NOTICE OF PUBLIC MEETING
AND POSSIBLE EXECUTIVE SESSION OF THE
STATE OF ARIZONA
CITIZENS CLEAN ELECTIONS COMMISSION

Location: **Citizens Clean Elections Commission**

1110 W. Washington, Suite 250

Phoenix, Arizona 85007

Date: **Thursday, September 25, 2025**

Time: **10:00 a. m.**

Pursuant to A.R.S. § 38-431.02, notice is hereby given to the Commissioners of the Citizens Clean Elections Commission and the general public that the Citizens Clean Elections Commission will hold a regular meeting, which is open to the public on September 25, 2025. This meeting will be held at 10:00 a.m. **This meeting will be held in person and virtually. The meeting location will be open by 9:45 a.m. at the latest**. Instructions on how the public may participate in this meeting are below. For additional information, please call (602) 364-3477 or contact Commission staff at ccec@azcleanelections.gov.

The meeting may be available for live streaming online at https://www.youtube.com/c/AZCCEC. You can also visit https://www.azcleanelections.gov/clean-elections-commission-meetings. Members of the Citizens Clean Elections Commission may attend in person, by telephone, video, or internet conferencing.

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Members of the public may participate via Zoom by computer, tablet or telephone. A dial-in option is also available but you will not be able to use the Zoom raise hand feature, so the meeting administrator will assist phone attendees. Please keep yourself muted unless you are prompted to speak.

The Commission may allow time for public comment on any item on the agenda. Commission members may not discuss items that are not specifically identified on the agenda. Therefore, pursuant to A.R.S. § 38-431.01(H), action taken as a result of public comment will be limited to directing Commission staff to study the matter, responding to any criticism, or scheduling the matter for further consideration and decision at a later date.

The Commission may vote to go into executive session, which will not be open to the public, for the purpose of obtaining legal advice on any item listed on the agenda, pursuant to A.R.S. § 38-431.03 (A)(3). The Commission reserves the right at its discretion to address the agenda matters in an order different than outlined below.

Any person with a disability may request a reasonable accommodation, such as a sign language interpreter, by contacting the Commission at (602) 364-3477. Requests should be made as early as possible to allow time to arrange accommodations.

The agenda for the meeting is as follows:

I. Call to Order.

II. Discussion and Possible Action on Meeting Minutes for June 26, 2025.

III. Discussion and Possible Action on Executive Director's Report, Enforcement and Regulatory Updates, and Legislative Update.

Note: The executive director's report includes announcements and information about elections and campaign finance, a report on voter education activities, administrative information, information on candidates running clean, reports on legal proceedings involving Clean Elections and other Arizona election officials, a report on correspondence from other agencies, appointments, enforcement status, the regulatory agenda, reports of the Auditor General, and the Governor's Regulatory Review Council. The legislative update includes bills that have or may be considered for action by the Arizona legislature or the Governor. Materials are

included in the Commission packet available on its website or by request at ccec@azcleanelections.gov.

IV. Discussion and Possible Action on Proposed Conciliation Agreement in MUR 25-02, Anna Abeytia, 2024 legislative candidate.

V. Discussion and Possible Action on Proposed Conciliation Agreement in MUR 25-01 and related repayment order, Hector Jaramillo, 2024 legislative candidate.

VI. Discussion and Possible Action on Status Report on Proposition 211 (Voters' Right to Know Act) implementation and litigation.

VII. Public Comment.

This is the time for consideration of comments and suggestions from the public. Action taken as a result of public comment will be limited to directing staff to study the matter or rescheduling the matter for further consideration and decision at a later date or responding to criticism

VIII. Adjournment.

This agenda is subject to change up to 24 hours prior to the meeting. A copy of the agenda background material provided to the Commission (with the exception of material relating to possible executive sessions) is available for public inspection at the Commission's office, 1110 W Washington St, #250, Phoenix, AZ 85007.

Dated this 23rd day of September, 2025
Citizens Clean Elections Commission
Thomas M. Collins, Executive Director

THE STATE OF ARIZONA

CITIZENS CLEAN ELECTIONS COMMISSION

REPORTER'S TRANSCRIPT OF PUBLIC MEETING

Phoenix, Arizona

June 26, 2025

10:00 a.m.

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PUBLIC MEETING, BEFORE THE CITIZENS CLEAN ELECTIONS COMMISSION, convened at 10:00 a.m. on June 26, 2025, at the State of Arizona, Citizens Clean Elections Commission, 1110 West Washington, Suite 250, Phoenix, Arizona, in the presence of the following Board Members:

Mr. Mark S. Kimble, Chairman
Mr. Galen Paton
Ms. Christina Estes-Werther
Ms. Amy Chan (videoconference)

OTHERS PRESENT:

Thomas M. Collins, Executive Director
Paula Thomas, Executive Officer
Mike Becker, Policy Director
Gina Roberts, Voter Education Director
Avery Xola, Voter Education Manager
Alec Shaffer, Web Content Manager
Jessica Painter, KCA, Inc.

OTHERS PRESENT VIA VIDEO CONFERENCE:

Mary O'Grady, Osborn Maledon
Rivko Knox, Member of the Public
Jonathan Berkon, Elias Law Group
Emma Anspach, Elias Law Group

P R O C E E D I N G

CHAIRMAN KIMBLE: Good morning. Agenda Item 1 this morning is the call to order. It's 10:00 a.m. on June 26, 2025, and I call this meeting of the Citizens Clean Elections Commission to order.

And with that, we will take attendance. Commissioners, please identify yourself for the record.

COMMISSIONER WERTHER: Christina Werther.

COMMISSIONER PATON: Galen Paton.

COMMISSIONER CHAN: Amy Chan.

CHAIRMAN KIMBLE: And I'm Mark Kimble; we have a quorum.

Item II, discussion and possible action on the minutes from the May 22nd, 2025, meeting. Commissioners, you have the minutes from our May meeting in your packets.

Is there any discussion?

(No response.)

CHAIRMAN KIMBLE: Hearing none, is there a motion to approve them?

COMMISSIONER WERTHER: I motion to approve the meeting minutes for May 22nd, 2025.

CHAIRMAN KIMBLE: Is there a second?

COMMISSIONER PATON: I'll second.

CHAIRMAN KIMBLE: It's been moved and seconded

to approve the minutes for the May 25 meeting.

I'll call the roll.

CHAIRMAN KIMBLE: Commissioner Werther.

COMMISSIONER WERTHER: Aye.

CHAIRMAN KIMBLE: Commissioner Paton.

COMMISSIONER PATON: Aye.

CHAIRMAN KIMBLE: Commissioner Chan.

COMMISSIONER CHAN: Aye.

CHAIRMAN KIMBLE: Chair votes aye.

The minutes are approved 4-to-nothing.

Item III is discussion and possible action on the Executive Director's report.

Tom.

MR. COLLINS: Thank you, Commissioners.

I wanted to -- we can talk about the CD7 primary election in a -- in a minute, especially the debate, but I wanted to before we get to that highlight.

The first thing we sort of know, I guess, is that the legislature is moving towards resolving the budget over the next couple of days. There was some action on that yesterday and -- and probably today, Mike?

MR. BECKER: Yeah.

MR. COLLINS: Oh, okay.

Now, whether or not that would have affected us directly because of the Voter Protection Act is a little, you

know, we -- you know, was -- you know, was not clear, but I think it would nevertheless have impacted the whole state, so. So we're -- we gather that's on its way to being resolved.

In addition to the debates in the CD7, we did have a very full month of activities out and about in throughout the state. We launched Captain Activate! Volume II at Fan Fusion this year. Our second appearance at Fan Fusion, right?

And Avery was a popular author there, so he's going to have to get his own booth there at some point with the other comic book authors.

And then Gina, Avery and I attended the Disability Rights, Arizona's African-American conference on disabilities, and that was -- that's been a good event.

And then I think this is the first time we may have been in Apache County probably in certainly a long time. Avery was up at Greer Days, which I think was I think a great invitation and a great place for us to be, and so I thank -- thank Avery for making the trek up there. Although, the weather is better so I'm not sure. And --

COMMISSIONER PATON: Yeah.

MR. COLLINS: Yeah, and then -- and then Commissioner Werther was on a panel at the Election Officials of Arizona Conference.

1 We get to take credit for that now?
2 Notwithstanding her -- her practice and her professional,
3 that goes on our list too?
4 COMMISSIONER WERTHER: I have two more
5 trainings this month. There you go.
6 MR. COLLINS: And Gina hosted a guided
7 discussion on voter education guides which I thought -- I sat
8 in on one of those, and I thought that was a very interesting
9 discussion to have and -- and hearing from different county
10 and city administrators about -- about voter education.
11 So I think those are the things that I -- that I
12 wanted to highlight.
13 The podcast that we've been recording, I think has
14 been well received. The lieutenant governor episode that is
15 on up -- was up last week I got e-mails and texts from people
16 who really liked that. So check that out if you haven't.
17 Real quick on this, just to close out I think my
18 aspect of this report, the *Center for Arizona Policy versus*
19 *Arizona Secretary of State,* that's the Prop 211 case about
20 whether or not Prop 211 violates the state constitution,
21 particularly the First Amendment analog in the state
22 constitution.
23 And so amicus briefs on -- on that were due this
24 week, so there were about four on each side which I'm happy
25 to share with you if you're interested in. I thought for our

1 purposes or for my law nerd purposes, John Leshy, who many
2 people may know is the leading authority on the Arizona
3 Constitution, he -- he with some other law professors weighed
4 in on our side about the original intent on the Arizona
5 Constitution.
6 So I think that was -- I think that's helpful, to
7 say the least.
8 I -- we were going to have -- I think if we could
9 just talk about the debates I thought, Mr. Chairman, if it
10 would be okay, we have Gina talk about that just because
11 she's the --
12 CHAIRMAN KIMBLE: Of course.
13 Debates were held in CD7, and I saw quite a bit of
14 coverage of them in the media mentioning Clean Elections.
15 So, Gina.
16 MS. ROBERTS: Thank you, Mr. Chairman,
17 Commissioners.
18 Yes, we -- we had the Democratic and Republican
19 debates for the candidates that are running in the special
20 CD7 primary election. Those were held on June 9th and
21 June 10th, and we were very pleased with the results of the
22 debate in terms of the metrics that were able to follow.
23 So all candidates that were eligible to participate
24 did participate. We actually held the debate down in the
25 district. So we went down to Tucson and we partnered with

1 Arizona Public Media, we had it there, at their station at
2 the U of A campus.
3 And in your packet you'll have a memorandum in
4 there that has both the "how to watch" documents for each
5 debate. This basically shows every single media partner that
6 picked up the debate, whether it was broadcast or radio or
7 airing digitally such as their websites, things like that.
8 So just to highlight briefly: Six TV stations in
9 Southern Arizona specifically aired each debate live in
10 English and one aired each debate live in Spanish as well.
11 Telemundo aired the debate as well in both Phoenix and
12 Tucson.
13 And for radio stations we had six, four in Southern
14 Arizona and two in Phoenix that aired the debate in both
15 English, and two radio stations aired the debate live in
16 Spanish. The reason why I call out the Spanish component of
17 it is because CD7 has a large amount of Spanish-speaking
18 population.
19 So when we do our debates, we offer them to
20 simulcast to any of the media partners in English. We have
21 live Spanish translators on-site at the debate, and then we
22 also do an American Sign Language box and we provide CART
23 captioning. So by providing these different variations of
24 the debates, it makes it much more accessible to the voters.
25 So, really happy to see the Spanish media pick that up and

1 make it available as well for the Spanish-speaking population
2 in CD7.
3 For comparison purposes when we had our debates in
4 2024 in this general area in Southern Arizona, we had
5 Congressional District 6, which is a very contested race
6 between Representative Juan Ciscomani and his opponent
7 Kirsten Engel, and that was a very successful debate in terms
8 of the metrics that we were following. This particular
9 July 15th special election CD7 race, the debate surpassed the
10 metrics for that CD6 debate.
11 So again, just comparison, a lot of folks are
12 interested in this special election and very happy to show
13 that our performance in the debates is -- was exceeding
14 expectations.
15 So as far as being down in the district, we did
16 have quite a bit of local media, including some folks from
17 Phoenix drive down as well, show up. Which, you know --
18 which is fantastic because the fact we brought the debate to
19 the district as opposed to having the candidates drive up
20 here, it provided more access to the local media. I think we
21 had approximately 15 members of the media which also afforded
22 opportunities for both Tom and I to do interviews with those
23 media as well to explain about the Clean Elections' debate
24 process.
25 So from a PR perspective, a public relations

1 perspective, when we look at the coverage for it, we see that
2 we had several links to the debate coverage referencing Clean
3 Elections, things like that.
4 So, you know, if we were to put this into dollars
5 amounts, the total advertising value for the debates was
6 approximately $179,000. So it's effective in terms of the
7 distribution, which goes back to our partnership with the
8 Arizona Media Association, how we are producing these
9 debates, again making that accessibility to it from captions
10 to Spanish translation, things like that. We are making
11 these debates as accessible as possible to -- to the voters.
12 So that's a highlight. Again, we have the very
13 specific metrics and details in your packet, but with that,
14 I'm happy to answer any questions.
15 CHAIRMAN KIMBLE: Thank you. And speaking of
16 advertising, I noticed a large billboard along I-10 when I
17 was driving from Tucson this morning mentioning the special
18 election and Clean Elections somewhere around Casa Grande.
19 MS. ROBERTS: Mm-hm.
20 CHAIRMAN KIMBLE: Any questions for Gina from
21 members of the Commission?
22 COMMISSIONER PATON: I -- I have a comment.
23 CHAIRMAN KIMBLE: Commissioner Paton.
24 COMMISSIONER PATON: So I went to the
25 Republican debate, and I was quite impressed. I thought it

1 was very professionally done. I thought -- I learned quite a
2 bit about the candidates. I mean, I don't vote in that area,
3 but I learned quite a bit about them and -- and then I could
4 tell my friends that I know live in those areas what I
5 thought when I saw that.
6 And I think in the past before we started doing
7 this for the federal things, I think, you know, the -- it
8 seems like we were just exposing people to -- to really see
9 who these candidates are. It's not just who has the most
10 money to throw the flyers out or whatever they do, and it
11 forces the media to cover all these people. And I noticed
12 that they found some interesting aspects about some of the --
13 the candidates that I bet they probably wouldn't have
14 investigated as hard I don't think.
15 But I mean, it seemed like, like to me there was
16 about 20 reporters there asking questions and -- and it kind
17 of seemed like it was some like in LA or someplace that has,
18 you know, a lot of more influence.
19 But, you know, I was really proud of the fact that
20 we put this on and -- and how Gina and Tom got all that
21 together and the Riester people that were doing that. I -- I
22 was really impressed about how it went.
23 Not as so impressed as I went the next night, but.
24 But, you know, it was very good and -- and I appreciate the
25 fact that we did that, and I think it was good for the State

1 of Arizona, and I hope we continue doing that kind of thing.
2 CHAIRMAN KIMBLE: Thank you, Commissioner
3 Paton. And we will continue doing it in the general
4 election. We have a debate set up already I think.
5 MS. ROBERTS: Yes, Mr. Chairman. August 26th
6 is our -- our tentative date. So once we get through the
7 primary, we will extend the official invitations to the
8 eligible candidates that can participate, lock down
9 participation.
10 And the goal is to have it on that date but, of
11 course, you know, if there are scheduling conflicts, we might
12 have to work around that.
13 COMMISSIONER PATON: In Tucson again?
14 MS. ROBERTS: Yes --
15 COMMISSIONER PATON: Okay.
16 MS. ROBERTS: -- absolutely. We will be going
17 right back down to the same studio. Mm-hm.
18 CHAIRMAN KIMBLE: Thank you. Any other
19 questions for Gina?
20 Thank you, Gina.
21 Tom, are you -- anything else from your Executive
22 Director's report?
23 MR. COLLINS: No. No, Mr. Chairman. Thanks.
24 CHAIRMAN KIMBLE: Okay, thanks.
25 Any other comments from the Commission for Tom or

1 anything else on the report?
2 If not, Item IV, discussion and possible action on
3 advisory opinion requested by Fair Democracy regarding
4 application of the definition of campaign media spending to
5 public communications.
6 We have an advisory opinion request to consider the
7 application of the Voters' Right to Know Act to several
8 public communications. Tom has an overview of the draft, and
9 we'll consider public comments if there are any.
10 Tom.
11 MR. COLLINS: Yes. Thank you, Mr. Chairman,
12 and I see that John and Emma are here, so.
13 The -- I wanted to -- we have a quick Power Point
14 we wanted to use to sort of frame at least the staff part of
15 this.
16 That's our logo.
17 So I wanted to start by saying that, you know,
18 these are sort of our options at this point. We have a
19 deadline in the rule that we drafted around this that didn't
20 quite work with the way we do our meetings compared to other
21 agencies that have -- from where we took the rule, but it's
22 working okay.
23 So what that means is that I think the deadline for
24 us to complete this -- answer this question is somewhere
25 around July 8th-ish.

1 So options today would be approve the advisory
2 opinion draft. A second option is if you were to get into,
3 of course, discussion and think, you know, we just can't, we
4 will not be able to resolve this, we would put out a written
5 statement that says we can't do that. And then a third would
6 be at least provisionally, an additional meeting if we had to
7 reconvene in some more -- probably more of -- probably an
8 online type of public meeting to -- to -- to resolve
9 questions.
10 So I just wanted to lay that out there first if I
11 could, and then we wanted to get into this a little bit
12 from -- from -- from where we think the -- we think the draft
13 is.
14 I would note to, the best of our knowledge, we
15 didn't get any written public comment about the request or
16 the -- or the -- or the draft we put out to -- circulated on,
17 I think, Monday. Which is fine, I just wanna -- that's --
18 that's our understanding. If anybody has an alternate
19 understanding, please let us know.
20 So first thing we want to talk a little bit about
21 is the standard here. This is the campaign media -- the
22 opinion draft principally deals with the application of two
23 provisions of the campaign media definition. One having to
24 do with this promotes/supports/attacks/opposes standard which
25 is we call that PASO because PSAO is harder to say. And --

1 and -- so, you know, and we put out an opinion related to
2 this last year and the upshot of that opinion, which I try to
3 summarize there, is, you know, you're trying to walk a line
4 between what qualifies as a mere reference to a candidate
5 because in another definition closer to the election, a
6 reference to a clearly identified candidate would -- might
7 bring your communication within the definition of campaign
8 media spending. We want an action that involves the
9 candidacy.
10 So the distinction we drew principally in the 24.03
11 advisory opinion was that a communication that focused on a
12 policy view of an election official but, you know, doesn't
13 mention their candidacy would not be covered.
14 So the mere fact that somebody was a candidate,
15 you've got a thing -- an -- an ad that says "Call So-and-So,"
16 you know, that's -- that is -- in this -- under this
17 definition which runs between 60 days before -- six months
18 before the election and the 90 days prior to the primary, you
19 know, that wouldn't qualify under that definition as a -- as
20 a -- as a -- as a campaign media spending.
21 I think we can go to the next one.
22 So this part is a little more elaborate. It's a
23 little more text, so we'll have two slides on this.
24 This is the definition. You know, spending monies
25 or accepting in-kind contributions for communication that

1 supports the election or defeat of candidates of an
2 identified political party or the electoral prospects of an
3 identified political party.
4 Then there's some examples laid out there which
5 are, you know, partisan voter registration, get-out-the-vote,
6 that kind of thing.
7 And then there again in 24.03 we considered some
8 party partisan communications or something that would seem to
9 apply or might apply in this, and we thought that a
10 communication that doesn't involve the electoral prospects of
11 candidates or particular party or the party itself are not
12 covered.
13 So an advertisement that mentions the party as a
14 means to another end, such as providing context for a call to
15 action to contact the legislator, or seeking to bring more
16 people into association with the organization, or facilitate
17 direct communication with a particular election official does
18 not meet that definition, so.
19 You know, again, we're trying to apply the statute
20 by its terms. We're trying to be conscious of the, you know,
21 the -- the constitutional overlay that goes over all of this.
22 And we're also -- also trying to act consistent with the
23 intent of the Act as the voters put it which, you know, was
24 to, you know, you know, we want -- we want -- the voters want
25 to know essentially who paid for, you know, campaign media

1 spending or, you know, campaign ads.
2 Now, I will say this, that we also think that the
3 way you do that sort of philosophically generally ought to be
4 intuitive and not necessarily counterintuitive. Right?
5 So there is a -- there is a way in which lawyers
6 think where the right answer turns out to be the answer that
7 everybody thought was wrong all along. That's something that
8 one of our -- one of my closest legal friends calls "The
9 clever lawyer test." We -- we -- we think that the voters
10 did not enact a clever lawyer test for campaign media
11 spending. We think that they enacted a statute that's pretty
12 clear and that people should be able to apply fairly, you
13 know, in a way that will result in folks, you know, voters
14 getting the information that they think they're going to get.
15 So we want to go down, I think the next one then.
16 We have a little chart.
17 This is basically a breakdown of the ad- -- of
18 the -- of the ads that we considered or the -- so we believe
19 that the first one -- and we'll look at -- we'll look at
20 these in detail, but we basically concluded that examples 3
21 and 5 were attacks essentially and that 1 and 4 were not, did
22 not fall within that. And then the 2 we inter- -- we took 2
23 to be about the party communication or activity standard.
24 Again, that's how we saw it. If other people think
25 there are other statutes we should have answered, we have a

1 footnote sort of getting at when you're doing list
2 development kind of stuff in there. But we didn't -- we're
3 not spending a lot of time in this presentation about that.
4 And that's sort of where we are.
5 The other thing I want to say by way of background
6 before we look at the ads themselves again, is, you know, we
7 have a case in Arizona with respect to disclosure, with
8 respect to what express advocacy means. And so I'm being a
9 little jargon-y here but, you know, the -- the sort of the --
10 you know, but we have a standard of what constitutes express
11 advocacy that has been announced by our Court of Appeals.
12 And -- and so, you know, we think that that case
13 which is good law and -- and we can -- we think binding on --
14 on -- on the Commission as a staff -- or as I do anyways --
15 you know, is something we have to bear in mind when we're
16 thinking about this. And so that's why if -- when you look
17 at the draft itself, there's a footnote that says if we're
18 going to -- if we get -- if we -- if we determine something
19 is, in fact, going to hit the PASO standard, then we're not
20 going to have to evaluate it for that express advocacy
21 standard.
22 But I think that that express advocacy standard as
23 applied in *Commission For Justice and Fairness v. Secretary*
24 *of State*, you know, it was an important thing for folks to
25 understand if you're actually in the business of reviewing

1 these things for compliance purposes, so.
2 So what -- I guess we can go to the ads themselves.
3 Let's see here.
4 So this was Communication 1, and this is actually
5 in the opinion -- or, in the request itself. We didn't
6 reproduce the ads in the opinion, although I think what we'll
7 end up doing when we distribute it is attaching the -- the
8 letter of request to the opinion that goes out so that folks
9 can cross-reference, you know.
10 This one you've got -- this one we think falls
11 within that 24.03 referring to a -- a representative who may
12 be a candidate, but it's really not focused on their -- on
13 their candidacy, it's focused on their -- on their -- on
14 their -- their role in the -- and -- and the role of the
15 party in opposition to a particular policy measure.
16 So we -- we thought that this falls within our --
17 our -- the way we applied this in the earlier draft.
18 So 2a, 2b, and 2c have to do with party, right? So
19 it's expressly calling out a particular party and talking
20 about what they want to do. You know, there is again a
21 direct reference to a particular policy issue that's ongoing.
22 And -- and -- and so we thought that, again, that this falls
23 within what we had said about how to -- how to deal with --
24 with partisan communications in the context of -- of that
25 standard.

1 We're trying to figure out a good analogy here. We
2 haven't quite got it except it's something like -- and it's
3 only something like I think -- the difference between a "got
4 milk" advertisement and a, you know, the -- and "buy milk at
5 Safeway" advertisement, you know, so. You know.
6 In other words, you know, feel good about your
7 party because they're doing this thing that is -- that we
8 like versus vote -- you know, versus come buy the party's
9 product. It's not quite perfect, but something like that.
10 Just for practical purposes, right? So if you're just doing
11 a -- if you're doing an advertisement to say "if you have
12 good feelings about me," that's not necessarily going to be
13 electoral per se, you know. At least under these
14 circumstances.
15 So I want to get into 3a and 3b which I think are
16 probably going to be the most -- maybe the most difficult in
17 a sense and because the distinction there is you've got -- as
18 least as we understand it -- you've got a candidate, not as
19 we understand it -- or we don't have any facts I don't think
20 that say that this person is in office now.
21 We have a -- one ad says do you -- "Where do your
22 candidates stand on education funding?"
23 And it says: "Candidate John Doe supports spending
24 tax dollars on private schools and ski passes."
25 And then the text is: "John Doe, candidate for

1 LD31 supports Arizona's universal school voucher program,
2 which costs the State X number of dollars. Doe opposes
3 efforts to add oversight or prevent misuse of funds and
4 describes himself as an outspoken school-of-choice advocate."
5 The next ad is essentially the same text, except
6 instead of saying "do you know where your candidates stand?"
7 It just says "John Doe" right? And then -- and then
8 essentially the same -- the same facts other than that.
9 So first -- you know, so, so that gets back to this
10 issue of we try to capture in the first line around the
11 action on the candidacy. I think if I read the -- the sort
12 of the letter from -- the request letter correctly, I think
13 the focus there is on the word "candidate" maybe -- and I'm
14 probably oversimplifying, so I will -- you know, John and
15 Emma can obviously flush that out from their perspective.
16 But, you know, from our perspective it sort of
17 comes down to we didn't think the word "candidate" alone is
18 enough. In part because, you know, you're -- you're taking a
19 particular -- first of all, person -- there's no public
20 policy this person has engaged upon in terms of their actual
21 activities. And, indeed, you're not -- like some of the
22 other ads that we said were not campaign media spending in
23 our 24.03, you're not saying calling anybody or talk about
24 anything, or there's not a call to action along those lines.
25 And then it's sort of taking the -- the -- a thing

1 that exists is, in fact, right, that people can spend, and
2 have apparently spent money, these monies, on private schools
3 and -- and ski passes, and then you're -- and then you're --
4 and you're leading with that, you know, you know, as -- as --
5 as a thing that is -- you know, that is -- that is negative.
6 So, you know, we -- we felt comfortable that this
7 represented an attack if you take -- when you take those
8 things together.
9 The -- we -- I think to some extent maybe that the
10 language in 24.03 that talked about action on candidacy, I
11 think if you read that in context, it's juxtaposing that in
12 reference to a candidate. We didn't see this was a reference
13 to a candidate; this is an action on a candidate.
14 So there's a sentence in 24.03 that I may -- and
15 maybe I'm wrong about that -- but if it was ambiguous, if
16 that's if I'm right, that's a thing that's I think that if
17 you really read that sentence is juxtaposing reference to
18 action, and the action here is the attack.
19 And -- and I -- I know, I think that if you look
20 at -- I do think that CJF, the Committee on Justice and
21 Fairness case is relevant here, because of if you look at how
22 that sets up what constitutes an attack, for lack of a better
23 way of putting it, in that context. So that's where that is.
24 4, so you got a state rep. Backlash. Introduced
25 the bill that has their -- that -- they that -- they claim is

1 a conflict of interest on. You know, that's -- that's a --
2 again, we felt that in contrast to 3a, but b falls into the
3 category of, you know -- I try not to use this word, but
4 issue advocacy.
5 And -- and then finally we get to publication 5 --
6 or public Communication 5. The report shows that Rep Jacobs
7 failed to file taxes on time.
8 You know, we -- we are assuming -- I guess, you
9 know, and if we're wrong about this assumption, obviously we
10 need to clarify that, but I -- we're assuming Rep Jacobs is
11 running for office. We're assuming people would know that,
12 and -- and we're assuming that, you know, that new report
13 shows that Rep Jacobs failed to file his taxes on time.
14 I mean, I just -- I don't want to overcomplicate
15 this. If you saw an ad that said, you know, you know,
16 "Councilman Jones doesn't pay his parking tickets," and the
17 tag line was "Shouldn't you pay or shouldn't everyone pay
18 their parking tickets?" I would just think that any -- a
19 reasonable person, certainly a person that enacted this would
20 believe this was attack ad. I think that's -- I think this
21 was pretty straightforward in that way.
22 So that's kind of where we ended up in evaluating
23 this. I think that's pretty much it.
24 Is that it? Yeah.
25 So if you 'all have question for me, I'm happy to

1 answer them. And then, you know, John and Emma submitted
2 this on behalf of Fair Democracy, so I'm sure they have --
3 maybe they have insight that they can share, so.
4 CHAIRMAN KIMBLE: Okay. Thank you, Tom.
5 We'll get to the representatives of Fair Democracy
6 in just a second. Do any members of the Commissioners have
7 any comments or questions of Tom?
8 (No response.)
9 CHAIRMAN KIMBLE: Hearing none, we have
10 Jonathan Berkon and Emily [verbatim] Anspach, the counsel for
11 Fair Democracy today.
12 Do either or both of you have comments about Tom's
13 conclusions?
14 MR. BERKON: I think, thanks to the Commission
15 and to Mr. Collins for your thoughtful assessment of this.
16 You know, our goal in seeking this is try to get
17 clarity for our client in where the lines are with the
18 standard that, you know, understandably on its face doesn't
19 always provide that clarity, so.
20 You know, I think we -- we view this draft opinion
21 as providing distinctions that we can understand between and
22 among these ads, which is sort of, you know, what we were --
23 were seeking in asking for this opinion.
24 So beyond that, unless you have anything else,
25 Emma, I don't think we have any additional comments. But we

1 are here to answer any questions that the -- the Commission
2 may have.
3 CHAIRMAN KIMBLE: Thank you, Mr. Berkon.
4 Ms. Anspach, do you have any other comments to
5 make?
6 MS. ANSPACH: No, I don't have anything else
7 to add. Thank you.
8 CHAIRMAN KIMBLE: Okay, thank you.
9 Do any members of the Commission have any questions
10 for the representatives of Fair Democracy?
11 (No response.)
12 CHAIRMAN KIMBLE: So Commissioners, what is
13 your preference?
14 We can approve the advisory opinion; we can say
15 that we -- we're unable to reach a conclusion -- whether we
16 agree with Tom's conclusion or not. We can schedule another
17 meeting before July 8th.
18 Any preference from members of the Commission?
19 COMMISSIONER WERTHER: I mean -- Mr. Chair,
20 I'm comfortable --
21 CHAIRMAN KIMBLE: Commissioner Werther.
22 COMMISSIONER WERTHER: -- approving today
23 seeing as it, you know, I reviewed this as well, that, you
24 know, that Tom provided, the analysis, and that I think the
25 fact that the requester I think also would accept it. I

1 mean, I'm more inclined to just go ahead and approve it and
2 provide that clarity that they're seeking sooner rather than
3 later.
4 CHAIRMAN KIMBLE: So just to be clear, you're
5 making a motion to approve the advisory opinion?
6 COMMISSIONER WERTHER: I -- I can. I didn't
7 know if anybody else wanted to weigh in before --
8 CHAIRMAN KIMBLE: Oh.
9 COMMISSIONER WERTHER: -- I made a motion.
10 CHAIRMAN KIMBLE: I didn't mean to misstate
11 your position.
12 COMMISSIONER PATON: I would make a comment.
13 CHAIRMAN KIMBLE: Commissioner Paton.
14 COMMISSIONER PATON: I would just say that as
15 being a nonlawyer, I mean, it makes sense and -- and I think
16 we have to have lines so that everybody knows what the --
17 the -- the game rules are. And so it makes it easier --
18 because we're going to have to be the umpire down the road or
19 whatever, and -- and I think these make things fairly simple
20 to figure out.
21 And so I would be happy with these as well.
22 CHAIRMAN KIMBLE: Thank you.
23 So do we have a motion how we want to proceed on
24 this?
25 COMMISSIONER WERTHER: Mr. Chair, I move to

1 approve the advisory opinion requested by Fair Democracy as
2 provided and discussed today by the Executive Director.
3 CHAIRMAN KIMBLE: Thank you, Commissioner
4 Werther.
5 Is there is a second?
6 COMMISSIONER PATON: I'll second.
7 CHAIRMAN KIMBLE: It's been moved and seconded
8 that we approve the advisory opinion.
9 I will call the roll.
10 Commissioner Werther.
11 COMMISSIONER WERTHER: Aye.
12 CHAIRMAN KIMBLE: Commissioner Paton.
13 COMMISSIONER PATON: Aye.
14 CHAIRMAN KIMBLE: Commissioner Chan.
15 COMMISSIONER CHAN: Aye.
16 CHAIRMAN KIMBLE: Chair votes aye.
17 The advisory opinion is approved 4-to-nothing.
18 Thank you both for coming today and we appreciate
19 your feedback.
20 MR. BERKON: Thank you very much.
21 CHAIRMAN KIMBLE: Thank you.
22 Item V, discussion and possible action on the
23 Five-Year Review Report for submission to the Governor's
24 Regulatory Review Council.
25 Somehow or another five years have gone by and we

1 have a report due to the Governor's Regulatory Review Council
2 regarding -- regarding our rules under the Clean Elections
3 Act.
4 Tom, is there anything to add here?
5 MR. COLLINS: I -- I think the only -- the --
6 as I mentioned in my memo I think the main -- the main thing
7 we want to be clear is we my have some changes we have to
8 make to finalize it. And there may be some feedback from
9 GRRC. When you submit, typically they give you some
10 editorial feedback on stuff that you missed or things.
11 So, you know, we -- we do -- you know, in -- we do
12 want authority to finalize what we do. So that, you know, so
13 if it doesn't turn out to be verbatim what we've got in front
14 of you, that we have some flexibility there.
15 Obviously, if there was something serious, we'll
16 bring that back to you. But -- but that was one thing I
17 wanted to make sure.
18 The other thing is we have -- for the purpose of
19 this draft, we have interpreted negative communication -- or
20 written criticism broadly just to be on the safe side. And
21 what that means is that, you know, some of the -- we have
22 some litigation that's not necessarily criticism of the rule,
23 but actually an effort to say a rule is invalid. And we have
24 had some criticism of -- of the application of the rule
25 really rather than necessarily the -- the rule itself and so

1 those are there.
2 And I -- and, again, I highlight that part because
3 I think -- I think that what GRRC is looking for is written
4 criticism that you received in the course of doing the rule
5 making or a letter that said, "Hey, you should tweak this."
6 But, you know, nevertheless, but to be on the safe side, we
7 wanted to be -- we wanted to include those things.
8 So I think that's the only other -- that's the
9 only -- oh. And the last thing, sorry.
10 This doesn't include Article VIII of our rules
11 which is the GRRC rules because those are not subject to GRRC
12 review.
13 CHAIRMAN KIMBLE: So just to be clear, you're
14 looking -- you're asking us to approve the response that you
15 have provided to us to the Governor's Regulatory Review
16 Council?
17 MR. COLLINS: Yes, correct.
18 CHAIRMAN KIMBLE: Okay. Do we have a motion
19 to that effect?
20 COMMISSIONER WERTHER: Mr. Chair, I move to
21 finalize and submit the Commission's Five-Year Rule Review
22 Report.
23 CHAIRMAN KIMBLE: Thank you, Commissioner
24 Werther.
25 Is there a second?

COMMISSIONER PATON: I'll second.

CHAIRMAN KIMBLE: Thank you, Commissioner Paton.

It's been moved and seconded that we approve the report to the Governor's Regulatory Review Council.

I'll call the roll.

Commissioner Chan.

COMMISSIONER CHAN: Aye.

CHAIRMAN KIMBLE: Commissioner Werther.

COMMISSIONER WERTHER: Aye.

CHAIRMAN KIMBLE: Commissioner Paton.

COMMISSIONER PATON: Aye.

CHAIRMAN KIMBLE: Chair votes aye. The motion is approved 4-to-nothing.

Item VI, public comment. This is the time for consideration of comments and suggestions from the public. Action taken as a result of public comment will be limited to directing staff to study the matter or rescheduling the matter for further consideration or decision at a later date or responding to criticism.

If anyone has any comments, please limit to your comment to more than -- to no more than two minutes.

Is there any member of the public wishing to make a comment at this time?

(No response.)

CHAIRMAN KIMBLE: No one in the room.

Anyone on Zoom?

(No response.)

CHAIRMAN KIMBLE: Appears not.

Public may also send comments to the Commission by e-mail at CCEC@azcleanelections.gov.

At this time I would entertain a motion to adjourn.

COMMISSIONER WERTHER: I move to adjourn.

CHAIRMAN KIMBLE: Is there a second?

COMMISSIONER PATON: I'll second.

CHAIRMAN KIMBLE: It's been moved and seconded that we adjourn.

I'll call the roll.

Commissioner Chan.

COMMISSIONER CHAN: Aye.

CHAIRMAN KIMBLE: Commissioner Werther.

COMMISSIONER WERTHER: Aye.

CHAIRMAN KIMBLE: Commissioner Paton.

COMMISSIONER PATON: Aye.

CHAIRMAN KIMBLE: Chair votes aye.

We are adjourned. Thank you.

(Proceeding concludes at 10:39 a.m.)

C E R T I F I C A T E

STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

BE IT KNOWN that the foregoing proceedings were taken before me, Angela Furniss Miller, Certified Reporter No. 50127, all done to the best of my skill and ability; that the proceedings were taken down by me in shorthand and thereafter reduced to print under my direction.

I CERTIFY that I am in no way related to any of the parties hereto nor am I in any way interested in the outcome thereof.

I FURTHER CERTIFY that I have complied with the requirements set forth in ACJA 7-206. Dated at Litchfield Park, Arizona, this 30th of June, 2025.

Angela Furniss Miller, RPR, CR
CERTIFIED REPORTER (AZ50127)

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CITIZENS CLEAN ELECTIONS COMMISSION
EXECUTIVE DIRECTOR REPORT
September 25, 2025

Announcements:

- We produced in "Inside the Issues: Education Solutions for Arizona," an in-depth 1-hour program offering a comprehensive look at the entire system—from early childhood development and K–12 to post-secondary success and the integration of new technologies.

  This is a new voter education project aimed at informing and educating Arizonans on the top policy issues they've identified in our research. Working with the Arizona Media Association and Riester, we brought together leading experts from across the educational continuum for a collaborative, nonpartisan discussion.

  We recorded on Saturday, September 13 at ABC15 Studios in Phoenix. A carriage (aka broadcast) plan is forthcoming and the content will soon be available on the Clean Elections YouTube channel. The project consisted of four panel discussions with top education experts in the state:
  - Early Childhood Education:
    - Eve DelReal (Head Start)
    - Shantel Meek (The Children's Equity Project)
    - Barbie Prinster (Arizona Early Childhood Education Association)
    - Angela Rabago (First Things First)
  - K-12 Education:
    - Katherine Haley (Arizona State Board of Education)
    - Steve King (Yavapai County School Superintendent)
    - Jake Logan (Arizona Charter School Association)
    - Karla Phillips-Krivickas (Champions for Kids)
  - Post-Secondary Education:
    - Susan Bitter Smith (Maricopa County Community College District)
    - Jadyn Fisher (Student Regent – Arizona Board of Regents)
    - Merrill Kemp-Wilcox (Pima JTED)
    - Rich Nickel (Education Forward Arizona)
  - Education in a Changing State:
    - Peter Boyle (Center for the Future of Arizona)
    - Jaime Casap (Former Chief Education Evangelist at Google)
    - Jessica Pacheco (Arizona Board of Regents)
    - Katie Ratlief (Common Sense Institute)

- Election Day for the Congressional District 7 Special General Election was Tuesday, September 23. The candidate elected will serve the remainder of Congressman Grijalva's term. Voters in the district will vote for congress again in 2026 along with every other district in the midterm election

- Other local elections will take place November 4. Alec is working coordinating with county officials to update our website. Currently, several jurisdictions are having an election, including several school districts.

<u>Voter Education and Outreach:</u>

- **National Voter Registration Day and Constitution Week**
    - Avery participated in National Voter Registration Day at Scottsdale Community College with Captain Activate!
    - Avery engaged students for Constitution Day on September 17 at Coconino Community College.
    - Gina and Tom interviewed Election Assistance Commission Commissioner Ben Hovland for a special edition of the Beyond the Ballot

AZ. Commissioner Hovland is on the National Voter Registration Day steering committee.

- **Voter outreach & Civic Engagement**
  - Avery and Gina tabled a voter education and outreach booth at the Tolleson Union High School District's Commitment Day held at the Cardinal's Stadium. It was a two-day event designed to share employment, enrollment and enlistment opportunities to Tolleson Union High School District seniors (about 11 schools were in attendance). Gina and Avery spoke about serving as a poll worker, careers in elections, pre-registration and voter registration. Captain Activate! made an appearance for selfies and encouraged students to visit the table for election information. The comic books were a hit!
  - Avery and Gina tabled and presented at the Middle Matters: The Southwest Middle Grades Summit. About 600 educators from Arizona and the southwest attended this one-day conference. Avery and Gina distributed the Clean Elections Civics Curriculum and comics and spoke about resources available to educators to promote civic engagement and voting. The comic books were also a hit as the educators expressed their students would be more receptive to comics for reading and media literacy and the lessons about civic engagement.
  - Avery recently recorded a City of Tempe election podcast with the City Clerk's Office and the Maricopa County Recorder's Office.
  - Avery was recognized at the Tempe City Council Work Study Session during the Mayor's National Voter Registration Day proclamation.
  - Tom presented to the Legislative District 29 Democratic Committee on Running for Office and Participating in Clean Elections.
  - Avery and Gina will attend the "Women of the Courts: Leadership, Legacy, and Justice" on September 25 at the Sandra Day O'Connor College of Law in partnership with the Arizona Civics Coalition proving attendees with information on Clean Elections and voting.
  - Gina presented to the Pinal County Democrats Civic Engagement and Leadership Academy on election administration and voter education.
- **Other activities**
  - Continued production of Beyond the Ballot AZ; recent guests include U.S. EAC Commissioner Ben Hovland, Professor Justin Leavitt of Loyola Law School, and Dr. Jose Jurado of the L. William Seidman Research Institute at ASU.

Legal:

- Center for Arizona Policy v. Arizona Secretary of State, Arizona Supreme Court No. CV-24-0295-PR.
    - Oral argument was held September 11. This is a state constitutional challenge to Proposition 211.

- Americans for Prosperity v. Meyer, No. 24-2933 (9th Cir.).
    - Pending at the Ninth Circuit following May Oral Argument.

- Montenegro v. Fontes, Arizona Supreme Court No. CV-24-0166-PR.
    - This case is pending a decision from the Arizona Supreme Court.

- The Power of Fives, LLC v. Clean Elections, CV2021-015826, Superior Court for Maricopa County & Clean Elections v. The Power of Fives, LLC et al. CV2022-053917, Superior Court for Arizona. Briefing on the Defense Motion for Summary Judgement in CV2021-015826 is complete.

- Branch et al. v. Collins, et al., CV2024-004136 in Superior Court for Maricopa County. Briefing on the Defendant's Motion to Dismiss complete.

Other legal:

The Secretary of State's Office issued a statement about how they will treat the use of campaign funds for security. According to the statement:

> [I]t is the opinion of the Secretary of State of the State of Arizona that candidates for any office subject to the jurisdiction of this Office as filing officer may lawfully use privately raised campaign funds for personal security for themselves and their families provided that the campaign's statutory obligations are met.
>
> A.R.S. § 16-901(25) defines "expenditure" as "any purchase, payment or other thing of value that is made by a person for the purpose of influencing an election." A.R.S. § 16-921(A) clarifies that "a person may make any expenditure not otherwise prohibited by law." Arizona law gives campaigns discretion to spend the funds they raise as they believe will influence an election.
>
> Unfortunately, personal security has become a necessary part of running for and holding elected office.
>
> Given this, this Administration will not open complaints or refer for enforcement any alleged violations of campaign finance law based on campaign committee expenditures on personal security for candidates or their families.

At this time, Clean Elections staff does not believe additional action by the Commission is necessary under the Clean Elections Act and Rules. As far as participating

candidates are concerned, staff is prepared to advise those candidates who have security expenses on appropriate means to do so. Please let us know if you have questions.

A number of different cases relating to the state Election Procedures Manual are in litigation. The Arizona Supreme Court accepted a petition for review asking that it reverse a court of appeals decision that held that the Arizona Procedures Act, which controls most rule-making procedures in state government, applies to the EPM. That case will be argued on October 14. The Election Procedures Manual directs filing officers on how to handle a range of administrative issues from voter registration to campaign finance complaints.

Appointments:

- Treasurer Yee appointed Commissioner Crump last month. His term runs through January 31, 2027. Staff continues to monitor appointments, and direct interested applicants to the appropriate officials.

Administrative:

- Tom is working with former Maricopa Supervisor Bill Gates and the Mechanics of Democracy Laboratory and Dr. Thom Reilly of the Center for an Independent and Sustainable Democracy in an effort to host the 2026 The Election Sciences, Reform, and Administration (ESRA) conference brings together election experts from academia, state and local government, non-profits, and research institutes to develop empirical approaches to the study of how law and administrative procedures affect the quality of elections in the United States.

- Gina and Alec completed Election Officer Recertification Training.
- Tom is teaching ethics for the Recertification course.
- The Auditor General performed its quadrennial audit and determined that it's review "disclosed no instances of noncompliance or significant deficiencies in internal control to report." https://www.azauditor.gov/sites/default/files/2025-09/FAD-20250915-01_0.pdf. We are grateful to the Auditor General's staff for their professional and thorough review.
- Participating Candidate Workshops began in July with six having already been completed and 11 candidates having attended.. The schedule for 2025 is available on the Commission's website, with more workshops to be held throughout 2026.

Complaints:

- MUR 24-01, Barnett
- MUR 24-05, Roberts
- MUR 24-07, Arizona Solutions PAC. Closed, please see attached report.
- MUR 25-01, Jaramillo, this agenda
- MUR 25-02, Abeytia, this agenda

- MUR 25-03, Timberlake
- MUR 24-04, Turning Point
- MUR 25-05, Turning Point

2025 Regulatory Agenda:

The Commission may conduct a rulemaking even if the rulemaking is not included on the annual regulatory agenda.

The Governor's Regulatory Review Council approved the Commission's 5-year rule review report on Articles 1-7 of the Clean Elections Act rules on September 2.

The following information is provided under A.R.S. § 41-1021.02:

- Notice of Docket Opening: 31 A.A.R. 2255 (revision and addition of funding rules), https://apps.azsos.gov/public_services/register/2025/27/contents.pdf.
- Notice of Proposed Rulemaking: 31 A.A.R. 2141 (revision and addition of funding rules), https://apps.azsos.gov/public_services/register/2025/27/contents.pdf.
- Supplemental Notice: Pending. Rules related to distribution and repayment of funds will be discussed in a public hearing at the Commission's November meeting. We postponed and renoticed the rules after our last meeting.
- Federal funds for proposed rulemaking: **None**
- Review of existing rules: **Five Year Report Approved 9/2/2025**
- Notice of Final Rulemaking: **None.**
- Rulemakings terminated: **None.**
- Privatization option or nontraditional regulatory approach considered: **None Applicable.**

Katie Hobbs
Governor

Thomas M. Collins
Executive Director

Mark S. Kimble
Chair

Steve M. Titla
Amy B. Chan
Galen D. Paton
Christina Werther
Commissioners

State of Arizona
Citizens Clean Elections Commission

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MEMORANDUM

To: **Commissioners**

From: **Tom Collins, Executive Director**

Date: **9/25/2025**

Subject: **Summary of Conciliation Agreement Terms for MUR 25-01 (Jaramillo) and MUR 25-02 (Abeytia)**

This memo briefly summarizes the key points of the Executive Director's Recommended Conciliation Agreements in the matters identified above.

The agreements are intended to recognize the seriousness of the Respondents actions in failing to meet their obligations to file timely complete reports and provide timely information to Commission staff and auditors. The agreements do that chiefly by assessing a financial penalty in each matter and by requiring that each Respondent agree not to seek or accept Clean Elections Funding again. This second point is, in the Executive Director's view, a serious sanction that demonstrates to the public that the receiving monies from the fund comes with responsibilities.

The agreements required amended campaign finance reports to provide details on the expenditures candidates made. They also allow further action in the event of a default. Respondent Abeytia also is required to repay excess funds.

Jaramillo

• Respondent shall pay a fine of $2,500. That fine shall be paid in installments of no less than $52 per month for 48 months beginning October 1, 2025 with a final
payment of the remaining balance due at the end of that period.

• Respondent shall amend his campaign finance reports to reflect the payments to her contractor identified in the audit report attached as Exhibit C and incorporated into this agreement.

• Respondent agrees not to seek or accept Clean Elections funding in any other election.

Abeytia

• Respondent shall pay a fine of $5,000. That fine shall be paid in installments of no less than $104.00 per month for 48 months beginning October 1, 2025 with a final payment of the remaining balance due at the end of that period.

• Respondent shall pay $2082.37within 30 days of the authorization of this agreement by the Commission in repayment.

• Respondent shall amend her campaign finance reports to reflect the payments to her\ contractor identified in the audit report attached as Exhibit B and incorporated into this agreement.

• Respondent agrees not to seek or accept Clean Elections funding in any other election.

STATE OF ARIZONA

CITIZENS CLEAN ELECTIONS COMMISSION

In the Matter of:	MUR 25-02
Anna Abeytia	**Conciliation Agreement**
Respondent	

Pursuant to A.R.S. § 16-957(A) the Citizens Clean Elections Commission ("Commission") and Anna Abeytia, (Hereinafter "Respondent") agree to enter into a public administrative settlement of this matter in the manner below.

1. On April 24, 2025, the Commission determined that there was reason to believe that Respondent may have violated the Citizens Clean Elections Act and Rules ('the Act"). The Statement of Reasons by the Executive Director is attached to this agreement and incorporated by reference.Exhibit A.
2. The Respondent failed to file timely campaign finance reports required by the Act, failed to timely respond to Agency auditors, and failed to timely return money to the Clean Elections Fund as required by law.
3. Respondent waives any right she may have under any law of this state or the United States, including the right to a hearing or appeal in this matter, and agrees with the Commission to an informal settlement of this matter.
4. This Settlement Agreement concludes the Commission's investigation into the Respondent's conduct and constitutes the final penalties related to the investigation against the Respondent.

WHEREFORE, the Citizens Clean Elections Commission enters the following orders in lieu of any other action regarding this matter:

5. Respondent acknowledges that she faces fines as identified in Table 1 under A.R.S. § 16-942, and additional amounts for failure to abide by the Act by failing to respond to auditors and staff requests for information and failure to return monies to the fund under A.A.C. R2-
20-222.

6. The parties hereby agree to settle this matter on the following basis:

- Respondent shall pay a fine of $5,000. That fine shall be paid in installments of no less than $104.00 per month for 48 months beginning ~~October 1~~November 1, 2025 with a final payment of the remaining balance due at the end of that period.
- Respondent shall pay $2082.37within 30 days of the authorization of this agreement by the Commission in repayment.
- Respondent shall amend her campaign finance reports to reflect the payments to her contractor identified in the audit report attached as Exhibit B and incorporated into this agreement.
- Respondent agrees not to seek or accept Clean Elections funding in any other election.

7. Upon Respondent's final payment and provided Respondent otherwise complies with the terms of this Conciliation Agreement, the Commission shall terminate proceedings related to MUR No. 25-02 and the matter shall be closed.

Table 1

Report	Days Late	Amount not reported	$420 (§ 16-942 doubled because 10 percent threshold exceeded not to exceed 2x amount not reported)
2024 Qualifying Period Recap Report	30 Days Late	Total Cash Receipts this Reporting Period: $34,676.06 Total Cash Disbursements this Reporting Period: Cash: $32,828.61 Total: $67,504.67	30 x $420 $12.600
2024 Primary Recap report	23 Days Late	Total Cash Receipts this Reporting Period: $21,199.06 Total Cash Disbursements this Reporting Period:	23 x $420 $9,660

		$7,937.02 Total: $29,136.08	
2024 Post Primary Report	188 Days Late	Total Cash Disbursements this Reporting Period: $40,000.60 ($47,937.62 reported less the $7,937.02 previously reported)	188 x $420 $78,960
2024 - Pre-General Election	177 Days Late	Transactions below $2	Executive Director recommends waiver
2024 General Election	160 Days Late	Transactions below $1	Executive Director recommends waiver
2024 Post-General Election	96 Days Late	Transactions below $1	Executive Director recommends waiver

Note: 10 percent of the 2023-2024 adjusted primary limit (16-952 one-party dominant) $3,176. 10 percent of the 2023-2024 adjusted general limit (16-952 one-party dominant) $2,117

8. The parties hereby agree to settle this matter on the following basis:

9. A default by Respondent with respect to this Conciliation Agreement shall make a penalty of $101,160 less any amounts previously paid by Respondent pursuant hereto, immediately due and payable by Respondent to the Citizens Clean Elections Fund.

10. All payments shall be made by check or money order payable to the Citizens Clean Elections Fund and delivered to the Citizens Clean Elections Commission, 1110 W. Washington St., Suite 250, Phoenix, Arizona, 85007.

11. Respondent shall be in default of this Agreement upon the occurrence of failure to comply with Paragraph 6 of this Agreement and any of the following:

- Respondent fails to make any payment required hereunder within five (5) working days following the date due;
- Respondent files a petition under the bankruptcy laws, or any creditor of the Respondent files any petition under said laws against the Respondent;
- Any creditor of Respondent commences a foreclosure action to foreclose (by suit or trustee sale) on real property of the Respondent, or commences garnishment, attachment, levy or execution against the Respondent's property;
- Respondent provided false information to the Commission; or
- Respondent fails to abide by any provision of this agreement.

12. Interest shall accrue and becomes immediately payable on any amount that remains unpaid thirty days after a default occurs. Interest shall accrue at the statutory rate of prime plus one (1) percent (8.5%) pursuant to A.R.S. § 44-1201(B).

13. Nothing contained in this Agreement shall be construed to prevent any state agency which issues licenses for any profession from requiring that the debt in issue be paid in full before said agency will issue Respondent a new license.

14. The Commission may waive any condition of default without waiving any other condition of default and without waiving its rights to full, timely future performance of the conditions waived.

15. In the event legal action is necessary to enforce collection hereunder, Respondent shall additionally pay all costs and expenses of collection, including without limitation, reasonable attorneys' fees in an amount equal to thirty-five percent (35%) of monies recovered.

16. Respondent acknowledges that all obligations payable pursuant to this Agreement constitute a fine, penalty, or forfeiture payable to and for the benefit of a governmental unit, not compensation for actual pecuniary loss, and that pursuant to 11 U.S.C. § 523 such obligations are not subject to discharge in bankruptcy.

17. This Agreement shall be construed under the laws of the State of Arizona.

18. In the event that any paragraph or provision hereof shall be ruled unenforceable, all other provisions hereof shall be unaffected thereby.

19. This Agreement shall constitute the entire agreement between the parties regarding the subject matter. This Agreement shall not be modified or amended except in a writing signed by all parties hereto.

20. This Agreement shall not be subject to assignment.

21. No delay, omission or failure by the Commission to exercise any right or power hereunder shall be construed to be a waiver or consent of any breach of any of the terms of this Agreement by the Respondent.

22. By entering into this Agreement, the Respondent does not waive any rights, claims, defenses or arguments in any subsequent proceeding before the Commission or any agency, court or other tribunal.

23. Respondent has obtained independent legal advice in connection with the execution of this Agreement or have freely chosen not to do so. Any rule construing this Agreement against the drafter is inapplicable and is waived.

Accordingly, the proceedings commenced by the Executive Director shall be terminated and the matter be closed upon payment of the civil penalties and other actions herein.

Dated this ___ day of September, 2025.

By: _____
, Executive Director

By: _____
, Respondent

Exhibit A

STATE OF ARIZONA
CITIZENS CLEAN ELECTIONS COMMISSION
MUR 25-02
Anna Abeytia
STATEMENT OF REASONS OF THE EXECUTIVE DIRECTOR AND RECOMMENDATION FOR APPROVAL OF REPAYMENT ORDER

The Executive Director hereby provides the following Statement of Reasons why there may be reason to believe that a violation of the Citizens Clean Elections Act and Commission rules (collectively, the "Act") may have occurred.

Summary of Recommendation

Anna Abeytia ("Respondent") chose to become a participating candidate for the 2024 election cycle and the Clean Elections Fund provided here $53,933. Because she has not filed timely campaign finance reports required by the Act and Rules and because she has failed to respond to multiple efforts from Clean Elections staff and auditors to find evidence to account for her use of funds, there is reason to believe she has violated multiple provisions of the Clean Elections Act and Rules.

I. Factual Background

Respondent applied for certification as a participating candidate on June 14, 2024. Exhibit 1. Respondent provided sufficient qualifying contributions to meet the statutory requirements for clean elections funding on July 9, 2024. Exhibit 2. Respondent reallocated a portion of clean elections funding to the primary election period pursuant to A.R.S. § 16-952. *Id.* Consequently, Respondent received $31,760 in clean elections funding for the primary. *Id.* Respondent won nomination to the

legislative district 24 general election. General election funding of $21,173 was approved on July 31, 2024. Exhibit 3.

Respondent did not file any periodic campaign finance reports after her primary recap report on September 4, 2024, Exhibit 4, until April 21, 2025.Consequently, Respondent did not file any campaign finance report for her 2024 committee after accepting her general election funding until April 21, 2025. Respondent ignored efforts to contact her made by Clean Elections designated auditors and Clean Elections staff members. Exhibit 5 at 3. Following initial notice from staff, the auditors reported:

> We reached out to Anna Abeytia (the Candidate) via email on November 25, 2024, and again on December 4, 2024; neither of which received a response. On December 12, 2024, we called the number listed on the Candidate's campaign finance report and left a message, again not receiving any type of response. We called again on January 28, 2025, and spoke to Anna Abeytia, and she said she would send over the requested documentation that evening. That was the last time we heard from her. It should also be noted that as of February 17, 2025, the Candidate has not filed their 2024 Primary Recap Report, 2024 Pre-General Election, or 2024 General Recap Report with the Arizona Secretary of State, and as such, does not show up on the See The Money website (https://seethemoney.az.gov/). Therefore, we are unable to review any of the expenses, contributions, or perform any other procedure as required for our testing of the Candidate's Clean Elections funding.

Id.

The Executive Director issued a Complaint against Respondent on March 10, 2025 along with a copy of the audit report. Exhibit 6. Respondent did not respond or acknowledge the Complaint.

Commission staff heard from Respondent via email on April 16 after contacting her about a discrepancy in her existing reports. Respondent wrote that: ""I have hired a fiance [sic] advisor to help get the reporting done and fix some stuff from the primary. There are was no money left over from the money but my reports weren't reflecting that so they are looking to figure that out. As for the General funding I do have about $1,900 or so left over and they working on getting the reporting done to reflect that." Exhibit 7.

Respondent finally filed remaining reports on April 21, but the reports generally show the same kind of lump sum payment to a consulting firm, Gumption Consulting. See Table 2 and Exhibit 8.

II. Alleged Violations

A. Failure to file campaign finance reports.

Candidates are required to file campaign finance reports "that include all receipts and disbursements for their current campaign account." Ariz. Admin. Code R2-20-110(A). "In addition to any other penalties imposed by law, the civil penalty for a violation by . . . any candidate of any reporting requirement imposed by [Chapter 6 of Title 16] shall be [$210] per day for candidates for the legislature" up to a statutory maximum limit based on the amount of money not reported. A.R.S. § 16-942(B).

Table 1 (April 17, 2025)

Reports Previously Filed

(Indicates Amended Reports Exist)

Show 25 entries

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Page 1 of 1

Report Due Date	Date Filed	Report Name	Report Filings	Status
01/15/2025		2024 - Post-General Election (Q4)		92 Day(s) Late Fines Due $2075.00
11/12/2024		2024 - General Recap Report		156 Day(s) Late
10/26/2024		2024 - Pre-General Election		173 Day(s) Late Fines Due $4100.00
10/15/2024		2024 - Post-Primary Election (Q3)		184 Day(s) Late Fines Due $4375.00
08/12/2024	09/04/2024	2024 - Primary Recap Report	PDF	23 Day(s) Late
08/05/2024	09/04/2024	2024 - Qualifying Period Recap Report	PDF	30 Day(s) Late
07/20/2024	07/19/2024	2024 - Pre-Primary Election	PDF	On Time
07/15/2024	07/15/2024	2024 - Quarter 2	PDF	On Time
06/24/2024	06/24/2024	2024 - Interim Report	PDF	On Time
06/24/2024	06/24/2024	2024 - Interim Report	PDF	On Time
06/14/2024	06/14/2024	2024 - Interim Report	PDF	On Time
06/14/2024	06/14/2024	2024 - Interim Report	PDF	On Time
06/12/2024	06/12/2024	2024 - Interim Report	PDF	On Time
06/12/2024	06/12/2024	2024 - Interim Report	PDF	On Time
04/15/2024	04/15/2024	2024 - Quarter 1	PDF	On Time
02/07/2024	02/07/2024	2024 - Interim Report	PDF	On Time

Showing 1 to 16 of 16 entries

Page 1 of 1

As Table 1 demonstrates, Respondent filed two reports late in 2024 and had failed to file a report for her Clean Elections committee since.

Table 2 demonstrates that after the Reason to Believe memo was sent to Respondent, she filed reports that were outstanding.

Table 2 (April 22, 2025)

Reports Previously Filed

(Indicates Amended Reports Exist)

Show 50 entries

Column visibility

Page 1 of 1

Report Due Date	Date Filed	Report Name	Report Filings	Status
02/07/2024	02/07/2024	2024 - Interim Report	PDF	On Time
04/15/2024	04/15/2024	2024 - Quarter 1	PDF	On Time
06/12/2024	06/12/2024	2024 - Interim Report	PDF	On Time
06/12/2024	06/12/2024	2024 - Interim Report	PDF	On Time
06/14/2024	06/14/2024	2024 - Interim Report	PDF	On Time
06/14/2024	06/14/2024	2024 - Interim Report	PDF	On Time
06/24/2024	06/24/2024	2024 - Interim Report	PDF	On Time
06/24/2024	06/24/2024	2024 - Interim Report	PDF	On Time
07/15/2024	07/15/2024	2024 - Quarter 2	PDF	On Time
07/20/2024	07/19/2024	2024 - Pre-Primary Election	PDF	On Time
08/05/2024	09/04/2024	2024 - Qualifying Period Recap Report	PDF	30 Day(s) Late
08/12/2024	09/04/2024	2024 - Primary Recap Report	PDF	23 Day(s) Late
10/15/2024	04/21/2025	2024 - Post-Primary Election (Q3)	PDF	188 Day(s) Late Fines Due $4475.00
10/26/2024	04/21/2025	2024 - Pre-General Election	PDF	177 Day(s) Late Fines Due $4200.00
11/12/2024	04/21/2025	2024 - General Recap Report	PDF	160 Day(s) Late
01/15/2025	04/21/2025	2024 - Post-General Election (Q4)	PDF	96 Day(s) Late Fines Due $2175.00

Showing 1 to 16 of 16 entries

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(Note the liability amounts indicated above are derived by the Secretary of State's Campaign Finance Reporting System based on the schedule establishing in A.R.S. § 16-927. The Clean Elections provides for an "additional penalty" to those otherwise imposed by law.")

Because Respondent has failed to file reports timely, there is reason to believe that she has violated the Clean Elections Act and Rules.

B. Recordkeeping and return of monies

The Clean Elections Act and Rules provide for various rules to prevent the misuse of monies from the Clean Elections Fund. Most of these rules are common sense, that is, the kind of things any ordinary campaign or small business project would consider.

In addition to the reporting requirements described above, candidates are required to maintain books and records. Ariz. Admin. Code R2-20-115(A)-(B). Audits are intended to ensure that these steps are taken. Additionally, reports and accounting requirements help verify that you have properly returned monies as required by A.R.S. § 16-953 (relating to return of monies).

Based on Respondent's decision to avoid the auditors and her admission last week that she needs to seek a professional service to assist her in addressing her reports, and her related admission she has not returned monies to the fund, there is reason to believe that a violation of Arizona Administrative Code section R2-20-115 has occurred and a violation of A.R.S. § 16-953 has occurred.

The mere fact that she has now filed additional reports that largely show large disbursements to a single consulting firm are not sufficient to satisfy Respondent's burden, while the late filings after the course of action Respondent has undertaken supports the inference the reports are not in order.

III. Repayment Order

The facts described above additionally support the Commission voting to approve the repayment order Staff has proposed. Respondent's failure to file reports at all, in many cases, or reports that she has not substantiated by her own admission, along with her refusal to respond to required audits to which she agreed support the conclusion that an order of repayment should be approved. Respondent has not met the burden she agreed to by choosing to participate. Specifically, as detailed in the proposed order, respondent has not met her burden regarding her use of clean elections funding the Commission orders repayment of the entire amount of $53,933 on the following two independent grounds:

a. Use of funds not for direct campaign expenses. Respondent had the burden of proving expenditures were for direct campaign purposes. Respondent has not met her burden to show that expenses with primary election funding were for direct campaign purposes or that the General Election funds were used for direct campaign expenses. Therefore, the Commission concludes that the funds were not used for direct campaign expenses and determines that the full amount of $53,933 must be returned. Ariz. Admin. Code § R2-20-704(B)(2).

b. Expenditures were not documented in accordance with campaign finance reporting requirements. Respondent has not provided sufficient documentation of expenditures in the primary election or general election. Therefore, the

Commission determines the full amount of $53,933 must be returned. Ariz. Admin. Code § R2-20-704(B)(3).

Recommendation

If the Commission determines there is a reason to believe that a violation of a statute or rule over which the Commission has jurisdiction may have occurred, an investigation shall be conducted. Ariz. Admin. Code R2-20-209(A). If the Commission determines there is reason to believe, the Executive Director shall, in the Executive Director's discretion, subpoena Respondent's records documenting disbursements, debts, or obligations to the present, and may authorize an audit.

Upon expiration of fourteen (14) days, if the Commission finds that the alleged violator remains out of compliance, the Commission shall make a public finding to that effect and issue an order assessing a civil penalty in accordance with A.R.S. § 16-942, unless the Commission publishes findings of fact and conclusions of law expressing good cause for reducing or excusing the penalty. A.R.S. § 16-957(B).

After fourteen (14) days and upon completion of the investigation, the Executive Director will recommend whether the Commission should find probable cause to believe that a violation of a statute or rule over which the Commission has jurisdiction has occurred. Ariz. Admin. Code R2-20-214(A). Upon a finding of probable cause that the alleged violator remains out of compliance, by an affirmative vote of at least three (3) of its members, the Commission may issue an

order and assess civil penalties pursuant to A.R.S. § 16-957(B). Ariz. Admin. Code R2-20-217.

The Executive Director also recommends the Commission approve the Repayment Order.

Dated this 23rd day of April 2025

S/Thomas M. Collins
Thomas M. Collins, Executive Director

Exhibit 1

FILED
JUN 14 2024
ARIZONA SECRETARY OF STATE

0000561805

☐ Initial Application
☐ Amended Application

STATE OF ARIZONA
APPLICATION FOR CERTIFICATION AS A PARTICIPATING CANDIDATE

Pursuant to Arizona Revised Statutes §§16-947 and 948 and AAC R2-20-104 (D)

COMMITTEE ID NUMBER **101577**

NAME OF CANDIDATE ANNA LYNN ABEYTIA		DATE 06/12/2024	
OFFICE SOUGHT STATE REPRESENTATIVE - DISTRICT 24	PARTY AFFILIATION Democrat	ELECTION CYCLE 2024	
CANDIDATE'S ADDRESS 5141 W AVALON DR	CITY PHOENIX	STATE AZ	ZIP 85031
CANDIDATE'S TELEPHONE # (480) 909-7030	CANDIDATE'S FAX #	CANDIDATE'S EMAIL ADDRESS ABEYTIAFORAZ@GMAIL.COM	
NAME OF POLITICAL COMMITTEE ANNA ABEYTIA FOR STATE REPRESENTATIVE - DISTRICT 24			
COMMITTEE ADDRESS 5141 W AVALON DR	CITY PHOENIX	STATE AZ	ZIP 85031
COMMITTEE MAILING ADDRESS (if different from above) 5141 W AVALON DR	CITY PHOENIX	STATE AZ	ZIP 85031
COMMITTEE TELEPHONE # (480) 909-7030	COMMITTEE FAX #	COMMITTEE EMAIL ADDRESS ABEYTIAFORAZ@GMAIL.COM	
NAME OF DESIGNATED INDIVIDUAL WITH AUTHORITY TO WITHDRAW FUNDS (IF APPLICABLE) (A.R.S. §16-948)			
DESIGNATED INDIVIDUAL'S ADDRESS	CITY	STATE	ZIP
DESIGNATED INDIVIDUAL'S TELEPHONE #	DESIGNATED INDIVIDUAL'S FAX #	DESIGNATED INDIVIDUAL'S EMAIL	
LIST THE NAME OF THE FINANCIAL INSTITUTION FROM WHICH THE CANDIDATE AND THE DESIGNATED INDIVIDUAL WILL CONDUCT ALL FINANCIAL ACTIVITY FOR THE CANDIDATE'S CAMPAIGN COMMITTEE (Do not list account numbers). (A.R.S. §16-948(A))			
NAME OF FINANCIAL INSTITUTION WELLS FARGO			

DESIGNATED CANDIDATE'S STATEMENT (if applicable) **(A.R.S. §16-948(B)): I hereby designate_____ as my duly authorized Designated Individual, with the authority to withdraw funds and make expenditures from my campaign account on my behalf.**

Candidate's Signature 6/14/24 Date

Office Revision 9/07

Committee ID:	101577
Date:	06/12/2024
Form ID:	0000561805

Application for Certification – Part II

CANDIDATE AND DESIGNATED INDIVIDUAL'S STATEMENT (*A.R.S. §16-947*):

I, the undersigned, upon my oath and under penalty of perjury, certify that the following statements are true and accurate to the best of my knowledge and belief:

1. I have complied with the restrictions of A.R.S. §16-941 (A) during the election cycle to date, which are as following:
   a) Not accepted contributions other than early contributions as specified in A.R.S. §16-945;
   b) Not made expenditures that exceed the candidate's personal money limit; and
   c) Conducted all financial activity through a single campaign account.
2. I will continue to comply with the restrictions in paragraph 1 during the remainder of the election cycle and will:
   a) Not make expenditures in the primary election period in excess of the adjusted primary election spending limit;
   b) Not make expenditures in the general election period in excess of the adjusted general election spending limit; and
   c) Return unused monies to the fund in accordance with A.R.S. § 16-953.
3. I have filed all campaign finance reports required under Title16, Chapter 6, Article I, during the election cycle to date, and the reports are complete and accurate.
4. I agree to use all Clean Election funding for direct campaign purposes only.
5. I will file, with this application, a campaign finance report showing all campaign activity to date in the current election cycle.
6. I will comply with all requirements of the Act and Commission rules.
7. I am subject to all enforcement actions by the Commission as authorized by the Act and Commission rules.
8. I have the burden of proving that expenditures made by or on behalf of the candidate were for direct campaign purposes.
9. I will keep and furnish to the Commission all documentation relating to expenditures, receipts, funding, books, records (including bank records for all accounts), and supporting documentation and other information that the Commission may request in accordance with Commission rules.
10. I will permit an audit and examination of all receipts and expenditures including those made by the candidate, the candidate's authorized committee, or any agent or person authorized to make expenditures on behalf of the candidate or committee. The candidate and the candidate's authorized committee shall also provide any material required in connection with an audit, investigation, or examination conducted by the Commission. The candidate and authorized committee shall facilitate the audit and examination and shall pay any amounts required to be repaid.
11. I will submit the name and mailing address of the person who is entitled to receive equalizing fund payments on behalf of the candidate and the name and address of the campaign depository designated by the candidate. Changes in the information required by this paragraph shall not be effective until submitted to the Commission in a letter signed by the candidate or the committee treasurer.
12. I will pay any civil penalties included in a conciliation agreement or otherwise imposed against the candidate.
13. I will file all campaign finance reports with the Secretary of State in an electronic format in a timely manner.

State of Arizona)
) ss.
County of Maricopa)

Candidate's Signature

SUBSCRIBED AND SWORN TO before me this 14th day of June 20 24.

Notary Public

State of Arizona)
) ss.
County of_____)

Designated Individual's Signature

SUBSCRIBED AND SWORN TO before me this_____day of_____20_____.

Notary Public

HOPE M. OLGUIN
Notary Public - State of Arizona
MARICOPA COUNTY
Commission # 625532
Expires April 4, 2026

Exhibit 2

Katie Hobbs
Governor

Thomas M. Collins
Executive Director

Mark S. Kimble
Chair

Steve M. Titla
Amy B. Chan
Galen D. Paton
Christina Werther
Commissioners

State of Arizona
Citizens Clean Elections Commission

1616 W. Adams - Suite 110 - Phoenix, Arizona 85007 - Tel (602) 364-3477 - Fax (602) 364-3487 - www.azcleanelections.gov

MEMORANDUM

To: Paula Thomas, Executive Officer

Thru: Thomas M. Collins, Executive Director

From: Mike Becker, Policy Director

Date: **July 9, 2024**

Subject: Disbursement of 2024 Primary Election Funds

In accordance with A.A.C. R2-20-105, this certifies that the candidate referenced below has met the following Commission requirements to receive primary funding (with reallocated funds) in the amount of **$31,760.**

1. The required number of signatures on the candidate's nominating petitions equals or exceeds the number required pursuant to A.R.S. § 16-322 and A.A.C. R2-20-106(A)(1)(a);
2. The required number of $5 qualifying contributions have been received and paid to the Secretary of State for deposit in the CCEC Fund; and
3. The candidate is opposed in the election.

Candidate Name: **Anna Abeytia**
Office Sought: **State House of Representatives, District 24**
Vendor Number: **VC*81073**

*X*_____ _____
Funding Received By *Date*

Exhibit 3

Katie Hobbs
Governor

Thomas M. Collins
Executive Director

Mark S. Kimble
Chair

Steve M. Titla
Galen D. Paton
Amy B. Chan
Christina Werther
Commissioners

State of Arizona
Citizens Clean Elections Commission

1110 W. Washington - Suite 250 - Phoenix, Arizona 85007 - Tel (602) 364-3477 - Fax (602) 364-3487 - www.azcleanelections.gov

MEMORANDUM

To: Paula Thomas, Executive Officer

Thru: Thomas M. Collins, Executive Director

From: Mike Becker. Policy Director

Date: July 31, 2024

Subject: Disbursement of 2024 General Election Funds- Re-allocated

In accordance with A.A.C. R2-20-106, the Commission has determined that the candidate referenced below has received the greatest number of votes in the primary election and is qualified to receive re-allocated general election funding in the amount of **$21,173**.

Candidate Name: **Anna Abeytia**
Office Sought: **State Representative, LD 24**
Vendor Number: **VC#81073**

*X*_____ _____

Funding Received By *Date*

Exhibit 4

Anna Abeytia For State Representative - District 24

Transactions

Filters

Demographic Information

Filer Name:

Anna Abeytia for State Representative - District 24

Status:

Active

Filer ID:

101577

Filer Type:

Candidate (participating in Clean Elections)

Registration Date:

02/07/2024

Last Amended Date:

02/07/2024

County:

Last Reported:

Mailing Address:

5141 W Avalon Dr
Phoenix AZ 85031
Email: abeytiaforaz@gmail.com
Phone: (480) 909-7030

Filer Address:

5141 W Avalon Dr
Phoenix AZ 85031

Chairman:

Serna, Ricardo

Treasurer:

Jaramillo, Hector

Candidate:

Abeytia, Anna Lynn
Email: abeytiaforaz@gmail.com

Phone: (480) 909-7030
Designee:

Office Sought:

State Representative - District 24
Party Affiliation:

Reports Previously Filed

(Indicates Amended Reports Exist)

Column visibility

Page 1 of 1

Report Due Date		Date Filed	Report Name	
01/15/2025		2024 - Post-General Election (Q4)		92 Day(s) Late Fines Due $2075.00
11/12/2024		2024 - General Recap Report		156 Day(s) Late
10/26/2024		2024 - Pre-General Election		173 Day(s) Late Fines Due $4100.00
10/15/2024		2024 - Post-Primary Election (Q3)		184 Day(s) Late Fines Due $4375.00
08/12/2024	09/04/2024	2024 - Primary Recap Report	PDF (https://seethemoney.az.gov/PublicReports/2024/CCE46647-C321-4FAC-A7FE-63D12AE317B3.pdf)	23 Day(s) Late

08/05/2024	09/04/2024	2024 - Qualifying Period Recap Report	PDF (https://seethemoney.az.gov/PublicReports/2024/C5E95435-7ED2-4E7E-A3D7-92A24186D943.pdf)	30 Day(s) Late
07/20/2024	07/19/2024	2024 - Pre-Primary Election	PDF (https://seethemoney.az.gov/PublicReports/2024/43305DE8-3495-419B-8177-EFCC8C7F821E.pdf) (https://Seethemoney.az.gov/Reporting/AmendedReports/?CommitteeReportId=293065)	On Time
07/15/2024	07/15/2024	2024 - Quarter 2	PDF (https://seethemoney.az.gov/PublicReports/2024/D13C0625-D7F3-4D09-9846-0F6A9994BB3A.pdf) (https://Seethemoney.az.gov/Reporting/AmendedReports/?CommitteeReportId=293064)	On Time
06/24/2024	06/24/2024	2024 - Interim Report	PDF (https://seethemoney.az.gov/PublicReports/2024/E99B540D-B596-4598-B91D-C7A5A2ACF3E0.pdf) (https://Seethemoney.az.gov/Reporting/AmendedReports/?CommitteeReportId=293072)	On Time
06/24/2024	06/24/2024	2024 - Interim Report	PDF (https://seethemoney.az.gov/PublicReports/2024/6772E62C-F07F-49AC-B3D4-163727152A12.pdf) (https://Seethemoney.az.gov/Reporting/AmendedReports/?CommitteeReportId=293071)	On Time
06/14/2024	06/14/2024	2024 - Interim Report	PDF (https://seethemoney.az.gov/PublicReports/2024/2D359766-250C-47DB-A763-9BED2C2ED3DB.pdf) (https://Seethemoney.az.gov/Reporting/AmendedReports/?CommitteeReportId=293070)	On Time
06/14/2024	06/14/2024	2024 - Interim Report	PDF (https://seethemoney.az.gov/PublicReports/2024/EB041DFD-51A0-4026-9552-F2ECACC444C7.pdf) (https://Seethemoney.az.gov/Reporting/AmendedReports/?CommitteeReportId=293069)	On Time
06/12/2024	06/12/2024	2024 - Interim Report	PDF (https://seethemoney.az.gov/PublicReports/2024/DC7FF47F-43BE-4632-AF2A-54F4813EF07C.pdf) (https://Seethemoney.az.gov/Reporting/AmendedReports/?CommitteeReportId=293068)	On Time

06/12/2024	06/12/2024	2024 - Interim Report	PDF (https://seethemoney.az.gov/PublicReports/2024/DB457EB9-40B3-46A2-8781-0B0A2F552A58.pdf) (https://Seethemoney.az.gov/Reporting/AmendedReports/?CommitteeReportId=293067)	On Time
04/15/2024	04/15/2024	2024 - Quarter 1	PDF (https://seethemoney.az.gov/PublicReports/2024/E9F441BB-F66B-4E9A-8133-E1575274FE02.pdf) (https://Seethemoney.az.gov/Reporting/AmendedReports/?CommitteeReportId=293063)	On Time
02/07/2024	02/07/2024	2024 - Interim Report	PDF (https://seethemoney.az.gov/PublicReports/2024/FB1E25DD-B76F-4F3C-B953-DE6829D1BB87.pdf) (https://Seethemoney.az.gov/Reporting/AmendedReports/?CommitteeReportId=293066)	On Time

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Paid for by the Arizona Secretary of State's Office and with Voter Approved Funding from the Clean Elections Fund

ADRIAN FONTES
SECRETARY OF STATE
STATE OF ARIZONA

;

Exhibit 5

CITIZENS CLEAN ELECTIONS COMMISSION

Report on Agreed-Upon Procedures

Anna Abeytia
Participating Candidate for
State Representative - District 24
General Election 2024

FESTER & CHAPMAN PLLC
CERTIFIED PUBLIC ACCOUNTANTS

Independent Accountants' Report on
Applying Agreed-Upon Procedures

To the Chairman and Members of the
Citizens Clean Elections Commission
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Anna Abeytia's (the Candidate)'s 2024 Post-Primary Election (Q3), 2024 Pre-General Election, and 2024 General Recap Report (the Reports) which covers the period from July 14, 2024 through November 5, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Anna Abeytia. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

Fester & Chapman, PLLC

February 28, 2025

Address • 9019 East Bahia Drive Suite 100 • Scottsdale, AZ 85260 | **Phone** • (602) 264-3077 | **Fax** • (602) 265-6241

Summary of Procedures and Findings

1. Preliminary Procedures

   a) Contractor will obtain a copy of the candidate's campaign finance reports for the reporting period.

   Finding
   We reached out to Anna Abeytia (the Candidate) via email on November 25, 2024, and again on December 4, 2024; neither of which received a response. On December 12, 2024, we called the number listed on the Candidate's campaign finance report and left a message, again not receiving any type of response. We called again on January 28, 2025, and spoke to Anna Abeytia, and she said she would send over the requested documentation that evening. That was the last time we heard from her. It should also be noted that as of February 17, 2025, the Candidate has not filed their 2024 Primary Recap Report, 2024 Pre-General Election, or 2024 General Recap Report with the Arizona Secretary of State, and as such, does not show up on the See The Money website (https://seethemoney.az.gov/). Therefore, we are unable to review any of the expenses, contributions, or perform any other procedure as required for our testing of the Candidate's Clean Elections funding.

   b). Perform a desk review of the disbursements reported in the candidate's campaign finance reports to identify any unusual items requiring follow-up during fieldwork.

   Finding
   We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

   d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

   Finding
   We attempted to contact the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed as described in step 1.a)., but we were unable to communicate with the Candidate.

2. Fieldwork Procedures

   a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 2024 General Recap Report.

   Finding
   Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

   b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

   Finding

See comment in a) above.

c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

Finding
We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

(i) Review bank statements from July 2024 through November 2024 (the reporting period) and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance reports.

  Finding
  We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the November 2024 bank statement and the 2024 General Recap Report.

  Finding
  We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

(i) The candidate accepted contributions only from individuals.

Finding
We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

(ii) None of the contributions received from individuals exceed the early contribution limit.

Finding
We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

(iii) Check compliance with the maximum early contribution limits.

Finding
We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

(iv) Check compliance with the maximum personal contribution limits.

Finding
We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the $5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than $100, which reflects the contributor's address, occupation and employer.

Finding
No contributions were reported in the Candidate's Campaign finance reports during the reporting period.

(i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

Finding
We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

(ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

Finding
We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance reports and perform the following:

(i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

Finding
We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

(ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

Finding
We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

- Agree the amount of the expenditure to the campaign account bank statement.

  Finding
  We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

(iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

Finding
We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

  Finding
  We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of $1,800.

Finding
We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

(i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the $210 limit on petty cash expenditures.

Finding
We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

Finding
We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

Finding

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

Exhibit 6

Thomas M. Collins
Executive Director

State of Arizona
Citizens Clean Elections Commission

1110 W. Washington St. - Suite 250 - Phoenix, Arizona 85007 - Tel (602) 364-3477 - Fax (602) 364-3487 - www.azcleanelections.gov

NOTICE OF COMPLAINT AND PRELIMINARY AUDIT REPORT AND RESPONSE OPPORTUNITY
Via Overnight Delivery and E-mail

March 10, 2025

The Hon. Anna Abeytia
5141 W Avalon Dr
Phoenix AZ 85031
Email: abeytiaforaz@gmail.com
Phone: (480) 909-7030

RE: CEC MUR 25-02

Dear Rep. Abeytia,

This letter represents notice of a complaint against you by the Executive Director of the Arizona Citizens Clean Elections Commission and well as to provide you a copy of a preliminary audit report. You have an opportunity to respond to both as discussed below.

According the Arizona Campaign Finance Reporting System, you stopped filing periodic reports after the late filing of your Primary Recap and Qualifying Period Recap Reports on September 9, 2024. *See* Table 1. Additionally, you have refused to participate in required auditing under the Citizens Clean Elections Act and Rules, as reflected in the attached report. *See* Exhibit 1.

The Clean Elections Act and Rules require participating candidates to file periodic reports of their campaign financial activities, conduct all activities through a single campaign account, ensure that funds are expended in accordance with the Act and Rules, and permit an audit to confirm compliance with those requirements.

Your failure to file campaign finance reports and failure to respond to a required audit logically support the conclusion you have acted knowingly in failing to meet these obligations. Indeed, the available records indicate your campaign ceased to provide any required financial information despite its legal obligations and the application for certification that you signed and filed. *See* Exhibit 2.

Campaign finance reports and audits are the primary mechanism by which Clean Elections ensures that you are abiding by the terms of the Act to which you have agreed.

The absence of proper reporting and ignoring the audit raises concerns that other important restrictions you agreed to as a participating candidate may not have been abided by.

Table 1

Reports Previously Filed

(Indicates Amended Reports Exist)

Show 50 entries

CSV Print Column visibility

Page 1 of 1

Report Due Date	Date Filed	Report Name	Report Filings	Status
08/12/2024	09/04/2024	2024 - Primary Recap Report	PDF	23 Day(s) Late
08/05/2024	09/04/2024	2024 - Qualifying Period Recap Report	PDF	30 Day(s) Late
07/20/2024	07/19/2024	2024 - Pre-Primary Election	PDF	On Time
07/15/2024	07/15/2024	2024 - Quarter 2	PDF	On Time
06/24/2024	06/24/2024	2024 - Interim Report	PDF	On Time
06/24/2024	06/24/2024	2024 - Interim Report	PDF	On Time
06/14/2024	06/14/2024	2024 - Interim Report	PDF	On Time
06/14/2024	06/14/2024	2024 - Interim Report	PDF	On Time
06/12/2024	06/12/2024	2024 - Interim Report	PDF	On Time
06/12/2024	06/12/2024	2024 - Interim Report	PDF	On Time
04/15/2024	04/15/2024	2024 - Quarter 1	PDF	On Time
02/07/2024	02/07/2024	2024 - Interim Report	PDF	On Time
10/15/2024		2024 - Post-Primary Election (Q3)		143 Day(s) Late Fines Due $3350.00
10/26/2024		2024 - Pre-General Election		132 Day(s) Late Fines Due $3075.00
11/12/2024		2024 - General Recap Report		115 Day(s) Late
01/15/2025		2024 - Post-General Election (Q4)		51 Day(s) Late Fines Due $1050.00

.

Consequently, you and your campaign may be in violation of A.R.S. §§ 16-941(A)(1) (limiting contributions), -941(A)(2) (limiting personal expenditures), -941(A)(3)(primary spending limit), -941(A)(4) (general spending limit), -941(A)(5)(campaign accounts and return of monies) and -948 (campaign accounts).

Failure to file reports can lead to penalties under A.R.S. § 16-942 (including daily penalties of $210 per day for violations for failure to follow reporting requirements).

Additionally, reports help verify that you have properly returned monies as required by A.R.S. § 16-953 (relating to return of monies). The absence of the reports supports an inquiry into what monies ought to have been returned.

Absent reports, we also consider that you may have violated Ariz. Admin. Code R2-20-110 (participating candidates reporting requirements) and Ariz. Admin. Code R2-20-115(books and recordkeeping requirements) and have failed to establish that you have fulfilled your obligation to show compliance with Ariz. Admin. Code R2-20-702 (use of funds), Ariz. Admin. Code R2-20-702.01(use of assets), Ariz. Admin. Code R2-20-703(documentation of expenditures), Ariz. Admin. Code R2-20-703.01(consultants). Again, in each of these instances,

absent reports and compliance with the audit requirements, we must consider these possible violations.

This is a serious matter. Violations of the above requirements can trigger penalties under A.R.S. §§ 16-942, -943, and -957, as well as Ariz. Admin. Code R2-20-222. Candidates can also be subjected to repayment under Ariz. Admin. Code R2-20-704. Additionally, "if the candidate fails to provide adequate office space, personnel or records, the Commission may seek judicial intervention to enforce the request or assess other penalties." Ariz. Admin. Code R2-20-403(C).

The Commission's rules provide that you "be afforded an opportunity to demonstrate that no action should be taken on the basis of a complaint by submitting, *within five days from receipt of a written copy of the complaint*, a letter or memorandum setting forth reasons why the Commission should take no action." Ariz. Admin. Code R2-20-205(A). Please respond to this notice and complaint by the close of business on March 18, 2025.

Additionally, if you have any response to the enclosed audit report you have 10 days to provide that response. Ariz. Admin. Code.R2-20-404(B).

Your response must be notarized, or it will not be considered. Ariz. Admin. Code R2-20-205(C). Failure to respond to this complaint within five days may be viewed as an admission to the allegations. *Id.*

The rule states that we are to provide you with an advisement of Commission compliance procedures. Those procedures are set forth in Article 2 of the Commission's Rules (Arizona Administrative Code Sections R2-20-201 to R2-20-228). *See* Exhibit 3.

This matter is in the initial stages of review. A finding will be made only after the Commission has fully reviewed this matter. Please contact me if you have any questions at (602) 364-3477 or by e-mail at thomas.collins@azcleanelections.gov .

Sincerely,

S/Thomas M. Collins

Executive Director
Citizens Clean Elections Commission

Enclosures

Exhibit 7

Gmail

MIKE BECKER <[redacted]

Re: Return of Funds

1 message

Anna Abeytia <[redacted]
To: MIKE BECKER <[redacted]

Thu, Apr 17, 2025 at 9:11 AM

Hello Mike,

I have hired a fiance advisor to help get the reporting done and fix some stuff from the primary. There are was no money left over from the money but my reports weren't reflecting that so they are looking to figure that out.

As for the General funding I do have about $1,900 or so left over and they working on getting the reporting done to reflect that.

Anna Abeytia

On Apr 16, 2025, at 8:41 AM, MIKE BECKER <[redacted] wrote:

Rep. Abeytia,

I am reaching out, once again, to remind you that all remaining funds from your campaign must be returned to the Commission. Your most recent report states that you have over $22,000 primary funds left. Those funds must be returned to the Commission immediately along with any remaining general election funds. If the funds have been spent, then your campaign finance reports must reflect that, and as of today, 4/16, they do not.
Please correct and file all of your reports, primary and general, showing how the funds were spent by the close of business Friday, April 18. In addition, please return the remaining funds that have been stated on your report by the close of business Friday, April 18.
Do not hesitate to reach out should you have questions.
--

Mike Becker

Policy Director

Arizona Citizens Clean Elections Commission

1110 W Washington, Suite 250

Phoenix, AZ 85007

Direct line: [redacted]

To ensure compliance with the Open Meeting Law, recipients of this message should not forward it to other board members of the public body. Members of the public body may reply to this message, but they should not send a copy of the reply to other members.

Exhibit 8A

State of Arizona

Campaign Finance Report

Anna Abeytia for State Representative - District 24
Committee #: 101577
Jurisdiction: Arizona Secretary of State

Treasurer: Jaramillo, Hector
5141 W Avalon Dr, Phoenix, AZ 85031
Phone: (480) 909-7030
Email: abeytiaforaz@gmail.com
Candidate Name: Abeytia, Anna Lynn
Office Sought: State Representative - District 24

2024 Pre-General Election

Election Cycle:	**2024**
Date Filed:	April 21, 2025
Reporting Period:	October 1, 2024-October 19, 2024
Jurisdiction:	Arizona Secretary of State

Summary of Finances

Cash Balance at Beginning of Reporting Period:	$2,084.06
Total Cash Receipts this Reporting Period:	$0.00
Total Cash Disbursements this Reporting Period:	$1.31
Cash Balance at End of Reporting Period:	$2,082.75

Report ID: 294049

101577 Anna Abeytia for State Representative - District 24
Jurisdiction: Arizona Secretary of State

Pre-General Election
Covers 10/01/2024 to 10/19/2024
Filed on 04/21/2025

Summary of Activity

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	$0.00	$0.00	$0.00	$0.00
Individual Contributions	C2	$0.00	$0.00	$0.00	$2,890.00
Contributions from Political Committees	C3a,b,c	$0.00	$0.00	$0.00	$0.00
Business Contributions	C4a,b,c	$0.00	$0.00	$0.00	$0.00
Small Contributions	C5	$0.00	$0.00	$0.00	$26.06
CCEC Funding and Matching	C6	$0.00	$0.00	$0.00	$52,933.00
Qualifying Contributions	C7	$0.00	$0.00	$0.00	$0.00
Loans Made to this Committee	L1	$0.00	$0.00	$0.00	$0.00
Other Receipts, including Interest and Dividends	R1	$0.00	$0.00	$0.00	$0.00
Transfers from Other Committees	T1	$0.00	$0.00	$0.00	$0.00
Cash Surplus from Previous Committee	S1	$0.00	$0.00	$0.00	$0.00
Total Income		$0.00	$0.00	$0.00	$55,849.06

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	$1.31	$0.00	$1.31	$53,766.31
Independent & Ballot Measure Expenditures	E2a,b,c	$0.00	$0.00	$0.00	$0.00
Contributions to Committees/Businesses	E3a -E3f	$0.00	$0.00	$0.00	$0.00
Small Expenses	E4	$0.00	$0.00	$0.00	$0.00
Transfers to Other Committees	T1	$0.00	$0.00	$0.00	$0.00
Loans Made by This Committee	L2	$0.00	$0.00	$0.00	$0.00
Disposal of Surplus Cash	S1	$0.00	$0.00	$0.00	$0.00
Total Expenditures		$1.31	$0.00	$1.31	$53,766.31
Bill Payments for Previous Expenditures	D1	$0.00		$0.00	$0.00
Total Cash Disbursed		$1.31			

Schedule C2 - Individual contributions

		Date	Amount	Cycle To Date
Name:	Parker, Bob	10/17/2024	$25.00	$0.00
Address:	4807 S 103rd Dr, Tolleson, AZ 85353		Cash	
Occupation:	Sales, S.C.C.			
Name:	Parker, Bob	10/17/2024	$(25.00)	$0.00
Address:	4807 S 103rd Dr, Tolleson, AZ 85353		Cash	
Occupation:	Sales, S.C.C.			
Trans. Type:	Refunded Contribution			
Memo:	Refund			
Original Date:	10/17/2024			
Original Amount:	$25.00			
Total of Individual Contributions			$25.00	
Total of Refunds Given			($25.00)	
Net Total of Individual Contributions			$0.00	

Schedule E1 - Operating expenses

		Date	Amount	Cycle To Date
Name:	ActBlue	10/01/2024	$0.15	$1.21
Address:	PO Box 962017, Boston, MA 02196		Cash	
Category:	Administration - Bank fees/service charge			
Memo:	September Transaction Fee			
Name:	ActBlue	10/11/2024	$0.38	$1.21
Address:	PO Box 962017, Boston, MA 02196		Cash	
Category:	Administration - Bank fees/service charge			
Memo:	October Transaction Fee			
Name:	Stripe	10/11/2024	$0.78	$72.86
Address:	3180 18th St, San Francisco, CA 94110		Cash	
Category:	Administration - Bank fees/service charge			
Memo:	October Transaction Fee			
Total of Operating Expenses			$1.31	
Total of Refunds, Rebates, and Credits Received			$0.00	
Net Total of Operating Expenses			$1.31	

Exhibit 8B

State of Arizona

Campaign Finance Report

Anna Abeytia for State Representative - District 24
Committee #: 101577
Jurisdiction: Arizona Secretary of State

Treasurer: Jaramillo, Hector
5141 W Avalon Dr, Phoenix, AZ 85031
Phone: (480) 909-7030
Email: abeytiaforaz@gmail.com
Candidate Name: Abeytia, Anna Lynn
Office Sought: State Representative - District 24

Amended 2024 Post-General Election (Q4)

Election Cycle:	**2024**
Date Filed:	April 21, 2025
Reporting Period:	October 20, 2024-December 31, 2024
Jurisdiction:	Arizona Secretary of State

Summary of Finances

Cash Balance at Beginning of Reporting Period:	$2,082.75
Total Cash Receipts this Reporting Period:	$0.00
Total Cash Disbursements this Reporting Period:	$0.38
Cash Balance at End of Reporting Period:	$2,082.37

Report ID: 305382

101577 Anna Abeytia for State Representative - District 24
Jurisdiction: Arizona Secretary of State

Amended Post-General Election (Q4)
Covers 10/20/2024 to 12/31/2024
Filed on 04/21/2025

Summary of Activity

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	$0.00	$0.00	$0.00	$0.00
Individual Contributions	C2	$0.00	$0.00	$0.00	$2,890.00
Contributions from Political Committees	C3a,b,c	$0.00	$0.00	$0.00	$0.00
Business Contributions	C4a,b,c	$0.00	$0.00	$0.00	$0.00
Small Contributions	C5	$0.00	$0.00	$0.00	$26.06
CCEC Funding and Matching	C6	$0.00	$0.00	$0.00	$52,933.00
Qualifying Contributions	C7	$0.00	$0.00	$0.00	$0.00
Loans Made to this Committee	L1	$0.00	$0.00	$0.00	$0.00
Other Receipts, including Interest and Dividends	R1	$0.00	$0.00	$0.00	$0.00
Transfers from Other Committees	T1	$0.00	$0.00	$0.00	$0.00
Cash Surplus from Previous Committee	S1	$0.00	$0.00	$0.00	$0.00
Total Income		$0.00	$0.00	$0.00	$55,849.06

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	$0.38	$0.00	$0.38	$53,766.69
Independent & Ballot Measure Expenditures	E2a,b,c	$0.00	$0.00	$0.00	$0.00
Contributions to Committees/Businesses	E3a -E3f	$0.00	$0.00	$0.00	$0.00
Small Expenses	E4	$0.00	$0.00	$0.00	$0.00
Transfers to Other Committees	T1	$0.00	$0.00	$0.00	$0.00
Loans Made by This Committee	L2	$0.00	$0.00	$0.00	$0.00
Disposal of Surplus Cash	S1	$0.00	$0.00	$0.00	$0.00
Total Expenditures		$0.38	$0.00	$0.38	$53,766.69
Bill Payments for Previous Expenditures	D1	$0.00		$0.00	$0.00
Total Cash Disbursed		$0.38			

Schedule E1 - Operating expenses

		Date	Amount	Cycle To Date
Name:	ActBlue	10/30/2024	$0.38	$1.59
Address:	PO Box 962017, Boston, MA 02196		Cash	
Category:	Administration - Bank fees/service charge			
Memo:	October Transaction Fee			
Total of Operating Expenses			$0.38	
Total of Refunds, Rebates, and Credits Received			$0.00	
Net Total of Operating Expenses			$0.38	

Exhibit 8C

State of Arizona

Campaign Finance Report

Anna Abeytia for State Representative - District 24
Committee #: 101577
Jurisdiction: Arizona Secretary of State

Treasurer: Jaramillo, Hector
5141 W Avalon Dr, Phoenix, AZ 85031
Phone: (480) 909-7030
Email: abeytiaforaz@gmail.com
Candidate Name: Abeytia, Anna Lynn
Office Sought: State Representative - District 24

Amended 2024 Post-Primary Election (Q3)

Election Cycle:	**2024**
Date Filed:	April 21, 2025
Reporting Period:	July 14, 2024-September 30, 2024
Jurisdiction:	Arizona Secretary of State

Summary of Finances

Cash Balance at Beginning of Reporting Period:	$28,812.62
Total Cash Receipts this Reporting Period:	$21,209.06
Total Cash Disbursements this Reporting Period:	$47,937.62
Cash Balance at End of Reporting Period:	$2,084.06

Report ID: 305373

101577 Anna Abeytia for State Representative - District 24
Jurisdiction: Arizona Secretary of State

Amended Post-Primary Election (Q3)
Covers 07/14/2024 to 09/30/2024
Filed on 04/21/2025

Summary of Activity

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	$0.00	$0.00	$0.00	$0.00
Individual Contributions	C2	$10.00	$0.00	$10.00	$2,890.00
Contributions from Political Committees	C3a,b,c	$0.00	$0.00	$0.00	$0.00
Business Contributions	C4a,b,c	$0.00	$0.00	$0.00	$0.00
Small Contributions	C5	$26.06	$0.00	$26.06	$26.06
CCEC Funding and Matching	C6	$21,173.00	$0.00	$21,173.00	$52,933.00
Qualifying Contributions	C7	$0.00	$0.00	$0.00	$0.00
Loans Made to this Committee	L1	$0.00	$0.00	$0.00	$0.00
Other Receipts, including Interest and Dividends	R1	$0.00	$0.00	$0.00	$0.00
Transfers from Other Committees	T1	$0.00	$0.00	$0.00	$0.00
Cash Surplus from Previous Committee	S1	$0.00	$0.00	$0.00	$0.00
Total Income		$21,209.06	$0.00	$21,209.06	$55,849.06

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	$47,937.62	$0.00	$47,937.62	$53,765.00
Independent & Ballot Measure Expenditures	E2a,b,c	$0.00	$0.00	$0.00	$0.00
Contributions to Committees/Businesses	E3a -E3f	$0.00	$0.00	$0.00	$0.00
Small Expenses	E4	$0.00	$0.00	$0.00	$0.00
Transfers to Other Committees	T1	$0.00	$0.00	$0.00	$0.00
Loans Made by This Committee	L2	$0.00	$0.00	$0.00	$0.00
Disposal of Surplus Cash	S1	$0.00	$0.00	$0.00	$0.00
Total Expenditures		$47,937.62	$0.00	$47,937.62	$53,765.00
Bill Payments for Previous Expenditures	D1	$0.00		$0.00	$0.00
Total Cash Disbursed		$47,937.62			

Schedule C2 - Individual contributions

		Date	Amount	Cycle To Date
Name:	Kayashima, Akagi	07/16/2024	$10.00	$135.00
Address:	8690 Sierra College Blvd Suite 160 PMB 364, Roseville, CA 95661		Cash	
Occupation:	Not Employed, Not Employed			
Name:	Kayashima, Akagi	08/20/2024	$10.00	$135.00
Address:	8690 Sierra College Blvd Suite 160 PMB 364, Roseville, CA 95661		Cash	
Occupation:	Not Employed, Not Employed			
Name:	Kayashima, Akagi	09/06/2024	$(10.00)	$135.00
Address:	8690 Sierra College Blvd Suite 160 PMB 364, Roseville, CA 95661		Cash	
Occupation:	Not Employed, Not Employed			
Trans. Type:	Refunded Contribution			
Memo:	Refund			
Original Date:	08/20/2024			
Original Amount:	$10.00			
Total of Individual Contributions			$20.00	
Total of Refunds Given			($10.00)	
Net Total of Individual Contributions			$10.00	

Schedule In-State Contributions of $100 or Less

	Date	Amount	Cycle To Date
Name: Multiple Contributors **Address:**	07/30/2024	$26.06 Cash	$26.06
Total of Small Contributions		$26.06	
Total of Refunds Given		$0.00	
Net Total of Small Contributions		$26.06	

Schedule C6 - Clean Elections funding and matching

		Date	Amount	Cycle To Date
Name:	Citizens Clean Election Commission	08/02/2024	$21,173.00	$52,933.00
Address:	1616 W Adams, Suite 110, Phoenix, AZ 85007		Cash	
Trans. Type:	CCEC Funding Received			
Total of Funding Received from Clean Elections			$21,173.00	
Total of Funds Returned to Clean Elections			$0.00	
Net Total of Funding from Clean Elections			$21,173.00	

Schedule E1 - Operating expenses

		Date	Amount	Cycle To Date
Name:	Gumption Consulting LLC	07/15/2024	$20,000.00	$53,310.00
Address:	5141 W Avalon Dr, Phoenix, AZ 85031		Cash	
Category:	Professional Services - Consultants			
Name:	Gumption Consulting LLC	07/26/2024	$3,500.00	$53,310.00
Address:	5141 W Avalon Dr, Phoenix, AZ 85031		Cash	
Category:	Professional Services - Consultants			
Name:	Gumption Consulting LLC	07/29/2024	$3,500.00	$53,310.00
Address:	5141 W Avalon Dr, Phoenix, AZ 85031		Cash	
Category:	Professional Services - Consultants			
Name:	Stripe	07/30/2024	$1.23	$72.08
Address:	3180 18th St, San Francisco, CA 94110		Cash	
Category:	Administration - Bank fees/service charge			
Memo:	July Transaction Fee			
Name:	Gumption Consulting LLC	07/31/2024	$910.00	$53,310.00
Address:	5141 W Avalon Dr, Phoenix, AZ 85031		Cash	
Category:	Professional Services - Consultants			
Name:	ActBlue	08/01/2024	$0.53	$0.68
Address:	PO Box 962017, Boston, MA 02196		Cash	
Category:	Administration - Bank fees/service charge			
Memo:	July Transaction Fee			
Name:	Quick Trip	08/01/2024	$25.26	$25.26
Address:	8045 N 51st Ave , Glendale, AZ 85301		Cash	
Category:	Event Expenses - Food/refreshments			
Memo:	Water, Gatorade for election day canvassing			
Name:	Gumption Consulting LLC	08/29/2024	$20,000.00	$53,310.00
Address:	5141 W Avalon Dr, Phoenix, AZ 85031		Cash	
Category:	Administration - Payroll			
Name:	Stripe	08/30/2024	$0.45	$72.08
Address:	3180 18th St, San Francisco, CA 94110		Cash	
Category:	Administration - Bank fees/service charge			
Memo:	August Transaction Fee			
Name:	ActBlue	09/01/2024	$0.15	$0.68
Address:	PO Box 962017, Boston, MA 02196		Cash	
Category:	Administration - Bank fees/service charge			
Memo:	August Transaction Fee			
Total of Operating Expenses			$47,937.62	
Total of Refunds, Rebates, and Credits Received			$0.00	
Net Total of Operating Expenses			$47,937.62	

Exhibit 8D

State of Arizona

Campaign Finance Report

Anna Abeytia for State Representative - District 24
Committee #: 101577
Jurisdiction: Arizona Secretary of State

Treasurer: Jaramillo, Hector
5141 W Avalon Dr, Phoenix, AZ 85031
Phone: (480) 909-7030
Email: abeytiaforaz@gmail.com
Candidate Name: Abeytia, Anna Lynn
Office Sought: State Representative - District 24

2024 General Recap Report

Election Cycle:	**2024**
Date Filed:	April 21, 2025
Reporting Period:	October 20, 2024-November 5, 2024
Jurisdiction:	Arizona Secretary of State

Summary of Finances

Cash Balance at Beginning of Reporting Period:	$2,082.75
Total Cash Receipts this Reporting Period:	$0.00
Total Cash Disbursements this Reporting Period:	$0.38
Cash Balance at End of Reporting Period:	$2,082.37

Report ID: 296247

101577 Anna Abeytia for State Representative - District 24
Jurisdiction: Arizona Secretary of State

General Recap Report
Covers 10/20/2024 to 11/05/2024
Filed on 04/21/2025

Summary of Activity

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	$0.00	$0.00	$0.00	$0.00
Individual Contributions	C2	$0.00	$0.00	$0.00	$2,890.00
Contributions from Political Committees	C3a,b,c	$0.00	$0.00	$0.00	$0.00
Business Contributions	C4a,b,c	$0.00	$0.00	$0.00	$0.00
Small Contributions	C5	$0.00	$0.00	$0.00	$26.06
CCEC Funding and Matching	C6	$0.00	$0.00	$0.00	$52,933.00
Qualifying Contributions	C7	$0.00	$0.00	$0.00	$0.00
Loans Made to this Committee	L1	$0.00	$0.00	$0.00	$0.00
Other Receipts, including Interest and Dividends	R1	$0.00	$0.00	$0.00	$0.00
Transfers from Other Committees	T1	$0.00	$0.00	$0.00	$0.00
Cash Surplus from Previous Committee	S1	$0.00	$0.00	$0.00	$0.00
Total Income		$0.00	$0.00	$0.00	$55,849.06

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	$0.38	$0.00	$0.38	$53,766.69
Independent & Ballot Measure Expenditures	E2a,b,c	$0.00	$0.00	$0.00	$0.00
Contributions to Committees/Businesses	E3a -E3f	$0.00	$0.00	$0.00	$0.00
Small Expenses	E4	$0.00	$0.00	$0.00	$0.00
Transfers to Other Committees	T1	$0.00	$0.00	$0.00	$0.00
Loans Made by This Committee	L2	$0.00	$0.00	$0.00	$0.00
Disposal of Surplus Cash	S1	$0.00	$0.00	$0.00	$0.00
Total Expenditures		$0.38	$0.00	$0.38	$53,766.69
Bill Payments for Previous Expenditures	D1	$0.00		$0.00	$0.00
Total Cash Disbursed		$0.38			

Schedule E1 - Operating expenses

		Date	Amount	Cycle To Date
Name:	ActBlue	10/30/2024	$0.38	$1.59
Address:	PO Box 962017, Boston, MA 02196		Cash	
Category:	Administration - Bank fees/service charge			
Memo:	October Transaction Fee			
Total of Operating Expenses			$0.38	
Total of Refunds, Rebates, and Credits Received			$0.00	
Net Total of Operating Expenses			$0.38	

Exhibit B

CITIZENS CLEAN ELECTIONS COMMISSION

Report on Agreed-Upon Procedures

Anna Abeytia
Participating Candidate for
State Representative - District 24
General Election 2024

DRAFT

Independent Accountants' Report on
Applying Agreed-Upon Procedures

To the Chairman and Members of the
Citizens Clean Elections Commission
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Anna Abeytia's (the Candidate)'s 2024 Post-Primary Election (Q3), 2024 Pre-General Election, and 2024 General Recap Report (the Reports) which covers the period from July 14, 2024 through November 5, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Anna Abeytia. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

Report Date, 2025

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Summary of Procedures and Findings

1. Preliminary Procedures

   a) Contractor will obtain a copy of the candidate's campaign finance reports for the reporting period.

   Finding
   We obtained the Candidate's Reports from the Arizona Secretary of State's website for the reporting period referred to above.

   b). Perform a desk review of the disbursements reported in the candidate's campaign finance reports to identify any unusual items requiring follow-up during fieldwork.

   Finding
   We noted no unusual disbursements during our review.

   d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

   Finding
   We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

2. Fieldwork Procedures

   a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 2024 General Recap Report.

   Finding
   Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

   b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

   Finding
   See comment in a) above.

   c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

   Finding
   The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

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(i) Review all bank statements from July 2024 through November 2024 (the reporting period) and perform the following:

- Select ten (10) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance reports.

  Finding
  We selected six deposits (total population tested) and nine withdrawals (total population tested) from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance reports.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the November 2024 bank statement and the 2024 General Recap Report.

  Finding
  The Candidate's 2024 General Recap Report campaign finance report listed a balance of $2,082.37 at November 5, 2024. The Candidate's campaign bank account statement listed a balance of $1,197.37 at November 30, 2024.

d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

(i) The candidate accepted contributions only from individuals.

Finding
The contributions received during the reporting period appeared to be only from individuals.

(ii) None of the contributions received from individuals exceed the early contribution limit.

Finding
Contributions received from individuals during the reporting period did not exceed the $210 early contribution limit.

(iii) Check compliance with the maximum early contribution limits.

Finding
Early contributions received during the reporting period did not exceed the $5,293 limit for a Legislative candidate.

(iv) Check compliance with the maximum personal contribution limits.

Finding
Personal contributions received during the reporting period did not exceed the $910 limit for a Legislative candidate.

DRAFT

e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of ten (10) contributions reported in the candidate's campaign finance report (not including the $5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than $100, which reflects the contributor's address, occupation and employer.

Finding
We reviewed the supporting documentation for two contributions (total population tested) reported in the Candidate's Campaign finance reports and determined the name of the contributors for the contributions was included on the support. For individuals who contributed over $50, we determined that the contributor's address, occupation, and employer were also included on the support.

(i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

Finding
No other types of cash receipts were reported in the Candidate's Campaign finance reports during the reporting period.

(ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

Finding
No in-kind contributions were reported in the Candidate's Campaign finance reports during the reporting period.

f) Contractor will judgmentally select ten (10) cash expenditures reported in the candidate's campaign finance reports and perform the following:

(i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

Finding
We reviewed ten expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

(ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

Finding
We reviewed ten expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance reports.

- Agree the amount of the expenditure to the campaign account bank statement.

Finding
We reviewed ten expenditures and agreed amounts to the Campaign account bank statements without exception.

DRAFT

(iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

Finding
We reviewed ten expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

  Finding
  Four of the expenditures we tested appeared to be for joint expenditures made in conjunction with other candidates, and it appeared that the amount paid represented the Candidate's proportionate share of the total cost.

g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of $1,800.

Finding
Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

(i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the $210 limit on petty cash expenditures.

Finding
Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

Finding
The Candidate did not report any debt on the Campaign Reports.

i) Based on a review of records provided under Preliminary Procedures 1(d):

(i) Identify records required under AA.C R2-20-703.01 respecting consultants.

Finding
We identified seventeen expenditures that related to consultants, see Appendix A.

(ii) Determine whether any payments to a consultant were performed consistent with the documentation.

Finding
All seventeen payments to a consultant tested appeared to be performed consistent with the documentation provided by the Candidate, see Appendix A.

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(iii) Determine whether any excess funds were returned to the candidate as required.

Finding
As of June 16, 2025, the Candidate has not returned any excess funds to the Commission.

(iv) Determine whether any subcontractors or vendors were employed by a consultant or agent of the candidate.

Finding
We reviewed all such invoices and determined that subcontractors and/or vendors were used by a consultant or agent of the candidate.

(v) Determine the amount of money paid to any subcontractor and vendor and the purpose of such payments.

Finding
Based on the documentation reviewed, $8,031.83 was paid to subcontractors and/or vendors, and related to palm cards, mailers, and postage.

(vi) Review all documents from Gumption Consulting and Ricardo Serna.

Finding
We reviewed all documents relating to seventeen expenditures paid to Gumption Consulting and Ricardo Serna, see Appendix A.

- Obtain and review the vendor contract or service agreement to understand the scope of work and deliverables.

  Finding
  There was no written contract or service agreement between the Candidate and the Gumption Consulting or Ricardo Serna.

- Review invoices and trace them to supporting documentation (e.g., time sheets, service reports, correspondence, deliverables).

  Finding
  We reviewed all invoices and traced them to the supporting documentation provided by the Candidate, Gumption Consulting, and Ricardo Serna, see Appendix A.

- Identify relevant personnel who could to confirm that services were received and performed satisfactorily.

  Finding
  We spoke to the Candidate and Ricardo Serna and both confirmed that services were received and performed satisfactorily.

.

- Inspect tangible evidence of service completion or delivery (e.g., reports, completed tasks, work logs, system logs).

  Finding
  We obtained and reviewed tangible evidence of service completion or delivery without exception.

DRAFT

- Reconcile dates of service on invoices with internal schedules, logs, or meeting minutes to verify timing and presence of vendor.

  Finding
  We reconciled dates of service on invoices with internal schedules, logs, or meeting minutes to verify timing and presence of the vendor, see Appendix A.

- Confirm receipt and use of deliverables or work product.

  Finding
  We confirmed receipt and use of the deliverables or work product.

j) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

Finding
We reported our findings to the Candidate and the Candidate responded with an acceptance of the report as presented.

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Anna Abeytia
Appendix A

Gumption invoice description	Date	Amount	Bank information	Date	Amount	State Report information	Date	Amount
Abeytia #1 Gumption Invoice	3/4/2024	$ 500.00	Zelle to Serna Ricardo	3/4/2024	$ 500.00	Gumption Consulting LLC	3/4/2024	$ 500.00
Abeytia #2 Gumption Invoice	4/26/2024	300.00	Zelle to Serna Ricardo	4/26/2024	300.00	Gumption Consulting LLC	4/26/2024	300.00
Abeytia #3 Gumption Invoice	6/11/2024	1,000.00	Zelle to Serna Ricardo	6/11/2024	1,000.00	Gumption Consulting LLC	6/11/2024	1,000.00
Abeytia #4 Gumption Invoice	7/11/2024	3,242.60	Zelle to Serna Ricardo	6/21/2024	100.00	Gumption Consulting LLC	6/21/2024	100.00
Abeytia #5 1_2 Gumption Invoice	7/18/2024	1,732.80	Zelle to Serna Ricardo	7/11/2024	3,500.00	Gumption Consulting LLC	7/11/2024	3,500.00
Abeytia #5 2_2 Gumption Invoice	7/18/2024	2,417.31	Check 12 paid to Serna	7/16/2024	20,000.00	Gumption Consulting LLC	7/15/2024	20,000.00
LD24 #1 12 Gumption Invoice	7/24/2024	703.95	Zelle to Serna Ricardo	7/26/2024	3,500.00	Gumption Consulting LLC	7/26/2024	3,500.00
LD24 #1 22 Gumption Invoice	7/24/2024	979.69	Zelle to Serna Ricardo	7/29/2024	3,500.00	Gumption Consulting LLC	7/29/2024	3,500.00
LD24 #2 12 Gumption Invoice	7/24/2024	703.95	Zelle to Serna Ricardo	7/31/2024	910.00	Gumption Consulting LLC	7/31/2024	910.00
LD24 #2 22 Gumption Invoice	7/24/2024	979.70	Payment made to Serna	8/29/2024	20,000.00	Gumption Consulting LLC	8/29/2024	20,000.00
Abeytia #6 Gumption Invoice	7/26/2024	12,000.00						
Abeytia #7 Gumption Invoice	7/28/2024	8,750.00						
Abeytia #11 Gumption Invoice	8/29/2024	8,000.00						
Abeytia #12 Gumption Invoice	8/29/2024	9,000.00						
Abeytia #13 Gumption Invoice	8/29/2024	3,000.00						
Grand Total		**$ 53,310.00**	**Grand Total**		**$ 53,310.00**	**Grand Total**		**$53,310.00**

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STATE OF ARIZONA

CITIZENS CLEAN ELECTIONS COMMISSION

In the Matter of: Hector Jaramillo Respondent	CEC RPO Jaramillo MUR 25-02 **Conciliation Agreement**

Pursuant to A.R.S. § 16-957(A) the Citizens Clean Elections Commission ("Commission") and Hector Jaramillo, (Hereinafter "Respondent") agree to enter into a public administrative settlement of this matter in the manner below.

1. On January 8, 2025, the Executive Director filed a complaint against Respondent alleging violations of the Citizens Clean Elections Act and Rules ('the Act") and providing notice that Respondent could be subject to a repayment order. Respondent did not respond to the Complaint, which included notice of the possible consequences of failing to respond. The Complaint is incorporated here and attached as Exbibit A.
2. On March 27 the Commission approved a Repayment Order requiring Respondent to repay the entire amount of primary funding provided by the Clean Elections Fund. That order is incorporated here and attached as Exhibit B. After the order, Respondent provided information to Commission auditors.
3. Respondent timely appealed to the Office of Administrative Hearings.
4. Respondent waives any right he may have under any law of this state or the United States, including the right to a hearing or appeal in this matter and his pending appeal, and agrees with the Commission to an informal settlement of this matter.

5. This Settlement Agreement concludes the Commission's investigation into the Respondent's conduct and constitutes the final penalties related to the investigation against the Respondent.

WHEREFORE, the Citizens Clean Elections Commission enters the following orders in lieu of any other action regarding this matter:

6. Respondent acknowledges that he faces fines as identified in Table 1 under A.R.S. § 16-942, and additional amounts for failure to abide by the Act by failing to respond to auditors and staff requests for information and failure to return monies to the fund under A.A.C. R2-
20-222.

7. The parties hereby agree to settle this matter on the following basis:

- Respondent shall pay a fine of $2,500. That fine shall be paid in installments of no less than $52 per month for 48 months beginning ~~October~~ November 1, 2025 with a final payment of the remaining balance due at the end of that period.
- Respondent shall amend his campaign finance reports to reflect the payments to her contractor identified in the audit report attached as Exhibit C and incorporated into this agreement.
- Respondent agrees not to seek or accept Clean Elections funding in any other election.

8. Upon Respondent's final payment and provided Respondent otherwise complies with the terms of this Conciliation Agreement, the Commission shall terminate proceedings related to MUR No. 25-01 and the repayment order and the matter shall be closed.

Table 1

Report	Days Late	Amount not reported	$420 (§ 16-942 doubled because 10 percent threshold exceeded not to exceed 2x amount not reported)
2024 - Pre-Primary Election	30 Days Late	51 dollars	Executive Director recommends waiver
2024 Qualifying Period Recap Report	234 Days Late	Total Cash Receipts this Reporting Period: $35,981.55 Total Cash Disbursements this Reporting Period: $33,260.35 Total: $69,241.90	30 x $420 $136,080
2024 Primary Recap report	227 Days Late	Total Cash Receipts this Reporting Period: $31,760.00 Total Cash	227 x $420 $95,340

		Disbursements this Reporting Period: $30,000.00 Total: $61,760.00	

Because candidate did not qualify for the general election, Executive Director elects not to pursue penalties for reports after the primary.

10 percent of the 2023-2024 adjusted primary limit (16-952 one-party dominant)

$3,176

10 percent of the 2023-2024 adjusted general limit (16-952 one-party dominant)

$2,117

9. The parties hereby agree to settle this matter on the following basis:

10. A default by Respondent with respect to this Conciliation Agreement shall make a penalty of $231,420 less any amounts previously paid by Respondent pursuant hereto, immediately due and payable by Respondent to the Citizens Clean Elections Fund.

11. All payments shall be made by check or money order payable to the Citizens Clean Elections Fund and delivered to the Citizens Clean Elections Commission, 1110 W. Washington St., Suite 250, Phoenix, Arizona, 85007.

12. Respondent shall be in default of this Agreement upon failure to comply with Paragraph 6 of this Agreement and any of the following:

- Respondent fails to make any payment required hereunder within five (5) working days following the date due;
- Respondent files a petition under the bankruptcy laws, or any creditor of the Respondent files any petition under said laws against the Respondent;

- Any creditor of Respondent commences a foreclosure action to foreclose (by suit or trustee sale) on real property of the Respondent, or commences garnishment, attachment, levy or execution against the Respondent's property;
- Respondent provided false information to the Commission; or
- Respondent fails to abide by any provision of this agreement.

13. Interest shall accrue and becomes immediately payable on any amount that remains unpaid thirty days after a default occurs. Interest shall accrue at the statutory rate of prime plus one (1) percent (8.5%) pursuant to A.R.S. § 44-1201(A).

14. Nothing contained in this Agreement shall be construed to prevent any state agency which issues licenses for any profession from requiring that the debt in issue be paid in full before said agency will issue Respondent a new license.

15. The Commission may waive any condition of default without waiving any other condition of default and without waiving its rights to full, timely future performance of the conditions waived.

16. In the event legal action is necessary to enforce collection hereunder, Respondent shall additionally pay all costs and expenses of collection, including without limitation, reasonable attorneys' fees in an amount equal to thirty-five percent (35%) of monies recovered.

17. Respondent acknowledges that all obligations payable pursuant to this Agreement constitute a fine, penalty, or forfeiture payable to and for the benefit of a governmental unit, not compensation for actual pecuniary loss, and that pursuant to 11 U.S.C. § 523 such obligations are not subject to discharge in bankruptcy.

18. This Agreement shall be construed under the laws of the State of Arizona.

19. In the event that any paragraph or provision hereof shall be ruled unenforceable, all other provisions hereof shall be unaffected thereby.

20. This Agreement shall constitute the entire agreement between the parties regarding the subject matter. This Agreement shall not be modified or amended except in a writing signed by all parties hereto.

21. This Agreement shall not be subject to assignment.

22. No delay, omission or failure by the Commission to exercise any right or power hereunder shall be construed to be a waiver or consent of any breach of any of the terms of this Agreement by the Respondent.

23. By entering into this Agreement, the Respondent does not waive any rights, claims, defenses or arguments in any subsequent proceeding before the Commission or any agency, court or other tribunal.

24. Respondent has obtained independent legal advice in connection with the execution of this Agreement or have freely chosen not to do so. Any rule construing this Agreement against the drafter is inapplicable and is waived.

25. Respondent consents to the dismissal of his pending appeal on a motion filed by the Commission's attorneys.

26. The Executive Director does not have express or implied authority to enter any agreement with Respondent. This agreement is not effective unless approved by the Commission.

Accordingly, the proceedings commenced by the Executive Director shall be terminated and the matter be closed upon payment of the civil penalties and other actions herein.

Dated this ___ day of September, 2025.

By: _____
, Executive Director

By: _____
, Respondent

Exhibit A

Thomas M. Collins
Executive Director

State of Arizona
Citizens Clean Elections Commission
1110 W. Washington St. - Suite 250 - Phoenix, Arizona 85007 - Tel (602) 364-3477 - Fax (602) 364-3487 - www.azcleanelections.gov

NOTICE OF COMPLAINT AND PRELIMINARY AUDIT REPORT AND RESPONSE OPPORTUNITY
Via Overnight Delivery and E-mail

January 8, 2025

Hector Jaramillo
6926 N 74th Ave
Glendale AZ 85303
Email: hec4az@gmail.com
Phone: (623) 986-4192

RE: CEC MUR 25-01

Dear Mr. Jaramillo,

This letter represents notice of a complaint against you by the Executive Director of the Arizona Citizens Clean Elections Commission and well as to provide you a copy of a preliminary audit report. You have an opportunity to respond to both as discussed below.

According the Arizona Campaign Finance Reporting System, you stopped filing periodic reports beginning with your qualifying period recap report. *See* Exhibit 1. Additionally, you have refused to participate in required auditing under the Citizens Clean Elections Act and Rules, as reflected in the attached report. *See* Exhibit 2.

The Clean Elections Act and Rules require participating candidates to file periodic reports of their campaign financial activities, conduct all activities through a single campaign account, ensure that funds are expended in accordance with the Act and Rules, and permit an audit to confirm compliance with those requirements.

Your failure to file campaign finance reports and failure to respond to a required audit logically support the conclusion you have acted knowingly in failing to meet these obligations. Indeed, the available records indicate your campaign ceased to provide any required financial information despite its legal obligations and the application for certification that you signed and filed. *See* Exhibit 3.

Campaign finance reports and audits are the primary mechanism by which Clean Elections ensures that you are abiding by the terms of the Act to which you have agreed.

The absence of proper reporting and ignoring the audit raises concerns that other important restrictions you agreed to as a participating candidate may not have been abided by.

Consequently, you and your campaign may be in violation of A.R.S. §§ 16-941(A)(1) (limiting contributions), -941(A)(2) (limiting personal expenditures), -941(A)(3)(primary spending limit), -941(A)(4) (general spending limit), -941(A)(5)(campaign accounts and return of monies) and -948 (campaign accounts).

Failure to file reports can lead to penalties under A.R.S. § 16-942 (including daily penalties of $210 per day for violations for failure to follow reporting requirements).

Additionally, reports help verify that you have properly returned monies as required by A.R.S. § 16-953 (relating to return of monies). The absence of the reports supports an inquiry into what monies ought to have been returned.

Absent reports, we also consider that you may have violated Ariz. Admin. Code R2-20-110 (participating candidates reporting requirements) and Ariz. Admin. Code R2-20-115(books and recordkeeping requirements) and have failed to establish that you have fulfilled your obligation to show compliance with Ariz. Admin. Code R2-20-702 (use of funds), Ariz. Admin. Code R2-20-702.01(use of assets), Ariz. Admin. Code R2-20-703(documentation of expenditures), Ariz. Admin. Code R2-20-703.01(consultants). Again, in each of these instances, absent reports and compliance with the audit requirements, we must consider these possible violations.

This is a serious matter. Violations of the above requirements can trigger penalties under A.R.S. §§ 16-942, -943, and -957, as well as Ariz. Admin. Code R2-20-222. Candidates can also be subjected to repayment under Ariz. Admin. Code R2-20-704. Additionally, "if the candidate fails to provide adequate office space, personnel or records, the Commission may seek judicial intervention to enforce the request or assess other penalties." Ariz. Admin. Code R2-20-403(C).

The Commission's rules provide that you "be afforded an opportunity to demonstrate that no action should be taken on the basis of a complaint by submitting, *within five days from receipt of a written copy of the complaint*, a letter or memorandum setting forth reasons why the Commission should take no action." Ariz. Admin. Code R2-20-205(A). Please respond to this notice and complaint by the close of business on January 16, 2025.

Additionally, if you have any response to the enclosed audit report you have 10 days to provide that response. Ariz. Admin. Code.R2-20-404(B).

Your response must be notarized, or the Commission will not consider it. Ariz. Admin. Code R2-20-205(C). Failure to respond to this complaint within five days may be viewed as an admission to the allegations. *Id.*

The rule states that we are to provide you with an advisement of Commission compliance procedures. Those procedures are set forth in Article 2 of the Commission's Rules (Arizona Administrative Code Sections R2-20-201 to R2-20-228). *See* Exhibit 4.

This matter is in the initial stages of review. A finding will be made only after the Commission has fully reviewed this matter. Please contact me if you have any questions at (602) 364-3477 or by e-mail at thomas.collins@azcleanelections.gov .

Sincerely,

S/Thomas M. Collins

Executive Director
Citizens Clean Elections Commission

Enclosures

Hector Jaramillo For State Representative - District 24

Transactions

Demographic Information

Filer Name:

Hector Jaramillo for State Representative - District 24

Status:

Active

Filer ID:

101580

Filer Type:

Candidate (participating in Clean Elections)

Registration Date:

02/04/2024

Last Amended Date:

02/04/2024

County:

Last Reported:

Mailing Address:

6926 N 74th Ave
Glendale AZ 85303
Email: hec4az@gmail.com
Phone: (623) 986-4192

Filer Address:

6926 N 74th Ave
Glendale AZ 85303

Chairman:

Serna, Ricardo

Treasurer:

Abeytia, Anna

Candidate:

Jaramillo, Hector
Email: treasury4azhec@gmail.com
Phone: (623) 986-4192

Designee:

Office Sought:

State Representative - District 24

Party Affiliation:

Reports Previously Filed

(Indicates Amended Reports Exist)

CSV | Print | Column visibility

Report Due Date		Date Filed	Report Name	Repo
11/12/2024		2024 - General Recap Report		51 Day(s) Late
10/26/2024		2024 - Pre-General Election		68 Day(s) Late Fines Due $1475.00
10/15/2024		2024 - Post-Primary Election (Q3)		79 Day(s) Late Fines Due $1750.00
08/12/2024		2024 - Primary Recap Report		143 Day(s) Late
08/05/2024		2024 - Qualifying Period Recap Report		150 Day(s) Late
07/20/2024	07/23/2024	2024 - Pre-Primary Election	PDF (https://seethemoney.az.gov/PublicReports/2024/4B3EE06B-DC6C-467F-BA31-2E840807D480.pdf)	3 Day(s) Late Fines Due $30.00
07/15/2024	07/15/2024	2024 - Quarter 2	PDF (https://seethemoney.az.gov/PublicReports/2024/ACF1ECCF-64CC-4025-803E-79E93EF12E3F.pdf)	On Time
06/24/2024	06/24/2024	2024 - Interim Report	PDF (https://seethemoney.az.gov/PublicReports/2024/FE8D9E67-7FDE-446E-A8FC-13CCBBA85637.pdf)	On Time
06/24/2024	06/24/2024	2024 - Interim Report	PDF (https://seethemoney.az.gov/PublicReports/2024/5B369055-7D52-4B3C-8C5B-13739971F4EB.pdf) (https://Seethemoney.az.gov/Reporting/AmendedReports/?CommitteeReportId=284106)	On Time
06/21/2024	06/21/2024	2024 - Interim Report	PDF (https://seethemoney.az.gov/PublicReports/2024/F3C9EF3E-A63B-455D-B470-26A4C65D074B.pdf) (https://Seethemoney.az.gov/Reporting/AmendedReports/?CommitteeReportId=284105)	On Time

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Paid for by the Arizona Secretary of State's Office and with Voter Approved Funding from the Clean Elections Fund

ADRIAN FONTES
SECRETARY OF STATE
STATE OF ARIZONA

;

CITIZENS CLEAN ELECTIONS COMMISSION

Report on Agreed-Upon Procedures

Hector Jaramillo
Participating Candidate for
State Representative - District 24
Primary Election 2024

FESTER & CHAPMAN PLLC
CERTIFIED PUBLIC ACCOUNTANTS

Independent Accountants' Report on
Applying Agreed-Upon Procedures

To the Chairman and Members of the
Citizens Clean Elections Commission
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Hector Jaramillo's (the Candidate)'s 2024 Qualifying Period Recap (QPR) Report which covers the period from August 1, 2023 through July 30, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Hector Jaramillo. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

Fester & Chapman, PLLC

December 9, 2024

Address • 9019 East Bahia Drive Suite 100 • Scottsdale, AZ 85260 | **Phone** • (602) 264-3077 | **Fax** • (602) 265-6241

Summary of Procedures and Findings

1. Preliminary Procedures

   a) Contractor will obtain a copy of the candidate's campaign finance report for the reporting period.

   Finding
   We reached out to Hector Jaramillo (the Candidate) via email on August 7, 2024, and again on August 21, 2024; neither of which received a response. On September 18, 2024, we called the number listed on the Candidate's campaign finance report and left a message, again not receiving any type of response. We called again on October 2, 2024 and spoke to someone, who did not identify themselves. We introduced ourselves and said that we were calling about the Clean Elections audit, but the individual said they were in a meeting and would call back soon. We never received a call back. On October 22, 2024, Mike Becker with Arizona Citizens Clean Elections Commission reached out to the Candidate's Treasurer. The Candidate's Treasurer spoke with Mike and said that the Candidate would meet with the campaign manager that night and the provide us with the information that was requested. That was the last time we heard from anyone associated with the Candidate. It should also be noted that the Candidate never filed their Qualifying Period Recap Report with the Arizona Secretary of State and as such, does not show up on the See The Money website (https://seethemoney.az.gov/). Therefore, we are unable to review any of the expenses, contributions, or perform any other procedure as required for our testing of the Candidate's Clean Elections funding.

   b). Perform a desk review of the disbursements reported in the candidate's campaign finance report to identify any unusual items requiring follow-up during fieldwork.

   Finding
   We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

   d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

   Finding
   We attempted to contact the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed as described in step 1.a)., but we were unable to communicate with the Candidate.

2. Fieldwork Procedures

   a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 4th Quarter Report.

   Finding
   Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate through a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

Finding
See comment in a) above.

c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

Finding
We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

(i) Review bank statements one month prior to the election date (beginning on the first of the month), the month including the election day, and one month after the election day (ending on the last of the month) in the reporting period and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance report.

  Finding
  We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the July 2024 bank statement and the 2024 Qualifying Period Recap Report.

  Finding
  We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

(i) The candidate accepted contributions only from individuals.

Finding
We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

(ii) None of the contributions received from individuals exceed the early contribution limit.

Finding
We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

(iii) Check compliance with the maximum early contribution limits.

Finding
We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

(iv) Check compliance with the maximum personal contribution limits.

Finding
We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the $5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than $100, which reflects the contributor's address, occupation and employer.

Finding
We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

(i) For other types of cash receipts reported on the candidate's campaign finance report, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

Finding
We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

(ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

Finding
We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance report and perform the following:

(i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance report.

Finding
We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

(ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance report.

Finding
We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

- Agree the amount of the expenditure to the campaign account bank statement.

  Finding
  We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

(iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

Finding
We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

  Finding
  We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of $1,800.

Finding
We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

(i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the $210 limit on petty cash expenditures.

Finding
We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

Finding
We were unable to establish communication with the Candidate; and as such, did not receive any items from the Candidate. As a result, we were unable to perform the test described above.

i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

Finding
We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

0000562081

☐ Initial Application
☐ Amended Application

STATE OF ARIZONA
APPLICATION FOR CERTIFICATION AS A PARTICIPATING CANDIDATE

FILED
JUN 24 2024
ARIZONA SECRETARY OF STATE

Pursuant to Arizona Revised Statutes §§16-947 and 948 and AAC R2-20-104 (D)

COMMITTEE ID NUMBER
101580

NAME OF CANDIDATE **HECTOR JARAMILLO**			DATE **06/21/2024**	
OFFICE SOUGHT **STATE REPRESENTATIVE - DISTRICT 24**	PARTY AFFILIATION	ELECTION CYCLE **2024**		
CANDIDATE'S ADDRESS **6926 N 74TH AVE**		CITY **GLENDALE**	STATE **AZ**	ZIP **85303**
CANDIDATE'S TELEPHONE # **(623) 986-4192**	CANDIDATE'S FAX #	CANDIDATE'S EMAIL ADDRESS **TREASURY4AZHEC@GMAIL.COM**		
NAME OF POLITICAL COMMITTEE **HECTOR JARAMILLO FOR STATE REPRESENTATIVE - DISTRICT 24**				
COMMITTEE ADDRESS **6926 N 74TH AVE**		CITY **GLENDALE**	STATE **AZ**	ZIP **85303**
COMMITTEE MAILING ADDRESS (if different from above) **6926 N 74TH AVE**		CITY **GLENDALE**	STATE **AZ**	ZIP **85303**
COMMITTEE TELEPHONE # **(623) 986-4192**	COMMITTEE FAX #	COMMITTEE EMAIL ADDRESS **HEC4AZ@GMAIL.COM**		
~~NAME OF DESIGNATED INDIVIDUAL WITH AUTHORITY TO WITHDRAW FUNDS (IF APPLICABLE) (A.R.S. §16-948)~~				
~~DESIGNATED INDIVIDUAL'S ADDRESS~~		CITY	STATE	ZIP
~~DESIGNATED INDIVIDUAL'S TELEPHONE #~~	~~DESIGNATED INDIVIDUAL'S FAX #~~	DESIGNATED INDIVIDUAL'S EMAIL		
LIST THE NAME OF THE FINANCIAL INSTITUTION FROM WHICH THE CANDIDATE AND THE DESIGNATED INDIVIDUAL WILL CONDUCT ALL FINANCIAL ACTIVITY FOR THE CANDIDATE'S CAMPAIGN COMMITTEE (Do not list account numbers). (A.R.S. §16-948(A))				
NAME OF FINANCIAL INSTITUTION **MARISOL**				

DESIGNATED CANDIDATE'S STATEMENT (if applicable) **(A.R.S. §16-948(B)): I hereby designate_____ as my duly authorized Designated Individual, with the authority to withdraw funds and make expenditures from my campaign account on my behalf.**

Candidate's Signature

Date 6/24/24

Office Revision 9/07

Committee ID:	101580
Date:	06/21/2024
Form ID:	0000562081

Application for Certification – Part II

CANDIDATE AND DESIGNATED INDIVIDUAL'S STATEMENT (*A.R.S. §16-947*):
I, the undersigned, upon my oath and under penalty of perjury, certify that the following statements are true and accurate to the best of my knowledge and belief:

1. I have complied with the restrictions of A.R.S. §16-941 (A) during the election cycle to date, which are as following:
   a) Not accepted contributions other than early contributions as specified in A.R.S. §16-945;
   b) Not made expenditures that exceed the candidate's personal money limit; and
   c) Conducted all financial activity through a single campaign account.
2. I will continue to comply with the restrictions in paragraph 1 during the remainder of the election cycle and will:
   a) Not make expenditures in the primary election period in excess of the adjusted primary election spending limit;
   b) Not make expenditures in the general election period in excess of the adjusted general election spending limit; and
   c) Return unused monies to the fund in accordance with A.R.S. § 16-953.
3. I have filed all campaign finance reports required under Title16, Chapter 6, Article I, during the election cycle to date, and the reports are complete and accurate.
4. I agree to use all Clean Election funding for direct campaign purposes only.
5. I will file, with this application, a campaign finance report showing all campaign activity to date in the current election cycle.
6. I will comply with all requirements of the Act and Commission rules.
7. I am subject to all enforcement actions by the Commission as authorized by the Act and Commission rules.
8. I have the burden of proving that expenditures made by or on behalf of the candidate were for direct campaign purposes.
9. I will keep and furnish to the Commission all documentation relating to expenditures, receipts, funding, books, records (including bank records for all accounts), and supporting documentation and other information that the Commission may request in accordance with Commission rules.
10. I will permit an audit and examination of all receipts and expenditures including those made by the candidate, the candidate's authorized committee, or any agent or person authorized to make expenditures on behalf of the candidate or committee. The candidate and the candidate's authorized committee shall also provide any material required in connection with an audit, investigation, or examination conducted by the Commission. The candidate and authorized committee shall facilitate the audit and examination and shall pay any amounts required to be repaid.
11. I will submit the name and mailing address of the person who is entitled to receive equalizing fund payments on behalf of the candidate and the name and address of the campaign depository designated by the candidate. Changes in the information required by this paragraph shall not be effective until submitted to the Commission in a letter signed by the candidate or the committee treasurer.
12. I will pay any civil penalties included in a conciliation agreement or otherwise imposed against the candidate.
13. I will file all campaign finance reports with the Secretary of State in an electronic format in a timely manner.

State of Arizona)
County of Maricopa)) ss.

Candidate's Signature

SUBSCRIBED AND SWORN TO before me this 24th day of June 20 24.

Notary Public

State of Arizona)
County of_____)) ss.

Designated Individual's Signature

SUBSCRIBED AND SWORN TO before me this_____day of_____20_____.

Notary Public

MARYN R. HERBERG
Notary Public - State of Arizona
MARICOPA COUNTY
Commission # 649487
Expires July 2, 2027

Thomas M. Collins
Executive Director

State of Arizona
Citizens Clean Elections Commission

1110 W. Washington St. - Suite 250 - Phoenix, Arizona 85007 - Tel (602) 364-3477 - Fax (602) 364-3487 - www.azcleanelections.gov

March 27, 2025

Via Overnight Mail and E-Mail

Hector Jaramillo
6926 N 74th Ave
Glendale AZ 85303
Email: hec4az@gmail.com
Phone: (623) 986-4192

Dear Mr. Jaramillo,

Attached is a repayment order signed by the Commission today.

You may "dispute[] the Commission's repayment determination, [by] request[ing] an administrative appeal of the determination in accordance with A.R.S. § 41-1092 et. seq." Ariz. Admin. Code § R2-20-704(D)(2). Please consult those legal provisions regarding your rights.

Sincerely

S/Thomas M. Collins
Executive Director

Enclosure

Exhibit B

" FINAL "

Final 3-27

STATE OF ARIZONA

CITIZENS CLEAN ELECTIONS COMMISSION

In the Matter of: Hector Jaramillo, Respondent	**Repayment Order (RO25-01)**

Pursuant to ARS § 16-956(A)(7) (providing that the Commission shall "[e]nforce this article, ensure that money from the fund is placed in candidate campaign accounts or otherwise spent as specified in this article and not otherwise, monitor reports filed pursuant to this chapter and financial records of candidates as needed and ensure that money required by this article to be paid to the fund is deposited in the fund.") and Ariz. Admin. Code §§ R2-20-702, R2-20-703 and R2-20-704 (providing for the repayment of funds), the Citizens Clean Elections Commission (the "Commission"), hereby orders Hector Jaramillo ("Respondent"), a participating candidate for Legislature in 2024, to repay the amount of $31,760. This order is effective upon approval of the Commission and is based on the following legal and factual reasons:

A. Respondent applied for certification as a participating candidate on June 24, 2024. Exhibit 1.

B. Respondent provided sufficient qualifying contributions to meet the statutory requirements for clean elections funding on July 22, 2024. Exhibit 2.

C. Respondent reallocated a portion of clean elections funding to the primary election period pursuant to A.R.S. § 16-952. Exhibit 3. Consequently, Respondent received $31,760 in clean elections funding. *Id.*

D. Respondent ceased filing periodic campaign finance reports after his pre-primary report on July 23, 2024. Exhibit 4. Consequently, Respondent has never reported the acceptance of the clean elections funding nor any expenditure of those funds.

E. Respondent ignored efforts to contact him made by Clean Elections designated auditors and Clean Elections staff members. Exhibit 5. As a result of Respondent's actions, the Clean Elections auditors were "unable to review any of the expenses, contributions, or perform any other procedure as required for our testing of the [Respondent's] Clean Elections funding." *Id.*

F. Respondent has provided no evidence funds were used for direct campaign expenses to the auditors or staff.

G. Respondent bears the burden of showing that expenditures of clean elections funding are for direct campaign purposes. Ariz. Admin. Code §§ R2-20-702, R2-20-703.

H. Respondent agreed to these conditions in his application for certification. Exhibit 1.

I. Respondent has not met his burden because he has failed to provide ~~to~~ documentation, failed to provide required reports and failed to respond~~ent~~ to staff and auditor's requests for information.

J. Because Respondent has provided no evidence regarding his use of clean elections funding the Commission orders repayment of the entire amount on the following two independent grounds:

a. Use of funds not for direct campaign expenses. Respondent had the burden of proving expenditures were for direct campaign purposes. Respondent has failed to any evidence clean elections funds were used for direct campaign expenses. Therefore, the Commission concludes that the funds were not used for direct campaign expenses and determines that the full amount of $31,760 must be returned. Ariz. Admin. Code § R2-20-704(B)(2).

b. Expenditures were not documented in accordance with campaign finance reporting requirements. Respondent has not provided ~~no~~ documentation of expenditures

~~has been provided~~ and has not filed ~~no~~ campaign finance reports relating to the funds. Therefore, the Commission determines the full amount of $31,760 must be returned. Ariz. Admin. Code § R2-20-704(B)(3).

WHEREFORE, the Commission enters the following orders in addition to any other action regarding this matter:

1. The Commission has jurisdiction over Respondent pursuant to A.R.S. § 16-956(A)(7) and the Arizona Administrative Code, Title 2, Chapter 20.
2. The Commission orders Respondent to repay $31,760 immediately.
3. All payments shall be made from Respondent's personal funds by check or money order payable to the Citizens Clean Elections Fund and delivered to the Citizens Clean Elections Commission, 1110 W. Washington St. Ste. 250, Phoenix, AZ 85007.
4. Interest shall accrue and becomes immediately payable on any amount that remains unpaid thirty days after the date of this Order. Interest shall accrue at the statutory rate of prime plus one (1) percent (8.5%) pursuant to A.R.S. § 44-1201(A).
5. This Order constitutes a fine, penalty, or forfeiture payable to and for the benefit of a governmental unit, and not compensation for actual pecuniary loss; and pursuant to 11 USC § 523 such obligations are not subject to discharge in bankruptcy.
6. In the event legal action is necessary to enforce collection hereunder, Respondent shall additionally pay all costs and expenses of collection, including without limitation, reasonable attorneys' fees ~~in an amount equal to thirty-five percent (35%) of monies recovered~~.
7. In the event that any paragraph or provision of this Order shall be ruled unenforceable, all other provisions hereof shall be unaffected thereby.
8. This Order does not prevent additional penalties against and repayments from Respondent.

9. If Respondent disputes the Commission's repayment determination, he may request an administrative appeal of the determination in accordance with A.R.S. § 41-1092, et. seq., Ariz. Admin. Code § R2-20-704(C)(2).

Dated this 27 day March 2025.

By: _____

Citizens Clean Elections Commission

Exhibit C

CITIZENS CLEAN ELECTIONS COMMISSION

Report on Agreed-Upon Procedures

Hector Jaramillo
Participating Candidate for
State Representative - District 24
Primary Election 2024

DRAFT

Independent Accountants' Report on
Applying Agreed-Upon Procedures

To the Chairman and Members of the
Citizens Clean Elections Commission
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Hector Jaramillo's (the Candidate)'s 2024 Qualifying Period Recap (QPR) Report which covers the period from August 1, 2023 through July 30, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Hector Jaramillo. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

Report Date, 2025

DRAFT

Summary of Procedures and Findings

1. Preliminary Procedures

   a) Contractor will obtain a copy of the candidate's campaign finance report for the reporting period.

   Finding
   We obtained the Candidate's QPR report from the Arizona Secretary of State's Website for the reporting period referred to above.

   b). Perform a desk review of the disbursements reported in the candidate's campaign finance report to identify any unusual items requiring follow-up during fieldwork.

   Finding
   We noted no unusual disbursements during our review.

   d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

   Finding
   We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

2. Fieldwork Procedures

   a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 4th Quarter Report.

   Finding
   Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

   b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

   Finding
   See comment in a) above.

   c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

   Finding
   The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

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(i) Review bank statements one month prior to the election date (beginning on the first of the month), the month including the election day, and one month after the election day (ending on the last of the month) in the reporting period and perform the following:

- Select ten (10) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance report.

  Finding
  We selected ten deposits and ten withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance report.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the July 2024 bank statement and the 2024 Qualifying Period Recap Report.

  Finding
  The Candidate's 2024 Qualifying Period Recap Report campaign finance report listed a balance of $2,721.20 at July 30, 2024. The Candidate's campaign bank account statement listed a balance of $3,680.93 at July 31, 2024.

d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

(i) The candidate accepted contributions only from individuals.

Finding
The contributions received during the reporting period appeared to be only from individuals.

(ii) None of the contributions received from individuals exceed the early contribution limit.

Finding
Contributions received from individuals during the reporting period did not exceed the $210 early contribution limit.

(iii) Check compliance with the maximum early contribution limits.

Finding
Early contributions received during the reporting period did not exceed the $5,293 limit for a Legislative candidate.

(iv) Check compliance with the maximum personal contribution limits.

Finding
Personal contributions received during the reporting period did not exceed the $910 limit for a Legislative candidate.

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e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of ten (10) contributions reported in the candidate's campaign finance report (not including the $5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than $100, which reflects the contributor's address, occupation and employer.

Finding
We reviewed the supporting documentation for ten contributions reported in the Candidate's Campaign finance reports and determined the name of the contributors for the contributions was included on the support. For individuals who contributed over $50, we determined that the contributor's address, occupation, and employer were also included on the support.

(i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

Finding
No other types of cash receipts were reported in the Candidate's Campaign finance reports during the reporting period.

(ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

Finding
No in-kind contributions were reported in the Candidate's Campaign finance reports during the reporting period.

f) Contractor will judgmentally select ten (10) cash expenditures reported in the candidate's campaign finance reports and perform the following:

(i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

Finding
We reviewed ten expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

(ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

Finding
We reviewed ten expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance reports.

- Agree the amount of the expenditure to the campaign account bank statement.

Finding
We reviewed ten expenditures and agreed amounts to the Campaign account bank statements without exception.

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(iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

Finding
We reviewed ten expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

  Finding
  Four of the expenditures we tested appeared to be for joint expenditures made in conjunction with other candidates, and it appeared that the amount paid represented the Candidate's proportionate share of the total cost.

g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of $1,800.

Finding
Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

(i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the $210 limit on petty cash expenditures.

Finding
Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

Finding
The Candidate did not report any debt on the Campaign Reports.

i) Based on a review of records provided under Preliminary Procedures 1(d):

(i) Identify records required under AA.C R2-20-703.01 respecting consultants.

Finding
We identified eleven expenditures that related to consultants, see Appendix A.

(ii) Determine whether any payments to a consultant were performed consistent with the documentation.

Finding
All eleven payments to a consultant tested appeared to be performed consistent with the documentation provided by the Candidate, see Appendix A.

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(iii) Determine whether any excess funds were returned to the candidate as required.

Finding
As of June 16, 2025, the Candidate has not returned any excess funds to the Commission.

(iv) Determine whether any subcontractors or vendors were employed by a consultant or agent of the candidate.

Finding
We reviewed all such invoices and determined that subcontractors and/or vendors were used by a consultant or agent of the candidate.

(v) Determine the amount of money paid to any subcontractor and vendor and the purpose of such payments.

Finding
Based on the documentation reviewed, $4,681,72 was paid to subcontractors and/or vendors, and related to palm cards, mailers, and postage.

(vi) Review all documents from Gumption Consulting and Ricardo Serna.

Finding
We reviewed all documents relating to eleven expenditures paid to Gumption Consulting and Ricardo Serna, see Appendix A.

- Obtain and review the vendor contract or service agreement to understand the scope of work and deliverables.

  Finding
  There was no written contract or service agreement between the Candidate and the Gumption Consulting or Ricardo Serna.

- Review invoices and trace them to supporting documentation (e.g., time sheets, service reports, correspondence, deliverables).

  Finding
  We reviewed all invoices and traced them to the supporting documentation provided by the Candidate, Gumption Consulting, and Ricardo Serna, see Appendix A.

- Identify relevant personnel who could to confirm that services were received and performed satisfactorily.

  Finding
  We spoke to the Candidate and Ricardo Serna and both confirmed that services were received and performed satisfactorily.

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- Inspect tangible evidence of service completion or delivery (e.g., reports, completed tasks, work logs, system logs).

  Finding
  We obtained and reviewed tangible evidence of service completion or delivery without exception.

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- Reconcile dates of service on invoices with internal schedules, logs, or meeting minutes to verify timing and presence of vendor.

  Finding
  We reconciled dates of service on invoices with internal schedules, logs, or meeting minutes to verify timing and presence of the vendor, see Appendix A.

- Confirm receipt and use of deliverables or work product.

  Finding
  We confirmed receipt and use of the deliverables or work product.

j) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

Finding
We reported our findings to the Candidate and the Candidate responded with an acceptance of the report as presented.

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Hector Jaramillo
Appendix A

Gumption invoice description	Date	Amount	Bank information	Date	Amount	State Reporting information	Date	Amount
Jaramillo #1	4/18/2024	$ 300.00	Cash withdrawal	4/26/2024	$ 300.00	Gumption Consulting LLC	4/18/2024	$ 300.00
Jaramillo #2 Gumption Invoice	5/1/2024	530.00	Cash withdrawal	5/2/2024	530.00	Gumption Consulting LLC	5/2/2024	530.00
Jaramillo #3 Gumption Invoice	7/17/2024	1,200.00	Check	7/17/2024	1,200.00	Gumption Consulting LLC	7/17/2024	1,200.00
Jaramillo #4 12 Gumption Invoice	7/24/2024	1,407.90	Check	7/25/2024	30,000.00	Gumption Consulting LLC	7/25/2024	30,000.00
Jaramillo #4 22 Gumption Invoice	7/24/2024	1,959.39						
LD24 #1 12 Gumption Invoice	7/24/2024	703.95						
LD24 #1 22 Gumption Invoice	7/24/2024	979.69						
LD24 #2 12 Gumption Invoice	7/24/2024	703.95						
LD24 #2 22 Gumption Invoice	7/24/2024	979.70						
Jaramillo #5 Gumption Invoice	7/26/2024	12,000.00						
Jaramillo #6 Gumption Invoice	7/30/2024	8,750.00						
Jaramillo #7 Gumption Invoice	7/30/2024	2,515.42						
Grand Total		**$ 32,030.00**	**Grand Total**		**$ 32,030.00**	**Grand Total**		**$ 32,030.00**

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