



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

Location: **Citizens Clean Elections Commission** ***REVISED***

1110 W. Washington, Suite 250

Phoenix, Arizona 85007

Date: **Thursday, October 23, 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 October 23, 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@azcleelections.gov.

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

Join Zoom Meeting

<https://us02web.zoom.us/j/81670739400>

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Please note that members of the public that choose to use the Zoom video link must keep their microphone muted for the duration of the meeting. If a member of the public wishes to speak, they may use the Zoom raise hand feature and once called on, unmute themselves on Zoom once the meeting is open for public comment.

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 August 28, 2025, September 25, 2025 and October 7, 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 Seeking Public Comment Regarding Proposed Amendment to Ariz. Admin. Code R2-20-702 (Use of Funds) related to personal use, payments to candidates, vendors, and family or household members.

The Commission may discuss controls on candidate accounts and use of Clean Elections Funds (A.R.S. § 16-948, A.R.S. § 16-956(A)(7)) and may direct staff to research additional matters.

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

- VI. Discussion and Possible Action on Proposed Conciliation Agreement in MUR 24-05, Frank Roberts, 2024 legislative candidate.

- 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 21st day of October, 2025
Citizens Clean Elections Commission
Thomas M. Collins, Executive Director

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THE STATE OF ARIZONA
CITIZENS CLEAN ELECTIONS COMMISSION

REPORTER'S TRANSCRIPT OF PUBLIC MEETING

Phoenix, Arizona
August 28, 2025
10:50 a.m.

By: Kathryn A. Blackwelder, RPR
Certified Reporter
Certificate No. 50666

**CERTIFIED
TRANSCRIPT**

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1 PUBLIC MEETING BEFORE THE CITIZENS CLEAN 2 ELECTIONS COMMISSION convened at 10:50 a.m. on August 3 28, 2025, at the State of Arizona, Clean Elections 4 Commission, 1110 West Washington, Conference Room, 5 Phoenix, Arizona, in the presence of the following 6 Board Members: 7 8 Mr. Mark Kimble, Chairman 9 Mr. Galen Paton 10 Ms. Christina Werther 11 Mr. Steve Titla 12 Mr. Sam Crump 13 14 OTHERS PRESENT: 15 Thomas M. Collins, Executive Director 16 Paula Thomas, Executive Officer 17 Gina Roberts, Voter Education Director 18 Mary O'Grady, Osborn Maledon 19 Craig Morgan, Taft Law 20 Jessica Painter, KCA 21 22 23 24 25	1 Because of our technical problems that make 2 it impossible for us to livestream this meeting and 3 make it impossible for the public to participate, we're 4 going to recess the meeting until September. 5 MR. COLLINS: We'll have -- we'll have the 6 information on the September meeting available and 7 noticed at that time. 8 CHAIRMAN KIMBLE: We will post on our website 9 the date and time of our September meeting. And I 10 apologize for these problems, but there's nothing we 11 can do about it right now. 12 So I will call the roll on the motion to 13 adjourn until September. Commissioner Werther. 14 COMMISSIONER WERTHER: I'm sorry. Did you 15 need a motion or did you make the motion? Need me to 16 second or -- 17 CHAIRMAN KIMBLE: Go ahead and make the 18 motion, please, Commissioner Werther. 19 COMMISSIONER WERTHER: Okay. I make a motion 20 to adjourn. 21 CHAIRMAN KIMBLE: Until September? 22 COMMISSIONER WERTHER: Until September. 23 CHAIRMAN KIMBLE: Thank you. 24 Is there a second? 25 COMMISSIONER PATON: Second.
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1 P R O C E E D I N G 2 CHAIRMAN KIMBLE: Good morning. I apologize 3 for our late meeting. We're having some substantial 4 technical problems, but I'm going to call this meeting 5 to order. It's 10:00 a.m. on August 28th, 2025, and I 6 call the meeting of the Citizens Clean Elections 7 Commission to order. 8 With that, we'll take attendance. 9 Commissioners, please identify yourselves for the 10 record. 11 COMMISSIONER PATON: Galen Paton. 12 COMMISSIONER CRUMP: Sam Crump. 13 CHAIRMAN KIMBLE: Mark Kimble. We have a 14 quorum. 15 Because of the technical problems -- 16 MR. COLLINS: Are they here? If they're 17 there, we should get them... 18 CHAIRMAN KIMBLE: Commissioner Werther, are 19 you there? 20 COMMISSIONER WERTHER: Yes, I'm here. 21 CHAIRMAN KIMBLE: Okay. Commissioner Titla, 22 are you here? 23 COMMISSIONER TITLA: Here. 24 CHAIRMAN KIMBLE: Okay. Thank you. We have 25 all five Commission Members present.	1 CHAIRMAN KIMBLE: It's been moved and 2 seconded that we adjourn until September. I'll call 3 the roll. 4 Commissioner Werther. 5 COMMISSIONER WERTHER: Aye. 6 CHAIRMAN KIMBLE: Commissioner Titla. 7 COMMISSIONER TITLA: Aye. 8 CHAIRMAN KIMBLE: Commissioner Trump -- 9 Crump. 10 COMMISSIONER CRUMP: Aye. 11 CHAIRMAN KIMBLE: Commissioner Paton. 12 COMMISSIONER PATON: Aye. 13 CHAIRMAN KIMBLE: Chair votes aye. 14 We are adjourned until September. Thank you. 15 (The meeting concluded at 10:52 a.m.) 16 17 18 19 20 21 22 23 24 25

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1 STATE OF ARIZONA)
) ss.

2 COUNTY OF MARICOPA)

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4 BE IT KNOWN that the foregoing proceedings
5 were taken by me; that I was then and there a Certified
6 Reporter of the State of Arizona; that the proceedings
7 were taken down by me in shorthand and thereafter
8 transcribed into typewriting under my direction; that
9 the foregoing pages are a full, true, and accurate
10 transcript of all proceedings had and adduced upon the
11 taking of said proceedings, all to the best of my skill
12 and ability.

13

14 I FURTHER CERTIFY that I am in no way related
15 to nor employed by any of the parties hereto nor am I
16 in any way interested in the outcome hereof.

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18 DATED at Tempe, Arizona, this 1st day of
19 September, 2025.

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Kathryn A. Blackwelder, RPR
Certified Reporter #50666

1 10:00 3:5 2 2025 3:5 28th 3:5 A a.m. 3:5 adjourn 4:13,20 ahead 4:17 apologize 3:2 4:10 attendance 3:8 August 3:5 C call 3:4,6 4:12 CHAIRMAN 3:2,13,18, 21,24 4:8,17,21,23 Citizens 3:6 Clean 3:6 COLLINS 3:16 4:5 Commission 3:7,25 Commissioner 3:11,12, 18,20,21,23 4:13,14,18, 19,22,25 Commissioners 3:9 Crump 3:12 D date 4:9 E Elections 3:6 G Galen 3:11 Good 3:2	I identify 3:9 impossible 4:2,3 information 4:6 K Kimble 3:2,13,18,21,24 4:8,17,21,23 L late 3:3 livestream 4:2 M make 4:1,3,15,17,19 Mark 3:13 meeting 3:3,4,6 4:2,4,6,9 Members 3:25 morning 3:2 motion 4:12,15,18,19 N noticed 4:7 O order 3:5,7 P participate 4:3 Paton 3:11 4:25 post 4:8 present 3:25 problems 3:4,15 4:1,10 public 4:3 Q quorum 3:14	R recess 4:4 record 3:10 roll 4:12 S Sam 3:12 September 4:4,6,9,13, 21,22 substantial 3:3 T technical 3:4,15 4:1 time 4:7,9 Titla 3:21,23 W website 4:8 Werther 3:18,20 4:13,14, 18,19,22
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THE STATE OF ARIZONA
CITIZENS CLEAN ELECTIONS COMMISSION

REPORTER'S TRANSCRIPT OF PUBLIC MEETING

Phoenix, Arizona
September 25, 2025
10:00 a.m.

By: Kathryn A. Blackwelder, RPR
Certified Reporter
Certificate No. 50666

**CERTIFIED
TRANSCRIPT**

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1 PUBLIC MEETING BEFORE THE CITIZENS CLEAN 2 ELECTIONS COMMISSION convened at 10:00 a.m. on 3 September 25, 2025, at the State of Arizona, Clean 4 Elections Commission, 1110 West Washington, Conference 5 Room, Phoenix, Arizona, in the presence of the 6 following Board Members: 7 8 Mr. Mark Kimble, Chairman 9 Mr. Galen Paton 10 Ms. Christina Werther 11 Mr. Sam Crump 12 13 OTHERS PRESENT: 14 Thomas M. Collins, Executive Director 15 Paula Thomas, Executive Officer 16 Mike Becker, Policy Director 17 Gina Roberts, Voter Education Director 18 Avery Xola, Voter Education Manager 19 Alec Shaffer, Web Content Manager 20 Mary O'Grady, Osborn Maledon 21 Craig Morgan, Taft Law 22 Cathy Herring, Meeting Planner, KCA 23 Rivko Knox, Member of the Public 24 Zach Humphreys, Member of the Public 25 Allie Karpurk, Member of the Public	1 Commission? 2 COMMISSIONER CRUMP: No, Chairman. 3 Appreciate the welcome. Looking forward to working 4 with you all. 5 CHAIRMAN KIMBLE: Thank you very much, 6 Commissioner. 7 I also want to express gratitude to 8 Commissioner Amy Chan for her service to the 9 Commission. Commissioner Chan was an important voice 10 on regulatory and voter education issues. She brought 11 valuable perspective as a former State Election 12 Director and a long-time public lawyer. We will miss 13 Amy on the Commission. 14 Item II, discussion and possible action on 15 the minutes from the June 26th, 2025 meeting. 16 Commissioners, you have the minutes from our June 17 meeting in your packets. Is there -- are there any 18 discussion? 19 COMMISSIONER CRUMP: Mr. Chairman. 20 CHAIRMAN KIMBLE: Yes, Commissioner Crump. 21 COMMISSIONER CRUMP: I would only speak and 22 state that I think I'll abstain since I wasn't on the 23 Commission or present at that meeting, so I don't think 24 I really have standing to -- to approve or disapprove 25 the minutes.
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1 P R O C E E D I N G 2 CHAIRMAN KIMBLE: Good morning. Agenda Item 3 Number I is the call to order. It's 10:00 a.m. on 4 September 25th, 2025. I call this meeting of the 5 Citizens Clean Elections Commission to order. 6 With that, we will take attendance. 7 Commissioners, please identify yourselves for the 8 record. 9 COMMISSIONER PATON: Galen Paton. 10 COMMISSIONER WERTHER: Christina Werther. 11 CHAIRMAN KIMBLE: Commissioner Crump? 12 COMMISSIONER CRUMP: Sam Crump, present. 13 CHAIRMAN KIMBLE: Thank you. We have four of 14 the five Members of the Commission present. We have a 15 quorum. 16 Before we move to the next item, I would like 17 to welcome Commissioner Sam Crump. Commissioner Crump 18 was appointed by State Treasurer Kimberly Yee. He's a 19 former Mayor, a former State Lawmaker, and he now 20 practices law in Anthem. 21 I want to note that Commissioner Paton and I 22 continue to be badly outnumbered by lawyers on this 23 Commission, but we will do the best we can. 24 And Commissioner, welcome. And is there 25 anything you'd like to say as a new Member of the	1 CHAIRMAN KIMBLE: Okay. Commissioner Crump, 2 that makes sense. 3 If there's no other comments, do I have a 4 motion to approve the minutes? 5 COMMISSIONER WERTHER: I motion to approve 6 the minutes for June 26, 2025. 7 CHAIRMAN KIMBLE: We have a motion to approve 8 the minutes. Is there a second? 9 COMMISSIONER PATON: I'll second. 10 CHAIRMAN KIMBLE: I will call the roll. 11 Commissioner Paton. 12 COMMISSIONER PATON: Aye. 13 CHAIRMAN KIMBLE: Commissioner Werther. 14 COMMISSIONER WERTHER: Aye. 15 CHAIRMAN KIMBLE: Chair votes aye. 16 The minutes are approved 3-to-nothing with 17 one abstention. 18 We will catch up on approving the August 19 minutes, along with these minutes, at our next meeting. 20 Item III is discussion and possible action on 21 the Executive Director's Report. 22 Tom. 23 MR. COLLINS: Thank you, Commissioners. And 24 welcome, Commissioner Crump. We -- so far so good here 25 with the technology.

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1 I wanted to highlight a couple of things from 2 the report. The first thing I wanted to highlight -- 3 and I think if you have questions, you know, Gina might 4 be better to -- might have better answers on the 5 detailed questions. But we did film a -- well, we 6 didn't film it. We recorded a town hall on education 7 issues on September 13th and -- you know, and that 8 really was, we think, a great event and opportunity. 9 The idea behind this project is to, in 10 conjunction with our -- our debate program, is to -- is 11 to use the research that we do in developing the debate 12 program to try to bring some light to the issues that 13 voters find most important and provide a forum where 14 folks can have a good exchange of information and also 15 provide an opportunity for, we hope, voters not only to 16 learn about, you know, the things that folks are 17 learning -- are happening in education, but also some 18 practical information for them. 19 I mean, we had a really impressive roster of 20 folks who came and -- and were able to address, I 21 think, a wide range of issues from a variety of 22 different sides, and I think that was really 23 remarkable. I also, having -- you know, being there, 24 it was kind of interesting. A lot of these folks have 25 a lot of places they have to be, you know, and	1 Commission have questions about this specific item? 2 (No response.) 3 CHAIRMAN KIMBLE: Gina, congratulations. 4 This looks like it was a really outstanding program on 5 an issue that there's a lot of -- a lot of talk on. 6 But I know that this is a good way to shine some light 7 on it and get to some actual facts, so congratulations. 8 MS. ROBERTS: Thank you, Mr. Chairman. Thank 9 you. 10 CHAIRMAN KIMBLE: Galen, did you want to say 11 anything? 12 COMMISSIONER PATON: No, thank you. 13 CHAIRMAN KIMBLE: Okay. Tom. 14 MR. COLLINS: Okay. Election day for 15 Congressional District 7 was Tuesday. And I know it's 16 not canvassed yet, but I think it's, you know, fairly 17 clear that Adelita Grijalva won the election, so -- but 18 the winner of the election then serves in the -- out 19 the remainder of this term but then can run. And there 20 will be -- the cycle, you know, with all the other 21 congressional offices will be up in 2026. 22 And then in November we'll have a number of 23 different bond and override school district elections, 24 also there's a big bond election in Maricopa County. 25 And so Alec is working to update our website so we can
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1 everybody really was there for the whole entire 2 filming. 3 Because it takes a couple hours, you know, 4 you've got to get set up and, you know -- and people 5 stayed through everybody else's panels and kind of -- 6 kind of -- and so it was a -- so just the production 7 itself was, I thought, a really -- really good. And it 8 started to air -- it aired on -- not Wednesday -- I 9 think Tuesday night on Channel 8 here in Phoenix, and 10 we'll get more information on where it's airing as we 11 go along, you know. And, you know, so this was 12 really -- this was really great. 13 And our hope, as I say, is if we can continue 14 to -- you know, one of the issues with the voter 15 education program is, you know, how do we have 16 continuity across the nonelection year in relation to 17 issues that are, you know, the issues that voters and 18 candidates are going to be addressing in the -- in the 19 election year itself in a manner that is nonpartisan 20 and neutral, but also informative. So we were very 21 happy about that. 22 So if anyone has any questions on that, 23 obviously I'm happy to take them, and I don't know if 24 there are any. 25 CHAIRMAN KIMBLE: Any Members of the	1 continue to be -- you know, have our website be the 2 one-stop shop that we want it to be for voters. 3 I wanted to also mention, you know, we had a 4 full range of activities for National Voter 5 Registration Day. Avery was at Scottsdale Community 6 College, and that was great. I got to drop by there 7 and, I think, you know, it was -- it was -- I mean, you 8 know, people were engaged with Captain Activate and it 9 was -- they had a really good event. And he was 10 then -- he was up in Flagstaff for Constitution Day 11 and, you know -- and then we did a special edition of 12 our -- of our podcast around National Voter 13 Registration Day. 14 So, you know, I thought that was all -- I 15 mean, that was all really, really good. And I think 16 this month, you know, between Avery and Gina, they've 17 been all -- you know, in a bunch of different places. 18 You know, the Tolleson event, we have some photos if we 19 could -- if anybody would want -- you know, from that. 20 That was -- and I don't know if Avery or Gina would 21 want to add anything, but this was a really neat event 22 where they have basically every high school student in 23 Tolleson School -- School District comes to the stadium 24 to sort of get them engaged around what their 25 post-high-school life will be, and obviously we want

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1 civics -- civic engagement and voting to be part of 2 that. 3 So, Mr. Chairman, I don't know if -- if 4 you -- if Gina had anything she wanted to add about 5 that or Avery. I don't know if they want to... 6 CHAIRMAN KIMBLE: Gina, anything you want to 7 add? 8 MS. ROBERTS: Sure. Mr. Chairman, 9 Commissioners, it was a really phenomenal event, and I 10 applaud the School District for putting together 11 something like this. They referred to it as Commitment 12 Day. So it was, you know, what is your plan, as a 13 senior, for, you know, post-secondary education or 14 careers, you know, whether it's looking at something 15 technical, you know, four-year, two-year, or you're 16 going straight into the workforce, are you enlisting. 17 And so it was held down at the Cardinals 18 Stadium, and they had a lot of folks show up to table 19 to talk about careers that you could have, everything 20 from -- I think we saw, you know, beauticians and, you 21 know, cosmetic school to, you know, the sheriff's 22 office, things like that, and a lot of the colleges, 23 Honeywell, things like that. 24 So it was really great to be able to go and 25 talk to students about, one, you could possibly have a	1 was a great opportunity for us to reach such a wide 2 amount of students. 3 CHAIRMAN KIMBLE: Thank you, Gina. 4 Avery, do you have anything you want to add 5 on your behalf or on Captain Activate's behalf? No? 6 Okay. Tom. 7 MR. COLLINS: Okay. So yeah. So I want 8 to -- I want to touch on some sort of bureaucratic 9 items too, because I can't help myself. You know, the 10 Secretary of State's Office had a statement out about 11 security expenditures in campaign finance. You know, 12 what I've quoted there is the guts of that statement, 13 you know. 14 And I think what the Secretary's Office is 15 saying is basically if you're spending money on 16 security, however you do it, it's probably okay. 17 There's some -- you know, it's a little -- it's a 18 little -- and that's part of the reason why, you know, 19 we've sort of concluded we wouldn't need to take any 20 additional action to sort of, you know, have a position 21 on this particular statement. 22 I mean, technically there's some language in 23 here that's a little -- and I think it was maybe 24 because of the informality of it, it's a little -- it's 25 got some technical things that I -- that, for Clean
Page 11	Page 13
1 career in election administration. You know, we need 2 more people coming into this workforce to be able to 3 conduct elections, and it's maybe something that most 4 folks don't think about. And we also got to talk about 5 being a poll worker. So even if you're not looking for 6 a career in elections, we were encouraging our younger 7 adults to sign up and serve as a poll worker, and then 8 just speak to them overall about civic engagement. 9 They had about 11 schools throughout the 10 District show up. It was a two-day event and it was 11 really exciting. I'm sure -- I don't know if Avery 12 wants to chime in here, but I personally thought that 13 our booth was the best booth. We had a lot of turnout. 14 Some of our neighbors were like, wow, your booth is 15 really popular. 16 So it was great to see the excitement and the 17 engagement from the students and wanting to talk about 18 elections, about voter education. Captain Activate 19 made an appearance, so he was, you know, very well 20 received by the students and taking selfies and 21 encouraging them to come check out our booth. So it 22 was a great event. It would be great to see more 23 school districts do something like this to really 24 prepare their seniors for those next steps. And then 25 having the opportunity to talk to so many at once, it	1 Elections purposes and for campaign finances purposes 2 generally, I might want to be phrased a little more 3 tightly. 4 But generally speaking, I think what they're 5 saying is, if folks are spending money -- campaign 6 money on security services as part of their campaign, 7 that that would not give rise to a campaign finance 8 complaint. And certainly what our position is is that, 9 you know, we wouldn't need to adjust our rules to 10 address that kind of issue. And certainly if there are 11 Clean candidates specifically who have questions about 12 how they would handle that, we -- we are prepared to 13 deal with that. I think that -- but I do think it's 14 important for me to sort of just make you all aware of 15 developments in campaign finance enforcement matters. 16 There will also be this argument October 17 14th, which doesn't directly relate to us, but has to 18 do with the Election Procedures Manual, which is 19 essentially the rules that implement the statutes of -- 20 of principally ballot, handling ballots, handling voter 21 registration. There is a section there on campaign 22 finance, there's a couple of others -- I mean, it's a 23 very voluminous document. 24 The reason why I flag this is because the 25 issue in this -- in this case has to do with the

Page 14 1 procedural steps that you take to implement the EPM. 2 The statute that is -- the statute that creates the EPM 3 doesn't -- essentially says you have to give -- you 4 have to work with the County Recorders and I think 5 County -- and I think the Election Directors too, but 6 certainly the County Recorders to develop the document, 7 then it gets approved by the AG and the Governor. It 8 doesn't necessarily tell you what kind of notice you 9 have to give and it doesn't necessarily tell you what 10 other steps there are. 11 So the argument is that the Arizona 12 Procedures Act, which is something we've gotten more 13 familiar with since 2018 in the Clean Elections 14 context, might apply, and what that would do is 15 essentially create a more formal notice and comment 16 period for the Election Procedures Manual. 17 You know, so -- you know, so it matters 18 because we now pay more attention also to the APA stuff 19 and because, you know, to the extent that it would -- 20 you know, so it's - and to the extent that it would 21 result in some potential changes going forward in how 22 the EPM gets developed, I think it's worth being aware 23 of. 24 The other thing I wanted to -- I think -- I 25 think two other things I want to note. We did receive	Page 16 1 security spending by a candidate is inherently an 2 expenditure, because that means that they have to spend 3 the money out of their campaign funds, whether they're 4 private or Clean Elections candidates, right. So what 5 we would say is if it's a direct campaign expenditure, 6 it's a direct campaign expenditure. 7 I think the harder part here is -- for people 8 to deal with is not -- is the issue of what do you do 9 with security spending that you don't have campaign 10 funding for. In other words, most campaigns do not 11 have the money -- certainly they don't have it through 12 the Clean system, and the vast majority -- for example, 13 legislative campaigns even in the private system are 14 not raising enough money to pay the costs of any kind 15 of serious -- any kind of serious security, assessment 16 or on-site staff and those kind of things, because that 17 can get -- you know, I mean, we know from our 18 experience, I think, with the debates and such that 19 that can get pretty expensive pretty fast. 20 So the bigger question, I think, will be, in 21 the long run, what do you do with expenditure -- you 22 know, so you wouldn't want to classify every time a 23 candidate has a security person on site as that 24 necessarily being an expenditure, because then you 25 couldn't in-kind that because you'd be subject to the
Page 15 1 a positive -- or, at least a non-negative report from 2 the Auditor General's Office with respect to our -- 3 with respect to our accounting and our -- and our 4 controls, so that's good. And we really appreciate the 5 professional work that the Auditor General's Office and 6 the staff we worked with did there. And we have -- we 7 started participating candidate workshops. 8 So those are the main things that we wanted 9 to cover, and I'm happy to answer any questions anyone 10 has about -- about anything. 11 CHAIRMAN KIMBLE: Tom, I have one question 12 going back to the issue of campaign funds for security. 13 MR. COLLINS: Sure. 14 CHAIRMAN KIMBLE: So if a Clean candidate 15 spends Clean money for security, we're going to 16 consider that fine? 17 MR. COLLINS: Well, I think what we would -- 18 what we would do is say -- and I think that the e-mail 19 reflects this approach too, although -- that right now 20 those expenditures have to be for direct campaign 21 purposes, right, so essentially we would want a tie 22 between the campaign spending and not. 23 But there's a -- there's a -- because what 24 you don't want to end up with, I think, is that it's 25 inherent -- election spending by a candidate -- or,	Page 17 1 limits. So there's -- that's where kind of the issues 2 come in. 3 So I think that if a Clean Elections 4 candidate has an event that they want security at and 5 they want to spend Clean Elections money on that, I 6 think -- I think we would -- we would -- we would -- 7 that would not be a problem, and I don't think it would 8 have been a problem before either. 9 CHAIRMAN KIMBLE: Well, do you see a need to 10 define security or say these things are okay or -- like 11 what does security cover, I mean -- 12 MR. COLLINS: Right. Well -- 13 CHAIRMAN KIMBLE: -- someone -- a security 14 person at an event, but security services at a house, 15 alarm services, a car? I mean, do you see a need that 16 we're going to have to put some limits or definitions 17 on what security is? 18 MR. COLLINS: That's a good -- Mr. Chairman, 19 that's -- that's a good question. For present 20 purposes, I don't think so, because what we will 21 typically advise candidates to do on those kinds of 22 expenditures to begin with is if they -- is call us and 23 let's talk through the expenditure itself and so we can 24 give them a look-ahead on -- 25 For example, and this is a serious question

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1 we've gotten, which is: I can pay for travel expenses. 2 Can I buy a car? The answer to that is no. The answer 3 to that is no, because the predominant use of the car 4 is going to be -- you're going to own a car, right. 5 And so we have -- we have said, look, I mean, you can 6 do what you want, but our position as staff is going to 7 be that that's -- that that's beyond the scope of a 8 direct campaign expense. 9 And so we think we can handle those on an 10 ad hoc basis. Now, I think your questions on a policy 11 basis are -- are actually really important ones, and so 12 I think that the -- we have a whole legislative session 13 ahead of us, so I think that there's a possibility that 14 somebody will address this in a bill. 15 Because to me the bigger question is -- is 16 part your question, which is, you know, what qualifies 17 under this, and then, you know, B, who gets to pay for 18 it, right. Because if it's a campaign expenditure, 19 right, then that means that if a security company 20 in-kind that money -- you know, that service to you 21 as a candidate -- this is not a Clean versus 22 traditional issue, it's just a -- then that's a 23 corporation that is making an expenditure on your 24 behalf and that becomes an illegal contribution, right. 25 So that's -- so you're right, defining that	1 still pretty confident that we don't need to drill down 2 on that. Although, you know, if we start to get 3 questions that are -- that are more substantial, we 4 will certainly -- we haven't gotten any -- we've only 5 had one question, and it wasn't from a candidate 6 directly, so far, so -- and it was more general. So I 7 think as those specific instances come up we'll know 8 more. So that's kind of a long and hopefully 9 comprehensive answer to your question. 10 CHAIRMAN KIMBLE: Okay. Thank you. 11 Any other Members of the Commission have 12 questions for Tom on the Executive Director's Report? 13 (No response.) 14 CHAIRMAN KIMBLE: Hearing none, thank you, 15 Tom. 16 Item IV, discussion and possible action on 17 proposed conciliation agreements -- conciliation 18 agreement, excuse me, in MUR 25-02, Anna Abeytia, 2024 19 legislative candidate. The Executive Director has 20 recommended a conciliation agreement regarding 21 Representative Abeytia. Tom will present his 22 recommendation and take questions. 23 Tom. 24 MR. COLLINS: Thank you, Mr. Chairman and 25 Commissioners. So I think we have a little bit of a
Page 19	Page 21
1 down I think would be of some value, and I think -- 2 based on what I've seen, I think that would be a likely 3 legislative thing in the short-term, because they can 4 start it, you know, within the quarter from now. And 5 then -- but then -- because the issue they really need 6 to resolve around that is, who -- who can pay for this 7 and will that be subject to any -- any reporting. 8 Because as it currently stands, it's that in-kind issue 9 that I really think becomes a serious one, or -- 10 You know, I mean, right now legal expenses 11 are largely outside of the scope of campaign finance. 12 They're just considered not contributions. And that 13 allows a person who has a compliance issue to call an 14 attorney and say -- you know, or have a legal defense 15 fund or other means that they might pay that lawyer 16 for. So you might want to categorize security as not a 17 contribution to sort of take that out of the equation 18 in the same way that you've taken lawyer and other 19 compliance services out. Because if it's just kind of 20 baked in, if you think about it, as a thing that people 21 have to do to get through the system, you might -- it 22 might not be as much of an influence -- you know, a 23 corrupting influence as some other expenses. 24 So that's -- so I think your question is 25 right on. I think -- for the short-term I think we're	1 PowerPoint that I put together. The way I did the 2 PowerPoint, just -- just so you all know, is I 3 basically tried -- this was an effort to sort of talk 4 about both this Agenda item and the next one together 5 because the issues are related. I wanted to give an 6 overview. This is similar to the memo that you should 7 have gotten with the packet. 8 So, yeah, if we could, Cathy. Thanks. And 9 there was a little delay on the -- on the slide, so it 10 will just be a second before it comes up, I think. 11 Cool. Thank you. 12 So the big issue in this -- in this -- in 13 these matters was the candidates essentially stopped 14 filing campaign finance reports and didn't respond to 15 inquiries from -- from the Commission staff and the 16 auditors. I filed a complaint against each of these 17 candidates, and the allegations there had to do with 18 failure to file timely campaign finance reports and 19 failure to provide information regarding those 20 expenditures at all. 21 So, you know, as we were just talking about a 22 minute ago, you know, the obligation you take on with 23 respect to the public financing is you have to use it 24 for direct campaign expenses if -- and the burden to 25 show that is on the candidate, not on the -- not on

Page 22 1 the -- not on us. And so if you don't file anything, 2 you know, essentially what our position is as staff 3 members is that a presumption of -- of non -- of not 4 meeting -- you haven't met that burden. You have the 5 burden of showing that they're direct campaign 6 expenditures; if you don't say anything, then you 7 haven't met your burden, essentially. 8 And then -- so, yeah, if we could go to the 9 next one, Cathy. Thanks. 10 With respect to the two candidates, we 11 recommended that Jaramillo be ordered to repay the 12 entirety of his funding allotment. At that time he 13 hadn't filed anything; we hadn't heard from him at all. 14 And then we also recommended a finding of reason to 15 believe that Abeytia, Representative Abeytia, had 16 violated the Clean Elections Act and rules. And the 17 Commission made a -- made a determination to that 18 effect. 19 We had also, at that time, represented -- I'm 20 sorry -- recommended a repayment order with respect to 21 Representative Abeytia. And if you recall from those 22 proceedings, she filed a report right around that time, 23 which, again, since the presumption we were operating 24 under was no report, no expenditure, we sort of 25 asked -- we sort of withdrew that for the -- for the	Page 24 1 accounts of -- of each candidate against the invoices 2 against the reports. And you can see there is a 3 reporting issue there in terms of making clear, you 4 know, how the -- you know, the reports are essentially 5 at too high of a level for -- to be appropriate. 6 But I think the critical point in working 7 with the auditors on this as to why we can, you know, 8 feel comfortable concluding that, you know, the money 9 went to the campaign is, you know, is the relationship 10 between the invoices and the -- and the checking 11 account spending. And it would be the kind of thing 12 where, you know, it's in the -- it's in the account, 13 the checking account itself, that you can see, you 14 know, that the timing of the expenditures, the checks, 15 essentially, to the consultant, you know, essentially, 16 you know, lined up sufficiently with the invoices that 17 it would be -- you know, that there's -- 18 You know, I would say the auditors were 19 comfortable and I think the auditors' report, in 20 fact -- and the report is labeled a draft. I mean, at 21 this point it is final for our purposes. But basically 22 they were able to come to the conclusion, in 23 conjunction with looking at that -- those -- that 24 documentation, talking to the consultant, and getting 25 representation of what the money was spent on that, you
Page 23 1 time being. 2 If we can go to the next one, Cathy. 3 So we -- after the -- after those hearings we 4 went out and sought to determine whether the Clean 5 Elections funding was spent in compliance with the Act 6 and rules and whether there -- the reports that were 7 filed were accurate. Jaramillo filed a report -- 8 started filing reports after the repayment 9 determination. And then so we -- we got documentation 10 of each candidate's campaign activity, including all 11 their bank account statements and invoices, reviewed 12 that documentation, communicated with the candidates, 13 and they have a shared consultant, and we -- and 14 through the audit report, which is attached to the 15 conciliation, you know, we were able to, you know, 16 determine that, at least to the -- you know, to the 17 satisfaction of the auditors, that those -- that that's 18 what -- that, in fact, the -- you know, the monies went 19 to campaign expenses. 20 Then we also -- you know, Representative 21 Abeytia -- Abeytia also had \$2,000 left over that she 22 needs -- she will -- we are -- we will be recovering. 23 The thing -- when you look at the -- if 24 you've looked at the audit report, you know, the 25 auditors lined up the expenses out of the checking	Page 25 1 know -- that, you know -- that there was sufficient 2 evidence for us to conclude that, in fact, the money 3 was not, you know, sort of taken for purposes other 4 than -- than campaigning. 5 In other words, the big issue, I think, in 6 this case, as in all -- any kind of case where we're 7 dealing with the failure to report, and that is 8 essentially is the money being converted to personal 9 use, right. And we've had that in the past. And just 10 based on the way that the -- the way -- the way -- the 11 way the money came out of the checking account and then 12 the auditors' ability to review, you know, the campaign 13 materials that they reviewed, I mean, we're comfortable 14 that there's not -- you know, we would not see a -- we 15 would not -- we don't have evidence of the money being 16 converted to some use other than -- other than 17 campaign. Now, you know -- so that's sort of where we 18 are as a factual matter. 19 If we could go to the next slide. 20 So we -- so in developing the conciliation 21 agreements that are in front of you, basically we look 22 -- this was a sort of an effort to look -- to sort of 23 draw up what are -- what we think are the staff 24 considerations. So we want to look at things like the 25 gravity of the conduct, we want to look at the

Page 26 1 transparency required for the Clean Elections program, 2 you know, the candidates agree to this. We look back 3 at our prior enforcement actions and conciliations, to 4 the extent that there are relevant considerations 5 there. And so, you know, here -- that's where that 6 issue of misuse of funds, we don't -- we don't have 7 that. 8 You know, just -- and just to put this in 9 perspective, I mean, you know, the auditors that we 10 work with are the auditors who have -- the last time we 11 had a major misuse of funds issue, this process we are 12 using identified that, so -- and so we have some 13 confidence in that. 14 You know, and then the novel issue here to us 15 is this issue of a candidate kind of -- kind of just 16 not -- not only not filing their reports timely, but 17 then not responding. 18 We also obviously want to have some deterrent 19 effect and we want to have -- we want there to be some 20 public confidence in the process. There's also an 21 efficacy issue here, you know, just in terms of both 22 the administrative and then judicial enforcement, as 23 well as the -- you know, among other things. 24 So I think that -- so we end up with -- and 25 I've got both of their key terms here, and I think --	Page 28 1 is going to bite these people specifically and -- but 2 is also recoverable. The -- so that -- 3 And then we also think that, based on the 4 overall approach that other campaign finance officials 5 are taking around the state, that this is probably a 6 pretty significant fine to actually pay because, I 7 mean, you know, a lot of these fines just simply go 8 uncollected or, in some cases, because of the expense 9 of collection and other things, they just simply go by 10 the wayside. So we think that that's -- that's got 11 some general deterrence aspect to it, right, that if 12 you do this incorrectly we will, in fact, you know, 13 have -- you know, seek to collect real money from you. 14 That brings me to the second, I think -- and 15 I think very important aspect of this, which is the 16 agreement -- you know, and I'm presuming agreement. I 17 mean, we have -- we don't bring these to you until -- 18 unless we think we have an agreement, but obviously 19 we -- the candidates haven't signed yet -- but the 20 agreement not to seek Clean funding. 21 So in the -- in order for that to be 22 effective typically you either have to have an 23 outstanding debt to the Commission, which, to my point 24 earlier, means we've gone through the entire 25 administrative process, gone to court, gotten a
Page 27 1 so I'm just going to kind of walk through this. With 2 Jaramillo we ended up with a fine of \$2,500 and an 3 amendment requirement and the candidate agreeing not to 4 seek or accept Clean Elections funding in any other 5 election. 6 This is also contingent on a candidate 7 actually completing the agreement. So, in other words, 8 if the -- if the candidate doesn't, then we can -- 9 essentially we have the ability to come after them for 10 the full amount of fines, which, because it's a daily 11 fine that accrues to candidates under the Act, I mean, 12 it's a -- it's a bunch of money. 13 So and then with Representative Abeytia, 14 similarly, we have a \$5,000 fine there and then we have 15 this repayment and then amendments and then -- and 16 then, again, the agrees not to seek or accept Clean 17 Elections funding. 18 So a couple things that people might think 19 about are, you know, are these fine amounts too low 20 considering the scope of the possible fines under the 21 Act? And the answer to that is -- is kind of twofold. 22 First, you know, we do think about the ability to pay, 23 and so there's both a specific deterrence issue and a 24 general deterrence issue, right. So, you know, we're 25 comfortable saying that this is an amount of money that	Page 29 1 judgment, you know, or at least that's how we -- how we 2 think that works, or you have to have been removed from 3 office by the Commission. So that's why we think 4 that's a significant sanction. 5 And we think that if you reflect back on the 6 other values that I talked about in terms of public 7 confidence, in terms of taking it seriously, in terms 8 of having the aspect of this being public money being 9 taken seriously, we think that, again, from a -- again, 10 from both -- there's obvious specific deterrence here, 11 right, they can't use it again, and then the general 12 deterrence point we think is that -- thank you -- is 13 that, you know, this says, look, you know, this is a 14 thing you sign up for voluntarily, you agreed to abide 15 by the rules, and if you are going to sort of blow this 16 off, you -- you know, we will ask for a serious -- a 17 serious sanction. 18 And so essentially what -- what I'm trying to 19 say is that we are getting a sanction in this agreement 20 that we otherwise would have a considerable expense as 21 -- you know, on behalf -- we would be -- to get to, 22 right. So I think that the value of the overall 23 agreement is resolution, real specific deterrence, and 24 real general deterrence with respect to, you know, 25 demonstrating to the public and folks who are going to

Page 30 1 be operating in this arena that there is a -- that the 2 Commission does, in fact -- and the staff and the -- 3 the Commission as an agency takes these matters very 4 seriously and that we will not -- you know, and we will 5 make sure that there is a real accounting of what went 6 on. 7 And this is all very avoidable. It's all 8 very avoidable. All you've got to do is return Mike's 9 phone calls. I mean, that's not all you've got to do, 10 but that's certainly a good start. And we are 11 available for that to everybody, and I think any 12 candidate who works in the system knows that. 13 So that -- those are all the reasons why, you 14 know, we are recommending this conciliation, at least 15 from my perspective. You know, I wasn't actually 16 expecting the candidates to be here, and I don't think 17 they are. And I don't -- you know, and I -- and 18 that's -- from a staff perspective my point of view on 19 that is, I don't -- I didn't make a point of 20 encouraging them or discouraging them, you know. I 21 mean, it's -- you know, but it's not -- it's absolutely 22 not out of the ordinary to have the -- once the sort of 23 -- we've gotten to a place where we have what we think 24 is an agreement, at least in principle, to not have the 25 respondent come. It's not a -- we don't have an Page 31 1 allocution process in this, so them not being here is 2 not to me a major issue. 3 CHAIRMAN KIMBLE: Thank you, Tom. 4 Are there any questions for Tom from Members 5 of the Commission? 6 COMMISSIONER PATON: I just have -- 7 CHAIRMAN KIMBLE: Commissioner Paton. 8 COMMISSIONER PATON: -- some comments, I 9 guess. I mean, I'm not from a legal background or 10 anything, but if we're -- if in our rules we're 11 supposed to be penalizing somebody \$420 a day, and we 12 were at like 188 days, I think then if we're going to 13 go through with this then we should change that amount 14 because it seems like it doesn't matter. I mean, 15 \$5,000 is -- I understand what he's saying, that he 16 thinks that's collectible, but to me I think they've -- 17 they were just thumbing their nose at whatever rules, 18 we can ignore stuff. 19 And I guess my background is in sports, and 20 we have rules for the game. You have to follow those 21 rules. And when you don't, there's penalties and 22 there's not, okay, we'll roll all that back kind of 23 thing. 24 And then to throw in the fact that the 25 campaign manager was her fiancé, I think we need to	Page 32 1 change that rule. I mean, if there is such a rule or 2 not such a rule, I think we should change that to where 3 you cannot be paying somebody that's that close of an 4 associate to you. 5 CHAIRMAN KIMBLE: Commissioner Paton, I just 6 want to clarify. So when you talk about we ought to 7 change the amount, the dollar amount, are you talking 8 about the dollar amount in the proposed settlement or 9 the dollar amount in our rules? 10 COMMISSIONER PATON: I think both. I mean -- 11 excuse me. I think both. I mean, I understand where 12 he thinks -- where they're saying -- he was saying that 13 he thinks that \$5,000 would be collectible. I'm not 14 sure that -- when you go in the future and they're 15 giving their little talk about all of our rules and so 16 on, and they come to the \$420 a day for not turning 17 something in or not corresponding with us, with the 18 auditors, or whatever, that all they have to do is go 19 back to the history and see that we didn't really 20 follow that. 21 So, I mean, I -- I just have a whole -- a 22 hard time with all of it. I don't -- do I think we 23 should punish her with a hundred-thousand-dollar fine? 24 No. But I think she is a sitting Representative and 25 she's passing rules, she's passing laws, but she can't Page 33 1 follow them. So I don't know. I guess I'm kind of 2 rambling, but anyway... 3 CHAIRMAN KIMBLE: Thank you, 4 Commissioner Paton. I think you make two very good 5 points. 6 And before you respond, Tom, I want to follow 7 up on one thing Commissioner Paton said. Do you feel 8 that we need to do something in the rules regarding 9 hiring relatives or people who live in the same 10 household or something as campaign staff? Because it's 11 very difficult to say that this is campaign expense 12 and -- as opposed to a personal expense when you're 13 paying someone you live with. So I don't know if 14 there's something that we ought to look at to clarify 15 that rule. And also, I'd like you to address 16 Commissioner Paton's comment about the fine amount 17 being too low. 18 MR. COLLINS: Yeah. Okay. So -- I'm sorry. 19 I just needed to -- 20 CHAIRMAN KIMBLE: No, that's fine. 21 MR. COLLINS: -- make sure what I said was 22 correct. So I might need you to remind me again the 23 second part of what you specifically want me to respond 24 to with respect to Commissioner Paton. 25 But on the first piece, with respect to the
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Page 34 1 household thing, what we currently do -- and the idea 2 of paying family members has come up before, and so we 3 have a rule that essentially says that the -- that the 4 candidate has to disclose to us if they're paying a 5 family member. And we haven't included -- the 6 definition just doesn't currently include fiancé or 7 those things. And that's a proposal that we can 8 certainly put up as a proposed rule. I mean, there's 9 absolutely no reason we couldn't do that. 10 But what the Commission has previously done 11 has been along the lines of disclosure rather than 12 forbidding, and that gets into, you know -- you know, I 13 mean, that's a judgment for you. So we can -- we can 14 tee this up in a couple of different ways. What we've 15 done in the past when we've had rule proposals is 16 offered a couple of different options for you all to 17 look at that deal with that. 18 The reason -- and I wasn't there for this, 19 and Mike may have been, but I think the reason we ended 20 up with a rule on family members that was disclosure 21 rather than forbidding is policing it is -- becomes an 22 issue and there's no similar restriction on the 23 traditional candidates. Now, that second one is -- you 24 know, obviously it's public money. That's a -- you 25 know, you can make what you want of that.	Page 36 1 that's because the stakes of the money are different 2 and the amounts of money not reported are different and 3 those kinds of things. The -- 4 But and we also don't have a lot of data. We 5 don't have a lot of -- we just don't have a lot of 6 complaints. You know, in this case, this was new, and 7 we just -- we don't -- we don't have this issue come 8 up. The last serious issue we had that was similar to 9 this was this -- was in, I want to say 2016, I think, 10 or something like that. So we don't have a lot of data 11 to point at. 12 We also don't have a lot -- a full 13 understanding of what other agencies are doing, other 14 than there's -- we know that there's difficulty with 15 getting these processed in other -- in other agencies 16 in the first place and we know that there's -- we know 17 that there's not like a consistent rule anybody knows 18 about when they're going to end up having to pay, when 19 it's going to be waived, when it's going to be settled. 20 Those are all kind of up in the air also. 21 So there are a couple ways we could address 22 that. One would be to publish in some way a schedule 23 of presumptive fines, in the event of a conciliation, 24 that says, you know, you will do -- you know, if the 25 range of lateness is X, you know, we will -- the
Page 35 1 On the first one, on the policing issue, you 2 know, that's a different -- that's a little different. 3 What you see -- I mean, the other context where 4 specific family relationship rules arise, you know, 5 are -- you know, there are other areas of law that 6 have -- include other than marriage and children and 7 blood relatives because of the potential for conflicts 8 and that kind of thing. So that's certainly something 9 we can -- we can take a look at and we can bring back 10 in the future. 11 The second issue, I think, was -- 12 CHAIRMAN KIMBLE: Well, the second issue that 13 Commissioner Paton raised was we have in our rules 14 potential fines that are extremely high -- 15 MR. COLLINS: Yeah. 16 CHAIRMAN KIMBLE: -- and we are settling for 17 an amount that is substantially lower than that and 18 should that -- should we be fining them more. 19 MR. COLLINS: Right. So that's a good 20 question. I mean, and I don't know that these are -- 21 these are -- this comes up periodically. It comes up 22 every time we try to resolve a matter because of that 23 issue. And, you know, we tend to, probably on average, 24 fine candidates a little less than we fine, you know, 25 significant expenditures that were made, but part of	Page 37 1 presumptive fine that we will seek is Y, and so people 2 have an understanding of what we are -- what we are 3 realistically doing. And that would create some more 4 transparency and consistency and maybe bring the fines 5 more in line with -- with what people can anticipate. 6 The other -- you know, the other thing we 7 always face is, you know, is that this statute is 8 broadly applicable to, you know, to any -- it's broadly 9 applicable to any candidate. It's actually -- there's 10 nothing that ties this candidate to Clean candidates 11 exclusively. It's also the statute that we use when 12 we're enforcing against folks for failure to file 13 trigger reports on the IE side. 14 So, you know, so there's a bunch of different 15 factors there that are relevant that we -- you know, 16 and we've deferred to other agencies with respect to 17 traditional candidates on their -- on their late 18 penalties, but, you know, that -- it's still something 19 we have to be, you know, conscious of. 20 So, I mean, the best immediate solution, to 21 my mind -- and we can get back to you with a better one 22 or this -- or if we can think of a better one -- would 23 be, you know, a schedule that says, look, if you get 24 past this point, this is what we're going to seek, 25 which is more along the lines -- and this is -- it's

Page 38 1 not a perfect analogy, but more along the lines of the 2 way that presumptive sentences work under the criminal 3 code, right. So you'd say, if you're at, you know -- 4 The way the statute works in terms of what 5 it, at least as I understand it, what it asks us to 6 do as a -- or, what it asks you to do and asks the 7 agency to do both is, you know, make an accounting for 8 why the decision is being made and how we're -- how 9 we're -- how we're setting up. So from a purely 10 legalistic perspective, that's a lot of what this 11 presentation is, that's why the conciliation agreement 12 goes in -- has all the numbers in it and has all that 13 laid out, so people can make a judgment. 14 That said, you know, it's -- it is -- it 15 is -- it is my, you know, sincere belief that barring 16 people from using the system is a serious -- is a 17 serious thing in the sense that, some candidates, this 18 is their way of running, I mean, this is, you know, 19 the -- I'm not sure both of them, but certainly 20 Representative Abeytia has run Clean before and so this 21 has been how she's run. So this is -- this is not, we 22 don't think, nothing with respect to her, you know. 23 So, I mean, other than that -- I mean, those 24 are the responses I have. I don't disagree that 25 there's a discrepancy there, and I think that that's	Page 40 1 have for these candidates when they come in, but when 2 they -- if they research things and see our history, I 3 mean, some people we kicked them out of the 4 Legislature, we fined them over \$50,000, that kind of 5 thing, so -- so I just think that if we have a thing 6 that says \$420 payment, I mean -- 7 How many people do not turn things in on 8 time, by the way? 9 MR. COLLINS: I think -- for us I think 10 that -- I think the -- I think the percentage is, of 11 being on time, is -- what would you guess? Maybe we 12 could get a rough guess. I don't know. 13 MR. BECKER: I would say 99 percent turn it 14 in on time. 15 COMMISSIONER PATON: Because they don't want 16 to pay \$420 a day. 17 MR. COLLINS: Well -- well, we also hope that 18 it's because they're, you know, law-abiding people. 19 COMMISSIONER PATON: Well, I understand that. 20 MR. COLLINS: The one thing -- the one thing 21 I want to, if I -- well, when the time comes I have a 22 couple things I want to make sure I make clear about 23 the other things we're doing around this issue, but... 24 COMMISSIONER PATON: So maybe other people 25 can speak to this stuff as well.
Page 39 1 something that people are -- are -- have -- you know, 2 you make a fair point. I mean, obviously I think, you 3 know, Commissioner Paton makes a fair point about that. 4 I think -- but I think that the best way we would have 5 to do that going forward would be to have some kind of 6 a, you know, henceforth this is the way we're going to 7 approach these things. These are the realistic ranges 8 you're looking at. We can -- and that allows, I think, 9 you to, you know, to weigh in on that outside of the -- 10 you know, in a context that would be deliverable. And 11 then I think, along with that, we need -- we should 12 consider how that applies to all the different entities 13 and folks who potentially come under the statute, 14 because that would be a worthy enterprise itself. 15 CHAIRMAN KIMBLE: Okay, Tom. 16 Commissioner Paton, did you have anything 17 else you wanted to add? 18 COMMISSIONER PATON: Well, as far as -- I 19 understand not taking Clean Elections money again. 20 But most people that do -- that use Clean Elections 21 money are first-time people, and then after they get in 22 they meet whatever people that can help finance them 23 later on. So I'm sure that's a negative thing, but I 24 think -- 25 I'm not involved in the classes that you guys	Page 41 1 CHAIRMAN KIMBLE: Okay. Tom, go ahead. 2 MR. COLLINS: So the first point is, the 3 other thing we've done, and we won't hear it until 4 November, but we do have this rule that will say if you 5 are late five days we're going to start repayment 6 proceedings against you, right. So that's going to be 7 a new rule that we will have online, and presuming -- 8 assuming -- assuming you all pass it. And then we'll 9 have an additional check that they -- about their 10 filing before they -- before they get the money. So we 11 bracketed in some effort to get at this -- to get at 12 this, because a repayment proceeding in the middle of a 13 campaign is a -- again, it's a -- it's a, we think, a 14 deterrent. But like I say, I'm -- we will look at -- 15 we'll have -- we can have these other two things in 16 front of you. 17 I want to make clear, because I think it's an 18 important -- although, you're right, the public is not 19 going to know the difference. But from a practical 20 perspective, the kicking people out of office has to do 21 with excessive -- excessive contributions. 22 COMMISSIONER PATON: Right. 23 MR. COLLINS: So we don't have that here. 24 COMMISSIONER PATON: Right. 25 MR. COLLINS: The 50,000 that the one person

Page 42 1 we -- owed came out of conversion and a repayment. 2 So, you know, we -- for our purposes, \$5,000 3 on an individual candidate is probably the -- I think 4 it's the -- for a fine I think is the second most we've 5 fined since I've been here, as a fine, put aside the 6 other stuff. So I think -- and I'm not sure, so -- so, 7 I mean, so just -- 8 So everything you said is true. I just 9 needed to make those clarifying points just because 10 I -- and I agree with you that the public may not know 11 the difference. There's no reason for them to. But 12 those cases involved different statutes and different 13 findings. And those could have happened here, but we 14 just don't think we have the evidence for that for 15 either of those, so that's -- that's what I've got. 16 CHAIRMAN KIMBLE: Are there any other 17 questions or comments from Members of the Commission? 18 Commissioner Werther. 19 COMMISSIONER WERTHER: Yes, Chairman. Thank 20 you. 21 So I have one comment and then two questions. 22 So first, I share, I think, in the frustration that we 23 have candidates taking public monies, knowing the rules 24 ahead of time, and then not abiding by them, and then 25 sort of looking at the enforcement and saying, this	Page 44 1 thousand dollars, again, it wouldn't be, you know, our 2 decision, it would be the filing officer's, but my 3 understanding is that this would fit within that -- 4 that Title 16 statute. 5 MR. COLLINS: Mr. Chairman, 6 Commissioner Werther, I don't know the answer to that 7 question insofar as my understanding is that the filing 8 officers around the state have taken very different 9 approaches to that. Some of them accept so long as you 10 are not in arrears on a payment plan, you are up to 11 date with respect to your obligations under the statute 12 regardless of how much it is. Some of them, I think, 13 think that even if liability hasn't been yet 14 established, that statute still applies, because the 15 statute -- the statute is very -- our statutes are a 16 little difficult. This statute is remarkably 17 difficult. 18 It says, except for where liability is being 19 appealed, so that sort of says liability has been 20 established, and then it has this statement about, you 21 know, whether or not it's been paid off or not and what 22 that means. And then the last sentence says something 23 about someone who, by virtue of failure to comply or 24 liability, right, so -- so unfortunately, from a legal 25 perspective, I mean, I -- I don't know. I personally,
Page 43 1 doesn't seem to be, you know, sort of almost a fair 2 amount given the time and expense that staff has had 3 to, you know, basically obtain, you know, their 4 reports, things that they should have done at the 5 outset. 6 I also kind of look at it, though, from the 7 perspective of having to do enforcement actions for 8 cities and towns, and this is a similar dilemma that 9 they also face. We could always charge the maximum 10 amount, but is it realistic to think that they're 11 actually going to get it, and most of the time it's no. 12 So we try to work out a resolution as best as possible, 13 as kind of Tom mentioned, as the deterrent. But I did 14 at least want to share that I'm equally frustrated by, 15 I think, both of these situations. 16 Then I just had one question. And I don't 17 know, Tom, that you can answer, because we're not 18 technically filing officers. But in Title 16, if you 19 have outstanding campaign finance penalties in excess 20 of \$1,000, filing officers are not supposed to take 21 your nomination paperwork for any office in Arizona. 22 So I don't know if that's something -- obviously, if 23 we -- if this goes on the website so that any -- you 24 know, if they decide to go elsewhere to run for office 25 and they still have those outstanding fines after a	Page 45 1 I think, am under the impression that while there's a 2 -- while repayment is being made timely, that filing 3 officers do not treat that as a reason -- a reason to 4 not accept papers. 5 The other issue that I understand to exist is 6 filing officers don't know if that statute means what 7 it literally says or whether or not it's up to a 8 challenger to observe to them, you ought not to have 9 accepted this. 10 So essentially what I'm trying to say is I 11 guess I know -- that's the landscape, in answer to your 12 question, as I understand it. I don't know -- you 13 may -- you may, in fact, know this better than I do, 14 but that's the landscape as I understand it. In other 15 words, with the ambiguities in the statute, there are a 16 variety of outcomes that happen. And because there 17 hasn't been any sort of reported appellate case on 18 this, nobody knows a definitive answer to that 19 question. 20 COMMISSIONER WERTHER: Well, thank you. I 21 agree, I think that the statute is somewhat kind of 22 broad and I -- and again, I didn't believe that it was 23 the Commission that would make that decision. It's 24 really going to be up to the filing officer, whoever it 25 is.

Page 46 1 But I also didn't know, because what comes 2 across at least at the municipal level is the clerks 3 really wouldn't know, right, who -- 4 MR. COLLINS: Sure. 5 COMMISSIONER WERTHER: -- if there was even a 6 pending -- so I didn't know if this information at 7 least goes on the website or like... 8 MR. COLLINS: It is, I mean, insofar as it's 9 on the packet. It's also been widely reported. This 10 has been one of the more widely reported matters we've 11 had here in quite some time. So we certainly -- I 12 mean, all of our information is publicly available and, 13 you know, we have a page that has information related 14 to that. We don't have a page currently that says, you 15 know, these are the people who are -- who we understand 16 currently owe the Commission money. 17 COMMISSIONER WERTHER: Got it. Okay. 18 And then my other question was just -- I know 19 it kind of talks in here about these -- in these 20 agreements about if these candidates default, but can 21 you just describe like if they do default under any of 22 these conditions, what are the next steps? Would it 23 come back here? Would you just immediately go and 24 enter -- like try to get a judgment? Like what are -- 25 what would that look like?	Page 48 1 would be one of our options today, right? 2 MR. COLLINS: Okay. So, Mr. Chairman, do you 3 want me to -- okay. 4 CHAIRMAN KIMBLE: Tom. 5 MR. COLLINS: So, yes, Mr. Chairman, 6 Commissioner Crump, in the event of default, as I -- we 7 think that the agreement is enforceable to allow us to 8 collect the entirety of the fines in the event of a 9 default. That is -- that is what we believe it does. 10 And I think that -- I took Commissioner Werther's 11 question to be more along the lines of the procedures 12 to do that and whether or not there are additional 13 steps with -- on staff to do that. 14 And I would just say that my immediate answer 15 to that would be that staff can do that. Because this 16 is an agreement, absent, you know, a direct Commission 17 decision, we would obviously -- because that would 18 involve some legal questions, I probably would want to 19 double-check. You know, how we would work with the 20 Commission in its capacity as the Commission to deal 21 with that would be a question we would -- we would 22 definitely want to make sure we had an answer to. And 23 whatever the answer to that question is would determine 24 what our course of action would be. 25 But, you know, just to recap, the main issue
Page 47 1 MR. COLLINS: That's a good question, and I 2 don't know that I've -- I've not thought through that, 3 but my -- my assumption would be that, the contract 4 having been executed, that at a minimum that staff 5 could enforce the contract without coming back to the 6 Commission, although I would be -- we would definitely 7 inform the Commission. 8 COMMISSIONER WERTHER: That's all I had. 9 CHAIRMAN KIMBLE: Are there any comments or 10 questions from any other Members of the Commission? 11 COMMISSIONER CRUMP: Mr. Chairman, 12 Commissioner Crump here. 13 CHAIRMAN KIMBLE: Yes, Commissioner Crump. 14 COMMISSIONER CRUMP: Yeah. A little bit 15 related -- this question, I guess, is for Tom, but 16 related to Commissioner Werther's questions. So I 17 would be interested in knowing, you know, if she 18 defaults on the agreement, assuming the agreement is 19 reached, that we can proceed and enforce the -- you 20 know, the fines in the statute and so forth. 21 And furthermore, a related question is, 22 understanding -- you know, as the new guy here, but 23 understanding our authority as the Commission here, 24 theoretically if we wanted to reject this proposed 25 agreement and just enforce the statute, that's -- that	Page 49 1 is that this agreement is set up so in the event of a 2 default -- and we haven't had defaults generally -- you 3 know, that we would be able to go after the candidate 4 for the full amount. You know, I would add that that's 5 -- that's also not a -- not -- that's also the hammer 6 here, right. 7 So one way to look at this is it's not 8 necessarily so much that we have waived -- we haven't 9 waived the full fines. What we've done is abated them 10 pending compliance with the terms of this agreement. 11 And when the agreement is complete, then it's complete 12 and those are the terms of the agreement by its own 13 terms. In other words, it's not, quote, unquote, over 14 until the payments are made in full and the amendment 15 -- and the -- and the reports have been amended and 16 the -- and the -- you know, that's when it's over. 17 So one way to frame this is, rather than a 18 waiver -- it's not a waiver, you know. There are 19 agencies that waive these fines; we didn't do that. We 20 are saying, you pay us this, you complete these tasks, 21 and then you will no longer -- you know, you will then 22 have -- be free from this -- this potential hammer. 23 With respect to your second question, 24 which -- I wrote down a note to myself that I can't 25 read, so I apologize.

Page 50 1 COMMISSIONER CRUMP: One of the options for 2 us right now would be to -- 3 MR. COLLINS: Oh, right. Right. 4 COMMISSIONER CRUMP: -- reject the proposed 5 agreement and just go with enforcement. 6 MR. COLLINS: So in this capacity you're 7 blessed to have Craig Morgan here to answer that 8 question from a perspective of your own. But from my 9 perspective as the Executive Director, you are free to 10 reject this. I don't -- I don't believe that you can 11 -- well, I don't believe, where we are procedurally, 12 that you could immediately order at this time the full 13 payment or a different amount of payment. I don't 14 think that that's -- that's correct. 15 As far as other changes you could make to the 16 agreement, you know -- you know, I really ought to 17 defer to Craig out of -- out of -- out of -- you know, 18 out of -- just for formality sake, if nothing else. 19 CHAIRMAN KIMBLE: Okay. Thank you. 20 Craig, do you want to address this? 21 MR. MORGAN: Mr. Chair, Commissioner Crump, 22 sure, I can address it. I'm going to be careful, 23 though, because we're not in executive session, to go 24 too far into things. But generally speaking, 25 Commissioner Crump --	Page 52 1 seriously and that there are penalties for this. So 2 that's just a suggestion I throw out there if you're 3 sort of thinking about, well, what are my options, 4 but -- 5 Was I able to answer your question, 6 Commissioner Crump? 7 COMMISSIONER CRUMP: Yes. Thank you, 8 Mr. Morgan, and thank you, Chairman, that does. And I 9 realize there would be, you know, procedures that we'd 10 have to continue to go through if we went that route. 11 But I agree, and I like what I just heard from counsel, 12 and that is I definitely would like to see something in 13 the agreement which acknowledges the consequences of 14 any default on this agreement. 15 And I think, you know, in civil law there's 16 things called offer of judgment and so forth that 17 would -- that would -- maybe we could even bypass all 18 of the administrative and court procedures that we 19 would have to go through, that she would be agreeing to 20 that, that we just immediately would have judgment. 21 That may or may not be allowed, I don't know, but I'd 22 be curious about that. 23 With your indulgence, Mr. Chairman, I'd just 24 like to mention a couple of other things on this. As 25 to whether the dollar amount is too low, you know, I
Page 51 1 CHAIRMAN KIMBLE: Excuse me, Craig. Could 2 you get a little closer to the microphone? 3 MR. MORGAN: Sure. Can you hear me now? 4 CHAIRMAN KIMBLE: Yes, much better. 5 MR. MORGAN: Yeah. So generally speaking, I 6 agree with what Mr. Collins said, Commissioner Crump. 7 You would need to follow essentially the administrative 8 rules and have the formal proceedings initiated and go 9 through that process. 10 One suggestion that might make sense too, and 11 I do this a lot in my civil practice, as I'm sure you 12 may, you can also, as a condition, and you wouldn't be 13 able to do it necessarily here today, I don't think, 14 but as a condition in any agreement you can make it 15 clear that we're giving you this amount, we'll say 2 16 grand, whatever it is, right, but if you don't pay us, 17 you're going to owe us the full amount, and here is 18 what that looks like. That might be a good bridge 19 between what everyone is saying. 20 Because I get the impression here that the 21 Commission agrees with, as it often does, because he's 22 often right, agrees with Mr. Collins in his assessment, 23 but would like to make this a very significant event so 24 that we ensure that this person actually pays and we 25 also ensure that the public knows that we take it	Page 53 1 somewhat agree with Commissioner Paton on that, that 2 this individual or individuals sort of thumbd their 3 nose at the Commission with lack of communication and 4 so forth. And does this just send a message that, 5 well, the consequences aren't very serious. 6 Obviously the daily fines got her attention, 7 and that's why hopefully we have an agreement now. So 8 that did have somewhat of a -- quite a bit of a 9 deterrent effect, I believe, in the end, but very 10 frustrating when somebody just doesn't communicate or 11 respect the authority of the Commission. 12 That brings me to my other point, something 13 that the Executive Director touched on earlier, and 14 that is that they're not necessarily expected to attend 15 this hearing and so forth. This rather surprises me. 16 You know, in the law we talk about, when we sit in 17 judgment, about mitigating and aggravating factors. 18 And it rather surprises me, having been a Legislator, 19 that if I were in this situation and I had disrespected 20 the public -- the public, quite honestly, breach of the 21 public trust, disrespected this Commission, and I'm 22 sitting in office, that I don't come forward and attend 23 this hearing or some other way apologize for my 24 conduct. I think that would be a mitigating factor, 25 and the lack thereof I think is an aggravating factor

Page 54 1 and I think it's a rather bad -- bad reflection on the 2 individuals, so -- 3 And then switching gears real quickly, there 4 was a nepotism question -- somewhat of a nepotism 5 question that came up before about hiring family 6 members and close associates and so forth. I'm not so 7 sure I'm interested in a bright line on that, because I 8 think it's fairly common and not unusual to -- is a 9 better way to say it -- to have a spouse, for example, 10 that you hire as your, you know, campaign worker, 11 campaign manager, that sort of thing. 12 For me it's more of a question of 13 proportionality, that you wouldn't want to see all of 14 the public funds that was given -- through the Clean 15 Elections Commission given to your spouse, so it 16 basically was just a job and you didn't spend any money 17 on voter outreach or anything like that. So I don't 18 know how that -- you know, if it's a case-by-case basis 19 where we say, well, 15 percent of the money was spent 20 on the campaign manager, who was the spouse, versus a 21 hundred percent of the money, okay. 22 So there's my thoughts on that. Thank you. 23 CHAIRMAN KIMBLE: Thank you, 24 Commissioner Crump. One point of clarification. 25 Earlier in this process, before you were on the	Page 56 1 about this and explain this to them and make sure that 2 there's actually an agreement. But I'd defer to 3 Mr. Collins. He's been speaking with these folks; I 4 haven't. 5 CHAIRMAN KIMBLE: Are you saying an agreement 6 on any change to this or an agreement -- 7 MR. MORGAN: Yes. Correct, Mr. Chairman. 8 Yeah. I'm just thinking about it from a -- not even a 9 legal perspective, just from an optics perspective for 10 the Commission. You know, you don't want it to look 11 like you're just out here doing things by fiat. I 12 mean, if we've engaged in communications with these 13 people, we should probably communicate with them 14 further and explain to them thinking and make sure that 15 they understand everything. 16 CHAIRMAN KIMBLE: Okay. Thank you. 17 Tom. 18 MR. MORGAN: You bet. Thank you. 19 MR. COLLINS: So, you know, not to -- I 20 think, you know -- Mr. Chairman, I think this 21 discussion has been helpful for me. I would -- at this 22 point I think what I would recommend we -- what I would 23 ask the Commission to do is -- you know, we think that 24 the language with respect to Representative Abeytia, 25 for example, at Page -- well, there's not page numbers
Page 55 1 Commission, we were discussing this and Representative 2 Abeytia did appear at an earlier meeting of us and a 3 little bit explained her position and -- I don't know 4 if I would say apologized, but she did appear. I can't 5 remember Mr. Jaramillo being here; I don't think he has 6 been. But she has been here once before. 7 So just to summarize, at this point the 8 proposed agreement with Abeytia is pay a fine of 9 \$5,000, pay restitution or repayment of \$2,082.37, 10 amend her campaign finance reports, and agree not to 11 seek or accept Clean Elections funding in any other 12 election. And from what Craig says, this is kind of a 13 -- we either adopt it this way or we reject it this 14 way, but we could adopt it with a provision saying, 15 should the respondent default on any of these 16 agreements, the full amount will be assessed or -- I 17 don't know exactly how we would word that, but we could 18 add that without redoing the whole thing. 19 Have I explained that correctly, Craig? 20 MR. MORGAN: Yes. My -- my recommendation, 21 though, would probably be -- because you got here 22 because of Mr. Collins' good work and collaboration 23 with the candidates, my gut reaction -- and we should 24 ask, I think, Mr. Collins what he thinks -- would be 25 that you probably would want him to talk with them	Page 57 1 on this, but this is Paragraph -- Paragraph 11. You 2 know, our -- our point of view is that Paragraph 11 -- 3 this is a little -- is that Paragraph 11 covers the 4 default issue. 5 That said, I think that the better course 6 here probably, you know, would be to -- you know, we 7 can -- we can make that paragraph tighter. So let me 8 double-check. Sorry. Okay. Anyways, I think that -- 9 yeah, that's right. Okay. Anyways, so -- I'm sorry. 10 So anyways, I -- 11 What I think we can do here, at a minimum, is 12 take a step back and rather than -- I mean, I think you 13 have a third option, obviously, and I assume -- I think 14 Craig will agree with this, which is to just -- we go 15 to the next -- we move this to October. I think if we 16 do that we can take a look at the default language, 17 make sure that it's as clear as possible, that it -- 18 that it means what we intended it to mean and what we 19 think the agreement is, and that might also allow for, 20 you know -- you know, the candidates to decide to 21 attend, if they choose. 22 I will say that I -- you know, my practice 23 has been, and this is something I own, has been to not 24 necessarily encourage folks to come because, you know 25 -- so I don't put a hard sell on anybody about -- about

Page 58 1 coming to these hearings because -- you know, because 2 we don't have a real allocution process. You know, 3 it's not a -- it's not a -- it's not a criminal 4 proceeding. So I've looked at it that way, and that's 5 on me, but so to the extent that -- obviously these are 6 adults, they can draw their own conclusion on what the 7 appropriate thing to do, and they probably ought to, 8 but they're not hearing from me a push to necessarily 9 have them here. 10 So I would -- I would say just for the sake 11 of clarity, and we certainly don't like to leave you in 12 a position where you're going to have nagging doubts 13 about what you've -- what you might have approved, I 14 mean, you know, I think that it's -- I think it seems 15 reasonable to me to say, okay, well, we've -- we're 16 here, we can talk with -- you know, we can look at the 17 language, we can -- we can make some changes as 18 necessary. We think that the -- that the language is 19 there, but obviously, you know, that can be clarified 20 in some way. So that -- I think that would be my 21 recommendation at this point. 22 You know, there's not a per se rush to do 23 this. It's really a matter of us trying to get to 24 the -- what -- a result that as staff members we think 25 is reasonable and -- you know, so we're -- you know, we	Page 60 1 anything like this at all, that's different. But I 2 just wanted to make sure you understand that that 3 language is in there. Thank you. 4 CHAIRMAN KIMBLE: Thank you, Craig. That's 5 a -- that's a very good point. 6 So what is the -- the will of the Commission? 7 Do you want to table this with some instructions? Do 8 you want to approve it? Do you want to reject it? 9 Does any Member of the Commission have a motion to 10 make? 11 COMMISSIONER CRUMP: Mr. Chairman, I 12 appreciate Counsel Morgan's clarification on that. And 13 so with that, I'm satisfied, just as long as we know 14 that we can go for the full -- the full amount in the 15 event of default. So in that spirit, I'd rather -- I 16 feel we should move forward and not take up more staff 17 time on this and let's get it moving forward. 18 So I would make a motion that the draft 19 agreements on both of the candidates, that we approve 20 those. 21 CHAIRMAN KIMBLE: I think we ought to take 22 them separately -- 23 COMMISSIONER CRUMP: Okay. 24 CHAIRMAN KIMBLE: -- Commissioner Crump, so 25 let's just address Representative Abeytia now. So what
Page 59 1 want to be -- we want to be cognizant of that. And so 2 that's -- that's sort of my recommendation at this 3 point, you know, would be that you not take any action 4 and we -- and we simply come back at this point. But 5 that would be my request, and then -- and you all can 6 -- that would be my request at this point. Thanks. 7 MR. MORGAN: Mr. Chair, if I may, I do want 8 to clarify. I do agree with what Mr. Collins said 9 about the options. I want to point out, though, to you 10 and the other Commissioners that in Paragraphs 9, 10, 11 and 11, et cetera, in both of these agreements that are 12 before you, it very clearly states that a default under 13 the agreement will result in a penalty and it lists the 14 entire amount. For Abeytia it's 101,000 and change; 15 for the other it's 231,000 and change. So I do think 16 that issue has been addressed. I just want to make 17 sure that you all understand that, because I don't know 18 that that was on everybody's radar earlier. So it's in 19 there. 20 So if the purpose of putting this out until 21 next month is to have language like that in there, I 22 submit to you that Mr. Collins has put it in there and 23 I'm comfortable with it. If the idea here, though, is 24 to push it out to next month because you want to 25 consider other issues or consider whether to do	Page 61 1 would your motion be regarding her? 2 COMMISSIONER CRUMP: My motion would be that 3 we accept and approve the staff's draft agreement for 4 conciliation on that matter. 5 CHAIRMAN KIMBLE: Thank you. 6 Is there a second to that motion? 7 COMMISSIONER WERTHER: I second. 8 CHAIRMAN KIMBLE: It's been moved and 9 seconded that we approve the agreement with 10 Representative Abeytia as presented to us. I will call 11 the roll. 12 Commissioner Crump. 13 COMMISSIONER CRUMP: Aye. 14 CHAIRMAN KIMBLE: Commissioner Werther. 15 COMMISSIONER WERTHER: Aye. 16 CHAIRMAN KIMBLE: Commissioner Paton. 17 COMMISSIONER PATON: No. 18 CHAIRMAN KIMBLE: Chair votes no. 19 It fails 2-to-2. 20 MR. COLLINS: Yep. Okay. I would like to 21 renew my request that you hold the Jaramillo agreement 22 until the next meeting. 23 CHAIRMAN KIMBLE: Okay. So Item V on the 24 Agenda, do we need a vote to table this or -- I don't 25 think we do, do we, Craig?

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1 MR. MORGAN: No, I don't think you do. 2 CHAIRMAN KIMBLE: Okay. So we'll move on to 3 Item VI, discussion and possible action on status 4 report on Proposition 211, Voters' Right To Know Act 5 implementation and litigation. As we prepared for this 6 meeting, we thought it would be helpful to have a brief 7 overview of where implementation of Proposition 211 8 stands and the status of ongoing litigation. Tom has a 9 presentation, after which we can ask questions and 10 discussion. 11 Tom. 12 MR. COLLINS: Yes, thank you. Thank you, 13 Commissioners. 14 Commissioner Crump, you know, you're going to 15 find that if you don't find the sound of my voice to be 16 just a -- sadly, you're going to hear a lot of it. 17 COMMISSIONER PATON: It's very pleasant. 18 MR. COLLINS: Thank you. That's what people 19 that listen to the podcast say, in fact, so you should 20 download or stream Beyond the Ballot AZ. People put it 21 on to go to sleep, they calm their babies. 22 Anyways, so -- yeah. So as Commissioner -- 23 Chairman Kimble said, we wanted to kind of ground 24 ourselves a little bit on the Prop 211 matter. Because 25 we've now gone through the -- all of the oral arguments	1 are the triggers, the drivers of this? Basically we're 2 talking about campaign media spending. That's a 3 defined term. It's -- it's mostly concerned with ads 4 and public communications. It's concerned a little bit 5 with partisan get out the vote activities, and it's 6 concerned a little bit about the prep work behind that 7 in terms of capturing some of those costs. It's also 8 concerned with initiatives, referendums, and recalls, 9 in addition to candidate independent expenditures. 10 It requires the disclosure of original donors 11 giving more than \$5,000. Those donors are the -- at a 12 minimum, the donor to spender -- there's a notice about 13 how that money is going to be used and then there's an 14 opt-out available, right. So if I give money to -- in 15 the most simple case, if -- if, you know, Person A 16 gives money to, you know, Nonprofit B for -- and then 17 Nonprofit B is going to spend the money on independent 18 expenditure ads, Nonprofit B has to tell Person A that 19 that's how the money is going to be used and give them 20 the opportunity to opt out of having their money used 21 for that purpose. 22 And by opting out of having their money used 23 for that purpose, it will mean that that money -- that 24 person's name would never be disclosed because they 25 couldn't be designated as a donor. You know, and it
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1 around this case, so we thought maybe it would be good 2 to sort of say -- and there's been some press coverage 3 around that, and I don't know if any of you've seen it. 4 If you haven't, we're happy to get you copies of that. 5 But, you know, the idea here was like what have -- what 6 have we been doing for the last two years while this 7 has been going on. 8 So the first thing we wanted to kind of do is 9 sort of talk about what this is. Proposition 211 is -- 10 this is sort of a boiled-down version of what the 11 purpose and intent section says. It says -- it 12 declares this right to know who are paying for campaign 13 ads, it wants donors over \$5,000 disclosed, and it 14 wants to know who that donor is regardless of how many 15 people touched the money along the way. As part of 16 that -- you know, this was passed as a voter 17 initiative. You know, it sets up this campaign funding 18 source law and then it imposes some responsibilities on 19 the Commission. So that kind of summarizes that. 20 If we could, Cathy -- yeah, thanks. 21 And obviously, please, Commissioners, 22 interrupt me if you have any questions about any of 23 this. And this is sort of a high-level thing, I mean, 24 but -- 25 You know, so what's the -- what's the -- what	1 also -- it also, you know -- it would mean that their 2 money could be used otherwise by the organization. 3 It prohibits structuring of transactions to 4 evade disclosure. So, you know, what that's trying to 5 get at is I'm going to spend -- I'm going to spend more 6 than \$50,000 and I want to keep -- but I'm -- and I 7 want to -- and I've got donors who want to spend more 8 than \$5,000, but we've set up, you know, four or five 9 different organizations for the purpose of doing that. 10 That's the general case. And, you know, so we're 11 talking about -- you know, that's the sort of thing. 12 And it allows for some exemptions. So, you 13 know, if you are a person who has a -- by law or by 14 some court order, but there's no -- which you could -- 15 either could get for this purpose, you could get it 16 from other purposes, that says your personal 17 information is not supposed to be disclosed, you are -- 18 you know, that there -- you will not be disclosed. And 19 then -- but your money can still be used, and I think 20 that's an important point. That's not taking your 21 money out of circulation; it's taking your name out of 22 circulation. 23 And then you can ask the Commission to exempt 24 you. And when the Commission exempts you, it -- you 25 know, the Commission -- there's a standard in the

Page 66 1 statute, and then we've set up some procedures along 2 those lines to try to make sure, in that process, that 3 your name is not revealed while you're asking, which we 4 haven't been asked by anybody yet to do that. 5 So I guess we could go to the next one, 6 please. 7 And this sort of -- I sort of anticipated, I 8 guess, with my last slide some of these. These are 9 the -- these are what we did -- in 2023 we held -- you 10 know, we did some work as staff talking to the 11 regulated community informally, we did some research, 12 we worked with our attorneys, and we developed a set of 13 rules that try to, you know, address the opt-out 14 provision process, address a process for, you know, 15 seeking that security exemption. We have a, you know, 16 process for complaints and investigations. 17 We also tried to set some ground rules for 18 recordkeeping and anti-structuring, and I want to 19 highlight those because what we -- what we tried to do 20 there is, you know -- and I think this was true for the 21 entire rules that the Commission adopted. We really 22 wanted to keep a -- sort of a minimal substantive 23 footprint for the rules. And what I mean by that is we 24 wanted the rules to be mostly procedural, how you 25 execute this, rather than what you have to execute,	Page 68 1 the -- that the -- we have a fillable PDF form. This 2 is a terrible admission to make, but ChatGPT told me 3 that we have had something like 200 reports. I haven't 4 counted them myself, but that's what it says, so I 5 thought that sounded like a good answer. But they are 6 posted, they're available at that website. 7 And, you know, the filing process is not 8 perfect, and we can talk a little bit about this as we 9 go on. One of the real complicating factors about the 10 reporting that, you know, the law doesn't -- doesn't 11 really -- I mean, the law says that if you're a 12 political action committee you're not required to file 13 on the same schedule as you would have to file these 14 campaign media spending reports. You know, essentially 15 you get to keep your own schedule so long as the 16 information you're disclosing as a PAC is the same 17 information you would be disclosing on one of these 18 reports. 19 So how do you do that without creating an 20 additional report for PACs? And, you know, what we -- 21 what we've -- what we have there is that essentially 22 what -- the best we've been able to suggest is that 23 folks essentially use the forms, the PAC forms, the 24 information -- the memo line in the PAC forms to 25 disclose original sources. You know, there are pros
Page 67 1 because the statute really dictates what you have to 2 execute. 3 And so, you know, where there were, you 4 know -- you know, so there -- you know, there -- and I 5 apologize for what I'm about to say to Commissioner 6 Kimble and Commissioner Paton, but there is a -- there 7 is a -- there's an extraordinarily fine line between 8 procedural and substantive rules that people have 9 written tomes about, and we were trying to stay on the 10 procedural side of that line, to the extent we could, 11 in doing that. And that's partially because we're 12 conscious of developments in the law around, you know, 13 administrative law and how the -- how that operates 14 constitutionally. 15 So I guess we can go to the next one. 16 So reports. So there's two main mechanisms 17 of disclosure under this Act. The one you're going to 18 see every day potentially is the -- the sign 19 disclaimer. So it makes some adjustments to the sign 20 disclaimer that -- to try to, where the law requires 21 it, to get the original source onto the sign or 22 campaign ad itself. And then -- and then there is a 23 more extensive report filed with the Secretary of 24 State's Office. 25 In implementing that, where we ended up was	Page 69 1 and cons to that approach. There are -- but, you 2 know -- 3 So overall, you know, I think that the PDFs 4 at least hit the immediacy issue for voters, which the 5 statute talks about. In other words, you can look at 6 it, you can see who's there, you can see when they 7 spent the money, you can see who the sources are. 8 Integrating that into the overall campaign finance 9 system so you could sort of aggregate out how much 10 money is being spent in a particular race, that's -- 11 that you'd have to do manually. 12 The other thing that's come up, and you'll 13 see this if you do -- have followed or do want to -- 14 or, you know, is whether we ought to have more 15 Commission eyeballs on the reports themselves prior to 16 a complaint being filed. And, you know, our -- you 17 know, what I've said about that, and I'm not sure I've 18 said it to you all before, but -- is that right now 19 there's no -- I'm not aware of any agency in the state 20 that does that, other than what we do for the Clean 21 candidates. 22 I think there would be some -- some real 23 pushback from the regulated community about that, you 24 know, so -- you know, and then the question would -- 25 because it would immediately raise questions about what

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1 the scope of those audits would be, are we going to get 2 into the business of looking at -- behind the reports 3 absent some cause, are we going to do that on a random 4 basis, are we going to look at all those things, right. 5 So that's a -- that would -- although we would have the 6 authority to do it, you know, it would be a -- it would 7 certainly raise the level of scrutiny in a -- in a -- 8 in a way that, you know, regulated actors would see as 9 a -- you know, as an invasion of their business 10 practices and other things. 11 So, you know, as staff we're -- I think I can 12 say that we're -- you know, we're a little -- we're -- 13 we're wary of venturing into that because, you know, it 14 would require a process just to get a rule in place 15 that really looked at some real fine line questions and 16 some -- and would touch at some real sensitive nerves 17 of folks who are involved in spending money on 18 campaigns and trying to get people elected or 19 initiatives passed. 20 Okay. Thanks. 21 The advisory opinions, you know, we developed 22 that rule -- and actually, I think this has been one of 23 the most effective rules we did -- in order to provide 24 folks with an interest under the Act the opportunity to 25 ask the Commission to sort of weigh in on a particular	1 things. So that's good. I mean, my hope is that 2 folks, before they do the ad, they pick up their 3 opinion and they can say, okay, where are we on this. 4 We're here. This is what we would need to put on the 5 disclaimer. This is how we need to proceed. I mean, 6 that's the goal, right, is to have a real -- a real 7 guide to that, and we think -- I think that's what's 8 happened, and so that's been good. 9 We've also gotten questions on initiative 10 signature gathering as campaign media spending, and 11 we've -- in that -- in that opinion we said that 12 initiative signature gathering is not campaign media 13 spending because it's not a public communication in and 14 of itself. It's a -- it's a -- it's a different 15 process than that. 16 And then we got, I thought, an interesting 17 one around the scope of the media exception. And, you 18 know, we provided, I think -- you know, that was a 19 little less black and white, but I think we provided 20 some guidance to folks on how to treat that. 21 So just to give you -- sort of highlight how 22 we've handled the complaints, I think we've had eight 23 total. I review the complaint to see if it qualifies. 24 So the rules set forth, you know, what the -- what the 25 parameters of a -- of a -- of a complaint are. And
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1 set of facts before they engage in that action. And 2 then we, in the rules, say that there's a -- they can 3 have some reliance on that. 4 The rule we adopted is effectively the same 5 process that the Federal Election Commission uses, 6 although we have five members, not six, so that 7 generally -- although, I think -- I think all of those 8 have been -- we've passed them unanimously. And 9 they've really been good questions. I really think 10 that the folks who are operating under this Act have 11 taken advantage of that for the purpose that I think -- 12 well, at least personally I had hoped that they would 13 so that, you know, we have a good -- especially on the 14 advertising formats that we've considered, you know, 15 we've -- this campaign media spending definition gets 16 into, you know, especially on the candidate's side, 17 gets into some different issues around what triggers 18 what in different time frames. And that's true under 19 state law otherwise, that's true under federal law, 20 but -- 21 So we've got a good compendium of the kind of 22 advertisements that you are likely to see over the 23 course of the -- that you're likely to see over the 24 course of the campaign, you know, standard -- your 25 standard Facebook ad, your standard -- some of those	1 then I ask for a response. And then, you know -- 2 And some of the complaints I think have 3 arisen -- I mean, I would say not all of, but I think 4 probably most of them have arisen in the context where 5 you have a -- that last transaction between the donor 6 and spender, right, is the one that gets reported, and 7 -- and the complainants have either provided some 8 context or have provided sufficient -- have met the 9 definition -- have met the rules sufficiently to me 10 being able to ask for a response on that with respect 11 to -- 12 You know, and we've gotten different answers 13 to that question. You know, the bulk of the answer -- 14 the predominant answer across context has been people 15 gave less than \$5,000, so we didn't have them disclose, 16 but that's not been the only answer we've gotten. In 17 one case the answer was, we have a -- we have an 18 existing investment fund within our organization that 19 we drew the money from, and therefore we are -- we 20 self-funded this as an organization, right. So, you 21 know -- 22 And so one of the things that arises with the 23 reports is, what do you do if you have no -- nothing to 24 report, right, is -- because a non-report that's not 25 compliant and a non-report that is compliant are --

Page 74 1 there's no way to determine that from the face of a 2 report. And so, you know, we've -- we've sort of left 3 it with the regulated community to try to determine how 4 they want to handle that. Some people just put in, we 5 have nothing to report here. And I think, as a 6 practice matter, I don't think it's actually a huge 7 imposition to say that. But we haven't sort of asked 8 you to consider a policy on that. 9 I also just want to note that, you know, we 10 have not used any additional process in this. So under 11 the rules essentially how this -- how this proceeds is 12 the -- it's a little different from what we do on the 13 Clean Elections Act side. Most of the enforcement 14 process is housed in the Executive Director's position. 15 And then if there is a -- either a settlement or a -- 16 or a hearing, then, you know, then the Commission comes 17 in in an adjudicative manner. But, you know, I think 18 it's important to note that we haven't -- you know, we 19 haven't subpoenaed anyone or done that -- anything like 20 that. 21 We do -- you know, when we get these 22 complaints we do take them seriously and they're 23 reported out to you in the Executive Director's Report. 24 We don't have any currently, but they've been in there. 25 And if any -- Commissioner Crump, for example, if you	Page 76 1 here that came up, you know, you just want to make sure 2 you're doing X, you know, that kind of thing. And so 3 there's a -- we think that that, again, has some 4 benefit to it. 5 I guess we can go to litigation. 6 And then so we have these three cases. I've 7 identified the main -- the main plaintiffs there. 8 There's some other plaintiffs along -- in there too, 9 but the -- but basically we have this federal -- 10 pending in the 9th Circuit we have this First Amendment 11 challenge which essentially says that -- you know, 12 there was a case called Bonta, I think, in -- what year 13 was that -- a few years ago where Americans for 14 Prosperity challenged a California law that required 15 nonprofits to provide their donors' names and 16 information to the California Attorney General's 17 Office, and really that was it, and then the Attorney 18 General's Office had them and didn't obviously do 19 anything with them. And that was struck down. So the 20 -- this case is -- this challenge is really basically 21 trying to attempt to extend that principle to campaign 22 disclosures and use the sort of original source, as 23 opposed to the last donor, as a -- as a leverage point 24 there. 25 The state challenges are -- you know, we have
Page 75 1 would -- and I should probably just get you what we've 2 reported out. What you see in the reports is that we 3 do look at the financial activities that are available 4 of the organizations that we're scrutinizing, right. 5 So we look at their 990s, we look to see if their 6 reports and their answers and the response align with 7 the other information that's out there. And so, you 8 know, I think that that's -- that's something that -- 9 you know, again, I think it's important. 10 I also will say, and this is partially a 11 point of pride and -- but also I think an important 12 policy point. As far as I know, at least at the State 13 and in Maricopa County, I think we're the only folks 14 who -- who expressly state why the complaint was closed 15 and why it was dismissed. I think so. I do think -- 16 and then the real point of personal pride is I do think 17 that the explanations that we provide are more 18 comprehensive than others you might see. Now, I may be 19 wrong about that. There may be somebody out there 20 who's -- who's doing that. But I do think we are -- my 21 impression is that we're doing that at a -- at a -- at 22 a -- at least with a -- as a point of emphasis. 23 And it also allows us to say to a respondent, 24 you know, we checked this, we checked this, and we're 25 dismissing the complaint, but -- you know, this issue	Page 77 1 the legislative leadership challenged the separation of 2 powers and non-delegation basically saying that the 3 voters infringed on the Legislature's authority. That 4 case is pending at the Arizona Supreme Court pending a 5 decision. We had an argument in March. 6 There was -- the Court of Appeals, we largely 7 were successful. The one point we -- where the Court 8 of Appeals said a provision of the Act was 9 unconstitutional, but severable, was there is some 10 language in the Act that says that the Commission's 11 regulatory and enforcement decisions are not subject to 12 oversight or action by an administrative body or 13 legislative body. And the Legislature took the 14 position that legislative body includes the 15 Legislature. The folks who wrote this thought it 16 included a rules committee of the Legislature. 17 But certainly our position, as the Clean 18 Elections Commission, was that the Legislature can 19 legislate. So we took the position that that was the 20 -- that regardless of what they were thinking when they 21 wrote it, that the right construction was it 22 couldn't -- it couldn't mean that the voters sought, by 23 statute, to prevent the Legislature from legislating. 24 The Court of Appeals said that that 25 construction wasn't -- wasn't -- essentially they

Page 78 1 rejected the construction. And because they rejected 2 the construction, they said that that provision of the 3 Act was -- violated separation of powers and then they 4 severed it from the rest of the Act. 5 I mean, that -- that provision is kind of 6 funny because it creates this sort of strange -- we 7 were enjoined. So it's not clear what we were -- how 8 we were -- what we were -- we were enjoined from 9 preventing the Legislature from trying to pass 10 legislation is just not a -- I mean, right, it's 11 just -- that's why we thought the construction had to 12 be what we said it was, because you can't -- I can't 13 conceive of how that works. 14 And then -- and then the last one, which was 15 argued a couple of weeks ago, is the Center for Arizona 16 Policy, Free Enterprise Club, Arizona Free Speech 17 challenge. There's a little bit about the Arizona 18 Constitution's Private Affairs Clause in there, but 19 it's mostly about the Article 2, Section 6 provision of 20 our constitution -- state constitution which says that, 21 you know, people shall be -- shall be able to freely 22 publish on all subjects, subject to, you know, 23 responsibility for abuse of this right, which is 24 different -- obviously different words than the First 25 Amendment.	Page 80 1 rescheduling it for further consideration, or 2 responding to criticism. Please limit your comments to 3 two more -- to no more than two minutes. 4 Does any member of the public wish to make 5 comments at this time? Anyone on Zoom wish to make a 6 comment? 7 Yes, Rivko. You're muted. I'm sorry, 8 Ms. Knox. Ms. Knox, we can't hear you. 9 MS. KNOX: Thank you, Commissioner. I 10 apologize. 11 CHAIRMAN KIMBLE: There you are. 12 MS. KNOX: I just wanted to say, my name is 13 Rivko Knox. I'm a long-time voter here in the state of 14 Arizona, since 1966. For a number of years I observed 15 the Commission on behalf of the Arizona League of Women 16 Voters, a nonpartisan organization, but now I'm 17 observing just as a regular voter. 18 My comment has to do with the outstanding 19 education program that was put on by primarily Gina 20 Roberts and her staff that was on PBS the other night. 21 I saw it advertised. I didn't know anything about it 22 before. And I was really just extremely taken by what 23 I heard. It was very, very well done. And at the end 24 it said, this comes to you from Clean Elections, and I 25 was very happy to hear that, because I think the idea
Page 79 1 And so -- so that's where those -- so three 2 decisions, all of them are at the Appellate level. We 3 don't know when we'll hear on those or how. 4 So that's -- that's kind of the sum total of 5 all the work you all have done. And Commissioner 6 Crump, we did force the Commissioners to sit through 7 like hours of explication of the Act itself along the 8 way. You know, we had I don't know many -- how many 9 PowerPoints did we make you all sit through? 10 CHAIRMAN KIMBLE: A lot. 11 MR. COLLINS: A lot. So this is the -- but 12 like I said, the Chairman -- you know, like the 13 Chairman said, I think this is right, that we just 14 wanted to kind of say, okay, well, what have we done 15 here so far, so we know where we are moving forward 16 with whatever the next thing is. 17 CHAIRMAN KIMBLE: Thank you, Tom. 18 Do any Members of the Commission have any 19 comments or questions for Tom? 20 (No response.) 21 CHAIRMAN KIMBLE: Okay. Hearing none, we'll 22 move on to Item VII, public comment. This is the time 23 for consideration of comments and suggestions from the 24 public. Action taken as a result of public comment 25 will be limited to directing staff to study the matter,	Page 81 1 of Clean Elections, in addition to all the voter 2 education that you do online and in person, which was 3 discussed earlier today -- actually educating people 4 about key issues is another area where Clean Elections 5 could do a wonderful job. So I just wanted to praise 6 and give kudos to Gina Roberts and her staff. 7 And I also want to apologize for beginning to 8 eat my breakfast in front of all of you. I thought I 9 had cut off the visual, but I forgot to do that. 10 So thank you very much and that's all I have 11 to say. 12 CHAIRMAN KIMBLE: Well, thank you for your 13 comments. No apology is needed. And I'm sure Gina 14 appreciates your viewership and your comments on her 15 panel. 16 Gina, did you want to say anything? 17 MS. ROBERTS: Mr. Chairman, Commissioners, 18 just that we very much appreciate any feedback that we 19 get on our -- on our services. So that was very nice 20 to hear, and we will continue to do our best. Thank 21 you. 22 CHAIRMAN KIMBLE: Thank you, Gina. 23 Is there anyone else who wishes to make any 24 comment? 25 (No response.)

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1 CHAIRMAN KIMBLE: Seeing none, public may
2 also submit comments by e-mail at
3 ccec@azcleelections.gov.
4 Item VIII, adjournment. At this time, I will
5 entertain a motion to adjourn.
6 COMMISSIONER WERTHER: I move to adjourn.
7 CHAIRMAN KIMBLE: Thank you. It's been moved
8 by Commissioner Werther that we adjourn. Is there a
9 second?
10 COMMISSIONER PATON: I'll second.
11 CHAIRMAN KIMBLE: Seconded by
12 Commissioner Paton. I'll call the roll.
13 Commissioner Crump.
14 COMMISSIONER CRUMP: Aye.
15 CHAIRMAN KIMBLE: Commissioner Werther.
16 COMMISSIONER WERTHER: Aye.
17 CHAIRMAN KIMBLE: Commissioner Paton.
18 COMMISSIONER PATON: Aye.
19 CHAIRMAN KIMBLE: Chair votes aye.
20 We are adjourned. Thank you.
21 (The meeting concluded at 11:51 a.m.)
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1 STATE OF ARIZONA)
) ss.
2 COUNTY OF MARICOPA)
3
4 BE IT KNOWN that the foregoing proceedings
5 were taken by me; that I was then and there a Certified
6 Reporter of the State of Arizona; that the proceedings
7 were taken down by me in shorthand and thereafter
8 transcribed into typewriting under my direction; that
9 the foregoing pages are a full, true, and accurate
10 transcript of all proceedings had and adduced upon the
11 taking of said proceedings, all to the best of my skill
12 and ability.
13
14 I FURTHER CERTIFY that I am in no way related
15 to nor employed by any of the parties hereto nor am I
16 in any way interested in the outcome hereof.
17
18 DATED at Tempe, Arizona, this 26th day of
19 September, 2025.

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21 
22
23 Kathryn A. Blackwelder, RPR
Certified Reporter #50666
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THE STATE OF ARIZONA
CITIZENS CLEAN ELECTIONS COMMISSION

REPORTER'S TRANSCRIPT OF VIRTUAL PUBLIC MEETING

Phoenix, Arizona
October 7, 2025
1:30 p.m.

By: Kathryn A. Blackwelder, RPR
Certified Reporter
Certificate No. 50666

**CERTIFIED
TRANSCRIPT**

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1 PUBLIC MEETING BEFORE THE CITIZENS CLEAN 2 ELECTIONS COMMISSION convened at 1:30 p.m. on October 3 7, 2025, at the State of Arizona, Clean Elections 4 Commission, 1110 West Washington, Conference Room, 5 Phoenix, Arizona, in the presence of the following 6 Board Members: 7 8 Mr. Mark Kimble, Chairman 9 Mr. Galen Paton 10 Ms. Christina Werther 11 Mr. Sam Crump 12 Mr. Steve Titla 13 OTHERS PRESENT: 14 Thomas M. Collins, Executive Director 15 Paula Thomas, Executive Officer 16 Mike Becker, Policy Director 17 Gina Roberts, Voter Education Director 18 Alec Shaffer, Web Content Manager 19 Craig Morgan, Taft Law 20 Allie Karpurk, Osborn Maledon 21 Cathy Herring, KCA 22 23 24 25	1 Cathy, if we are able to get that slide up, I 2 think that would be help -- help me a little bit with 3 talking through this a little bit. 4 So -- so hopefully what you all can see there 5 is a timeline of where we are to try to -- try to put 6 us in a -- you know, try to put this in some 7 perspective. So we have -- so the sort of narrative, 8 that covers both of these Agenda items, and it starts, 9 you know, prior to January 2025 when Mr. Jaramillo, 10 who -- 11 I should note, I heard from him earlier about 12 whether or not he was going to be able to get a break 13 from work to join us. I don't -- I don't expect that 14 he's going -- he has, but, you know, but he did contact 15 me and was trying to work that out. 16 So we had an issue that we've had with a 17 handful of candidates this 2024 election cycle where 18 folks were not -- sort of stopped -- sort of -- did 19 stop contacting or filing and then didn't respond to 20 calls from staff or from our auditors. And so among 21 the complaints that were filed -- that I filed was this 22 one against Hector Jaramillo in January. 23 So in January there's a complaint. That 24 complaint essentially articulates, hey, you haven't 25 filed and we don't know what's going on with you.
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1 P R O C E E D I N G 2 CHAIRMAN KIMBLE: Agenda Item I is the call 3 to order. It is 1:30 p.m. on October 7th, 2025. I'm 4 Mark Kimble and I call this meeting of the Citizens 5 Clean Elections Commission to order. 6 With that, we will take attendance. 7 Commissioners, please identify yourselves for the 8 record. 9 COMMISSIONER PATON: Galen Paton. 10 COMMISSIONER WERTHER: Christina Werther. 11 COMMISSIONER TITLA: Steve Titla. 12 COMMISSIONER CRUMP: Sam Crump. 13 CHAIRMAN KIMBLE: Thank you. We have all 14 Commissioners -- all five Commissioners present, so we 15 obviously have a quorum. 16 Item II, discussion and possible action on 17 Hector Jaramillo, 2024 legislative candidate, repayment 18 order issued March 2025 and Office of Administrative 19 Hearings Case Number 25-01-CCE. Commissioners, our 20 first business item is our March 27th, 2025 repayment 21 order against Hector Jaramillo. Tom has a brief 22 outline of the circumstances, but he is requesting that 23 we vacate that order. 24 Tom. 25 MR. COLLINS: Thank you, Commissioners.	1 You're not responding to the audits; that's not 2 allowed. You know, and lays out all the different -- 3 excuse me -- potential violations that are there, 4 including the possibility of being subject to 5 repayment. That did not lead to a response, which was 6 our -- our hope. 7 And then in March we had to make a decision 8 about what to do with the -- in order to get 9 Mr. Jaramillo's attention. And given that there were 10 no filings, at that time we made a decision -- I made a 11 decision that said, okay, well, the immediate question 12 is where is the money, because without the reports and 13 without any response to the auditors we don't know 14 where that is, and the most effective way to get that 15 -- get the attention of anybody is to initiate the 16 proceedings to collect the money. So we did that via a 17 repayment order. We issued that order -- you all 18 approved and issued that order in March. 19 And then that day, you know, we heard from 20 Mr. Jaramillo for the first time, and then over the 21 course of the next several months a couple of things 22 happened. The first thing that happened, you know, is 23 we got some -- started to get some -- well, I don't 24 know if it's first or second, but around the same time 25 we got both cooperation around providing the documents

Page 6 1 that we needed to work on the audit, and we went 2 broader -- the audit was then broader than the audit we 3 would do just as a matter of course. It was a fuller 4 audit. And those documents were provided to me and 5 relayed to the auditor. 6 At the same time, because the repayment order 7 is a real -- you know, this is a real live 8 administrative action that we took, Mr. Jaramillo had a 9 right under -- under the administrative code to -- or, 10 under the Administrative Procedures Act to file an 11 appeal to the Office of Administrative Hearings, which 12 he did, so -- 13 So now a couple of things are happening at 14 one time. There is an appeal to the Office of 15 Administrative Hearings. There is an effort to 16 provide -- by our auditors to make sure that we have 17 what we need to understand if, in fact, the repayment, 18 you know, order should stand. And then thirdly, there 19 is the outstanding issue in the complaint regarding 20 late filing and related matters. 21 You know, so we get through -- we're on a 22 track where the auditors are working, the OAH 23 proceedings are proceeding, and we are -- start working 24 with Mr. Jaramillo on a conciliation that would -- 25 because this was the draft conciliation that we have --	Page 8 1 to the ALJ that says, hey, we're still working on this, 2 but -- because that would imply that we still have a 3 position to defend the repayment order on its terms. 4 All right. So we -- so our goal was to have 5 a conciliation that consolidated everything and 6 dismissed the appeal, imposed the fines, and moved on. 7 August, we lose that month because of the storm 8 knocking out our camera. I mean, this is a thing that 9 happens. And so now we are in a position where we need 10 to bifurcate these issues. 11 And procedurally what my view is is that what 12 we -- the right thing to do here is to, you know, get 13 rid of -- you know, to vacate the repayment order, 14 because we're not going to pursue repayment, and then 15 we have another agenda item where you will be, you 16 know, assessing whether or not there is reason to 17 believe there's a violation on the fine issue. 18 That's a step we had -- we were, you know, 19 going to, again, avoid by virtue of the conciliation, 20 had we gotten that done. But again, because we ended 21 up with this kind of oddly compressed timeline where 22 we're going to have to report back to OAH before we 23 resolve the case, you know, we -- it just is -- it's a 24 cleaner record for -- for us to work on these matters 25 as staff to be able to, you know, communicate to the
Page 7 1 we offered and later withdrew from consideration that 2 would have wrapped up the filing issues and the 3 repayment -- and the repayment issues, and that -- that 4 conciliation would have dismissed the OAH appeal. It 5 would have dismissed that case, because we would have 6 withdrawn the -- in that conciliation we would have 7 withdrawn the repayment order, we would have assessed a 8 fine for the -- the late penalties and other, you know, 9 matters that were contained there, and it would have 10 resolved both issues, both the repayment order and the 11 penalty issue that we had. 12 August we had our -- our -- the storm hit our 13 camera, and that -- and that actually matters here 14 because at the end of October I have, along with the 15 attorneys that are working with us on the appeal, a 16 report due to the Office of Administrative Hearings on 17 the status of the repayment order. 18 So now we've completed the audit work. We 19 are, as staff, satisfied that the repayment order is 20 not something that we would want to be defending on 21 appeal, because we asked for -- given we had no 22 information, we asked for the entire amount of money 23 back. We now have an audit report that says that 24 doesn't justify asking for money back, right, and -- 25 and so we can't make a report, as a practical matter,	Page 9 1 Office of Administrative Hearings what we need to 2 communicate there, and then we can continue to work on 3 the penalty aspect of this -- these matters. 4 So that's the -- that's the big picture. We 5 broke them up into different Agenda items because they 6 are different Agenda items insofar as in one case we 7 are -- we are -- we are -- you know, we're dealing with 8 a decision that has already been made that, you know, 9 in view of the subsequent cooperation, we now know that 10 that repayment order is not something that we -- we 11 would have imposed had this information been provided 12 to us in a timely manner. 13 And then in the other case, we, as staff, are 14 recommending that we make a determination that there's 15 reason to believe a violation occurred because that 16 there, right, the failure to file and provide that 17 information, that is the cause of the repayment order 18 having been initiated in the first place. 19 So those are separate questions. One of 20 these we're asking to now clear the -- clear this one 21 out. And then because we had -- you know, because of 22 the compressed timeline we are now under, we will move 23 forward and essentially move forward with the fine 24 aspect of this in that separate Agenda item. 25 So that's -- that's the broad overview. But

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1 the bottom line is that, you know, when -- once we 2 received the information from Jaramillo about his -- 3 his bank accounts and the like, we were not going to 4 sustain a repayment order. And because of the mishap 5 with the -- with the -- with the -- with the 6 technological mishap, we lost this month, so that means 7 that -- losing that month means that I was going to 8 have to go back to OAH, and I can only -- I can only 9 represent to OAH what I can fairly represent to OAH 10 ethically. So that's -- that's what it is. 11 It sounds complicated, but it's really -- in 12 this part, and you'll have to make a substantive 13 determination in the -- in the other Agenda item, but 14 this particular part is really, in many ways, 15 procedural and necessary in order for us to feel 16 comfortable moving forward to actually get this case 17 done. 18 And, you know, if we were in a setting where 19 we had a -- you know, a single judge, we would have 20 a -- we would do this in a phone call, where 21 Mr. Jaramillo would have the opportunity to appear if 22 he chose, I would be serving as -- as an attorney, and 23 you all would be serving -- there would be one judge 24 and we'd be done in -- very quickly. But, you know, 25 obviously because of our obligations under the Open	1 COMMISSIONER CRUMP: I'll second. 2 CHAIRMAN KIMBLE: Thank you, 3 Commissioner Crump. 4 It's been moved and seconded that we vacate 5 the repayment order. I will call the roll. 6 Commissioner Werther. 7 COMMISSIONER WERTHER: Aye. 8 CHAIRMAN KIMBLE: Commissioner Crump. 9 COMMISSIONER CRUMP: Aye. 10 CHAIRMAN KIMBLE: Commissioner Paton. 11 COMMISSIONER PATON: Aye. 12 CHAIRMAN KIMBLE: Commissioner Titla. 13 COMMISSIONER TITLA: Aye. 14 CHAIRMAN KIMBLE: Chair votes aye. Chair 15 votes aye. The motion is approved 5-to-nothing. 16 Let's move on to Item III, discussion and 17 possible action on MUR 25-01, Hector Jaramillo, 18 including Executive Director's recommendation on reason 19 to believe that violation or violations of the Clean 20 Elections Act and Rules have occurred. In the packet 21 you received outlining the Executive Director's 22 recommendation on whether there is reason to believe 23 violations of the Clean Elections Act and Rules 24 occurred -- 25 Tom, do you have anything you'd like to add?
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1 Meeting Law and other things, we have much more, you 2 know -- you know, sort of elaborate, if you will, 3 process for doing this. 4 So that's -- that's the upshot of where we 5 are on Item One. I'm not sure if there's specific 6 questions that you all have. I think that -- but I 7 think that about sums up what I have to say about it. 8 So I'm happy to, Mr. Chairman, to answer any questions 9 anyone has. 10 CHAIRMAN KIMBLE: Okay. Thank you, Tom. 11 Does anyone -- any Member of the Commission 12 have any questions for Tom? 13 (No response.) 14 CHAIRMAN KIMBLE: Just for the record, is 15 Mr. Jaramillo present or any of -- or one of his 16 representatives present? 17 (No response.) 18 CHAIRMAN KIMBLE: Okay. So is there a motion 19 from some Member of the Commission to vacate the 20 repayment order? 21 COMMISSIONER WERTHER: I move to vacate the 22 repayment order that was issued in March of 2025. 23 CHAIRMAN KIMBLE: Thank you, 24 Commissioner Werther. 25 Is there a second?	1 MR. COLLINS: Mr. Chairman, I would. Again, 2 I just -- I want to outline what we're talking about 3 here so we -- everybody understands what I'm -- what 4 I'm asking for, what I'm recommending, and what I think 5 the right thing to do here is. 6 So our rules for enforcement provide for 7 essentially an order of proceedings where, when we go 8 to impose a fine, we first make a -- or, we -- the 9 Executive Director first asks the Commission if you 10 will make a determination that there's reason to 11 believe a violation may have occurred. 12 This is -- for those of you worked -- and 13 there are, I think, a couple of you at least -- have 14 worked on a -- on the -- in a city or county or state, 15 Secretary of State, campaign finance context, this is 16 the equivalent of the reasonable cause determination 17 that a -- that a Secretary of State's Office makes, and 18 then they advance -- and then that advances in that 19 context to the AG or the County Attorney. In our 20 context it advances to the -- to the -- to a briefing 21 phase and then essentially a penalty phase. 22 So as I said earlier, you know, we made -- I 23 made a decision early on this year to pursue the 24 repayment order first in the hopes of, you know, making 25 sure we got a handle on where this money was. We were

Page 14 1 in a position where we were proceeding in a way that we 2 thought we would be able to wrap all this up in one 3 package. We had the August meeting mishap. And so now 4 I think in order to ensure that the Commission has an 5 opportunity to review this case and draw -- ultimately, 6 you know -- you know, put us in a position where we can 7 resolve this case certainly, you know, we're asking you 8 to approve the -- the memo, essentially, and the 9 reasonable cause -- the reason to believe determination 10 that's in there. 11 Again, the issues here are principally 12 filing. So this is a candidate who, once they, you 13 know, sort of got their -- they received funding from 14 the Commission, they stopped filing reports, they 15 weren't responsive to efforts by our auditors and staff 16 to get ahold of them, to respond to our questions, to 17 respond to the basic audit they were required to submit 18 to, and that -- and as you can see outlined in the 19 document, you know, that meant that these reports were 20 substantially late and, additionally, that -- you know, 21 that the candidate, you know, was not responsive to 22 questions from Commission staff or auditors, as they're 23 both required to by rule and statute and by the 24 agreement that they sign in order to be a participating 25 candidate.	Page 16 1 we have a meeting in November, I mean, I would like to 2 do that. 3 In the -- in the -- in the event that that's 4 not the case, we would -- what the next step would be 5 would be what's called a probable cause to believe 6 process. And that's really more -- that's in the 7 nature of where the Commission makes a determination, 8 to a preponderance of the evidence standard, that there 9 has, in fact, been a violation. And that can -- you 10 know, there's a -- there's a compliance period and the 11 notice period and then there's a response to that 12 brief. 13 So, you know, I would say the soonest, that 14 would probably be November just -- it might be a little 15 difficult to make that happen by the end of the month 16 if we end up there. But I think -- I think -- by the 17 back-of-the-envelope math I'm doing, I think we -- the 18 soonest would be November. And certainly our goal, as 19 staff, has been to -- we would like to get all of 20 these, if we can, done before 2026. The -- 21 So that's -- that's -- that's where -- that's 22 where we are. So I think the best guess would be -- I 23 would say just my best guess would probably be November 24 either way. My hope would be October if we are in a 25 position where we have something that we are
Page 15 1 So those are the basic facts. So we -- you 2 know, we're not -- you know, we're not at a place where 3 we're asking you to sort of -- this is not a judgment 4 yet. This is a, you know, reason to believe a 5 violation may have occurred. We do believe we meet 6 that standard. And so, you know, we would ask that the 7 Commission, you know, make that determination. 8 And I think that concludes what I -- what I 9 wanted to make sure that I put on the record, 10 Mr. Chairman. 11 CHAIRMAN KIMBLE: Okay. Thank you, Tom. 12 Is there any discussion or questions from the 13 Commission? 14 COMMISSIONER CRUMP: I have a question. 15 CHAIRMAN KIMBLE: Yes, Mr. Crump. 16 COMMISSIONER CRUMP: Tom, if we were to 17 approve this today, when would we expect to have this 18 matter back in front of us? 19 MR. COLLINS: Sure. Mr. Chairman, 20 Commissioner Crump, that's a good question. So there's 21 a couple of different avenues. As -- one is, if we're 22 able to be in a position where there's a -- where we 23 have an agreement that I can recommend to the 24 Commission with respect to Mr. Jaramillo, I mean, we 25 have another meeting at the end of the month and then	Page 17 1 comfortable recommending to you in the form of a -- of 2 an administrative settlement. 3 CHAIRMAN KIMBLE: Commissioner Crump, did 4 that answer your question? 5 COMMISSIONER CRUMP: Yep. Great. Thank you. 6 CHAIRMAN KIMBLE: Any other questions or 7 discussion from Members of the Commission? 8 (No response.) 9 CHAIRMAN KIMBLE: Hearing none, is there a 10 motion to determine there is reason to believe the 11 violations identified in the memo may have occurred? 12 COMMISSIONER WERTHER: So I move to approve 13 the Executive Director's recommendation of the reason 14 to believe violation or violations has occurred by 15 Hector Jaramillo. 16 CHAIRMAN KIMBLE: Thank you, 17 Commissioner Werther. 18 Is there a second? 19 COMMISSIONER CRUMP: I'll second. 20 CHAIRMAN KIMBLE: Was that 21 Commissioner Crump? 22 COMMISSIONER CRUMP: Yes. 23 CHAIRMAN KIMBLE: Okay. Thank you. 24 It's been moved and seconded that we're going 25 to determine there's reason to believe the violations

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1 identified in the memo may have occurred. I will call 2 the roll. 3 Commissioner Werther. 4 (No response.) 5 CHAIRMAN KIMBLE: Commissioner Werther, can 6 you hear me? 7 COMMISSIONER WERTHER: Yes. Aye. 8 CHAIRMAN KIMBLE: Thank you. 9 Commissioner Crump. 10 COMMISSIONER CRUMP: Aye. 11 CHAIRMAN KIMBLE: Commissioner Paton. 12 COMMISSIONER PATON: Aye. 13 CHAIRMAN KIMBLE: Commissioner Titla. 14 (No response.) 15 CHAIRMAN KIMBLE: Commissioner Titla, are you 16 with us? 17 COMMISSIONER TITLA: Aye. 18 CHAIRMAN KIMBLE: Thank you, Commissioner 19 Titla. 20 Chair votes aye. The motion is approved 21 5-to-nothing. 22 Thank you, Tom. 23 MR. COLLINS: Thank you. 24 CHAIRMAN KIMBLE: Item IV, public comment. 25 This is the time for consideration of comments and	1 Commissioner Werther. 2 COMMISSIONER WERTHER: Aye. 3 CHAIRMAN KIMBLE: Commissioner Crump. 4 COMMISSIONER CRUMP: Aye. 5 CHAIRMAN KIMBLE: Commissioner Paton. 6 COMMISSIONER PATON: Aye. 7 CHAIRMAN KIMBLE: Commissioner Titla. 8 COMMISSIONER TITLA: Aye. 9 CHAIRMAN KIMBLE: Chair votes aye. We are 10 adjourned. Thank you very much. 11 (The meeting concluded at 1:53 p.m.) 12 13 14 15 16 17 18 19 20 21 22 23 24 25
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1 suggestions from the public. Action taken as a result 2 of public comment will be limited to directing staff to 3 study the matter, rescheduling it for further 4 consideration, or responding to criticism. Please 5 limit your comments to no more than two minutes. 6 Does any member of the public wish to make 7 comments at this time, anyone on Zoom wish to make 8 comments? 9 (No response.) 10 CHAIRMAN KIMBLE: Cathy, no one raising a 11 hand? 12 MS. HERRING: Correct. 13 CHAIRMAN KIMBLE: Okay. Thank you. 14 The public may also submit comments by e-mail 15 at ccec@azccleanelections.gov. 16 Item V is adjournment. At this time, I would 17 entertain a motion to adjourn. 18 COMMISSIONER WERTHER: I move to adjourn. 19 CHAIRMAN KIMBLE: Thank you, 20 Commissioner Werther. 21 Is there a second? 22 COMMISSIONER CRUMP: I'll second. 23 CHAIRMAN KIMBLE: Thank you, 24 Commissioner Crump. 25 It's been moved and seconded that we adjourn.	1 STATE OF ARIZONA)) ss. 2 COUNTY OF MARICOPA) 3 4 BE IT KNOWN that the foregoing proceedings 5 were taken by me; that I was then and there a Certified 6 Reporter of the State of Arizona; that the proceedings 7 were taken down by me in shorthand and thereafter 8 transcribed into typewriting under my direction; that 9 the foregoing pages are a full, true, and accurate 10 transcript of all proceedings had and adduced upon the 11 taking of said proceedings, all to the best of my skill 12 and ability. 13 14 I FURTHER CERTIFY that I am in no way related 15 to nor employed by any of the parties hereto nor am I 16 in any way interested in the outcome hereof. 17 18 DATED at Tempe, Arizona, this 8th day of 19 October, 2025. 20 21 22 23 24 25  Kathryn A. Blackwelder, RPR Certified Reporter #50666

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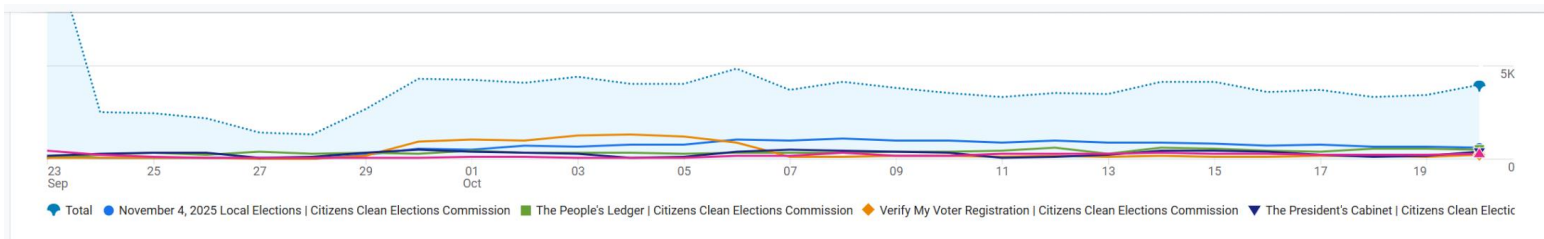
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**CITIZENS CLEAN ELECTIONS COMMISSION
EXECUTIVE DIRECTOR REPORT
October 23, 2025**

Announcements:

- The party formerly known as No Labels has been renamed the Arizona Independent Party. As party, we anticipate that candidates who run as part of the party are eligible for Clean Funding if they qualify the same as other parties. More here: <https://www.axios.com/local/phoenix/2025/10/17/no-labels-arizona-independent-party>.
- Ten counties are conducting local elections on November 4. Voting is underway and voters can find details, including all of the propositions, at azcleelections.gov. The figure below shows that the November election is our highest visited page this month.



We highlighted this election in our latest newsletter and will feature it on the Beyond the Ballot AZ podcast ahead of Election Day.

- I wanted to highlight our October 9 episode of Beyond the Ballot AZ where Gina and I interviewed Dr. Jose Jurado of Arizona State University's Seidman Research Institute. We discussed the federal debt and deficit and the interview is very impactful in terms of the country's future fiscal challenges. <https://smartlink.ausha.co/beyond-the-ballot-az/how-federal-debt-and-your-finances-are-linked>.

Voter Education and Outreach:

- **National Voter Registration Day, Constitution Week, and Vote Early Day**
Clean Elections participated in statewide outreach efforts celebrating civic engagement and voter participation.
- **Voter Outreach & Civic Engagement**
Ongoing partnerships and community events continue to expand our reach across Arizona communities.
- **Captain Activate!**
Made an appearance at **Tempe Family Day**, visiting with the **City of Tempe Clerk's Office** to promote civic awareness.
- **Mesa Community College – Civic Action Hour**
Avery presented to students on the importance of student engagement and voter turnout.

- **Northern Arizona University and Coconino County Elections visit**
 - Tom attended Northern Arizona University's State of our Democracy program, sponsored by the Dr. Richard D. Young Faculty Fellowship.
 - The program featured University of Chicago Professor Susan Stokes and NAU professor Stephen Nuño and Secretary Fontes.
 - Tom toured the Coconino County Election Department facility with county Election Director Esler Musta.
- **Election Recertification Training**
Avery and Tom successfully completed his state election recertification.
- **Disability Voter Education Day (Tucson)**
Avery participated and presented during **Disability Rights Arizona's** statewide event focused on accessibility and civic inclusion.
- **Mi Familia Vota Fall Fellowship Program**
Avery will serve as a guest speaker, sharing insights on organizing, networking, and building long-term civic engagement.
- **Ongoing Partnerships**
Avery continues active participation with the **Arizona Commission of African American Affairs** and the **AZSOS Advisory Committee**.
- **Upcoming Conference: October 23–24**
Staff will attend **Strategic Partnerships for Arizona Elections**, focused on collaboration between Tribal governments, county officials, and state partners. **Gina** will present on Clean Elections' voter education efforts.
- **2026 Planning Underway**
Preparations for **creative asset production, debates, and voter education initiatives** are in progress.

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.
 - Top lawmakers from the Arizona House and Senate filed a challenge to Prop. 211 arguing that the law unlawfully shifts legislative authority to the Commission, violating the state Constitution's separation-of-powers principle.
 - The Arizona Supreme Court ruled that the legislators are entitled to challenge the law, but made no ruling on the merits or part of a prior court of appeals opinion addressing the severability of part of the proposition.
 - On remand, the Superior Court has ordered a conference for October 30, with a joint status report due October 27. The question before the leadership is how they proceed.

- 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. Oral argument on motion to dismiss scheduled for November 17.

Other legal:

- The Arizona Supreme Court ruled that the Arizona Procedures Act, a law that controls general rulemaking process for state agencies, does not control the Election Procedures Manual, the rules that the Secretary of State issues (with approval of the Arizona Attorney General and the Governor) to govern day to day election operations. The decision order in Republican National Committee v. Fontes is at the link and an opinion will follow. <https://www.democracydoCKET.com/wp-content/uploads/2024/02/2025-10-16-Decision.pdf>.
 - There are several other Election Procedures Manual related lawsuits remaining.
- The Attorney General's Office and Congresswoman-elect Grijalva filed a lawsuit in Washington, D.C. seeking a declaration that the congresswoman should be deemed a member of the House of Representatives upon her swearing in and that if the Speaker does not administer the oath, any person authorized by law may effectively do so. The Complaint is at this link: https://mcusercontent.com/cc1fad182b6d6f8b1e352e206/files/2373e6ca-e621-5ed7-d8bb-4dd1042a55ce/2025_10_21_Complaint_for_Declaratory_Relief_State_et_al._v._US_House_et_al.pdf.
- The United States Supreme Court held arguments this month regarding the validity of using race as a factor in redistricting. The case is Louisiana v. Callais. Commentators suggested after oral argument that a majority of the court may be inclined to prevent limit the usage of race. In the Louisiana case, a first round of redistricting resulted in one majority Black voter congressional district despite Black voters making up 1/3 of the population. Litigation resulted in a new map that created two majority Black voter districts. That map is challenged in the case.
 - The Commission has a redistricting resource page here: <https://www.azcleaselections.gov/how-government-works/redistricting>.
 - We featured Professor Justin Leavitt discussing procedural aspects of redistricting and partisan gerrymandering on a two-part Beyond the Ballot AZ podcast here: <https://www.azcleaselections.gov/podcast>.

- In December, the Court will take on a campaign finance case related to an existing federal law restricting party coordination with federal candidates. We will provide more details in future reports.

Appointments:

- Staff continues to monitor appointments, and direct interested applicants to the appropriate officials.

Administrative:

- 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, this agenda
- MUR 25-01, Jaramillo
- MUR 25-02, Abeytia,
- MUR 25-03, Timberlake
- MUR 25-04, Turning Point
- MUR 25-05, Turning Point

2025 Regulatory Agenda:

The Commission may conduct a rulemaking even if the rulemaking is not included here. The Commission will consider revisions to Ariz. Admin. Code § R2-20-702 related to use of funds on this agenda. 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. 31 A.A.R.3917 (setting our next meeting to consider rules related to campaign finance report and monitoring of clean candidate funds). https://apps.azsos.gov/public_services/register/2025/40/contents.pdf.
- 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
Galen D. Paton
Christina Werther
Sam Crump
Commissioners

State of Arizona
Citizens Clean Elections Commission

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MEMORANDUM

To: Commissioners

From: Thomas Collins

Date: October 20, 2025

**Subject: Proposed Rule Amendment on Personal Use, Vendor Relations,
Payment to Candidates.**

I. Introduction

This memo addresses two related issues:

1. The need to clarify how Clean Elections rules apply when a candidate resides with a campaign vendor; and
2. The discovery of a discrepancy between the Commission's version of Rule R2-20-702 (personal use) and the version published in the Arizona Administrative Code by the Secretary of State.

I recommend recodifying the rule to reconcile those inconsistencies and to modernize the rule to address candidate–vendor relationships.

II. Background

The Clean Elections Act & Rules Manual (2022) includes a detailed list of prohibited campaign expenditures under Rule R2-20-702 relating to personal use. However, that list does not appear in the current Arizona Administrative Code. See Arizona Citizens Clean Elections Act & Rules Manual, at 57 (Ariz. Citizens Clean Elections Comm'n 2022), available at <https://storage.googleapis.com/core.usgovcloudapi.net/public/docs/747-ACTRulesManual-2022.pdf>. The relevant text is included in the Appendix at page 8.

Earlier editions of the Arizona Administrative Register (2013 and 2017) contained the full language. *See Ariz. Admin. Reg.* Vol. 23, Issue 34, at 2343 (Aug. 25, 2017), available at https://apps.azsos.gov/public_services/register/2017/34/contents.pdf; *Ariz. Admin. Reg.* Vol. 19, Issue 26, at 2343 (June 28, 2013), available at https://apps.azsos.gov/public_services/register/2013/26/contents.pdf.

Documents obtained from the Secretary of State’s Office confirmed that the former Executive Director and I authorized removal of some redundant text, essentially two sentences of the personal use rule. However, the personal-use subsection appears to have been inadvertently deleted.

I recommend recodification to avoid confusion and ensure the accuracy of the published Code matches Commission practice and policy. *See, e.g., Ariz. Admin. Code R2-20-703(A)(1)*(“All participating candidates shall have the burden of proving that expenditures made by the candidate were for direct campaign purposes.”).

III. Practice

Under Rule 702, candidates may not use campaign funds for personal expenses (food, clothing, mortgage payments, entertainment, etc.) or to overpay family members for campaign work.

“Family member” is defined in R2-20-101(13) to include parents, grandparents, siblings, and similar relations. Under the previously adopted section in R2-20-702, payments to family members are permitted only if they reflect fair market value and are fully disclosed on campaign finance reports.

The rules have not addressed relationships involving a candidate who shares living expenses with a vendor.

IV. Addressing Personal-Use Concerns Between Candidates and Vendors

In our review, we examined two issues:

- 1) How to handle situations where a candidate and a vendor share living expenses; and
- 2) Whether the Commission’s rules clearly address candidates who might seek to pay themselves salaries. Research demonstrated that the candidate salary issue can be intertwined with the vendor relationship.

Under R2-20-702, the Commission provided:

A participating candidate shall not use funds in the candidate's campaign account for ...

Payment to a candidate or a candidate's family member, as defined in R2-20-101(13), or an enterprise owned in whole or part by a candidate or family member, for the provision of goods or services to the extent the payments exceed the fair market value of the goods or services. All payments made to family members or to enterprises owned in whole or part by the candidate or a family member shall be clearly itemized and indicated as such in all campaign finance reports.

"Family member" is defined as "a parent, grandparent, aunt, uncle, child, or sibling of the candidate or the candidate's spouse, including the spouse of any of the listed family members, regardless of whether the relation is established by marriage or adoption." Ariz. Admin. Code R2-20-101(13).

In short, the rule prohibits overpaying family members and requires that such payments be disclosed. It is not a blanket prohibition.

Maine's Clean Election program prohibits payments to a candidate, spouse, or domestic partner or their businesses but allows payments to other household or family members under strict conditions. *See* 21-A M.R.S. § 1125(6-C). Maine thus recognizes that prohibiting a payment to a spouse or similar person follows from prohibiting payment to the candidate. The Maine statute is included in the Appendix at page 9.

By contrast, the Federal Election Commission permits candidates to pay themselves salaries during a campaign. *See* Federal Election Commission, Candidate Salary, FEC.gov, <https://www.fec.gov/help-candidates-and-committees/making-disbursements/candidate-salary>; Shanna Ports, *Revised Candidate Salary Rules Could Diversify Congress*, Campaign Legal Center (Jan. 2, 2024), <https://campaignlegal.org/update/revised-candidate-salary-rules-could-diversify-congress> (stating that "one major reason we don't see many low-income candidates is that campaigning is often costly and can require candidates . . . to forgo other employment, which effectively bars those who can't afford to give up their salary and benefits from running for office").

The FEC's policy applies to privately funded candidates, while Maine's applies to publicly funded candidates. It is likely that Clean Elections existing rules already bar candidate salaries, for example, but the rule could be made clearer. I am not aware of the issue coming up before. I am persuaded that because our other rules expressly emphasize that the Clean Elections Fund should not be used for living expenses, or should be used only for direct campaign expenses, that prohibiting payments to candidates is appropriate.

Staff also considered a percentage cap on how much Clean Elections funding could be paid to a single individual but concluded that such a limitation would be difficult to administer.

V. Recommended Action

Staff recommends that the Commission recodify Rule R2-20-702's provisions expressly prohibiting particular personal uses of campaign funds and add new language addressing candidate–vendor and cohabitation scenarios.

The proposed amendment (R2-20-702(F)) would:

1. Retain previously adopted prohibitions on personal use.
2. Continue to allow reasonable, disclosed payments to family members at fair market value.
3. Add a new prohibition on payments to the candidate, the candidate's spouse, or any person who shares household expenses with the candidate, and to any business entity owned or managed by such individuals.

This approach codifies the Commission's consistent approach to the use of Clean Elections Funds while ensuring the rules reflect current concerns about conflicts of interest and the appearance of personal use.

Proposed R2-20-702(F)

F. A participating candidate shall not use funds in the candidate's campaign account for:

1. Costs of legal defense in any campaign law enforcement proceeding or for any affirmative claim or litigation in court or before the Commission regarding a campaign. This prohibition does not bar use of campaign funds for payments to attorneys or certified accountants for proactive compliance advice and assistance.
2. Food and beverages for staff and volunteers exceeding \$11 for breakfast, \$16 for lunch, and \$27 for dinner per person.
3. Personal use, which includes, but is not limited to, any item listed below:
 - a. Household food items or supplies.
 - b. Clothing, other than items of de minimis value used in the campaign, such as campaign t-shirts or caps with campaign slogans.
 - c. Tuition payments, other than those associated with training campaign staff.
 - d. Mortgage, loan, rent, lease, or utility payments:
 - i. For any part of a personal residence of the candidate or family member; or
 - ii. For real or personal property owned or leased by the candidate or a family member and used for campaign purposes, to the extent payments exceed the fair market value of the property usage.
 - e. Admission to a sporting event, concert, theater, or other form of entertainment, unless part of a specific campaign activity.
 - f. Dues, fees, or gratuities at a country club, health club, recreational facility, or other non-political organization, unless they are part of the costs of a specific fundraising event that takes place on the organization's premises.
 - g. Gifts or donations.
 - h. Extended warranties or other similar purchase options that extend beyond the campaign.
4. Payment to a family member, as defined in R2-20-101(13), or an enterprise owned in whole or part by a family member, for the provision of goods or services to the extent payments exceed the fair market value of the goods or services. All such payments shall be clearly itemized and indicated as such in all campaign finance reports.

5. Notwithstanding subsection R2-20-702(F)(4):
- a. A candidate shall not use funds in the candidate's campaign account to pay or compensate the candidate, the candidate's spouse, or a person with whom the candidate shares household expenses, or to pay or compensate any enterprise owned, managed, or controlled by such individuals, including any limited liability company of which any of them is a member.
 - b. This subsection does not prohibit reimbursement of the candidate, the candidate's spouse, or a person with whom the candidate shares household expenses for reasonable expenses otherwise permitted under the Act or these rules.
 - c. A candidate may request an exception to this subsection. The candidate bears the burden of showing that competition for the goods or services in question is impracticable.

Appendix

Relevant Excerpt of Rule 702 as it appears in Commission Act and Rules Manual

B. A participating candidate shall not use funds in the candidate's campaign account for:

1. Costs of legal defense in any campaign law enforcement proceeding or for any affirmative claim or litigation in court or before the Commission regarding a campaign. This prohibition does not bar use of campaign funds for payments to attorneys or certified accountants for proactive compliance advice and assistance.
2. Food and beverages for staff and volunteers exceeding \$11 for breakfast, \$16 for lunch, and \$27 for dinner, per person.
3. Personal use, which includes, but is not limited to, any item listed below:
 - a. Household food items or supplies.
 - b. Clothing, other than items of de minimis value that are used in the campaign, such as campaign "t-shirts" or caps with campaign slogans.
 - c. Tuition payments, other than those associated with training campaign staff.
 - d. Mortgage, loan, rent, lease or utility payments:
 - i. For any part of any personal residence of the candidate or a member of the candidate's family; or
 - ii. For real or personal property that is owned or leased by the candidate or a member of the candidate's family and used for campaign purposes, to the extent the payments exceed the fair market value of the property usage.
 - e. Admission to a sporting event, concert, theater or other form of entertainment, unless part of a specific campaign activity.
 - f. Dues, fees or gratuities at a country club, health club, recreational facility or other nonpolitical organization, unless they are part of the costs of a specific fundraising event that takes place on the organization's premises.
 - g. Gifts or donations.
 - h. Extended warranties or other similar purchase options that extend beyond the campaign
4. Payment to a candidate or a candidate's family member, as defined in R2-20-101(13), or an enterprise owned in whole or part by a candidate or family member, for the provisions of goods or services to the extent the payments exceed the fair market value of the goods or services. All payments made to family members or to enterprises owned in whole or part by the candidate or a family member shall be clearly itemized and indicated as such in all campaign finance reports.

Maine Revised Statutes, Title 21-A, section 1125(6-C). Expenditures to the candidate or family or household members. Expenditures to the candidate or immediate family member or household member of the candidate are governed by this subsection.

A. The candidate may not use fund revenues to pay or compensate the candidate or the candidate's spouse or domestic partner, a sole proprietorship of the candidate or the candidate's spouse or domestic partner, a business entity in which the candidate or the candidate's spouse or domestic partner holds a significant proprietary or financial interest or a nonprofit entity in which the candidate or the candidate's spouse or domestic partner is a director, officer, executive director or chief financial officer for campaign-related goods or services.

B. A candidate may make expenditures using fund revenues to pay a member of the candidate's immediate family or household other than the candidate's spouse or domestic partner; a business entity in which a member of the candidate's immediate family or household other than the candidate's spouse or domestic partner holds a significant proprietary or financial interest; or a nonprofit entity in which a member of the candidate's immediate family or household other than the candidate's spouse or domestic partner is a director, officer, executive director or chief financial officer, as long as the expenditure is made:

- (1) For a legitimate campaign-related purpose;
- (2) To an individual or business that provides the goods or services being purchased in the normal course of the individual's occupation or the business; and
- (3) In an amount that is reasonable taking into consideration current market value and other factors the commission may choose to consider.

For the purpose of this paragraph, "business entity" means a corporation, limited liability company, limited partnership, limited liability partnership and general partnership.

If a candidate uses fund revenues for an expenditure covered by this paragraph, the candidate shall submit evidence demonstrating that the expenditure complies with the requirements of this paragraph if requested by the commission.

This subsection does not prohibit reimbursement to the candidate or a member of a candidate's household or immediate family when made in accordance with this chapter and rules adopted by the commission.

Cite as 21-A M.R.S. § 1125(6-C).

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.

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

- 3 5. Respondent acknowledges that she faces fines as identified in Table 1 under A.R.S. §
4 16-942, and additional amounts for failure to abide by the Act by failing to respond to
5 auditors and staff requests for information and failure to return monies to the fund
6 under A.A.C. R2-222.

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

- 9 • Respondent shall pay a fine of \$10,000. That fine shall be paid in installments of no
10 less than \$139.00 per month for 72 months beginning December 1, 2025 with a final
11 payment of the remaining balance due at the end of that 72-month period.
12 Respondent may pre-pay an amount toward the fine and that amount shall advance
13 her next payment proportionally by month (E.g., Respondent pays \$417.00 on Jan. 1,
14 Respondents next payment is due April 1).
- 15 • Respondent shall pay \$2,082.37 by December 1 in repayment.
- 16 • Respondent shall amend her campaign finance reports to reflect the payments to her
17 contractor identified in the audit report attached as Exhibit B and incorporated into this
18 agreement.
- 19 • Respondent agrees not to seek or accept Clean Elections funding in any other
20 election.

- 21 7. Upon Respondent's final payment and provided Respondent otherwise complies with the
22 terms of this Conciliation Agreement, the Commission shall terminate proceedings related to
23 MUR No. 25-02 and the matter shall be closed.
- 24
25

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

1			\$7,937.02	
2				
3			Total: \$29,136.08	
4	2024 Post Primary	188 Days Late		188 x \$420
5	Report		Total Cash	
6			Disbursements this	\$78,960
7			Reporting Period:	
8			\$40,000.60	
9				
10			(\$47,937.62 reported	
11			less the \$7,937.02	
12			previously reported)	
13				
14				
15				
16	2024 - Pre-General	177 Days Late	Transactions below \$2	Executive Director
17	Election			recommends waiver
18	2024 General Election	160 Days Late	Transactions below \$1	Executive Director
19				recommends waiver
20	2024 Post-General	96 Days Late	Transactions below \$1	Executive Director
21	Election			recommends waiver
22	8. 10 percent of the 2023-2024 adjusted primary limit (16-952 one-party dominant)			
23	\$3,176. 10 percent of the 2023-2024 adjusted general limit (16-952 one-party dominant)			
24	\$2,117			
25				

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

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

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

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

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

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

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

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

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

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

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

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

15 20. This Agreement shall not be subject to assignment.

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

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

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

25 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.

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Dated this ____ day of October, 2025.

By: _____
_____, Executive Director

By: _____
_____, Respondent

**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 her \$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 fiancé [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
CSV	Print	Column visibility		
				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				
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				

(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.

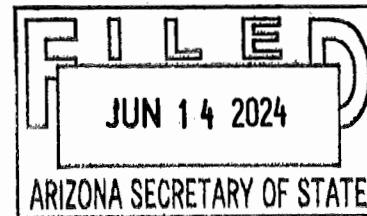
The Executive Director also recommends the Commission approve the Repayment Order.

Dated this 23rd day of April 2025

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



**STATE OF ARIZONA
APPLICATION FOR CERTIFICATION
AS A PARTICIPATING CANDIDATE**



0000561805

- ☐ Initial Application
☐ Amended Application

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

Date

Committee ID: 101577

Application for Certification – Part II

Date: 06/12/2024

Form ID: 0000561805

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 Title 16, 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 14th day

of June, 2024

Notary Public

State of Arizona)

County of _____)

) ss.

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

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

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

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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ADRIAN FONTES
SECRETARY OF STATE
STATE OF ARIZONA



CITIZENS CLEAN ELECTIONS COMMISSION

Report on Agreed-Upon Procedures

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



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

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.

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)		
CSV	Print	Column visibility		
		Show 50 entries		
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



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 fiancé 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.

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

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

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	

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

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

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	

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

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	07/30/2024	\$26.06	\$26.06
Address:			Cash	
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:	Gumpton 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:	Gumpton 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:	Gumpton 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:	Gumpton 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:	Gumpton 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	

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

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

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	

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

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.

- (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.

- 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.

- (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.

- (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 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.

- 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.

Anna Abeytia
Appendix A

<u>Gumption invoice description</u>	<u>Date</u>	<u>Amount</u>	<u>Bank information</u>	<u>Date</u>	<u>Amount</u>	<u>State Report information</u>	<u>Date</u>	<u>Amount</u>
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

STATE OF ARIZONA
CITIZENS CLEAN ELECTIONS COMMISSION

In the Matter of:

Frank Roberts

MUR No. 24-05

CONCILIATION AGREEMENT

Pursuant to ARS § 16-957(A), the Citizens Clean Elections Commission (the "Commission") and Frank Roberts, participating candidate for Legislature in 2024 ("Respondent") enter this Conciliation Agreement (the "Conciliation Agreement") in the manner described below:

1. On October 17, 2024, the Executive Director filed a Complaint against Respondent, a copy of which is attached as Exhibit 1 and incorporated herein by reference, alleging that Respondent's campaign finance reports were insufficient to meet the requirements of the Clean Elections Act and Rules (collectively, the "Act").
2. Candidates who participate in public financing must abide by the Clean Elections Act and Rules and the Commission has authority to enforce the Act and Rules pursuant to A.R.S. § 16-956(A)(7), including reporting requirements applicable to any candidate.
3. Respondent filed deficient reports that did not include necessary information regarding his campaign finance activities, including certain transactions that Commission staff knew had occurred, or information about how Respondent was spending money. In short, the reports did not identify ongoing campaign activity, even if they were filed.

- 1 4. Respondent communicated with staff, made efforts to amend is campaign finance
2 reports, returned money to the Clean Elections Fund, and completed an Audit with no
3 major findings. See Exhibit 2 (Audit Report)
- 4 5. This Conciliation Agreement concludes the Commission's enforcement proceeding
5 respecting the facts outlined in the Complaint.

6
7 WHEREFORE, the Commission enters the following orders in lieu of any other action regarding this
8 matter:

- 9 1. Respondent acknowledge that pursuant to A.R.S. § 16-942(B), the statutory penalty for
10 any reporting violation begins at \$210 per day and can double under certain
11 circumstances up to twice the value of the unreported amount.
- 12 2. Respondent agree to settle this matter under the following terms:
 - 13 a. Respondent will pay a \$1,500 fine. He will pay \$125.00 on the first of every month
14 beginning December 1, 2025 to the Clean Elections Fund with the final payment of
15 any amount remaining due December 1, 2026. Respondent may pre-pay an amount
16 toward the fine and that amount shall advance her next payment proportionally by
17 month (E.g., Respondent pays \$375.00 on Jan. 1, Respondents next payment is
18 due April 1).
 - 19 b. Respondent shall file reports with Clean Elections Commission staff at the end of
20 each month showing all campaign activity. These reports are in addition to reports
21 required by the Act and filed with the Secretary of State.
- 22 3. All payments shall be made by check or money order payable to the Citizens Clean
23 Elections Fund and delivered to the Citizens Clean Elections Commission, 1802 W.
24 Jackson St. #129 Phoenix, Arizona 85007.
- 25 4. Respondent acknowledges that the Executive Director's complaint alleged serious
26 violations of his reporting requirements.

- 1 5. Respondent avows that statements to the Commission made by them, their committees
2 and attorneys, agents and other individuals who provided goods and services directly
3 or indirectly for the campaign and any materials provided by any of these individuals to
4 the Commission are truthful and acknowledge that if such statements were false,
5 incorrect, or misleading the Commission may reopen this matter and proceed with
6 further enforcement, including any applicable penalties.
- 7 6. The Commission shall not commence any legal action against Respondent to collect
8 the claims so long as they are not in default.
- 9 7. Respondent shall be in default of this Agreement and any outstanding matters will be
10 forwarded to the Office of the Attorney General upon the occurrence of any of the
11 following:
- 12 a. Respondent fails to make any payment required hereunder within five (5) working
13 days following the date due;
- 14 b. Respondent files a petition under the bankruptcy laws or any creditor of the
15 Respondent file any petition under said laws against the Respondent;
- 16 c. Any creditor of Respondent commences a foreclosure action to foreclose (by suit
17 or trustee sale) on real property of the Respondent or commences garnishment,
18 attachment, levy or execution against the Respondent's property; or;
- 19 d. Respondent provides false information to the Commission.
- 20 8. In the event of default hereunder, at the option of the Commission, all unpaid amounts
21 hereunder shall be immediately due and payable. In addition, interest shall accrue on
22 the unpaid balance from the date that the payments became due and payable. Interest
23 shall accrue at the statutory rate of prime plus one (1) percent (8.5%) pursuant to
24 A.R.S. § 44-1201(B).
- 25 9. Nothing contained in this Agreement shall be construed to prevent any state agency
26 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.

- 1 10. The Commission may waive any condition of default without waiving any other
2 condition of default and without waiving its rights to full, timely future performance of
3 the conditions waived.
- 4 11. In the event legal action is necessary to enforce collection hereunder, Respondent shall
5 additionally pay all costs and expenses of collection, including without limitation,
6 reasonable attorneys' fees in an amount equal to thirty-five percent (35%) of monies
7 recovered.
- 8 12. If the initial payment is not received by the Commission on or before December 1,
9 2025, or any subsequent payment is not timely received thereafter, Respondent
10 stipulate that the entire fine amount, less any amounts previously paid will become due
11 and payable by Respondent.
- 12 13. Respondent acknowledge that all obligations payable pursuant to this Agreement
13 constitute a fine, penalty, or forfeiture payable to and for the benefit of a governmental
14 unit, and not compensation for actual pecuniary loss; and that pursuant to 11 USC §
15 523 such obligations are not subject to discharge in bankruptcy.
- 16 14. This Agreement shall be construed under the laws of the State of Arizona.
- 17 15. In the event that any paragraph or provision hereof shall be ruled unenforceable, all
18 other provisions hereof shall be unaffected thereby.
- 19 16. This Agreement shall constitute the entire agreement between the parties regarding the
20 subject matter. This Agreement shall not be modified or amended except in a writing
21 signed by all parties hereto.
- 22 17. This Agreement shall not be subject to assignment.
- 23 18. No delay, omission or failure by the Commission to exercise any right or power
24 hereunder shall be construed to be a waiver or consent of any breach of any of the
25 terms of this Agreement by the Respondent.
- 26

19. 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.
20. Respondent must return a signed copy of this agreement within one week of the Commission's approval. A signed copy of the agreement delivered by email to the Commission at ccec@azcanelections.gov is deemed to satisfy this agreement.
21. All proceedings in this matter will be terminated and the matter closed, upon completion of the requirements of this Agreement.

Dated this ____ day of October, 2025.

By: _____
Thomas M. Collins, Executive Director
Citizens Clean Elections Commission

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 RESPONSE OPPORTUNITY
Via Overnight Delivery and E-mail

October 17, 2024

Frank Roberts
2131 W Hayward Ave.
Phoenix AZ 85021
Email: nutralabs@yahoo.com

RE: CEC MUR 24-05

Dear Mr. Roberts,

This letter represents notice and a complaint against you by the Executive Director of the Arizona Citizens Clean Elections Commission.

According the Arizona Campaign Finance Reporting System, you have reported:

1. No activity on your Amended Pre-Primary Election Report (filed July 25, 2024),
2. No activity on your 2024 Primary Recap Report (filed August 14, 2024),
3. \$46.45 in activity on your Qualifying Period Recap Report (filed August 14, 2024),
4. \$70 in total activity on your Amended 2024 Quarter 2 report (filed August 14, 2024).

Your Amended Quarter 1 Report shows only qualifying contributions collected.

None of the interim reports I have reviewed show significant campaign activity.

As of this writing, your 2024 Post-Primary Report shows as being unfiled and late.

The reports are enclosed.

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, and ensure that funds are expended in accordance with the Act and Rules.

Your campaign finance reports are entirely deficient under these requirements. For instance, they do not show any transfer of money to the Clean Elections Fund as part of the qualifying process, nor any of the funds received by you from the fund, nor any campaign expenditures with those funds. Additionally, they show no record of any seed money or other authorized contributions other than qualifying contributions. In other words, your campaign finance reports do not account for substantial financial activity that commission records demonstrate should be accounted for, nor for any activity that campaigns report as a matter of course. These reports 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 gives rise to an inference that other important restrictions you agreed to as a participating candidate may not have been abided by.**

Consequently, your reports show that 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). Additionally, these reports show that you may be in violation of § 16-948 relating to campaign accounts, A.R.S. § 16-942 (including penalties for violations and failure follow reporting requirements), and A.R.S. § 16-953 (relating to return of monies).

Your reports also provide evidence that you may have violated Ariz. Admin. Code R2-20-110 (participating candidates reporting requirements), Ariz. Admin. Code R2-20-115(books and recordkeeping requirements), 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).

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.

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 ***Monday, October 28, 2024***.

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.*

Additionally, the rule provides for an advisement of 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).

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



Campaign Finance Report

Frank Roberts for State Representative - District 26

Committee #: 101552

Jurisdiction: Arizona Secretary of State

Treasurer: Roberts, Frank

2131 w Hayward ave, Phoenix, AZ 85021

Phone: (602) 332-9325

Email: nutralabs@yahoo.com

Candidate Name: Roberts, Frank I

Office Sought: State Representative - District 26

NO ACTIVITY THIS PERIOD

Amended 2024 Pre-Primary Election

Election Cycle:	2024
Date Filed:	July 25, 2024
Reporting Period:	July 1, 2024-July 13, 2024
Jurisdiction:	Arizona Secretary of State

Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$1,178.55
Total Cash Receipts this Reporting Period:	\$0.00
Total Cash Disbursements this Reporting Period:	\$0.00
Cash Balance at End of Reporting Period:	\$1,178.55

Report ID: 292364

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	\$0.00
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	\$0.00
CCEC Funding and Matching	C6	\$0.00	\$0.00	\$0.00	\$0.00
Qualifying Contributions	C7	\$0.00	\$0.00	\$0.00	\$1,225.00
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	\$1,225.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$0.00	\$0.00	\$0.00	\$0.00
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	\$46.45
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		\$0.00	\$0.00	\$0.00	\$46.45
Bill Payments for Previous Expenditures	D1	\$0.00		\$0.00	\$0.00
Total Cash Disbursed		\$0.00			



Campaign Finance Report

Frank Roberts for State Representative - District 26

Committee #: 101552

Jurisdiction: Arizona Secretary of State

Treasurer: Roberts, Frank

2131 w Hayward ave, Phoenix, AZ 85021

Phone: (602) 332-9325

Email: nutralabs@yahoo.com

Candidate Name: Roberts, Frank I

Office Sought: State Representative - District 26

Amended 2024 Quarter 1

Election Cycle: **2024**
Date Filed: April 16, 2024
Reporting Period: January 1, 2024-March 31, 2024
Jurisdiction: Arizona Secretary of State

Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$230.00
Total Cash Receipts this Reporting Period:	\$970.00
Total Cash Disbursements this Reporting Period:	\$0.00
Cash Balance at End of Reporting Period:	\$1,200.00

Report ID: 292362

101552 Frank Roberts for State Representative - District 26

Jurisdiction: Arizona Secretary of State

Amended Quarter 1

Covers 01/01/2024 to 03/31/2024

Filed on 04/16/2024

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	\$0.00
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	\$0.00
CCEC Funding and Matching	C6	\$0.00	\$0.00	\$0.00	\$0.00
Qualifying Contributions	C7	\$970.00	\$0.00	\$970.00	\$1,200.00
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		\$970.00	\$0.00	\$970.00	\$1,200.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$0.00	\$0.00	\$0.00	\$0.00
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		\$0.00	\$0.00	\$0.00	\$0.00
Bill Payments for Previous Expenditures	D1	\$0.00		\$0.00	\$0.00
Total Cash Disbursed		\$0.00			

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Stockard, Kevin Address:	01/02/2024	\$5.00 Cash	\$5.00
Name: Galindo-Tovar, Antonio F Address:	01/05/2024	\$5.00 Cash	\$5.00
Name: Masters, Lanette T Address:	01/08/2024	\$5.00 Cash	\$5.00
Name: Masters, William Address:	01/08/2024	\$5.00 Cash	\$5.00
Name: Dittrich, Kathleen S Address:	01/10/2024	\$5.00 Cash	\$5.00
Name: Lauck, Anthony Address:	01/10/2024	\$5.00 Cash	\$5.00
Name: Iwangou, King Golden Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Shepard, Susan Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Sutton, Bill Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Sutton, Margeret Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Spears, Gary Address:	01/18/2024	\$5.00 Cash	\$5.00
Name: Spears, Priscilla Address:	01/18/2024	\$5.00 Cash	\$5.00
Name: Weesner, Patricia Address:	01/20/2024	\$5.00 Cash	\$5.00
Name: Porter, C.Curtis Address:	01/21/2024	\$5.00 Cash	\$5.00
Name: LaFlower, Michael Address:	01/27/2024	\$5.00 Cash	\$5.00
Name: Flift, James Address:	01/28/2024	\$5.00 Cash	\$5.00
Name: Gonzales, Matt Address:	01/28/2024	\$5.00 Cash	\$5.00
Name: Granthen, Harriet E Address:	01/28/2024	\$5.00 Cash	\$5.00
Name: Landauer, Rosemary Address:	01/28/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Scbuster, Robert Address:	01/28/2024	\$5.00 Cash	\$5.00
Name: Chizowast, Teena Address:	01/29/2024	\$5.00 Cash	\$5.00
Name: Allison, Thomas Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Flesner, Barbara Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Grobe, June Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Hamline, Kent Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Hawk, Georlyit Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Rotta, Garret Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Terich, Dorthy Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Lanule, Richard Address:	01/31/2024	\$5.00 Cash	\$5.00
Name: Mann, Russell Address:	01/31/2024	\$5.00 Cash	\$5.00
Name: Smith, James Address:	01/31/2024	\$5.00 Cash	\$5.00
Name: Dunlap, Scott Address:	02/01/2024	\$5.00 Cash	\$5.00
Name: Hernandez, Steven Address:	02/01/2024	\$5.00 Cash	\$5.00
Name: Patton, Patricia Address:	02/01/2024	\$5.00 Cash	\$5.00
Name: Gover, Sandra Address:	02/02/2024	\$5.00 Cash	\$5.00
Name: McGrath, Brian Address:	02/02/2024	\$5.00 Cash	\$5.00
Name: Greirbin, Virgil wayne Address:	02/03/2024	\$5.00 Cash	\$5.00
Name: Gribbin, Sharyl Address:	02/03/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Machen, Amanda Address:	02/03/2024	\$5.00 Cash	\$5.00
Name: McGrath, Janet Address:	02/03/2024	\$5.00 Cash	\$5.00
Name: Smith, Catherine Address:	02/03/2024	\$5.00 Cash	\$5.00
Name: Ojeda, Z Address:	02/04/2024	\$5.00 Cash	\$5.00
Name: Amado, Eric Address:	02/10/2024	\$5.00 Cash	\$5.00
Name: Adams, William s sr Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Armstrong, Brandon Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Bell, Mary Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Bituhey, Stanya Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: DeBaun, david Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: DeBaun, Wanda Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Finn, Brian Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Gonzales Bituhey, Gabriel Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Kohler, Janna Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Leguire, Alexandra Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Peterson, David Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Smith, Dewitt Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Bales, Jackee Address:	02/15/2024	\$5.00 Cash	\$5.00
Name: Eulett, Tina Address:	02/15/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Harman, Richard Jr Address:	02/15/2024	\$5.00 Cash	\$5.00
Name: Swanson, Melvin Address:	02/15/2024	\$5.00 Cash	\$5.00
Name: O'Brien, Sara Address:	02/16/2024	\$5.00 Cash	\$5.00
Name: Gidwani, Michael Address:	02/17/2024	\$5.00 Cash	\$5.00
Name: Lusson, Gabriel Address:	02/17/2024	\$5.00 Cash	\$5.00
Name: Talbett, Deborah Address:	02/17/2024	\$5.00 Cash	\$5.00
Name: Lazar, Jeffrey Address:	02/18/2024	\$5.00 Cash	\$5.00
Name: Ludwig, Steve Address:	02/18/2024	\$5.00 Cash	\$5.00
Name: Mandin, Dexter Address:	02/18/2024	\$5.00 Cash	\$5.00
Name: Reynolds, Thomas Address:	02/18/2024	\$5.00 Cash	\$5.00
Name: Stamper, Dereck Address:	02/18/2024	\$5.00 Cash	\$5.00
Name: Bolavanti, King Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Christian, Lucas Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Cramer, Kenneth Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: De La Huerta, Lois Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Drubes, Brian Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Michaelson, Toni Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Sanchez, Samuel Jr Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Teerpoead, Edward Address:	02/19/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Temporado, Carol Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Leekey, Delvina Address:	02/20/2024	\$5.00 Cash	\$5.00
Name: Pena, Gabrielle Address:	02/20/2024	\$5.00 Cash	\$5.00
Name: Woodwick, forrest Address:	02/20/2024	\$5.00 Cash	\$5.00
Name: Breast, Diana B Address:	02/22/2024	\$5.00 Cash	\$5.00
Name: Schultz, Donald Address:	02/22/2024	\$5.00 Cash	\$5.00
Name: Hendershot, Carole Address:	02/23/2024	\$5.00 Cash	\$5.00
Name: Owen, Henry Address:	02/23/2024	\$5.00 Cash	\$5.00
Name: Owens, Jayce R Address:	02/23/2024	\$5.00 Cash	\$5.00
Name: Rintalk, Rodney Address:	02/23/2024	\$5.00 Cash	\$5.00
Name: Bahlbi, Asfaha G Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Cocho, Mark Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Dalton, Phillip Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: DRAPER, BARRY Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: DRAPER, VIRGINIA Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Elliott, Shay Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Fletcher, Thomas Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Gaines, Richard Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Giurepps, Anthony D Address:	02/24/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Hart, Kathy Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: HERNANDEZ, ANTONIO Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Huff, Kimberly Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Kemper, Cherie Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Paterno-Samos, Chloe Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Solaro, Beryl Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Swanson, Violet Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Unsnees, Jesus Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Cox, Dennis J Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Demers, Gary Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Hoff, Francog Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Ruhf, Louise Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Seagle, Charles Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Sellers, Melissa Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Snyder, Nancy Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Traslavina, Connie Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Traslavina, Ray A Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Doctor, Pierstn Address:	02/26/2024	\$5.00 Cash	\$5.00
Name: Doctor, Ridel Address:	02/26/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Gehrne, Robert Address:	02/27/2024	\$5.00 Cash	\$5.00
Name: Fahendale, Sara Address:	03/01/2024	\$5.00 Cash	\$5.00
Name: Gonzales, Samuel Address:	03/01/2024	\$5.00 Cash	\$5.00
Name: Henderson, Donald Address:	03/01/2024	\$5.00 Cash	\$5.00
Name: JOHNSON, BELINDA Address:	03/01/2024	\$5.00 Cash	\$5.00
Name: Johnson, Eric Address:	03/01/2024	\$5.00 Cash	\$5.00
Name: Pieri, Ben Address:	03/01/2024	\$5.00 Cash	\$5.00
Name: Pieri, Damien Address:	03/01/2024	\$5.00 Cash	\$5.00
Name: Ptuyac, Emma Address:	03/01/2024	\$5.00 Cash	\$5.00
Name: THOMPSON, BETTY Address:	03/01/2024	\$5.00 Cash	\$5.00
Name: Granthan, Greg Address:	03/02/2024	\$5.00 Cash	\$5.00
Name: Hagstrom, Jennifer Leon Address:	03/02/2024	\$5.00 Cash	\$5.00
Name: Jaco, Sherry Address:	03/02/2024	\$5.00 Cash	\$5.00
Name: Lyons, Robert Address:	03/02/2024	\$5.00 Cash	\$5.00
Name: Lyons, Sheila Address:	03/02/2024	\$5.00 Cash	\$5.00
Name: Martinez, Christine Address:	03/02/2024	\$5.00 Cash	\$5.00
Name: Meighen, Janine Address:	03/02/2024	\$5.00 Cash	\$5.00
Name: Orquille, Danny Address:	03/02/2024	\$5.00 Cash	\$5.00
Name: Romesburg, Denise Address:	03/02/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Truong, Du Van Address:	03/02/2024	\$5.00 Cash	\$5.00
Name: Asher, Rose Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Darell, Diana Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Dunnigan, Mark Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Garrett, Connie Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Hess, Katie Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Lad, Kevin Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Meuehey, James Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Mink, Jared Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Norman, Casey Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Phellzos, Travis Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Pyle, Lawrence Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Reinhardt, Lisa Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Dramber, Christopher Address:	03/04/2024	\$5.00 Cash	\$5.00
Name: Hinz, Karen Address:	03/04/2024	\$5.00 Cash	\$5.00
Name: Hunter, Gary Address:	03/04/2024	\$5.00 Cash	\$5.00
Name: Pacheco, Norma Address:	03/04/2024	\$5.00 Cash	\$5.00
Name: Parker, Kristi Address:	03/04/2024	\$5.00 Cash	\$5.00
Name: Sheiton, Susan L Address:	03/04/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Tillman, Timothy Address:	03/04/2024	\$5.00 Cash	\$5.00
Name: Coscia, Philip Address:	03/05/2024	\$5.00 Cash	\$5.00
Name: Clegg, Jon Address:	03/14/2024	\$5.00 Cash	\$5.00
Name: Badger, James Address:	03/17/2024	\$5.00 Cash	\$5.00
Name: Kemper, Christopher Address:	03/17/2024	\$5.00 Cash	\$5.00
Name: Klien, Micheal Address:	03/17/2024	\$5.00 Cash	\$5.00
Name: Vakula, Kimberly Address:	03/17/2024	\$5.00 Cash	\$5.00
Name: Naylor, Kenneth Address:	03/18/2024	\$5.00 Cash	\$5.00
Name: Saldiwew, Greg Address:	03/18/2024	\$5.00 Cash	\$5.00
Name: Arabasz, Jan Address:	03/19/2024	\$5.00 Cash	\$5.00
Name: Arabasz, Krystyna Address:	03/19/2024	\$5.00 Cash	\$5.00
Name: Baum, James Address:	03/19/2024	\$5.00 Cash	\$5.00
Name: Burton, Richard w Address:	03/19/2024	\$5.00 Cash	\$5.00
Name: Downey, Brian Address:	03/19/2024	\$5.00 Cash	\$5.00
Name: Fultan, Joshua Address:	03/19/2024	\$5.00 Cash	\$5.00
Name: Higlow, Nora Address:	03/19/2024	\$5.00 Cash	\$5.00
Name: Lape, Don Address:	03/19/2024	\$5.00 Cash	\$5.00
Name: Pyle, Michelle Address:	03/19/2024	\$5.00 Cash	\$5.00
Name: Rasmussen, Lisa Address:	03/19/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Rasmussen, Mike Address:	03/19/2024	\$5.00 Cash	\$5.00
Name: Sheets, Michele Address:	03/19/2024	\$5.00 Cash	\$5.00
Name: Weller, Craig Address:	03/19/2024	\$5.00 Cash	\$5.00
Name: Baumer, Therese Address:	03/20/2024	\$5.00 Cash	\$5.00
Name: Fohl, John Address:	03/20/2024	\$5.00 Cash	\$5.00
Name: Winchell, Gary Address:	03/21/2024	\$5.00 Cash	\$5.00
Name: Ludwig, Martha Address:	03/23/2024	\$5.00 Cash	\$5.00
Name: Peterson LaBean, Linda M Address:	03/23/2024	\$5.00 Cash	\$5.00
Name: Vincent, Holly M Address:	03/23/2024	\$5.00 Cash	\$5.00
Name: Wilson, Peggy Address:	03/23/2024	\$5.00 Cash	\$5.00
Name: Graneheleon, Bradley Address:	03/24/2024	\$5.00 Cash	\$5.00
Name: Hatcher, Brian Address:	03/24/2024	\$5.00 Cash	\$5.00
Name: Hernandez, Marvin Armiro Address:	03/24/2024	\$5.00 Cash	\$5.00
Name: Langdon, Katrina Address:	03/24/2024	\$5.00 Cash	\$5.00
Name: Mitchell, Karen Address:	03/24/2024	\$5.00 Cash	\$5.00
Name: Mithchell, John Address:	03/24/2024	\$5.00 Cash	\$5.00
Name: Deluna, Edward Address:	03/25/2024	\$5.00 Cash	\$5.00
Name: Marable, Phyllis Address:	03/25/2024	\$5.00 Cash	\$5.00
Name: Prenovost, Barbara Address:	03/25/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

		Date	Amount	Cycle To Date
Name:	Plascencia, Victor	03/26/2024	\$5.00	\$5.00
Address:			Cash	
Name:	Plaspencia, Cyndee	03/26/2024	\$5.00	\$5.00
Address:			Cash	
Name:	Dunaway, Tracey Leigh	03/31/2024	\$5.00	\$5.00
Address:			Cash	
Name:	Frayar, Daniel R	03/31/2024	\$5.00	\$5.00
Address:			Cash	
Total of Clean Elections Qualifying Contributions			\$970.00	
Total of Refunds Given			\$0.00	
Net Total of Qualifying Contributions			\$970.00	



Campaign Finance Report

Frank Roberts for State Representative - District 26

Committee #: 101552

Jurisdiction: Arizona Secretary of State

Treasurer: Roberts, Frank

2131 w Hayward ave, Phoenix, AZ 85021

Phone: (602) 332-9325

Email: nutralabs@yahoo.com

Candidate Name: Roberts, Frank I

Office Sought: State Representative - District 26

Amended 2024 Quarter 2

Election Cycle:	2024
Date Filed:	August 14, 2024
Reporting Period:	April 1, 2024-June 30, 2024
Jurisdiction:	Arizona Secretary of State

Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$1,200.00
Total Cash Receipts this Reporting Period:	\$25.00
Total Cash Disbursements this Reporting Period:	\$46.45
Cash Balance at End of Reporting Period:	\$1,178.55

Report ID: 292363

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	\$0.00
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	\$0.00
CCEC Funding and Matching	C6	\$0.00	\$0.00	\$0.00	\$0.00
Qualifying Contributions	C7	\$25.00	\$0.00	\$25.00	\$1,225.00
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		\$25.00	\$0.00	\$25.00	\$1,225.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$0.00	\$0.00	\$0.00	\$0.00
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	\$46.45	\$0.00	\$46.45	\$46.45
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		\$46.45	\$0.00	\$46.45	\$46.45
Bill Payments for Previous Expenditures	D1	\$0.00		\$0.00	\$0.00
Total Cash Disbursed		\$46.45			

Schedule C7 - Qualifying contributions

		Date	Amount	Cycle To Date
Name:	Kiss, Denise	04/01/2024	\$5.00	\$5.00
Address:			Cash	
Name:	Lee, Glenda	04/01/2024	\$5.00	\$5.00
Address:			Cash	
Name:	Noriega, Mario H	04/01/2024	\$5.00	\$5.00
Address:			Cash	
Name:	Potter, Jeffrey G	04/01/2024	\$5.00	\$5.00
Address:			Cash	
Name:	Stockdale, Jason	04/01/2024	\$5.00	\$5.00
Address:			Cash	
Total of Clean Elections Qualifying Contributions			\$25.00	
Total of Refunds Given			\$0.00	
Net Total of Qualifying Contributions			\$25.00	

Schedule E4 - Aggregate Small Expenses

Schedule E4 - Aggregate Small Expenses		Date	Amount	Cycle To Date
Name:	Multiple Contributors	04/10/2024	\$46.45	\$46.45
Address:			Cash	
Trans. Type:	Aggregate Expenses less than \$250 (Cash)			
Memo:	ez way mini storage			
Total of Aggregate Small Expenses			\$46.45	
Total of Refunds, Rebates, and Credits Received			\$0.00	
Net Total of Aggregate Small Expenses			\$46.45	



Campaign Finance Report

Frank Roberts for State Representative - District 26

Committee #: 101552

Jurisdiction: Arizona Secretary of State

Treasurer: Roberts, Frank

2131 w Hayward ave, Phoenix, AZ 85021

Phone: (602) 332-9325

Email: nutralabs@yahoo.com

Candidate Name: Roberts, Frank I

Office Sought: State Representative - District 26

NO ACTIVITY THIS PERIOD

2024 Primary Recap Report

Election Cycle:	2024
Date Filed:	August 14, 2024
Reporting Period:	July 21, 2024-August 6, 2024
Jurisdiction:	Arizona Secretary of State

Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$1,178.55
Total Cash Receipts this Reporting Period:	\$0.00
Total Cash Disbursements this Reporting Period:	\$0.00
Cash Balance at End of Reporting Period:	\$1,178.55

Report ID: 291032

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	\$0.00
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	\$0.00
CCEC Funding and Matching	C6	\$0.00	\$0.00	\$0.00	\$0.00
Qualifying Contributions	C7	\$0.00	\$0.00	\$0.00	\$1,225.00
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	\$1,225.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$0.00	\$0.00	\$0.00	\$0.00
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	\$46.45
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		\$0.00	\$0.00	\$0.00	\$46.45
Bill Payments for Previous Expenditures	D1	\$0.00		\$0.00	\$0.00
Total Cash Disbursed		\$0.00			



Campaign Finance Report

Frank Roberts for State Representative - District 26

Committee #: 101552

Jurisdiction: Arizona Secretary of State

Treasurer: Roberts, Frank

2131 w Hayward ave, Phoenix, AZ 85021

Phone: (602) 332-9325

Email: nutralabs@yahoo.com

Candidate Name: Roberts, Frank I

Office Sought: State Representative - District 26

2024 Qualifying Period Recap Report

Election Cycle:	2024
Date Filed:	August 14, 2024
Reporting Period:	August 1, 2023-July 30, 2024
Jurisdiction:	Arizona Secretary of State

Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$0.00
Total Cash Receipts this Reporting Period:	\$1,225.00
Total Cash Disbursements this Reporting Period:	\$46.45
Cash Balance at End of Reporting Period:	\$1,178.55

Report ID: 290930

101552 Frank Roberts for State Representative - District 26

Jurisdiction: Arizona Secretary of State

Qualifying Period Recap Report

Covers 08/01/2023 to 07/30/2024

Filed on 08/14/2024

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	\$0.00
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	\$0.00
CCEC Funding and Matching	C6	\$0.00	\$0.00	\$0.00	\$0.00
Qualifying Contributions	C7	\$1,225.00	\$0.00	\$1,225.00	\$1,225.00
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		\$1,225.00	\$0.00	\$1,225.00	\$1,225.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$0.00	\$0.00	\$0.00	\$0.00
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	\$46.45	\$0.00	\$46.45	\$46.45
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		\$46.45	\$0.00	\$46.45	\$46.45
Bill Payments for Previous Expenditures	D1	\$0.00		\$0.00	\$0.00
Total Cash Disbursed		\$46.45			

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Roberts, Frank Address:	08/15/2023	\$5.00 Cash	\$5.00
Name: Bezancon, Richard Address:	09/11/2023	\$5.00 Cash	\$5.00
Name: Bezanson, Richard Address:	09/11/2023	\$5.00 Cash	\$5.00
Name: Evitts-Tatalovich, Loni Address:	09/11/2023	\$5.00 Cash	\$5.00
Name: Huber, Louise Address:	09/11/2023	\$5.00 Cash	\$5.00
Name: Saylor, Diane Address:	09/11/2023	\$5.00 Cash	\$5.00
Name: Schwartz, Timothy Address:	09/11/2023	\$5.00 Cash	\$5.00
Name: Smith, Dina Address:	09/11/2023	\$5.00 Cash	\$5.00
Name: BEAUDROT, FRANK Address:	10/04/2023	\$5.00 Cash	\$5.00
Name: PENA, CHRISTIAN Address:	10/07/2023	\$5.00 Cash	\$5.00
Name: PENA, GABBY Address:	10/07/2023	\$5.00 Cash	\$5.00
Name: PENA, JODI Address:	10/07/2023	\$5.00 Cash	\$5.00
Name: Peno, Diego Address:	10/09/2023	\$5.00 Cash	\$5.00
Name: SIMS, LYNDA Address:	10/09/2023	\$5.00 Cash	\$5.00
Name: Spruces, Shelley Address:	10/09/2023	\$5.00 Cash	\$5.00
Name: GALLEGOS, OLIVER Address:	11/02/2023	\$5.00 Cash	\$5.00
Name: POTTER, RICHARD Address:	11/02/2023	\$5.00 Cash	\$5.00
Name: HERNANDEZ, NICOLE Address:	11/19/2023	\$5.00 Cash	\$5.00
Name: Dihephenl, Boyd Address:	11/25/2023	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Dinehdeal, Barbara Address:	11/25/2023	\$5.00 Cash	\$5.00
Name: Dinehdell, Hiram Address:	11/25/2023	\$5.00 Cash	\$5.00
Name: Olgain, Daniel Address:	11/30/2023	\$5.00 Cash	\$5.00
Name: Cillens, Keith Address:	12/02/2023	\$5.00 Cash	\$5.00
Name: Culleks, Sharon Address:	12/02/2023	\$5.00 Cash	\$5.00
Name: MAZUR, BARBARA Address:	12/02/2023	\$5.00 Cash	\$5.00
Name: Mazur, Walter Address:	12/02/2023	\$5.00 Cash	\$5.00
Name: BAILEY, YVONNE Address:	12/09/2023	\$5.00 Cash	\$5.00
Name: Edwards, Skyla Address:	12/09/2023	\$5.00 Cash	\$5.00
Name: FERRAIOLI, DEBRA Address:	12/10/2023	\$5.00 Cash	\$5.00
Name: Miller, Russell Address:	12/10/2023	\$5.00 Cash	\$5.00
Name: Ronning, Lawrence Address:	12/10/2023	\$5.00 Cash	\$5.00
Name: Lopez, Salena Address:	12/12/2023	\$5.00 Cash	\$5.00
Name: Prorateoure, Linda Address:	12/16/2023	\$5.00 Cash	\$5.00
Name: Coletti, Michelle Address:	12/30/2023	\$5.00 Cash	\$5.00
Name: Ellsworth, Mark Address:	12/30/2023	\$5.00 Cash	\$5.00
Name: Kintz, Donna Address:	12/30/2023	\$5.00 Cash	\$5.00
Name: Kintz, Mark Address:	12/30/2023	\$5.00 Cash	\$5.00
Name: Mallaire, Fred Address:	12/30/2023	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Onnen, Brian Address:	12/30/2023	\$5.00 Cash	\$5.00
Name: Sonita, Dee Address:	12/30/2023	\$5.00 Cash	\$5.00
Name: Swieeney, Ellen Address:	12/30/2023	\$5.00 Cash	\$5.00
Name: Thomson, Kevin Address:	12/30/2023	\$5.00 Cash	\$5.00
Name: McNaughton, Kathleen Address:	12/31/2023	\$5.00 Cash	\$5.00
Name: McNaughton, Robert Address:	12/31/2023	\$5.00 Cash	\$5.00
Name: Okray, David Address:	12/31/2023	\$5.00 Cash	\$5.00
Name: Rewick, Ralph Address:	12/31/2023	\$5.00 Cash	\$5.00
Name: Stockard, Kevin Address:	01/02/2024	\$5.00 Cash	\$5.00
Name: Galindo-Tovar, Antonio F Address:	01/05/2024	\$5.00 Cash	\$5.00
Name: Masters, Lanette T Address:	01/08/2024	\$5.00 Cash	\$5.00
Name: Masters, William Address:	01/08/2024	\$5.00 Cash	\$5.00
Name: Dittrich, Kathleen S Address:	01/10/2024	\$5.00 Cash	\$5.00
Name: Lauck, Anthony Address:	01/10/2024	\$5.00 Cash	\$5.00
Name: Iwangou, King Golden Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Shepard, Susan Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Sutton, Bill Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Sutton, Margeret Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Spears, Gary Address:	01/18/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Spears, Priscilla Address:	01/18/2024	\$5.00 Cash	\$5.00
Name: Weesner, Patricia Address:	01/20/2024	\$5.00 Cash	\$5.00
Name: Porter, C.Curtis Address:	01/21/2024	\$5.00 Cash	\$5.00
Name: LaFlower, Michael Address:	01/27/2024	\$5.00 Cash	\$5.00
Name: Flift, James Address:	01/28/2024	\$5.00 Cash	\$5.00
Name: Gonzales, Matt Address:	01/28/2024	\$5.00 Cash	\$5.00
Name: Granthen, Harriet E Address:	01/28/2024	\$5.00 Cash	\$5.00
Name: Landauer, Rosemary Address:	01/28/2024	\$5.00 Cash	\$5.00
Name: Scbuster, Robert Address:	01/28/2024	\$5.00 Cash	\$5.00
Name: Chizowast, Teena Address:	01/29/2024	\$5.00 Cash	\$5.00
Name: Allison, Thomas Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Flesner, Barbara Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Grobe, June Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Hamline, Kent Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Hawk, Georlyit Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Rotta, Garret Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Terich, Dorthy Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Lanule, Richard Address:	01/31/2024	\$5.00 Cash	\$5.00
Name: Mann, Russell Address:	01/31/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Smith, James Address:	01/31/2024	\$5.00 Cash	\$5.00
Name: Dunlap, Scott Address:	02/01/2024	\$5.00 Cash	\$5.00
Name: Hernandez, Steven Address:	02/01/2024	\$5.00 Cash	\$5.00
Name: Patton, Patricia Address:	02/01/2024	\$5.00 Cash	\$5.00
Name: Gover, Sandra Address:	02/02/2024	\$5.00 Cash	\$5.00
Name: McGrath, Brian Address:	02/02/2024	\$5.00 Cash	\$5.00
Name: Greirbin, Virgil wayne Address:	02/03/2024	\$5.00 Cash	\$5.00
Name: Gribbin, Sharyl Address:	02/03/2024	\$5.00 Cash	\$5.00
Name: Machen, Amanda Address:	02/03/2024	\$5.00 Cash	\$5.00
Name: McGrath, Janet Address:	02/03/2024	\$5.00 Cash	\$5.00
Name: Smith, Catherine Address:	02/03/2024	\$5.00 Cash	\$5.00
Name: Ojeda, Z Address:	02/04/2024	\$5.00 Cash	\$5.00
Name: Amado, Eric Address:	02/10/2024	\$5.00 Cash	\$5.00
Name: Adams, William s sr Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Armstrong, Brandon Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Bell, Mary Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Bituhey, Stanya Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: DeBaun, david Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: DeBaun, Wanda Address:	02/12/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Finn, Brian Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Gonzales Bituhey, Gabriel Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Kohler, Janna Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Leguire, Alexandra Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Peterson, David Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Smith, Dewitt Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Bales, Jackee Address:	02/15/2024	\$5.00 Cash	\$5.00
Name: Eulett, Tina Address:	02/15/2024	\$5.00 Cash	\$5.00
Name: Harman, Richard Jr Address:	02/15/2024	\$5.00 Cash	\$5.00
Name: Swanson, Melvin Address:	02/15/2024	\$5.00 Cash	\$5.00
Name: O'Brien, Sara Address:	02/16/2024	\$5.00 Cash	\$5.00
Name: Gidwani, Michael Address:	02/17/2024	\$5.00 Cash	\$5.00
Name: Lusson, Gabriel Address:	02/17/2024	\$5.00 Cash	\$5.00
Name: Talbett, Deborah Address:	02/17/2024	\$5.00 Cash	\$5.00
Name: Lazar, Jeffrey Address:	02/18/2024	\$5.00 Cash	\$5.00
Name: Ludwig, Steve Address:	02/18/2024	\$5.00 Cash	\$5.00
Name: Mandin, Dexter Address:	02/18/2024	\$5.00 Cash	\$5.00
Name: Reynolds, Thomas Address:	02/18/2024	\$5.00 Cash	\$5.00
Name: Stamper, Dereck Address:	02/18/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Bolavanti, King Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Christian, Lucas Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Cramer, Kenneth Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: De La Huerta, Lois Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Drubes, Brian Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Michaelson, Toni Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Sanchez, Samuel Jr Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Teerpoead, Edward Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Temporado, Carol Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Leekey, Delvina Address:	02/20/2024	\$5.00 Cash	\$5.00
Name: Pena, Gabrielle Address:	02/20/2024	\$5.00 Cash	\$5.00
Name: Woodwick, forrest Address:	02/20/2024	\$5.00 Cash	\$5.00
Name: Breast, Diana B Address:	02/22/2024	\$5.00 Cash	\$5.00
Name: Schultz, Donald Address:	02/22/2024	\$5.00 Cash	\$5.00
Name: Hendershot, Carole Address:	02/23/2024	\$5.00 Cash	\$5.00
Name: Owen, Henry Address:	02/23/2024	\$5.00 Cash	\$5.00
Name: Owens, Jayce R Address:	02/23/2024	\$5.00 Cash	\$5.00
Name: Rintalk, Rodney Address:	02/23/2024	\$5.00 Cash	\$5.00
Name: Bahlbi, Asfaha G Address:	02/24/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Cocho, Mark Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Dalton, Phillip Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: DRAPER, BARRY Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: DRAPER, VIRGINIA Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Elliott, Shay Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Fletcher, Thomas Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Gaines, Richard Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Giurepps, Anthony D Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Hart, Kathy Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: HERNANDEZ, ANTONIO Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Huff, Kimberly Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Kemper, Cherie Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Paterno-Samos, Chloe Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Solaro, Beryl Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Swanson, Violet Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Unsnees, Jesus Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Cox, Dennis J Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Demers, Gary Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Hoff, Francog Address:	02/25/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Ruhf, Louise Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Seagle, Charles Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Sellers, Melissa Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Snyder, Nancy Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Traslavina, Connie Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Traslavina, Ray A Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Doctor, Pierstn Address:	02/26/2024	\$5.00 Cash	\$5.00
Name: Doctor, Ridel Address:	02/26/2024	\$5.00 Cash	\$5.00
Name: Gehrne, Robert Address:	02/27/2024	\$5.00 Cash	\$5.00
Name: Fahendale, Sara Address:	03/01/2024	\$5.00 Cash	\$5.00
Name: Gonzales, Samuel Address:	03/01/2024	\$5.00 Cash	\$5.00
Name: Henderson, Donald Address:	03/01/2024	\$5.00 Cash	\$5.00
Name: JOHNSON, BELINDA Address:	03/01/2024	\$5.00 Cash	\$5.00
Name: Johnson, Eric Address:	03/01/2024	\$5.00 Cash	\$5.00
Name: Pieri, Ben Address:	03/01/2024	\$5.00 Cash	\$5.00
Name: Pieri, Damien Address:	03/01/2024	\$5.00 Cash	\$5.00
Name: Ptuyac, Emma Address:	03/01/2024	\$5.00 Cash	\$5.00
Name: THOMPSON, BETTY Address:	03/01/2024	\$5.00 Cash	\$5.00
Name: Granthan, Greg Address:	03/02/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Hagstrom, Jennifer Leon Address:	03/02/2024	\$5.00 Cash	\$5.00
Name: Jaco, Sherry Address:	03/02/2024	\$5.00 Cash	\$5.00
Name: Lyons, Robert Address:	03/02/2024	\$5.00 Cash	\$5.00
Name: Lyons, Sheila Address:	03/02/2024	\$5.00 Cash	\$5.00
Name: Martinez, Christine Address:	03/02/2024	\$5.00 Cash	\$5.00
Name: Meighen, Janine Address:	03/02/2024	\$5.00 Cash	\$5.00
Name: Orquille, Danny Address:	03/02/2024	\$5.00 Cash	\$5.00
Name: Romesburg, Denise Address:	03/02/2024	\$5.00 Cash	\$5.00
Name: Truong, Du Van Address:	03/02/2024	\$5.00 Cash	\$5.00
Name: Asher, Rose Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Darell, Diana Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Dunnigan, Mark Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Garrett, Connie Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Hess, Katie Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Lad, Kevin Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Meuehey, James Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Mink, Jared Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Norman, Casey Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Phellzos, Travis Address:	03/03/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Pyle, Lawrence Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Reinhardt, Lisa Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Dramber, Christopher Address:	03/04/2024	\$5.00 Cash	\$5.00
Name: Hinz, Karen Address:	03/04/2024	\$5.00 Cash	\$5.00
Name: Hunter, Gary Address:	03/04/2024	\$5.00 Cash	\$5.00
Name: Pacheco, Norma Address:	03/04/2024	\$5.00 Cash	\$5.00
Name: Parker, Kristi Address:	03/04/2024	\$5.00 Cash	\$5.00
Name: Sheiton, Susan L Address:	03/04/2024	\$5.00 Cash	\$5.00
Name: Tillman, Timothy Address:	03/04/2024	\$5.00 Cash	\$5.00
Name: Coscia, Philip Address:	03/05/2024	\$5.00 Cash	\$5.00
Name: Clegg, Jon Address:	03/14/2024	\$5.00 Cash	\$5.00
Name: Badger, James Address:	03/17/2024	\$5.00 Cash	\$5.00
Name: Kemper, Christopher Address:	03/17/2024	\$5.00 Cash	\$5.00
Name: Klien, Micheal Address:	03/17/2024	\$5.00 Cash	\$5.00
Name: Vakula, Kimberly Address:	03/17/2024	\$5.00 Cash	\$5.00
Name: Naylor, Kenneth Address:	03/18/2024	\$5.00 Cash	\$5.00
Name: Saldiwee, Greg Address:	03/18/2024	\$5.00 Cash	\$5.00
Name: Arabasz, Jan Address:	03/19/2024	\$5.00 Cash	\$5.00
Name: Arabasz, Krystyna Address:	03/19/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Baum, James Address:	03/19/2024	\$5.00 Cash	\$5.00
Name: Burton, Richard w Address:	03/19/2024	\$5.00 Cash	\$5.00
Name: Downey, Brian Address:	03/19/2024	\$5.00 Cash	\$5.00
Name: Fultan, Joshua Address:	03/19/2024	\$5.00 Cash	\$5.00
Name: Higlow, Nora Address:	03/19/2024	\$5.00 Cash	\$5.00
Name: Lape, Don Address:	03/19/2024	\$5.00 Cash	\$5.00
Name: Pyle, Michelle Address:	03/19/2024	\$5.00 Cash	\$5.00
Name: Rasmussen, Lisa Address:	03/19/2024	\$5.00 Cash	\$5.00
Name: Rasmussen, Mike Address:	03/19/2024	\$5.00 Cash	\$5.00
Name: Sheets, Michele Address:	03/19/2024	\$5.00 Cash	\$5.00
Name: Weller, Craig Address:	03/19/2024	\$5.00 Cash	\$5.00
Name: Baumer, Therese Address:	03/20/2024	\$5.00 Cash	\$5.00
Name: Fohl, John Address:	03/20/2024	\$5.00 Cash	\$5.00
Name: Winchell, Gary Address:	03/21/2024	\$5.00 Cash	\$5.00
Name: Ludwig, Martha Address:	03/23/2024	\$5.00 Cash	\$5.00
Name: Peterson LaBean, Linda M Address:	03/23/2024	\$5.00 Cash	\$5.00
Name: Vincent, Holly M Address:	03/23/2024	\$5.00 Cash	\$5.00
Name: Wilson, Peggy Address:	03/23/2024	\$5.00 Cash	\$5.00
Name: Graneheleon, Bradley Address:	03/24/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Hatcher, Brian Address:	03/24/2024	\$5.00 Cash	\$5.00
Name: Hernandez, Marvin Armiro Address:	03/24/2024	\$5.00 Cash	\$5.00
Name: Langdon, Katrina Address:	03/24/2024	\$5.00 Cash	\$5.00
Name: Mitchell, Karen Address:	03/24/2024	\$5.00 Cash	\$5.00
Name: Mithchell, John Address:	03/24/2024	\$5.00 Cash	\$5.00
Name: Deluna, Edward Address:	03/25/2024	\$5.00 Cash	\$5.00
Name: Marable, Phyllis Address:	03/25/2024	\$5.00 Cash	\$5.00
Name: Prenovost, Barbara Address:	03/25/2024	\$5.00 Cash	\$5.00
Name: Plascencia, Victor Address:	03/26/2024	\$5.00 Cash	\$5.00
Name: Plaspencia, Cyndee Address:	03/26/2024	\$5.00 Cash	\$5.00
Name: Dunaway, Tracey Leigh Address:	03/31/2024	\$5.00 Cash	\$5.00
Name: Frayer, Daniel R Address:	03/31/2024	\$5.00 Cash	\$5.00
Name: Kiss, Denise Address:	04/01/2024	\$5.00 Cash	\$5.00
Name: Lee, Glenda Address:	04/01/2024	\$5.00 Cash	\$5.00
Name: Noriega, Mario H Address:	04/01/2024	\$5.00 Cash	\$5.00
Name: Potter, Jeffrey G Address:	04/01/2024	\$5.00 Cash	\$5.00
Name: Stockdale, Jason Address:	04/01/2024	\$5.00 Cash	\$5.00
Total of Clean Elections Qualifying Contributions		\$1,225.00	
Total of Refunds Given		\$0.00	
Net Total of Qualifying Contributions		\$1,225.00	

Schedule E4 - Aggregate Small Expenses

Schedule E4 - Aggregate Small Expenses		Date	Amount	Cycle To Date
Name:	Multiple Contributors	04/10/2024	\$46.45	\$46.45
Address:			Cash	
Trans. Type:	Aggregate Expenses less than \$250 (Cash)			
Memo:	ez way mini storage			
Total of Aggregate Small Expenses			\$46.45	
Total of Refunds, Rebates, and Credits Received			\$0.00	
Net Total of Aggregate Small Expenses			\$46.45	



Campaign Finance Report

Frank Roberts for State Representative - District 26

Committee #: 101552

Jurisdiction: Arizona Secretary of State

Treasurer: Roberts, Frank

2131 w Hayward ave, Phoenix, AZ 85021

Phone: (602) 332-9325

Email: nutralabs@yahoo.com

Candidate Name: Roberts, Frank I

Office Sought: State Representative - District 26

Amended 2024 Interim Report

Election Cycle:	2024
Date Filed:	March 28, 2024
Reporting Period:	January 1, 2024-March 3, 2024
Jurisdiction:	Arizona Secretary of State

Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$230.00
Total Cash Receipts this Reporting Period:	\$730.00
Total Cash Disbursements this Reporting Period:	\$0.00
Cash Balance at End of Reporting Period:	\$960.00

Report ID: 292388

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	\$0.00
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	\$0.00
CCEC Funding and Matching	C6	\$0.00	\$0.00	\$0.00	\$0.00
Qualifying Contributions	C7	\$730.00	\$0.00	\$730.00	\$960.00
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		\$730.00	\$0.00	\$730.00	\$960.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$0.00	\$0.00	\$0.00	\$0.00
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		\$0.00	\$0.00	\$0.00	\$0.00
Bill Payments for Previous Expenditures	D1	\$0.00		\$0.00	\$0.00
Total Cash Disbursed		\$0.00			

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Stockard, Kevin Address:	01/02/2024	\$5.00 Cash	\$5.00
Name: Galindo-Tovar, Antonio F Address:	01/05/2024	\$5.00 Cash	\$5.00
Name: Masters, Lanette T Address:	01/08/2024	\$5.00 Cash	\$5.00
Name: Masters, William Address:	01/08/2024	\$5.00 Cash	\$5.00
Name: Dittrich, Kathleen S Address:	01/10/2024	\$5.00 Cash	\$5.00
Name: Lauck, Anthony Address:	01/10/2024	\$5.00 Cash	\$5.00
Name: Iwangou, King Golden Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Shepard, Susan Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Sutton, Bill Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Sutton, Margeret Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Spears, Gary Address:	01/18/2024	\$5.00 Cash	\$5.00
Name: Spears, Priscilla Address:	01/18/2024	\$5.00 Cash	\$5.00
Name: Weesner, Patricia Address:	01/20/2024	\$5.00 Cash	\$5.00
Name: Porter, C.Curtis Address:	01/21/2024	\$5.00 Cash	\$5.00
Name: LaFlower, Michael Address:	01/27/2024	\$5.00 Cash	\$5.00
Name: Flift, James Address:	01/28/2024	\$5.00 Cash	\$5.00
Name: Gonzales, Matt Address:	01/28/2024	\$5.00 Cash	\$5.00
Name: Granthen, Harriet E Address:	01/28/2024	\$5.00 Cash	\$5.00
Name: Landauer, Rosemary Address:	01/28/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Scbuster, Robert Address:	01/28/2024	\$5.00 Cash	\$5.00
Name: Chizowast, Teena Address:	01/29/2024	\$5.00 Cash	\$5.00
Name: Allison, Thomas Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Flesner, Barbara Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Grobe, June Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Hamline, Kent Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Hawk, Georlyit Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Rotta, Garret Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Terich, Dorthy Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Lanule, Richard Address:	01/31/2024	\$5.00 Cash	\$5.00
Name: Mann, Russell Address:	01/31/2024	\$5.00 Cash	\$5.00
Name: Smith, James Address:	01/31/2024	\$5.00 Cash	\$5.00
Name: Dunlap, Scott Address:	02/01/2024	\$5.00 Cash	\$5.00
Name: Hernandez, Steven Address:	02/01/2024	\$5.00 Cash	\$5.00
Name: Patton, Patricia Address:	02/01/2024	\$5.00 Cash	\$5.00
Name: Gover, Sandra Address:	02/02/2024	\$5.00 Cash	\$5.00
Name: McGrath, Brian Address:	02/02/2024	\$5.00 Cash	\$5.00
Name: Greirbin, Virgil wayne Address:	02/03/2024	\$5.00 Cash	\$5.00
Name: Gribbin, Sharyl Address:	02/03/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Machen, Amanda Address:	02/03/2024	\$5.00 Cash	\$5.00
Name: McGrath, Janet Address:	02/03/2024	\$5.00 Cash	\$5.00
Name: Smith, Catherine Address:	02/03/2024	\$5.00 Cash	\$5.00
Name: Ojeda, Z Address:	02/04/2024	\$5.00 Cash	\$5.00
Name: Amado, Eric Address:	02/10/2024	\$5.00 Cash	\$5.00
Name: Adams, William s sr Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Armstrong, Brandon Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Bell, Mary Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Bituhey, Stanya Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: DeBaun, david Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: DeBaun, Wanda Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Finn, Brian Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Gonzales Bituhey, Gabriel Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Kohler, Janna Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Leguire, Alexandra Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Peterson, David Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Smith, Dewitt Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Bales, Jackee Address:	02/15/2024	\$5.00 Cash	\$5.00
Name: Eulett, Tina Address:	02/15/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Harman, Richard Jr Address:	02/15/2024	\$5.00 Cash	\$5.00
Name: Swanson, Melvin Address:	02/15/2024	\$5.00 Cash	\$5.00
Name: O'Brien, Sara Address:	02/16/2024	\$5.00 Cash	\$5.00
Name: Gidwani, Michael Address:	02/17/2024	\$5.00 Cash	\$5.00
Name: Lusson, Gabriel Address:	02/17/2024	\$5.00 Cash	\$5.00
Name: Talbett, Deborah Address:	02/17/2024	\$5.00 Cash	\$5.00
Name: Lazar, Jeffrey Address:	02/18/2024	\$5.00 Cash	\$5.00
Name: Ludwig, Steve Address:	02/18/2024	\$5.00 Cash	\$5.00
Name: Mandin, Dexter Address:	02/18/2024	\$5.00 Cash	\$5.00
Name: Reynolds, Thomas Address:	02/18/2024	\$5.00 Cash	\$5.00
Name: Stamper, Dereck Address:	02/18/2024	\$5.00 Cash	\$5.00
Name: Bolavanti, King Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Christian, Lucas Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Cramer, Kenneth Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: De La Huerta, Lois Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Drubes, Brian Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Michaelson, Toni Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Sanchez, Samuel Jr Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Teerpoead, Edward Address:	02/19/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Temporado, Carol Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Leekey, Delvina Address:	02/20/2024	\$5.00 Cash	\$5.00
Name: Pena, Gabrielle Address:	02/20/2024	\$5.00 Cash	\$5.00
Name: Woodwick, forrest Address:	02/20/2024	\$5.00 Cash	\$5.00
Name: Breast, Diana B Address:	02/22/2024	\$5.00 Cash	\$5.00
Name: Schultz, Donald Address:	02/22/2024	\$5.00 Cash	\$5.00
Name: Hendershot, Carole Address:	02/23/2024	\$5.00 Cash	\$5.00
Name: Owen, Henry Address:	02/23/2024	\$5.00 Cash	\$5.00
Name: Owens, Jayce R Address:	02/23/2024	\$5.00 Cash	\$5.00
Name: Rintalk, Rodney Address:	02/23/2024	\$5.00 Cash	\$5.00
Name: Bahlbi, Asfaha G Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Cocho, Mark Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Dalton, Phillip Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: DRAPER, BARRY Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: DRAPER, VIRGINIA Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Elliott, Shay Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Fletcher, Thomas Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Gaines, Richard Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Giurepps, Anthony D Address:	02/24/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Hart, Kathy Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: HERNANDEZ, ANTONIO Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Huff, Kimberly Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Kemper, Cherie Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Paterno-Samos, Chloe Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Solaro, Beryl Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Swanson, Violet Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Unsnees, Jesus Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Cox, Dennis J Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Demers, Gary Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Hoff, Francog Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Ruhf, Louise Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Seagle, Charles Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Sellers, Melissa Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Snyder, Nancy Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Traslavina, Connie Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Traslavina, Ray A Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Doctor, Pierstn Address:	02/26/2024	\$5.00 Cash	\$5.00
Name: Doctor, Ridel Address:	02/26/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Gehrne, Robert Address:	02/27/2024	\$5.00 Cash	\$5.00
Name: Fahendale, Sara Address:	03/01/2024	\$5.00 Cash	\$5.00
Name: Gonzales, Samuel Address:	03/01/2024	\$5.00 Cash	\$5.00
Name: Henderson, Donald Address:	03/01/2024	\$5.00 Cash	\$5.00
Name: JOHNSON, BELINDA Address:	03/01/2024	\$5.00 Cash	\$5.00
Name: Johnson, Eric Address:	03/01/2024	\$5.00 Cash	\$5.00
Name: Pieri, Ben Address:	03/01/2024	\$5.00 Cash	\$5.00
Name: Pieri, Damien Address:	03/01/2024	\$5.00 Cash	\$5.00
Name: Ptuyac, Emma Address:	03/01/2024	\$5.00 Cash	\$5.00
Name: THOMPSON, BETTY Address:	03/01/2024	\$5.00 Cash	\$5.00
Name: Granthan, Greg Address:	03/02/2024	\$5.00 Cash	\$5.00
Name: Hagstrom, Jennifer Leon Address:	03/02/2024	\$5.00 Cash	\$5.00
Name: Jaco, Sherry Address:	03/02/2024	\$5.00 Cash	\$5.00
Name: Lyons, Robert Address:	03/02/2024	\$5.00 Cash	\$5.00
Name: Lyons, Sheila Address:	03/02/2024	\$5.00 Cash	\$5.00
Name: Martinez, Christine Address:	03/02/2024	\$5.00 Cash	\$5.00
Name: Meighen, Janine Address:	03/02/2024	\$5.00 Cash	\$5.00
Name: Orquille, Danny Address:	03/02/2024	\$5.00 Cash	\$5.00
Name: Romesburg, Denise Address:	03/02/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Truong, Du Van Address:	03/02/2024	\$5.00 Cash	\$5.00
Name: Asher, Rose Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Darell, Diana Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Dunnigan, Mark Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Garrett, Connie Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Hess, Katie Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Lad, Kevin Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Meuehey, James Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Mink, Jared Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Norman, Casey Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Phellzos, Travis Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Pyle, Lawrence Address:	03/03/2024	\$5.00 Cash	\$5.00
Name: Reinhardt, Lisa Address:	03/03/2024	\$5.00 Cash	\$5.00
Total of Clean Elections Qualifying Contributions		\$730.00	
Total of Refunds Given		\$0.00	
Net Total of Qualifying Contributions		\$730.00	



Campaign Finance Report

Frank Roberts for State Representative - District 26

Committee #: 101552

Jurisdiction: Arizona Secretary of State

Treasurer: Roberts, Frank

2131 w Hayward ave, Phoenix, AZ 85021

Phone: (602) 332-9325

Email: nutralabs@yahoo.com

Candidate Name: Roberts, Frank I

Office Sought: State Representative - District 26

Amended 2024 Interim Report

Election Cycle:	2024
Date Filed:	January 31, 2024
Reporting Period:	January 1, 2024-January 31, 2024
Jurisdiction:	Arizona Secretary of State

Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$230.00
Total Cash Receipts this Reporting Period:	\$155.00
Total Cash Disbursements this Reporting Period:	\$0.00
Cash Balance at End of Reporting Period:	\$385.00

Report ID: 292374

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	\$0.00
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	\$0.00
CCEC Funding and Matching	C6	\$0.00	\$0.00	\$0.00	\$0.00
Qualifying Contributions	C7	\$155.00	\$0.00	\$155.00	\$385.00
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		\$155.00	\$0.00	\$155.00	\$385.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$0.00	\$0.00	\$0.00	\$0.00
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		\$0.00	\$0.00	\$0.00	\$0.00
Bill Payments for Previous Expenditures	D1	\$0.00		\$0.00	\$0.00
Total Cash Disbursed		\$0.00			

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Stockard, Kevin Address:	01/02/2024	\$5.00 Cash	\$5.00
Name: Galindo-Tovar, Antonio F Address:	01/05/2024	\$5.00 Cash	\$5.00
Name: Masters, Lanette T Address:	01/08/2024	\$5.00 Cash	\$5.00
Name: Masters, William Address:	01/08/2024	\$5.00 Cash	\$5.00
Name: Dittrich, Kathleen S Address:	01/10/2024	\$5.00 Cash	\$5.00
Name: Lauck, Anthony Address:	01/10/2024	\$5.00 Cash	\$5.00
Name: Iwangou, King Golden Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Shepard, Susan Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Sutton, Bill Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Sutton, Margeret Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Spears, Gary Address:	01/18/2024	\$5.00 Cash	\$5.00
Name: Spears, Priscilla Address:	01/18/2024	\$5.00 Cash	\$5.00
Name: Weesner, Patricia Address:	01/20/2024	\$5.00 Cash	\$5.00
Name: Porter, C.Curtis Address:	01/21/2024	\$5.00 Cash	\$5.00
Name: LaFlower, Michael Address:	01/27/2024	\$5.00 Cash	\$5.00
Name: Flift, James Address:	01/28/2024	\$5.00 Cash	\$5.00
Name: Gonzales, Matt Address:	01/28/2024	\$5.00 Cash	\$5.00
Name: Granthen, Harriet E Address:	01/28/2024	\$5.00 Cash	\$5.00
Name: Landauer, Rosemary Address:	01/28/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Scbuster, Robert	01/28/2024	\$5.00	\$5.00
Address:		Cash	
Name: Chizowast, Teena	01/29/2024	\$5.00	\$5.00
Address:		Cash	
Name: Allison, Thomas	01/30/2024	\$5.00	\$5.00
Address:		Cash	
Name: Flesner, Barbara	01/30/2024	\$5.00	\$5.00
Address:		Cash	
Name: Grobe, June	01/30/2024	\$5.00	\$5.00
Address:		Cash	
Name: Hamline, Kent	01/30/2024	\$5.00	\$5.00
Address:		Cash	
Name: Hawk, Georlyit	01/30/2024	\$5.00	\$5.00
Address:		Cash	
Name: Rotta, Garret	01/30/2024	\$5.00	\$5.00
Address:		Cash	
Name: Terich, Dorthy	01/30/2024	\$5.00	\$5.00
Address:		Cash	
Name: Lanule, Richard	01/31/2024	\$5.00	\$5.00
Address:		Cash	
Name: Mann, Russell	01/31/2024	\$5.00	\$5.00
Address:		Cash	
Name: Smith, James	01/31/2024	\$5.00	\$5.00
Address:		Cash	
Total of Clean Elections Qualifying Contributions		\$155.00	
Total of Refunds Given		\$0.00	
Net Total of Qualifying Contributions		\$155.00	

State of Arizona



Campaign Finance Report

Frank Roberts for State Representative - District 26

Committee #: 101552

Jurisdiction: Arizona Secretary of State

Treasurer: Roberts, Frank

2131 w Hayward ave, Phoenix, AZ 85021

Phone: (602) 332-9325

Email: nutralabs@yahoo.com

Candidate Name: Roberts, Frank I

Office Sought: State Representative - District 26

Amended 2024 Interim Report

Election Cycle:	2024
Date Filed:	June 11, 2024
Reporting Period:	April 1, 2024-June 11, 2024
Jurisdiction:	Arizona Secretary of State

Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$1,200.00
Total Cash Receipts this Reporting Period:	\$25.00
Total Cash Disbursements this Reporting Period:	\$46.45
Cash Balance at End of Reporting Period:	\$1,178.55

Report ID: 292391

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	\$0.00
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	\$0.00
CCEC Funding and Matching	C6	\$0.00	\$0.00	\$0.00	\$0.00
Qualifying Contributions	C7	\$25.00	\$0.00	\$25.00	\$1,225.00
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		\$25.00	\$0.00	\$25.00	\$1,225.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$0.00	\$0.00	\$0.00	\$0.00
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	\$46.45	\$0.00	\$46.45	\$46.45
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		\$46.45	\$0.00	\$46.45	\$46.45
Bill Payments for Previous Expenditures	D1	\$0.00		\$0.00	\$0.00
Total Cash Disbursed		\$46.45			

Schedule C7 - Qualifying contributions

		Date	Amount	Cycle To Date
Name:	Kiss, Denise	04/01/2024	\$5.00	\$5.00
Address:			Cash	
Name:	Lee, Glenda	04/01/2024	\$5.00	\$5.00
Address:			Cash	
Name:	Noriega, Mario H	04/01/2024	\$5.00	\$5.00
Address:			Cash	
Name:	Potter, Jeffrey G	04/01/2024	\$5.00	\$5.00
Address:			Cash	
Name:	Stockdale, Jason	04/01/2024	\$5.00	\$5.00
Address:			Cash	
Total of Clean Elections Qualifying Contributions			\$25.00	
Total of Refunds Given			\$0.00	
Net Total of Qualifying Contributions			\$25.00	

Schedule E4 - Aggregate Small Expenses

Schedule E4 - Aggregate Small Expenses		Date	Amount	Cycle To Date
Name:	Multiple Contributors	04/10/2024	\$46.45	\$46.45
Address:			Cash	
Trans. Type:	Aggregate Expenses less than \$250 (Cash)			
Memo:	ez way mini storage			
Total of Aggregate Small Expenses			\$46.45	
Total of Refunds, Rebates, and Credits Received			\$0.00	
Net Total of Aggregate Small Expenses			\$46.45	



Campaign Finance Report

Frank Roberts for State Representative - District 26

Committee #: 101552

Jurisdiction: Arizona Secretary of State

Treasurer: Roberts, Frank

2131 w Hayward ave, Phoenix, AZ 85021

Phone: (602) 332-9325

Email: nutralabs@yahoo.com

Candidate Name: Roberts, Frank I

Office Sought: State Representative - District 26

Amended 2023 Pre-Organization Report

Election Cycle:	2024
Date Filed:	April 16, 2024
Reporting Period:	January 1, 2023-December 31, 2023
Jurisdiction:	Arizona Secretary of State

Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$0.00
Total Cash Receipts this Reporting Period:	\$230.00
Total Cash Disbursements this Reporting Period:	\$0.00
Cash Balance at End of Reporting Period:	\$230.00

Report ID: 260558

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	\$0.00
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	\$0.00
CCEC Funding and Matching	C6	\$0.00	\$0.00	\$0.00	\$0.00
Qualifying Contributions	C7	\$230.00	\$0.00	\$230.00	\$230.00
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		\$230.00	\$0.00	\$230.00	\$230.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$0.00	\$0.00	\$0.00	\$0.00
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		\$0.00	\$0.00	\$0.00	\$0.00
Bill Payments for Previous Expenditures	D1	\$0.00		\$0.00	\$0.00
Total Cash Disbursed		\$0.00			

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Roberts, Frank Address:	08/15/2023	\$5.00 Cash	\$5.00
Name: Bezancon, Richard Address:	09/11/2023	\$5.00 Cash	\$5.00
Name: Bezanson, Richard Address:	09/11/2023	\$5.00 Cash	\$5.00
Name: Evitts-Tatalovich, Loni Address:	09/11/2023	\$5.00 Cash	\$5.00
Name: Huber, Louise Address:	09/11/2023	\$5.00 Cash	\$5.00
Name: Saylor, Diane Address:	09/11/2023	\$5.00 Cash	\$5.00
Name: Schwartz, Timothy Address:	09/11/2023	\$5.00 Cash	\$5.00
Name: Smith, Dina Address:	09/11/2023	\$5.00 Cash	\$5.00
Name: BEAUDROT, FRANK Address:	10/04/2023	\$5.00 Cash	\$5.00
Name: PENA, CHRISTIAN Address:	10/07/2023	\$5.00 Cash	\$5.00
Name: PENA, GABBY Address:	10/07/2023	\$5.00 Cash	\$5.00
Name: PENA, JODI Address:	10/07/2023	\$5.00 Cash	\$5.00
Name: Peno, Diego Address:	10/09/2023	\$5.00 Cash	\$5.00
Name: SIMS, LYNDIA Address:	10/09/2023	\$5.00 Cash	\$5.00
Name: Spruces, Shelley Address:	10/09/2023	\$5.00 Cash	\$5.00
Name: GALLEGOS, OLIVER Address:	11/02/2023	\$5.00 Cash	\$5.00
Name: POTTER, RICHARD Address:	11/02/2023	\$5.00 Cash	\$5.00
Name: HERNANDEZ, NICOLE Address:	11/19/2023	\$5.00 Cash	\$5.00
Name: Dihephenl, Boyd Address:	11/25/2023	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Dinehdeal, Barbara Address:	11/25/2023	\$5.00 Cash	\$5.00
Name: Dinehdell, Hiram Address:	11/25/2023	\$5.00 Cash	\$5.00
Name: Olgain, Daniel Address:	11/30/2023	\$5.00 Cash	\$5.00
Name: Cillens, Keith Address:	12/02/2023	\$5.00 Cash	\$5.00
Name: Culleks, Sharon Address:	12/02/2023	\$5.00 Cash	\$5.00
Name: MAZUR, BARBARA Address:	12/02/2023	\$5.00 Cash	\$5.00
Name: Mazur, Walter Address:	12/02/2023	\$5.00 Cash	\$5.00
Name: BAILEY, YVONNE Address:	12/09/2023	\$5.00 Cash	\$5.00
Name: Edwards, Skyla Address:	12/09/2023	\$5.00 Cash	\$5.00
Name: FERRAIOLI, DEBRA Address:	12/10/2023	\$5.00 Cash	\$5.00
Name: Miller, Russell Address:	12/10/2023	\$5.00 Cash	\$5.00
Name: Ronning, Lawrence Address:	12/10/2023	\$5.00 Cash	\$5.00
Name: Lopez, Salena Address:	12/12/2023	\$5.00 Cash	\$5.00
Name: Prorateoure, Linda Address:	12/16/2023	\$5.00 Cash	\$5.00
Name: Coletti, Michelle Address:	12/30/2023	\$5.00 Cash	\$5.00
Name: Ellsworth, Mark Address:	12/30/2023	\$5.00 Cash	\$5.00
Name: Kintz, Donna Address:	12/30/2023	\$5.00 Cash	\$5.00
Name: Kintz, Mark Address:	12/30/2023	\$5.00 Cash	\$5.00
Name: Mallaire, Fred Address:	12/30/2023	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

		Date	Amount	Cycle To Date
Name:	Onnen, Brian	12/30/2023	\$5.00	\$5.00
Address:			Cash	
Name:	Sonita, Dee	12/30/2023	\$5.00	\$5.00
Address:			Cash	
Name:	Swieeney, Ellen	12/30/2023	\$5.00	\$5.00
Address:			Cash	
Name:	Thomson, Kevin	12/30/2023	\$5.00	\$5.00
Address:			Cash	
Name:	McNaughton, Kathleen	12/31/2023	\$5.00	\$5.00
Address:			Cash	
Name:	McNaughton, Robert	12/31/2023	\$5.00	\$5.00
Address:			Cash	
Name:	Okray, David	12/31/2023	\$5.00	\$5.00
Address:			Cash	
Name:	Rewick, Ralph	12/31/2023	\$5.00	\$5.00
Address:			Cash	
Total of Clean Elections Qualifying Contributions			\$230.00	
Total of Refunds Given			\$0.00	
Net Total of Qualifying Contributions			\$230.00	



Campaign Finance Report

Frank Roberts for State Representative - District 26

Committee #: 101552

Jurisdiction: Arizona Secretary of State

Treasurer: Roberts, Frank

2131 w Hayward ave, Phoenix, AZ 85021

Phone: (602) 332-9325

Email: nutralabs@yahoo.com

Candidate Name: Roberts, Frank I

Office Sought: State Representative - District 26

Amended 2024 Interim Report

Election Cycle:	2024
Date Filed:	March 28, 2024
Reporting Period:	January 1, 2024-February 2, 2024
Jurisdiction:	Arizona Secretary of State

Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$230.00
Total Cash Receipts this Reporting Period:	\$180.00
Total Cash Disbursements this Reporting Period:	\$0.00
Cash Balance at End of Reporting Period:	\$410.00

Report ID: 292384

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	\$0.00
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	\$0.00
CCEC Funding and Matching	C6	\$0.00	\$0.00	\$0.00	\$0.00
Qualifying Contributions	C7	\$180.00	\$0.00	\$180.00	\$410.00
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		\$180.00	\$0.00	\$180.00	\$410.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$0.00	\$0.00	\$0.00	\$0.00
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		\$0.00	\$0.00	\$0.00	\$0.00
Bill Payments for Previous Expenditures	D1	\$0.00		\$0.00	\$0.00
Total Cash Disbursed		\$0.00			

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Stockard, Kevin Address:	01/02/2024	\$5.00 Cash	\$5.00
Name: Galindo-Tovar, Antonio F Address:	01/05/2024	\$5.00 Cash	\$5.00
Name: Masters, Lanette T Address:	01/08/2024	\$5.00 Cash	\$5.00
Name: Masters, William Address:	01/08/2024	\$5.00 Cash	\$5.00
Name: Dittrich, Kathleen S Address:	01/10/2024	\$5.00 Cash	\$5.00
Name: Lauck, Anthony Address:	01/10/2024	\$5.00 Cash	\$5.00
Name: Iwangou, King Golden Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Shepard, Susan Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Sutton, Bill Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Sutton, Margeret Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Spears, Gary Address:	01/18/2024	\$5.00 Cash	\$5.00
Name: Spears, Priscilla Address:	01/18/2024	\$5.00 Cash	\$5.00
Name: Weesner, Patricia Address:	01/20/2024	\$5.00 Cash	\$5.00
Name: Porter, C.Curtis Address:	01/21/2024	\$5.00 Cash	\$5.00
Name: LaFlower, Michael Address:	01/27/2024	\$5.00 Cash	\$5.00
Name: Flift, James Address:	01/28/2024	\$5.00 Cash	\$5.00
Name: Gonzales, Matt Address:	01/28/2024	\$5.00 Cash	\$5.00
Name: Granthen, Harriet E Address:	01/28/2024	\$5.00 Cash	\$5.00
Name: Landauer, Rosemary Address:	01/28/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Scbuster, Robert Address:	01/28/2024	\$5.00 Cash	\$5.00
Name: Chizowast, Teena Address:	01/29/2024	\$5.00 Cash	\$5.00
Name: Allison, Thomas Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Flesner, Barbara Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Grobe, June Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Hamline, Kent Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Hawk, Georlyit Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Rotta, Garret Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Terich, Dorthy Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Lanule, Richard Address:	01/31/2024	\$5.00 Cash	\$5.00
Name: Mann, Russell Address:	01/31/2024	\$5.00 Cash	\$5.00
Name: Smith, James Address:	01/31/2024	\$5.00 Cash	\$5.00
Name: Dunlap, Scott Address:	02/01/2024	\$5.00 Cash	\$5.00
Name: Hernandez, Steven Address:	02/01/2024	\$5.00 Cash	\$5.00
Name: Patton, Patricia Address:	02/01/2024	\$5.00 Cash	\$5.00
Name: Gover, Sandra Address:	02/02/2024	\$5.00 Cash	\$5.00
Name: McGrath, Brian Address:	02/02/2024	\$5.00 Cash	\$5.00
Total of Clean Elections Qualifying Contributions		\$180.00	
Total of Refunds Given		\$0.00	
Net Total of Qualifying Contributions		\$180.00	



Campaign Finance Report

Frank Roberts for State Representative - District 26

Committee #: 101552

Jurisdiction: Arizona Secretary of State

Treasurer: Roberts, Frank

2131 w Hayward ave, Phoenix, AZ 85021

Phone: (602) 332-9325

Email: nutralabs@yahoo.com

Candidate Name: Roberts, Frank I

Office Sought: State Representative - District 26

Amended 2024 Interim Report

Election Cycle: **2024**
Date Filed: January 17, 2024
Reporting Period: January 1, 2024-January 17, 2024
Jurisdiction: Arizona Secretary of State

Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$230.00
Total Cash Receipts this Reporting Period:	\$50.00
Total Cash Disbursements this Reporting Period:	\$0.00
Cash Balance at End of Reporting Period:	\$280.00

Report ID: 292368

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	\$0.00
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	\$0.00
CCEC Funding and Matching	C6	\$0.00	\$0.00	\$0.00	\$0.00
Qualifying Contributions	C7	\$50.00	\$0.00	\$50.00	\$280.00
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		\$50.00	\$0.00	\$50.00	\$280.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$0.00	\$0.00	\$0.00	\$0.00
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		\$0.00	\$0.00	\$0.00	\$0.00
Bill Payments for Previous Expenditures	D1	\$0.00		\$0.00	\$0.00
Total Cash Disbursed		\$0.00			

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Stockard, Kevin Address:	01/02/2024	\$5.00 Cash	\$5.00
Name: Galindo-Tovar, Antonio F Address:	01/05/2024	\$5.00 Cash	\$5.00
Name: Masters, Lanette T Address:	01/08/2024	\$5.00 Cash	\$5.00
Name: Masters, William Address:	01/08/2024	\$5.00 Cash	\$5.00
Name: Dittrich, Kathleen S Address:	01/10/2024	\$5.00 Cash	\$5.00
Name: Lauck, Anthony Address:	01/10/2024	\$5.00 Cash	\$5.00
Name: Iwangou, King Golden Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Shepard, Susan Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Sutton, Bill Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Sutton, Margeret Address:	01/14/2024	\$5.00 Cash	\$5.00
Total of Clean Elections Qualifying Contributions		\$50.00	
Total of Refunds Given		\$0.00	
Net Total of Qualifying Contributions		\$50.00	

State of Arizona



Campaign Finance Report

Frank Roberts for State Representative - District 26

Committee #: 101552

Jurisdiction: Arizona Secretary of State

Treasurer: Roberts, Frank

2131 w Hayward ave, Phoenix, AZ 85021

Phone: (602) 332-9325

Email: nutralabs@yahoo.com

Candidate Name: Roberts, Frank I

Office Sought: State Representative - District 26

Amended 2024 Interim Report

Election Cycle:	2024
Date Filed:	February 1, 2024
Reporting Period:	January 1, 2024-February 1, 2024
Jurisdiction:	Arizona Secretary of State

Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$230.00
Total Cash Receipts this Reporting Period:	\$170.00
Total Cash Disbursements this Reporting Period:	\$0.00
Cash Balance at End of Reporting Period:	\$400.00

Report ID: 292382

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	\$0.00
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	\$0.00
CCEC Funding and Matching	C6	\$0.00	\$0.00	\$0.00	\$0.00
Qualifying Contributions	C7	\$170.00	\$0.00	\$170.00	\$400.00
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		\$170.00	\$0.00	\$170.00	\$400.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$0.00	\$0.00	\$0.00	\$0.00
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		\$0.00	\$0.00	\$0.00	\$0.00
Bill Payments for Previous Expenditures	D1	\$0.00		\$0.00	\$0.00
Total Cash Disbursed		\$0.00			

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Stockard, Kevin Address:	01/02/2024	\$5.00 Cash	\$5.00
Name: Galindo-Tovar, Antonio F Address:	01/05/2024	\$5.00 Cash	\$5.00
Name: Masters, Lanette T Address:	01/08/2024	\$5.00 Cash	\$5.00
Name: Masters, William Address:	01/08/2024	\$5.00 Cash	\$5.00
Name: Dittrich, Kathleen S Address:	01/10/2024	\$5.00 Cash	\$5.00
Name: Lauck, Anthony Address:	01/10/2024	\$5.00 Cash	\$5.00
Name: Iwangou, King Golden Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Shepard, Susan Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Sutton, Bill Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Sutton, Margeret Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Spears, Gary Address:	01/18/2024	\$5.00 Cash	\$5.00
Name: Spears, Priscilla Address:	01/18/2024	\$5.00 Cash	\$5.00
Name: Weesner, Patricia Address:	01/20/2024	\$5.00 Cash	\$5.00
Name: Porter, C.Curtis Address:	01/21/2024	\$5.00 Cash	\$5.00
Name: LaFlower, Michael Address:	01/27/2024	\$5.00 Cash	\$5.00
Name: Flift, James Address:	01/28/2024	\$5.00 Cash	\$5.00
Name: Gonzales, Matt Address:	01/28/2024	\$5.00 Cash	\$5.00
Name: Granthen, Harriet E Address:	01/28/2024	\$5.00 Cash	\$5.00
Name: Landauer, Rosemary Address:	01/28/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Scbuster, Robert	01/28/2024	\$5.00	\$5.00
Address:		Cash	
Name: Chizowast, Teena	01/29/2024	\$5.00	\$5.00
Address:		Cash	
Name: Allison, Thomas	01/30/2024	\$5.00	\$5.00
Address:		Cash	
Name: Flesner, Barbara	01/30/2024	\$5.00	\$5.00
Address:		Cash	
Name: Grobe, June	01/30/2024	\$5.00	\$5.00
Address:		Cash	
Name: Hamline, Kent	01/30/2024	\$5.00	\$5.00
Address:		Cash	
Name: Hawk, Georlyit	01/30/2024	\$5.00	\$5.00
Address:		Cash	
Name: Rotta, Garret	01/30/2024	\$5.00	\$5.00
Address:		Cash	
Name: Terich, Dorthy	01/30/2024	\$5.00	\$5.00
Address:		Cash	
Name: Lanule, Richard	01/31/2024	\$5.00	\$5.00
Address:		Cash	
Name: Mann, Russell	01/31/2024	\$5.00	\$5.00
Address:		Cash	
Name: Smith, James	01/31/2024	\$5.00	\$5.00
Address:		Cash	
Name: Dunlap, Scott	02/01/2024	\$5.00	\$5.00
Address:		Cash	
Name: Hernandez, Steven	02/01/2024	\$5.00	\$5.00
Address:		Cash	
Name: Patton, Patricia	02/01/2024	\$5.00	\$5.00
Address:		Cash	
Total of Clean Elections Qualifying Contributions		\$170.00	
Total of Refunds Given		\$0.00	
Net Total of Qualifying Contributions		\$170.00	



Campaign Finance Report

Frank Roberts for State Representative - District 26

Committee #: 101552

Jurisdiction: Arizona Secretary of State

Treasurer: Roberts, Frank

2131 w Hayward ave, Phoenix, AZ 85021

Phone: (602) 332-9325

Email: nutralabs@yahoo.com

Candidate Name: Roberts, Frank I

Office Sought: State Representative - District 26

Amended 2024 Interim Report

Election Cycle:	2024
Date Filed:	April 16, 2024
Reporting Period:	January 1, 2024-February 27, 2024
Jurisdiction:	Arizona Secretary of State

Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$230.00
Total Cash Receipts this Reporting Period:	\$575.00
Total Cash Disbursements this Reporting Period:	\$0.00
Cash Balance at End of Reporting Period:	\$805.00

Report ID: 292386

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	\$0.00
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	\$0.00
CCEC Funding and Matching	C6	\$0.00	\$0.00	\$0.00	\$0.00
Qualifying Contributions	C7	\$575.00	\$0.00	\$575.00	\$805.00
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		\$575.00	\$0.00	\$575.00	\$805.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$0.00	\$0.00	\$0.00	\$0.00
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		\$0.00	\$0.00	\$0.00	\$0.00
Bill Payments for Previous Expenditures	D1	\$0.00		\$0.00	\$0.00
Total Cash Disbursed		\$0.00			

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Stockard, Kevin Address:	01/02/2024	\$5.00 Cash	\$5.00
Name: Galindo-Tovar, Antonio F Address:	01/05/2024	\$5.00 Cash	\$5.00
Name: Masters, Lanette T Address:	01/08/2024	\$5.00 Cash	\$5.00
Name: Masters, William Address:	01/08/2024	\$5.00 Cash	\$5.00
Name: Dittrich, Kathleen S Address:	01/10/2024	\$5.00 Cash	\$5.00
Name: Lauck, Anthony Address:	01/10/2024	\$5.00 Cash	\$5.00
Name: Iwangou, King Golden Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Shepard, Susan Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Sutton, Bill Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Sutton, Margeret Address:	01/14/2024	\$5.00 Cash	\$5.00
Name: Spears, Gary Address:	01/18/2024	\$5.00 Cash	\$5.00
Name: Spears, Priscilla Address:	01/18/2024	\$5.00 Cash	\$5.00
Name: Weesner, Patricia Address:	01/20/2024	\$5.00 Cash	\$5.00
Name: Porter, C.Curtis Address:	01/21/2024	\$5.00 Cash	\$5.00
Name: LaFlower, Michael Address:	01/27/2024	\$5.00 Cash	\$5.00
Name: Flift, James Address:	01/28/2024	\$5.00 Cash	\$5.00
Name: Gonzales, Matt Address:	01/28/2024	\$5.00 Cash	\$5.00
Name: Granthen, Harriet E Address:	01/28/2024	\$5.00 Cash	\$5.00
Name: Landauer, Rosemary Address:	01/28/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Scbuster, Robert Address:	01/28/2024	\$5.00 Cash	\$5.00
Name: Chizowast, Teena Address:	01/29/2024	\$5.00 Cash	\$5.00
Name: Allison, Thomas Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Flesner, Barbara Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Grobe, June Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Hamline, Kent Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Hawk, Georlyit Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Rotta, Garret Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Terich, Dorthy Address:	01/30/2024	\$5.00 Cash	\$5.00
Name: Lanule, Richard Address:	01/31/2024	\$5.00 Cash	\$5.00
Name: Mann, Russell Address:	01/31/2024	\$5.00 Cash	\$5.00
Name: Smith, James Address:	01/31/2024	\$5.00 Cash	\$5.00
Name: Dunlap, Scott Address:	02/01/2024	\$5.00 Cash	\$5.00
Name: Hernandez, Steven Address:	02/01/2024	\$5.00 Cash	\$5.00
Name: Patton, Patricia Address:	02/01/2024	\$5.00 Cash	\$5.00
Name: Gover, Sandra Address:	02/02/2024	\$5.00 Cash	\$5.00
Name: McGrath, Brian Address:	02/02/2024	\$5.00 Cash	\$5.00
Name: Greirbin, Virgil wayne Address:	02/03/2024	\$5.00 Cash	\$5.00
Name: Gribbin, Sharyl Address:	02/03/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Machen, Amanda Address:	02/03/2024	\$5.00 Cash	\$5.00
Name: McGrath, Janet Address:	02/03/2024	\$5.00 Cash	\$5.00
Name: Smith, Catherine Address:	02/03/2024	\$5.00 Cash	\$5.00
Name: Ojeda, Z Address:	02/04/2024	\$5.00 Cash	\$5.00
Name: Amado, Eric Address:	02/10/2024	\$5.00 Cash	\$5.00
Name: Adams, William s sr Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Armstrong, Brandon Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Bell, Mary Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Bituhey, Stanya Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: DeBaun, david Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: DeBaun, Wanda Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Finn, Brian Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Gonzales Bituhey, Gabriel Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Kohler, Janna Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Leguire, Alexandra Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Peterson, David Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Smith, Dewitt Address:	02/12/2024	\$5.00 Cash	\$5.00
Name: Bales, Jackee Address:	02/15/2024	\$5.00 Cash	\$5.00
Name: Eulett, Tina Address:	02/15/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Harman, Richard Jr Address:	02/15/2024	\$5.00 Cash	\$5.00
Name: Swanson, Melvin Address:	02/15/2024	\$5.00 Cash	\$5.00
Name: O'Brien, Sara Address:	02/16/2024	\$5.00 Cash	\$5.00
Name: Gidwani, Michael Address:	02/17/2024	\$5.00 Cash	\$5.00
Name: Lusson, Gabriel Address:	02/17/2024	\$5.00 Cash	\$5.00
Name: Talbett, Deborah Address:	02/17/2024	\$5.00 Cash	\$5.00
Name: Lazar, Jeffrey Address:	02/18/2024	\$5.00 Cash	\$5.00
Name: Ludwig, Steve Address:	02/18/2024	\$5.00 Cash	\$5.00
Name: Mandin, Dexter Address:	02/18/2024	\$5.00 Cash	\$5.00
Name: Reynolds, Thomas Address:	02/18/2024	\$5.00 Cash	\$5.00
Name: Stamper, Dereck Address:	02/18/2024	\$5.00 Cash	\$5.00
Name: Bolavanti, King Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Christian, Lucas Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Cramer, Kenneth Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: De La Huerta, Lois Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Drubes, Brian Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Michaelson, Toni Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Sanchez, Samuel Jr Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Teerpoead, Edward Address:	02/19/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Temporado, Carol Address:	02/19/2024	\$5.00 Cash	\$5.00
Name: Leekey, Delvina Address:	02/20/2024	\$5.00 Cash	\$5.00
Name: Pena, Gabrielle Address:	02/20/2024	\$5.00 Cash	\$5.00
Name: Woodwick, forrest Address:	02/20/2024	\$5.00 Cash	\$5.00
Name: Breast, Diana B Address:	02/22/2024	\$5.00 Cash	\$5.00
Name: Schultz, Donald Address:	02/22/2024	\$5.00 Cash	\$5.00
Name: Hendershot, Carole Address:	02/23/2024	\$5.00 Cash	\$5.00
Name: Owen, Henry Address:	02/23/2024	\$5.00 Cash	\$5.00
Name: Owens, Jayce R Address:	02/23/2024	\$5.00 Cash	\$5.00
Name: Rintalk, Rodney Address:	02/23/2024	\$5.00 Cash	\$5.00
Name: Bahlbi, Asfaha G Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Cocho, Mark Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Dalton, Phillip Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: DRAPER, BARRY Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: DRAPER, VIRGINIA Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Elliott, Shay Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Fletcher, Thomas Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Gaines, Richard Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Giurepps, Anthony D Address:	02/24/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Hart, Kathy Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: HERNANDEZ, ANTONIO Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Huff, Kimberly Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Kemper, Cherie Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Paterno-Samos, Chloe Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Solaro, Beryl Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Swanson, Violet Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Unsnees, Jesus Address:	02/24/2024	\$5.00 Cash	\$5.00
Name: Cox, Dennis J Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Demers, Gary Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Hoff, Francog Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Ruhf, Louise Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Seagle, Charles Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Sellers, Melissa Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Snyder, Nancy Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Traslavina, Connie Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Traslavina, Ray A Address:	02/25/2024	\$5.00 Cash	\$5.00
Name: Doctor, Pierstn Address:	02/26/2024	\$5.00 Cash	\$5.00
Name: Doctor, Ridel Address:	02/26/2024	\$5.00 Cash	\$5.00

Schedule C7 - Qualifying contributions

	Date	Amount	Cycle To Date
Name: Gehrne, Robert	02/27/2024	\$5.00	\$5.00
Address:		Cash	
Total of Clean Elections Qualifying Contributions		\$575.00	
Total of Refunds Given		\$0.00	
Net Total of Qualifying Contributions		\$575.00	

CITIZENS CLEAN ELECTIONS COMMISSION

Report on Agreed-Upon Procedures

**Frank Roberts
Participating Candidate for
State Representative - District 26
General Election 2024**



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 Frank Roberts'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 Frank Roberts. 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

April 21, 2025

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.

- (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 selected three deposits (total population tested) and five withdrawals 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 \$15,689.23 at November 5, 2024. The Candidate's campaign bank account statement listed a balance of \$828.54 at November 26, 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.

- 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

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) 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 reviewed fifteen 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

For two out of fifteen expenditures tested, the name provided on the supporting documentation did not agree to the name listed on the Candidate's Campaign finance reports. The amount and nature of goods or services for these two expenditures agreed, however.

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

Finding

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

- (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 fifteen 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

None of the expenditures we tested appeared to be for joint expenditures.

- 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) 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.



Thomas Collins <thomas.collins@azcleelections.gov>

Fw: Clean Elections -Tom Collins

1 message

Frank Roberts <azld26@yahoo.com>

Wed, Oct 15, 2025 at 5:51 PM

To: Thomas Collins <thomas.collins@azcleelections.gov>

Dear Mr. Collins and members of the Commission:

I would like to thank everyone that has been involved in this process for being professional and courteous. I have learned a great deal, the hard way, and would like to propose a way forward that might resolve our current situation.

To start, let me be sure to take responsibility for the inadequate finance reports that were filed. Not knowing what I was doing is not a good reason and it is no kind of excuse. Clearly the few experienced hands I counted on for guidance were also woefully ignorant in that department.

I have worked with accountants and your auditors, I have corrected and amended all of the finance reports, and they have determined that everything is in balance, zeroed out properly, and ready for termination once this process is completed.

I assume some sort of penalty remains in order and would ask that you be gentle on the financial side. I am not a person of any particular wealth. I would propose an amount of \$1,500 paid by me personally, ideally paid \$500 a month over three months to make the hit more achievable, as my penalty.

I also want to make sure that you know that I have learned my lesson and will handle these matters very differently in the future. I have spoken with a political consultant named Constantin Querard and have had several people tell me that he is very experienced with the Clean Election system. CQ has agreed to help me in any future campaigns.

I am also willing, if it is possible using the online campaign finance reporting system, to file periodic reports in addition to those required by law. If you want reports every 60 days or even 30 days, I would be willing to file those. It keeps me better organized and you can know that I'm keeping on top of the fine details.

Please let me know if there is anything else I could do to help bring this matter to a successful close. .

Thank you for considering this offer.

Frank Roberts