

FILED *AR*  
UNITED STATES DISTRICT COURT  
DISTRICT OF NEW MEXICO

2016 JUL 26 PM 3:42

CLERK-SANTA FE

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**STATE OF NEW MEXICO, ex rel.  
State Engineer,**

**Plaintiff,**

**v.**

**R. LEE AAMODT, et al.,  
Defendants,**

**No. 66-cv6639**

**and**

**UNITED STATES OF AMERICA,  
PUEBLO OF NAMBE,  
PUEBLO OF POJOAQUE,  
PUEBLO DE SAN ILDEFONSO,  
and PUEBLO DE TESUQUE,**

**Plaintiffs-in-Intervention.**

**ERROR AND OMMISION  
AAMODT LITIGATION WATER RIGHTS  
TOWN OF JACONA LAND GRANT**

My name is Paul Ortiz and I am the new President of the Town of Jacona Land Grant. I have been reviewing Town Of Jacona Land Grant documents and have found an error and omission, since the Town of Jacona Land Grant is not included in the Aamodt litigation.

I have talked to our secretary and Land Grant Board members and they said the Land Grant has never received any documents or correspondence from the United States District Court for the District of New Mexico or the New Mexico State Engineer concerning the Town of Jacona water Rights. Basically there has been no communication with the court. The Town of Jacona Land Grant encompasses thousands of acres in Santa Fe County and was ignored by the court or considered non-existent.

The Town of Jacona Land Grant has water rights granted from the King of Spain since 1699. The water rights are guaranteed in documents from the King of Spain in 1699 and documents in 1703. This is all guaranteed in a warranty deed from the King of Spain.

The Town of Jacona Land Grant claims water rights and will submit a declaration of water rights to the New Mexico State Engineer.



Paul Ortiz  
President  
Town of Jacona Land Grant  
11 W. Gutierrez Ste 3769  
Santa Fe, NM 87506  
United States

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on the date of filing I have served by mail a true and correct copy of the foregoing memorandum upon the following opposing counsel of record this 26 day of July 2016:

Edward C. Bagley  
Special Assistant Attorney General  
Attn: Aamodt Adjudication  
Office of the State Engineer  
P.O. Box 25102  
Santa Fe, New Mexico 87504-5102