

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

GILBERT GUZMAN,)
an individual,)
)
Plaintiff,)
v.)
)
NEW MEXICO STATE DEPARTMENT)
OF CULTURAL AFFAIRS (DCA),)
a New Mexico entity, and CITY OF)
SANTA FE,)

Case No.

Defendants.

**PLAINTIFF’S VERIFIED MOTION AND MEMORANDUM OF LAW
IN SUPPORT OF APPLICATION FOR TEMPORARY
RESTRAINING ORDER & PRELIMINARY INJUNCTION**

INTRODUCTION

Plaintiff, Gilbert Guzman (“Guzman”) painted a nationally recognized and original mural (the “Mural”) located at 404 Montezuma St. in Santa Fe, NM (the “Halpin Building”).

The Halpin Building is slated to be renovated to be replaced with the new New Mexico Museum of Art Vladem Contemporary (“Vladem Museum”).

It was reported on February 3, 2021 that construction on the Vladem Museum will begin within the week at the Halpin Building site.¹

¹ <https://ladailypost.com/construction-to-start-this-week-on-new-mexico-museum-of-art-vladem-contemporary-in-santa-fe/>

Defendants' intended renovation would violate Guzman's contractual right and VARA rights pursuant to 17 U.S.C. § 106A, and thus cause irreparable harm.

This is an application for temporary restraining order and preliminary injunction to maintain the *status quo* and prevent Defendants from demolishing, distorting, mutilating, or modifying the Mural until the merits of this lawsuit are decided.

FACTUAL BACKGROUND

In or around 1980, Guzman painted the Mural titled "Multicultural," located at 404 Montezuma St. in Santa Fe, NM (the "Halpin Building"). A true and correct photograph of a portion of this mural along with the artist Guzman is attached as **Exhibit A**.

A Mural Agreement was entered by the then property owner, DFA/Property Control Division ("DFA") and Guzman for this mural. A true and correct copy of this Agreement is attached as **Exhibit B**. DFA expressed its intent in the Agreement "not to alter or paint over the mural during its normal life." DFA also agreed to allow Guzman "access to the mural so that [he] may maintain said mural for its natural life."

The mural is titled "Multicultural" because it depicts the multicultural settlement of families, individuals, and all ethnic groups who were the first settlers in the beautiful city of Santa Fe. It also represents the "Gateway to Santa Fe." The Mural is a work of visual art as defined in 17 U.S.C. § 101 and as the term is used in 17 U.S.C. § 106A. The mural is a contemporary art piece that has been published nationally and provides Santa Fe the honor of having a mural of high quality incorporating the historic and cultural history of the region.

The Halpin Building is slated to be renovated to be replaced with the new New Mexico Museum of Art Vladem Contemporary ("Vladem Museum"). A true and correct copy of one of the \$8.5 million project proposal is attached as **Exhibit C**.

During his life, Guzman has been nationally recognized as a muralist with murals in the New Mexico State Library, Gold Star Mother painting in the Bataan Bldg., paintings in the state Rotunda, on 4th and Copper in Albuquerque, plus numerous others. Guzman was awarded the Santa Fe Living Treasure Award in 2017. A true and correct copy of Guzman's resume is attached as **Exhibit D**. Guzman last renovated the mural in 1990.

Upon information and belief, the State of New Mexico currently owns the Halpin Building with oversight by the Department of Cultural Affairs ("DCA"), a department whose main responsibility and mission statement is the following:

The New Mexico Department of Cultural Affairs preserves, fosters, and interprets New Mexico's diverse cultural heritage and expression for present and future generations, enhancing the quality of life and economic well-being of the state.

Since 2018, Guzman has communicated with the director of the New Mexico Art Museum, DCA, architects, and planners of the Vladem Museum. Guzman accepted a design concept that the mural remain in its current location, however, possibly reduced in size. Defendants knew or should have known that Guzman held contractual rights as well as rights of attribution and integrity covering the Mural at all relevant times pursuant to VARA, 17 U.S.C. § 106A. When Guzman was advised that there was no money for a more current mural renovation, he directly requested funds from Senator Gerald Ortiz y Pino. Because of this request, Senator Ortiz y Pino procured an estimated \$53,000.00, earmarked for this mural renovation.

Since the procurement of funds, the museum design has changed as to not allow the mural renovation, as the mural is being proposed to be digitized and therefore altered, modified, mutilated, or removed. The Mural is a work of recognized stature pursuant to 17 U.S.C. § 106A(a)(3)(B), being widely and publicly recognized for over forty (40) years, and being praised and approved by influential members of the artistic community.

Defendants intend to renovate the Halpin Building such that the Mural would be distorted, mutilated, or modified in a way prejudicial to Guzman's honor and reputation. Guzman has never waived his VARA rights. Defendants' intended acts would certainly violate Guzman's VARA rights therefore, causing actual damages in an amount to be proven at trial. Guzman neither knew nor should have known of Defendants' intended acts in violation of VARA until sometime after January 2020.

Upon information and belief, the Halpin Building demolition has been scheduled to begin since January 25, 2020 but has been postponed due to the Covid-19 pandemic. It was reported on February 3, 2021 that construction on the Vladem Museum will begin within the week at the Halpin Building site.

Upon information and belief, the current owner of record is the State of New Mexico Records Center and Archives, but the building itself is overseen by DCA, which was created as part of the state executive branch under NMSA 1978, § 9-4A-4. The City also maintains statutory authority over the state building in question pursuant to NMSA 1978, § 3-22-6.

ARGUMENT

PLAINTIFF IS ENTITLED TO A TEMPORARY RESTRAINING ORDER AND PRELIMINARY INJUNCTION

I. Standard for a Temporary Restraining Order and Preliminary Injunction

The standard for a party seeking a temporary restraining order and preliminary injunction pursuant to Rule 65 of the Federal Rules of Civil Procedure are identical. *Grisham v. Romero*, 2021 N.M. LEXIS 3, *1, 2021 WL 608790, citing *Romer v. Green Point Sav. Bank*, 27 F.3d 12, 16 (2d Cir. 1994). Both a temporary restraining order and a preliminary injunction require Plaintiff to demonstrate that: 1) Plaintiff will suffer irreparable harm unless the injunctive relief is granted; 2) Plaintiff is likely to succeed on the merits; 3) Plaintiff's threatened injury outweighs any damage

the injunctive relief might cause Defendants; and 4) issuance of the injunctive relief will be in the public interest. *Id*; see also *Schrier v. Univ. of Colo.*, 427 F.3d 1253, 1258 (10th Cir. 2005); Fed. R. Civ. P. 65(b)(1)(A).”The primary purpose of injunctive relief is to preserve *the status quo* pending a final determination of the parties' rights.” *Simmons v. Clements*, 2011 U.S. Dist. LEXIS 105562, citing *Otero Savings and Loan Ass'n v. Federal Reserve Bank of Kansas City, Mo.*, 665 F.2d 275 (10th Cir. 1981).

II. Irreparable Harm

Guzman’s demonstration of irreparable harm comprises a violation of a federal right. Here, Plaintiff will suffer irreparable harm if immediate injunctive relief is not granted, because the Mural is one of a kind, painted over forty (40) years ago, and cannot be replaced or duplicated. Plaintiff’s VARA rights will be violated and this Court will not have an opportunity to rule on the merits in time before the demolition. The mural is a contemporary art piece that has been published nationally and provides Santa Fe the honor of having a mural of high quality incorporating the historic and cultural history of the region.

Furthermore, VARA grants artists certain moral rights but this right is not an economical right. See William F. Patry, *Copyright Law and Practice*, Ch. 14, at 1021 (These rights "are intended to supplement the economic interests that form the basis of the Section 106 rights by protecting the author's personal association with his or her work."). As such, Guzman would not be made whole through an award of money damages.

Plaintiff complains that the demolition of the Mural that exists only in one original form and has continued to exist this way for over forty (40) years, that his contractual rights will be violated, and complains that his VARA rights will be violated. These allegations are sufficient to meet the irreparable harm prong of the preliminary injunction analysis. Even so, Defendants have stated

their intention to remove or materially alter the Mural. As such, Plaintiff is entitled to the presumption of irreparable harm generally available in cases of copyright infringement.

III. Likelihood of Success on the Merits

VARA was enacted

to provide for the protection of the so-called "moral rights" of certain artists. *See Carter v. Helmsley-Spear ("Carter I")*, 861 F. Supp. 303, 313 (S.D.N.Y. 1994), vacated in part, rev'd in part on other grounds, *Carter II*, 71 F.3d 77 (2d Cir. 1995). "Moral rights afford protection for the author's personal, non-economic interests in receiving attribution for her work, and in preserving the work in the form in which it was created, even after its sale or licensing." *Id.* (quoting Jane C. Ginsburg, *Copyright in the 101st Congress: Commentary on the Visual Artists Rights Act and the Architectural Works Copyright Protection Act of 1990*, 14 Colum.-VLA J.L. & Arts 477, 478 (1990)) (alteration in original).

Pollara v. Seymour, 344 F.3d 265, 269. The Act provides a person the right,

(A) to prevent any intentional distortion, mutilation, or other modification of that work which would be prejudicial to his or her honor or reputation, and any intentional distortion, mutilation, or modification of that work is a violation of that right, and

(B) to prevent any destruction of a work of recognized stature, and any intentional or grossly negligent destruction of that work is a violation of that right.

17 U.S.C. § 106A(a)(3). This right exists irrespective of copyright ownership. 17 U.S.C. § 106A(b).

Here, Guzman painted the Mural on or about 1980 but Guzman retained certain rights to the Mural as evidenced by the Mural Agreement. Although the Mural Agreement specifically states that the property owner, DFA, acquired and retained "all ownership rights on the Mural on its completion," Plaintiff did not expressly relinquish or transfer full rights, nor any of his rights afforded by the Act. In fact, he retained rights to access and maintain the Mural. Defendants could have obtained a waiver and transfer from Guzman seeing as he was contractually provided the

right to maintain and refurbish the Mural over the years and their contractual relationship was ongoing.

Furthermore, DFA made a promise through the Mural Agreement “not to alter or paint over the mural during its normal life.” A promise that will ultimately be broken if the Mural is allowed to be destroyed, thus resulting in a breach of contract as claimed by Plaintiff’s Complaint. Defendants ratified the Agreement by, until recently, allowing Plaintiff the rights provided to him under the Agreement. As such, the promises made by DFA, also a state entity, survive the transfer of title to the building, if such transfer has occurred.

VARA precedent in the state of New Mexico is scarce, but Courts around the nation have been instructed to “use common sense and generally accepted standards of the artistic community in determining whether a particular work falls within the scope of the definition [of a ‘work of visual art’],” *Pollara* at 269, citing *Carter II*, 71 F.3d at 84 (quoting H.R. Rep 101-514, 101st Cong., reprinted at 1990 U.S.C.C.A.N. 6915, 6921). Here, the Court is urged to take notice of the communal history that this Mural encompasses, and the national acknowledgement and prestige it provides to the city of Santa Fe, the oldest capital in the U.S.²

IV. Plaintiff’s Threatened Injury Outweighs Any Damage the Injunctive Relief Might Cause Defendants

In this instance, the threatened injury to the Plaintiff includes: loss of a nationally recognized, one of a kind, historical work of art, damage to Plaintiff’s reputation and prestige, violation of Plaintiff’s VARA rights, and violation of Plaintiff’s contractual rights. The damage is not limited

² *Historical Chicano Mural Threatened by Santa Fe’s New Vldem Contemporary Museum*, Ellie Duke December 30, 2019, <https://hyperallergic.com/535266/historical-chicano-mural-threatened-by-santa-fes-new-vldem-contemporary-museum/> (*Hyperallergic* is headquartered in Brooklyn, NM).

to just Plaintiff, however. The city of Santa Fe, its community, and the state of New Mexico, will forever lose a piece of history and culture.

The Defendants will not suffer any direct, individual damages should an injunction be issued. They may argue that an injunction will compromise their over \$8M project and progress in the Vladem Museum. The Defendants already demonstrated the ability to maintain the Mural, albeit not in original form, and its cultural history intact by incorporating it in the Vladem Museum itself. Only recently did they chose to avoid preservation of the Mural and its authenticity altogether. Certainly, Defendants will not suffer any harm given the \$4M donation already committed by the Vladem family.

In sum, the injury to Plaintiff outweighs the speculative (at best) damage that an injunction in this instance may cause Defendants.

V. Issuance of an Injunction Will Not be Adverse to the Public's Interest

Santa Fe's own publication explains, "The Halpin is a contributing historic structure within the Historic Transition District, one of the five historic districts established to preserve the city's unique character."³ As this publication goes on to acknowledge,

[T]he Historic District and Landmark Act. NMSA §3-22-2 'empowers municipalities ... of this state with as full and complete power to **preserve, protect and enhance the historic areas and landmarks** lying within their respective jurisdictions as it is possible for this legislature to permit under ... the constitution of New Mexico.'

Id. (emphasis added). Clearly, Defendants ignore their legal obligations, and moral and ethical duties imposed by them under the Historic District and Landmark Act.

³ *Vladem Contemporary Clashes with Historic Santa Fe*, John Pen La Farge October 27, 2018, https://www.santafenewmexican.com/opinion/my_view/vladem-contemporary-clashes-with-historic-santa-fe/article_dae27611-dfd7-5177-ad7d-ce05c9c6bee0.html.

The public interest in maintaining its rich and original history cannot be underestimated. The community's love for this Mural and Plaintiff is evident and unmeasurable. The threat of demolition of the Halpin Building has already devastated the community and even state leaders. Protests and demonstrations as recent as March 7th, 2021 demonstrate the community's rejection of gentrification efforts and threats to the Halpin building.⁴ It is also undisputable that Defendants have utterly failed to follow their Mural Agreement placing stress on Plaintiff and his continued love and maintenance for the Mural. The Defendants' failure to follow contractual terms or preserve historic work of arts demonstrate their complete disregard for community, history, culture, and diversity, and places all of this below and subordinate to that of an outsiders' purse-further fueling the gentrification efforts of those at the top.

A SECURITY BOND SHOULD NOT BE REQUIRED

FRCP 65(c) grants district courts a wide range of discretion in setting an amount of security bond. *See Walczak v. EPL Prolong, Inc.*, 198 F.3d 725, 99 Cal. Daily Op. Service 9481, 99 D.A.R. 12213, 45 Fed. R. Serv. 3d (Callaghan) 296, 1999 U.S. App. LEXIS 31555 (9th Cir. 1999). Here, it is difficult to calculate a value for possible damages. Plaintiff is not seeking any action that would result in damages to Defendants, and any damages that Defendants risk are outweighed by Plaintiff's current damages. Lastly, Plaintiff is not a wealthy man and has afforded the ability to retain counsel through community donations. Any additional funds required for a bond will need to be raised through further community efforts. The urgent nature of this request for preliminary injunction makes such a time constricting effort impossible. As such, good cause exists for waiving any requirement of security.

⁴ *Dozens Rally Against Gentrification in Santa Fe Railyard*, Dillon Mullan March 6, 2021, https://www.santafenewmexican.com/news/local_news/dozens-rally-against-gentrification-in-santa-fe-railyard/article_7692e672-7ecd-11eb-bef9-03bb53addf1b.html.

CONCLUSION

For the reasons set forth herein, Plaintiff is entitled to a temporary restraining order and preliminary injunction preventing demolition, destruction, or otherwise modification of the Haplin building and Mural.

Respectfully submitted,

DAVIS MILES MCGUIRE GARDNER, PLLC

/s/ Penelope Quintero

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Gilberto Guzman

Gilberto Guzman
International Muralist
Muralist for "Multicultural", Santa Fe, New Mexico

Exhibit A

RECEIVED
MAY 13 1980
M
L.F.F.C.L.

MURAL AGREEMENT

THIS AGREEMENT, entered into this 12th day of May, 1980,
between DFA/Property Control Division (hereafter "Property Owner") and
Gilbert Guzman (hereafter "Muralist") in Santa Fe,
New Mexico.

WITNESSETH:

WHEREAS, Property Owner is the lawful and true owner of a
building located at 404 Montezuma St. in Santa Fe New Mexico;
and

WHEREAS, Muralist deems the building of Property Owner to be
particularly suited for the painting of an exterior mural on the east
wall of said building; and

WHEREAS, both parties agree that they should each have certain
rights and responsibilities and that this agreement should specify those
rights and responsibilities;

NOW BE IT THEREFORE RESOLVED that the following terms and conditions
are binding on both parties from this date forward:

1. Muralist will submit to Property Owner a sketch or cartoon
to scale of the proposed mural.
2. Property Owner must accept in writing the design of the mural.
The design shall include representations of all ethnic groups participating in
New Mexico history.
3. Muralist agrees not to disturb or harm the property of the
Property Owner during the process of painting the mural.
4. Property Owner expresses its intent not to alter or paint
over the mural during its normal life, but property owner acquires and
retains all ownership rights in the mural on its completion.
5. Property Owner agrees to allow muralist access to the mural
so that muralist may maintain said mural for its natural life.
6. This agreement will be binding upon both parties.

PROPERTY OWNER



MURALIST

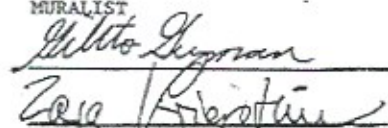


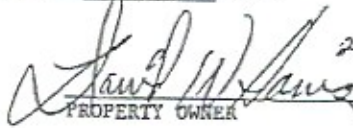
Exhibit B

Subscribed and sworn to before me this 12th day of May, 1980.
My commission expires February 5, 1984.

ACCEPTANCE OF DESIGN

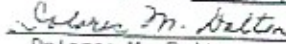
David W. Harris for
I. Property Control Division, being the property owner of the property
above-referenced do hereby approve of the design submitted to me in the
form of a sketch or cartoon drawn to scale.

Dated this 12th day of May, 1980


PROPERTY OWNER

Subscribed and sworn to before me this 12th day of
May, 1980.

My commission expires February 5, 1984.


Dolores M. Dalton



NEW MEXICO MUSEUM OF ART CONTEMPORARY ART ANNEX ARCHITECTURAL TEAM PROFILE INFORMATION



OVERVIEW

- The historic Halpin State Records Center will be transformed into a new space for contemporary art at the Santa Fe Railyard set to open in 2020.
- The architects for the project are the partnership of **DNCA Architects** and **Studio GP**, both based in Albuquerque.
- DNCA and Studio GP came to the top of a national competitive call for submissions, demonstrating the depth and caliber of creative talent here in New Mexico. It's a great bonus that we had a national call and a New Mexican firm won the contract. We have national talent, locally based which is part of what makes the cultural landscape of New Mexico so vibrant.



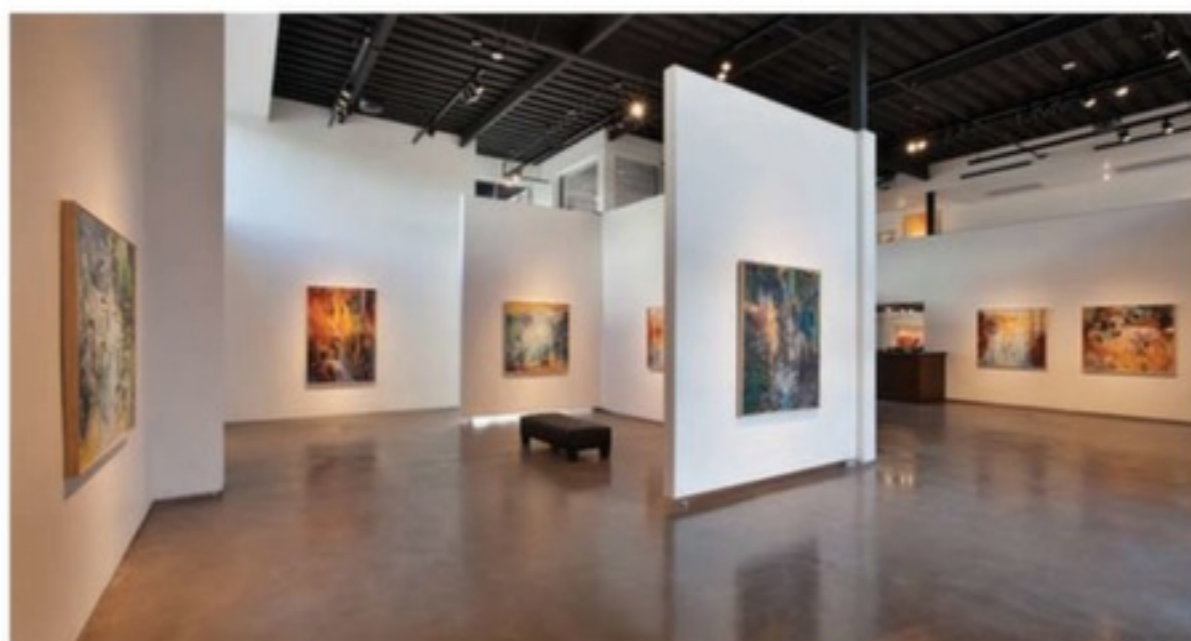
ROBERT RECK

DNCA ARCHITECTS ALBUQUERQUE, NEW MEXICO

DNCA's portfolio includes many contemporary art spaces as well as creative adaptive reuse of historic, industrial style buildings—a perfect combination for the aesthetic needed to create a special experience in the Halpin Building.

- DNCA designed many of the contemporary art galleries that are now in the Santa Fe Railyard such as the Rose Morelli Building, the Railyard Galleries (pictured above) and the LewAllen Galleries

(below), in an \$8.5 million project. This cluster of buildings at the north end of the Railyard helped create the transformation of this part of town into the contemporary arts district in the heart of Santa Fe. And, like the Halpin building, these were spaces converted to art gallery venues from different, previous uses.



ROBERT RECK

- These buildings are frequently used for multimedia and performance installations and are characterized by highly flexible spaces and successful adaptive reuse of existing buildings. Natural lighting is integrated into the experience of the space and particular attention addressed both energy efficiency and visitor comfort.



ROBERT RECK



PATRICK COUPE

- Other DNCA projects include Albuquerque's Tamarind Institute (above) at the University of New Mexico as well as Second Street Brewery's Rufina Street location in Santa Fe.

Resume

Gilberto Guzman is an internationally known, Master Painter and Muralist.

Guzman has been a Santa Fe resident for over 50+ years and has accomplished extraordinary artworks. He holds the belief that art creates positive attitudes in people. “Art just makes people feel good”, he said. He uses acrylics of rich, Mexican colors, paints figures of exaggerated size, profile and roundness.

Guzman was born in East Los Angeles on October 10, 1932 and began drawing at the age of 22 copying Norman Rockwell Illustrations from magazines. He was accepted into the Chouinard School of Art in Los Angeles, but because of a serious accident his education there could not continue. During rehab in San Francisco (1969-1972), he took commercial art classes at the San Francisco Academy of Art before moving to New Mexico.

Following are his extraordinary accomplishments:

Murals

- 1978 Art in Public Places Program, New Mexico Arts, Dept. of Cultural Affairs, New Mexico State Library Building, Santa Fe, New Mexico
“Pueblo Revolt, Buffalo Dancer” –oil on panel 16’ x 2’
“Corn Goddess” -oil on panel 13’4”x 2’6”
“Gold Star Mothers”, oil on panel 16’ x 8’, State of New Mexico, Bataan Memorial Building, Santa Fe, New Mexico
- Feb 1979 This “Anti-War” mural was painted on the walls of the public playground besides the October Gallery, London. The gallery opened in February 1979 in a spacious Victorian building which began life as a school. It has 12 shows per year from artists around the world. Guzman’s exhibition was representing the USA. Mural size is 50’ x varying sizes.
- 1980 Multi-cultural Mural, 120’ x 20’ at the New Mexico State Archives Building, 104 Montezuma St., Santa Fe, New Mexico
- 1985 “Harvest” mural is 55’ x varying sizes. Albuquerque Public Art at the 5th and Copper parking structure, Albuquerque, New Mexico.

1991 "The Harvest", 5' x 6' painting at the New Mexico State Capitol Rotunda Building, Santa Fe, New Mexico

National Publications

Feb 1979 Mural photos and article, "From the Barrios", first London exhibition at the October Gallery, 24 Old Gloucester, St. WCI, promoted in the Observer Magazine, September 1979.

Dec 1979 Article and photo from "Walls of Passion" article, in Nuestro Magazine regarding mural in Santa Fe on the façade of the Community Law Office on San Francisco Street.

1984 Articles and Photos of "Los Artes Guadalupanos de Aztlan: Lady of Justice, 1972; St. Francis Road Mural, 1972; "The Pueblo Revolt", Canyon Road mural; 1978, Multi-Cultural Mural, 1980, New Mexico State Records Center and "Gold Star Mothers" 1977, Bataan Memorial Building, Santa Fe, NM, in Community Murals: The People's Art Book, Author, Alan W. Barnett

Feb 1985 Article featured in New Mexico Magazine by "One Percent for Art" article by Mary Tolan.

"Harvest shows people picking fruit and gathering vegetables on one side of the wall and on the other shows people picking roses. This represents the balance of life that is so important and that art can provide. It's a dream I have, to get that balance between the beauty and the bodily needs of life. Art is what provides the beauty. Putting art in public places enhances that beauty and makes it more possible for people to obtain a balance in their lives" –Gilberto Guzman

June 1989 Front Cover Art, Invocation L.A. Urban Multicultural Poetry, West End Press, Box 27334, Albuquerque, NM 87125,
This project is partially supported by a grant from the California Arts Council through funding provided by the National Endowment for the Arts.

Mar 25, 1993

Full Page Advertisement, "Absolut New Mexico" USA Today

National Publications (continued)

Feb 14, 1994

Full Page Advertisement, "Absolut New Mexico" Advertisement, Time Magazine, featured inside front page "Absolut Statehood", Absolut New Mexico is one of 51 original, new works by gifted artist-one from each state in the U.S. plus the District of Columbia commissioned by Absolut Vodka.

Jan 1995 Full Page back in-side cover, "Absolut Guzman", Absolut Vodka AD, Art & Auction magazine

March 1995 Full Page Advertisement, "Absolut Guzman", Absolut Vodka AD, Art in America magazine, Brant Art Publications, Inc., 575 Broadway, NY, NY, 10012

Sept/Oct 1995

Full Page Back Cover, "Absolut Guzman", Absolut Vodka AD in Archaeology Magazine, 135 William St., New York, NY 10038

Sept.1995 Full Page back in-side cover, "Absolut Guzman", Absolut Vodka Advertisement, ARTFORUM International Magazine, P.O. Box 3000, Denville, NJ 07834

May 1997 Full Page Advertisement, "Absolut Guzman", Absolut Vodka Advertisement, center fold-out, Art in America magazine, Brant Art Publications, Inc., 575 Broadway, New York, NY, 10012

Jan 1998 Full Page Advertisement, "Absolut Guzman", Absolut Vodka Advertisement, center fold-out, featured in Art in America magazine, Brant Art Publications, Inc., 575 Broadway, New York, NY, 10012

One-Man Exhibitions

1998 El Museo Cultural, Santa Fe, New Mexico
1988 S.P.A.R.C, Venice, California
1981 Gallery of the 21st Century, Santa Fe, New Mexico
1980 Cantastiks Gallery, Santa Fe, New Mexico
1979 October Gallery, London, England
1979 Black Kachina Gallery, Santa Fe, New Mexico

Selected Group Exhibitions

1992 Third Muralist Conference Invitational, Albuquerque, New Mexico
1990 CARA, Museum of Albuquerque, Albuquerque, New Mexico
1984 "A Spirit Shared, 20th Century Art in Mexico and New Mexico",
Museum of Fine Arts, Museum of New Mexico, Santa Fe, NM
1984 "One Percent" Arts Exhibition, Kimo Gallery, Albuquerque, NM
1982 Dawning Hummingbird Gallery, Taos, NM
1980 Armory for The Arts, Hispanic Artists Invitational, Santa Fe, NM
1979 La Cofradia Group Exhibition, Armory for The Arts, Santa Fe, NM
1977 La Cofradia Group Exhibition, Sociedad Historica de Nuestra Senora
de Guadalupe, Santa Fe, NM
1977 Santa Fe Co-op Gallery, Santa Fe, NM

Grants

1993-1996 Grand Foundation, Teaneck, New Jersey
\$40,000 for restoration for Multi-Cultural Mural, New Mexico State
Archives Building, 104 Montezuma, Santa Fe, NM



