ink and is positioned above a horizontal line.

Robin C. Blair
Attorney at Law
P.O. Box 10
Raton, New Mexico 87740
Attorney for Applicant

Exhibit A

Recall Petition
NMSA 1978, Section 22-7-6

Recall is a local decision to be funded by local money. Additional state funds will not be advanced to support recall.

This Petition is being initiated on _____, 20 _____, by Citizens of Raton whose mailing address is 700 North 2nd Street, Raton, New Mexico 87740, for the recall of the following Official:

Kathy Honeyfield, Raton School Board Member

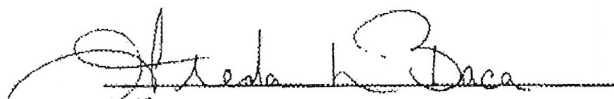
The specific charges in support of the recall of the above named member that constitute malfeasance in the office, misfeasance in office or violation of oath of office as follows:

- Actions taken do not reflect the community needs/wants therefore no confidence in representing community effectively.
- Lack of professionalism toward board members and school staff.
- Possible allegations of Nepotism interfering with judgment on basic and paramount decisions.

Signatures are valid for a maximum of one hundred ten days from date of initiation.

I, the undersigned, a registered voter in the County of Colfax, New Mexico, and a resident of the Raton School District, hereby petition for the recall of Kathy Honeyfield, Board Member named on the face sheet of this petition.

Approved of form:



05-11-15

Recall Petition
NMSA 1978, Section 22-7-6

Recall is a local decision to be funded by local money. Additional state funds will not be advanced to support recall.

This Petition is being initiated on _____, 20 _____, by Concerned Citizens whose mailing address is 515 Roosevelt Street, Raton, New Mexico 87740, for the recall of the following Official:

Theodore P. Kamp, Raton School Board Member

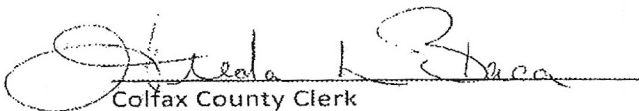
The specific charges in support of the recall of the above named member that constitute malfeasance in the office, misfeasance in office or violation of oath of office as follows:

- Insubordination
- Not following Parliamentary Procedure
- Conflict of Interest/Business Partner

Signatures are valid for a maximum of one hundred ten days from date of initiation.

I, the undersigned, a registered voter in the County of Colfax, New Mexico, and a resident of the Raton School District, hereby petition for the recall of Theodore P. Kamp, Board Member named on the face sheet of this petition.

Approved of form:


Colfax County Clerk

May 28, 2015
Date

