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

Location: **Citizens Clean Elections Commission**

1110 W. Washington, Suite 250

Phoenix, Arizona 85007

Date: **Thursday, January 29, 2026**

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 January 29, 2026. This meeting will be held at 10:00 a.m. **This meeting will be held in person and virtually. The meeting location will be open by 9:45 a.m. at the latest**. Instructions on how the public may participate in this meeting are below. For additional information, please call (602) 364-3477 or contact Commission staff at ccec@azcleanelections.gov.

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

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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 December 11, 2025 and December 22, 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 (including agreements with state budget units such as Arizona State University), 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 penalties in MUR 25-01 Hector Jaramillo, 2024 candidate for legislature.

V. Discussion and Possible *Action Arizona Citizens Clean Elections Comm'n v. Fontes*, No. CV-2025-064149 (Consol.) (Super. Ct. Ariz., Maricopa).

The Commission may vote to go into Executive Session, which is not open to the public, to receive legal advice or consult with its attorneys regarding this litigation. A.R.S. § 38-431.03(A)(3), (4).

VI. Discussion and Possible Action on the 2026 Voter Education Plan.

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 27th day of January, 2026
Citizens Clean Elections Commission
Thomas M. Collins, Executive Director

THE STATE OF ARIZONA

CITIZENS CLEAN ELECTIONS COMMISSION

REPORTER'S TRANSCRIPT OF PUBLIC MEETING

Phoenix, Arizona
December 11, 2025
10:00 a.m.

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

CERTIFIED TRANSCRIPT

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PUBLIC MEETING BEFORE THE CITIZENS CLEAN ELECTIONS COMMISSION convened at 10:00 a.m. on December 11, 2025, at the State of Arizona, Clean Elections Commission, 1110 West Washington, Conference Room, Phoenix, Arizona, in the presence of the following Board Members:

Mr. Mark Kimble, Chairman
Mr. Galen Paton
Ms. Christina Werther
Mr. Sam Crump
Mr. Steve Titla

OTHERS PRESENT:
Thomas M. Collins, Executive Director
Paula Thomas, Executive Officer
Mike Becker, Policy Director
Gina Roberts, Voter Education Director
Alec Shaffer, Web Content Manager
Avery Xola, Voter Education Manager
Bill Richards, Richards & Moskowitz
Samantha Fox, Richards & Moskowitz
Craig Morgan, Taft Law
Cathy Herring, KCA

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P R O C E E D I N G

CHAIRMAN KIMBLE: Good morning. I'm Mark Kimble, Chair of the Citizens Clean Elections Commission. It's 10:00 a.m. on Thursday, December 11th, 2025. I call this meeting of the Citizens Clean Elections Commission to order.

With that, we'll take attendance. Commissioners, please identify yourselves for the record.

COMMISSIONER WERTHER: Christina Werther.

COMMISSIONER PATON: Galen Paton.

COMMISSIONER CRUMP: Sam Crump.

CHAIRMAN KIMBLE: And I'm Mark Kimble. We have a quorum. Four of the five of us are here.

Item II, discussion and possible action on meeting minutes for two meetings.

I'm sorry. I see Commissioner Titla is now here with us. Commissioner Titla, are you here?

COMMISSIONER TITLA: Yes, sir. Good morning, Chairman. Good morning to everybody.

CHAIRMAN KIMBLE: Good morning, Commissioner Titla. All five of us are here. Thank you.

Item II, discussion and possible action on meeting minutes for two meetings, November 20th, 2025

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and November 28th, 2025.

Do any Commissioners have comments or questions on the minutes before we move to a motion?

(No response.)

CHAIRMAN KIMBLE: Hearing none, is there a motion to approve the minutes for the two meetings on November 20th and November 28th?

COMMISSIONER WERTHER: Mr. Chairman, I move to approve the minutes for November 20th and November 28th of 2025.

CHAIRMAN KIMBLE: Thank you, Commissioner Werther.

Is there a second?

COMMISSIONER PATON: I'll second.

CHAIRMAN KIMBLE: Thank you, Commissioner Paton.

It's been moved and seconded that we approve the minutes for November 20th and November 28th, 2025. I'll call the roll.

Commissioner Werther.

COMMISSIONER WERTHER: Aye.

CHAIRMAN KIMBLE: Commissioner Paton.

COMMISSIONER PATON: Aye.

CHAIRMAN KIMBLE: Commissioner Crump.

COMMISSIONER CRUMP: Aye.

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CHAIRMAN KIMBLE: Commissioner Titla.

COMMISSIONER TITLA: Aye.

CHAIRMAN KIMBLE: Chair votes aye. The minutes are approved 5-to-nothing.

Item III, Executive Director's Report.

Tom.

MR. COLLINS: Yes, Mr. Chairman. Thank you. Thank you, Commissioners, for all being here.

A couple of highlights. First, I wanted to congratulate Commissioner Werther on being elected President of the Arizona City Attorneys Association. So that's -- I thought that was a cool thing. And that's all the City Attorneys for all of Arizona's 91 cities and towns.

COMMISSIONER WERTHER: 92.

MR. COLLINS: 92.

COMMISSIONER WERTHER: There's a new one.

MR. COLLINS: There's a new one? Oh, that's right. It's Queen Creek.

COMMISSIONER WERTHER: San Tan.

MR. COLLINS: San Tan. I'm sorry. Anyways, I thought that was super cool, so --

We also did this town hall panel discussion on healthcare with Telemundo on December 1st and it aired on the 4th and the 5th. You can see some of the

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1 panelists we had. We thought this was a great
2 opportunity. This is the second issue town hall-type
3 forum that we did -- have done this calendar year, and
4 I think we're -- we also -- I will also say that
5 everybody on our staff, Gina and everybody working at
6 Riester, we moved -- and Telemundo moved very quickly
7 to put this together on an expedited basis and --
8 because we wanted to get this done timely during the
9 open enrollment season. And so we -- you know, so this
10 was really, really -- this was really an important
11 thing, and we'll have more of that as we get into next
12 year.
13 As you can see, we're -- everybody sort of
14 had a lot of outreach activities going on.
15 And we are working on the 2026 voter
16 education plans. We've had -- we've had nine workshops
17 so far, and we'll have the 2026 workshops coming up in
18 January.
19 On the cases, the only thing I wanted to
20 update you is that, you know, we have a -- some
21 response -- we have a response due tomorrow in a motion
22 for a preliminary injunction in Montenegro v. Fontes.
23 So where that case is now -- this is the case that
24 challenges Prop 211 on the basis of separation of
25 powers/delegation principles, so essentially the

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1 legislative leaders saying that the Proposition
2 delegates too much authority to the Commission to -- to
3 administrate the Voters' Right to Know Act.
4 So there's a motion for judgment on the
5 pleadings that has been filed by the leaders that we
6 responded to on Monday, then they filed a motion for
7 preliminary injunction. So we'll have hearings coming
8 up the beginning of the year on -- on those.
9 You know, I think that the case that came out
10 of the Supreme Court had to do with their standing,
11 that is to say, whether or not they had an injury.
12 This has to do with whether or not, in fact, there's a
13 violation.
14 And on the preliminary injunction, you know,
15 part of the question is whether or not they're harmed,
16 irreparably harmed, which is not the same as just
17 whether or not they have injury sufficient to be in
18 court. So, you know, those are -- those are still
19 ongoing. We do have a discovery issue there too that
20 we're working through with the leadership.
21 I did want to mention two other things real
22 quick. There was this argument on the 9th in this
23 National Republican Senatorial Committee versus Federal
24 Election Commission case that was covered pretty
25 extensively by all -- you know, in the news. That has

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1 to do with whether or not it's constitutional to
2 restrict party-coordinated expenditures with
3 candidates. You know, in Arizona, you know, I don't
4 know that a decision on this on a First Amendment basis
5 will affect Arizona very much, because in 2016 we
6 passed a law that said that party-coordinated
7 expenditures are not contributions to candidates and
8 they are not subject to the independent expenditure,
9 you know, limitations that exist.
10 So the more interesting question, probably,
11 when this case -- a decision gets issued sometime
12 before the end of June is, you know, sort of how deeply
13 into the campaign finance limits law the majority of
14 the Supreme Court cuts. You know, most states and the
15 federal government have some form of campaign finance
16 limits, you know, how much you can take and from whom
17 you can take the money. So that's probably the most
18 interesting thing there, but, you know --
19 This was -- not to get super technical, but
20 this was on cert. It wasn't on a direct appeal, which
21 you can have in some of these campaign finance cases.
22 So they didn't have to take the case. So the fact they
23 took the case, you know, tells you a lot about where
24 this is going.
25 I also want to mention these two bills. You

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1 know, Mike, as you know -- or, well, Commissioner
2 Crump, you don't know -- but Mike puts out a
3 legislative report starting with the session that will
4 be part of this Executive Director's Report then. But
5 we had two bills we wanted to highlight.
6 One, you know, Senator Kavanagh files a bill
7 I think pretty much every year to change the threshold
8 at which folks' -- donors' identity would be reported.
9 You know, I was in Atlanta for this conference of
10 government ethics lawyers, and there was a lot of
11 discussion around, you know, how this issue will play
12 out in legislatures that are controlled by both parties
13 because of the, you know, the concerns around just
14 general -- how much information is out there about
15 people and what can it be used for. You know, so I
16 think that, you know, we'll be sensitive to that.
17 Obviously under the Voters' Right to Know
18 Act, in addition to those legal parameters that exist,
19 the Commission has the authority to, if we ever got an
20 application -- we haven't ever -- to exercise its, you
21 know, authority to address, you know, safety issues if
22 they were to arise, those kind of things. So, I mean,
23 that's a timely thing. And I think if there was a year
24 that this kind of bill would get, you know, some
25 momentum, it might be this year.

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And then the primary date. You know, in -- what was it, 2024 -- in 2024 for 2024 they moved the state primary date. This was to account for the lower recount threshold that the Legislature passed. This -- it's very likely there will be a bill that will -- and this may be it -- that will make that permanent. So instead of the first Tuesday in August, our primary would be the last Tuesday in July going forward if that passed.

So those were -- I mean, you know, I just think there's a -- you know, so there's a number of things going on in the world that will have some -- some relevancy to what we do, and I wanted to make sure that, you know, as we go into next year we sort of try to make you aware of those.

So that's -- I think that's all I had.

CHAIRMAN KIMBLE: Thank you, Tom.

Are there any comments or questions from Members of the Commission?

(No response.)

CHAIRMAN KIMBLE: Hearing none, we'll move on to Item IV, litigation matters, discussion and possible action. Item IV contains -- excuse me. Item IV concerns three matters: The first is the Commission's suit against the Secretary of State; the second is a

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similar suit later filed by the Democratic Party; and finally, we have this notice of claim. As indicated in the Agenda, the Commission may consider authorizing a range of legal options and may vote to go into executive session for legal advice or to instruct our attorneys.

Before we go any further, I'd like Tom to give us a brief summary of these matters, see if any Commissioners have questions they would like to address in an open session.

Tom.

MR. COLLINS: Thank you, Mr. Chair, Commissioners. So, you know, the Commission voted to authorize the lawsuit, and we filed on December 2nd. It's a declaratory judgment action that, you know, essentially seeks to -- a declaration that the Secretary of State -- excuse me -- lacks the authority to, you know, unilaterally change the name of a party and the -- in this manner.

On -- later that week the Arizona Democratic Party filed a lawsuit that, you know, largely, I think, reflects similar theory to -- to ours. I think that's probably -- but they filed it as a special action. So the major differences between a special action and our declaratory judgment action have to do -- first, it's

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discretionary on the court whether or not they would take jurisdiction over this case in the first place. That's the most significant one. It's not necessarily clear that they get any more timely relief from that.

The -- and then we received this notice of claim. The notice of claim itself is a -- you know, is a -- I mean, it's been distributed by the attorneys who filed it to, I think, a lot of different reporters. So, you know, the upshot there is that this is -- this really has more to do with the threshold number of signatures that independent candidates have to get than it has anything to do with the lawsuit that we have filed. There's a little conflation of those two things in some of the press coverage.

And then there is some other aspects of that that are a little idiosyncratic in the sense that if the threshold -- so independents have to get roughly -- well, in 2024 independents had to get, for statewide office, 42,000 signatures, while a Democratic Party candidate for statewide office had to get like 5,000. And the statutes basically say that an independent -- and this statute has been written this way I think since, I want to say, early '80s, maybe -- maybe the mid-'90s. But it says you have -- they take -- you take 3 percent of the eligible population of

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independent voters, I believe is what they have to get, something like that. So it's basically you end up with a much higher percentage of -- a much higher number.

42,000, though, quite candidly, I mean, it may not be that insurmountable. I mean, nobody -- people say it's insurmountable. When you think about it, with E-Qual and different things that you have now, it may not. But anyways, that's the -- that's the argument. It's essentially an argument that says that, you know, that's a violation of equal protection.

So it really doesn't have a lot to do with what we're -- with what we're doing. There is some matters in there about objecting to whether or not we have a role here, you know, so -- so that's -- that's kind of where those things are.

In the meantime, you know, there is an aspect of this overall issue that involves the Elections Procedures Manual. And the Elections Procedures Manual -- the final Elections Procedures Manual, the deadline for that is the 31st of -- you know, before the beginning of the year. Not a lot of news to report, at least that I have, as far as where that is in the process.

You will recall that one of the issues that the Motor Vehicle Division has raised and that the

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1 Counties have raised is that the EPM itself says -- it
2 identifies five parties. It doesn't identify an
3 Arizona Independent Party. So if you're directing a
4 set of County Recorders to take an action, to the
5 extent the Secretary can even really do that, and that
6 action is not one that is recognized in the EPM, you
7 know, that creates a -- you know, a real conundrum,
8 right, for a county. You can't do both, literally, is
9 what they -- what their communications have said.
10 So that's where we are. I think the thing
11 that's, you know -- so -- and I think that -- I think
12 that's really about -- about all I have that -- to just
13 sort of summarize the sort of top news, you know. I --
14 so outside of that, I don't know -- so I don't know if
15 there are any questions about those factual issues.
16 And I guess beyond that, I probably would, you know,
17 defer to Bill and to you all about what you want to
18 do -- you know, when we want to go -- when you would
19 want to go into executive session.
20 CHAIRMAN KIMBLE: Before that, are there any
21 questions that Commissioners have in open session?
22 COMMISSIONER TITLA: Chairman.
23 CHAIRMAN KIMBLE: Commissioner Titla.
24 COMMISSIONER TITLA: Yes, sir.
25 Tom, regarding your statement, earlier you

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1 stated that this was discretionary. Were you referring
2 to the Commission's lawsuit or the Democratic lawsuit?
3 MR. COLLINS: Mr. Chairman,
4 Commissioner Titla, the -- what I was referring
5 specifically to was the court's discretion to accept
6 jurisdiction of the Democratic Party's special action,
7 just because, as you know, you know, the special action
8 rules just allow a court, unless you have a mandatory
9 special action provision, to decline jurisdiction of
10 special actions.
11 COMMISSIONER TITLA: Yeah, thank you.
12 Because you said that it was discretionary to this
13 lawsuit, and there are a couple lawsuits out there --
14 MR. COLLINS: Right.
15 COMMISSIONER TITLA: -- the Commission's
16 lawsuit and the Democratic Party's lawsuit. So I
17 didn't know which one you were referring to, but thank
18 you for the clarification.
19 Second, I have a question on -- has the
20 Secretary of State answered the pleadings that have
21 been filed by the Commission and the Democratic Party?
22 MR. COLLINS: Mr. Chairman,
23 Commissioner Titla, no. Their answer or whatever they
24 will file is due the 24th of December. I think -- so I
25 guess for the Democratic Party I'm actually not sure --

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1 I'm actually not sure if their answer is due on the
2 same schedule or if they get a different schedule for
3 the special action. But, you know, we have been in
4 communication with the Secretary of State's attorneys,
5 but, no, there is not a -- not yet been a -- there
6 won't be a -- they don't have a responsive pleading due
7 until the 24th.
8 COMMISSIONER TITLA: Okay. If it's due on
9 the 24th, is there a reply date for the Commission to
10 that reply?
11 MR. COLLINS: So -- right. Mr. Chairman,
12 Commissioner Titla, so to that point, I think that one
13 of the things that -- one of the things that I think
14 is, I mean, sort of self-evident in front of the
15 Commission as plaintiff is, you know, how to best
16 execute getting relief in a manner that is timely. And
17 so, you know, probably a better question for Bill and
18 Samantha, but we have given that issue a lot of thought
19 and we have those thoughts to share with you for sure.
20 COMMISSIONER TITLA: Okay. So is there going
21 to be a court hearing on these pleadings after those
22 time limits? And when do you expect those court
23 hearings to occur?
24 MR. COLLINS: Right. So, Mr. Chairman,
25 Commissioner Titla, right now there's not. But getting

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1 one sooner rather than later is the -- is sort of the
2 next step we have to take.
3 It took a little while to figure out who the
4 Secretary's attorneys were for this matter. So we now
5 know that, you know, they have some representation from
6 the Attorney General's Office on this. And, you know,
7 our -- so our -- I mean, without -- so basically our
8 position with those attorneys has been the -- that
9 there is a clear controversy here.
10 Clearly the Commission's legal position --
11 you know, obviously it wasn't unanimous, but
12 nevertheless, the Commission's legal position is
13 consistent with the positions of most, if not all, of
14 the other election officials involved in this
15 transaction and, you know, at least one party we know
16 for sure and all of those folks evaluating the law. So
17 it seems to us that it's pretty self-evident that this
18 is a real controversy that ought to get resolved, and
19 we, I think, communicated that the -- it's in
20 everyone's best interest to settle that question
21 quickly.
22 So, you know, we don't -- beyond having
23 communicated that and the hope that that will get
24 communicated to the proper folks in the client
25 representative capacity at the Secretary's Office, we

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1 don't really have an answer yet.
2 COMMISSIONER TITLA: Well, Tom, my question
3 is, when do you think the court hearings will occur,
4 and I think this is the answer you gave, right? I
5 can't remember what my question was after your answer.
6 MR. COLLINS: Well, yeah, the answer is --
7 yeah, so the answer is -- the answer is there's no date
8 set for anything. The process we're following here is
9 to try to get one as soon as possible.
10 The hope is that the Secretary of State's
11 Office will recognize that it is in their interest, as
12 well as everybody else's interest, to have that happen
13 quickly and not, you know, sort of delay resolving the
14 controversy when there's an obvious -- there obviously
15 is one and it's pretty simple, really, at the end of
16 the day.
17 So the short answer is, I don't have a date;
18 the long answer is, we have a process to get a date.
19 And as soon as we have one, we will let you know. So I
20 guess I --
21 COMMISSIONER TITLA: Yeah. Yeah. Thank you,
22 Tom. Also, you said that the Secretary of State has
23 Attorney General -- some Attorney General attorneys at
24 their office. I noticed that we have an Attorney
25 General appear -- attorney appear at our meetings

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1 previously, right?
2 MR. COLLINS: Yes, that's correct.
3 Mr. Chairman, yes, that's correct.
4 COMMISSIONER TITLA: So is there some sort of
5 conflict if we have an Attorney General attorney appear
6 at our meetings and then they have representation from
7 the same office, the Secretary of State's Office?
8 MR. COLLINS: Mr. Chairman,
9 Commissioner Titla, we think we've resolved those
10 issues by virtue of the way we resolved the
11 relationship with the Attorney General's Office. So,
12 you know, with some exceptions, you know --
13 Paula, could you grab Randy for me.
14 The -- with some exceptions, the -- there's
15 not going to be a likely conflict unless there is an
16 existing matter, historical matter, some other issues
17 like that. And in those situations what we've said is,
18 you know, we reserve the right to object when
19 necessary.
20 My own view on this, and I haven't given a
21 lot of thought and I'm not, you know, your legal
22 representative for this purpose, but that in this
23 matter, based on the attorneys who are representing the
24 Secretary's Office, I'm not -- and given the way we
25 have resolved our relationship with the Attorney

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1 General's Office, I'm not particularly concerned about
2 the potential conflict here based on our former
3 relationship.
4 COMMISSIONER TITLA: Thank you, Tom.
5 Chairman, that concludes my questions. Thank
6 you.
7 CHAIRMAN KIMBLE: Thank you,
8 Commissioner Titla.
9 Any other questions in open session from
10 Members of the Commission?
11 (No response.)
12 CHAIRMAN KIMBLE: Hearing none, are there any
13 members of the public who wish to address this issue?
14 If so, please make yourselves known. There's no one
15 here in the audience and I don't see anyone on Zoom.
16 (No response.)
17 CHAIRMAN KIMBLE: Okay. Hearing none, I
18 would entertain a motion to go into executive session.
19 COMMISSIONER WERTHER: Mr. Chairman, I move
20 to go into executive session for Item No. IV.
21 CHAIRMAN KIMBLE: Thank you,
22 Commissioner Werther.
23 Is there a second?
24 COMMISSIONER PATON: I'll second it.
25 CHAIRMAN KIMBLE: Thank you,

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1 Commissioner Paton.
2 It's been moved and seconded that we go into
3 executive session for this matter. I will call the
4 roll.
5 Commissioner Werther.
6 COMMISSIONER WERTHER: Aye.
7 CHAIRMAN KIMBLE: Commissioner Paton.
8 COMMISSIONER PATON: Aye.
9 CHAIRMAN KIMBLE: Commissioner Crump.
10 COMMISSIONER CRUMP: Aye.
11 CHAIRMAN KIMBLE: Commissioner Titla.
12 COMMISSIONER TITLA: Aye.
13 CHAIRMAN KIMBLE: Chair votes aye. The vote
14 is 5-to-nothing. We will go into executive session.
15 Thank you.
16 (The following section of the meeting is in
17 executive session and bound under separate cover.)
18 * * * * *
19 (End of executive session. Public meeting
20 resumes at 11:16 a.m.)
21 CHAIRMAN KIMBLE: We're back in open session.
22 At this time, do I have a motion from any Members of
23 the Commission -- any Member of the Commission?
24 COMMISSIONER WERTHER: Mr. Chairman, I'd like
25 to move to instruct counsel -- outside legal counsel to

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1 expedite the Commission v. Fontes lawsuit consistent
2 with other instructions given in executive session.
3 CHAIRMAN KIMBLE: Thank you,
4 Commissioner Werther.
5 Is there a second?
6 COMMISSIONER PATON: I'll second.
7 CHAIRMAN KIMBLE: Thank you,
8 Commissioner Paton.
9 It's been moved and seconded that we
10 authorize counsel to move ahead as enumerated by
11 Commissioner Werther. I'll call the roll.
12 Commissioner Werther.
13 COMMISSIONER WERTHER: Aye.
14 CHAIRMAN KIMBLE: Commissioner Paton.
15 COMMISSIONER PATON: Aye.
16 CHAIRMAN KIMBLE: Commissioner Crump.
17 COMMISSIONER CRUMP: Aye.
18 CHAIRMAN KIMBLE: Commissioner Titla.
19 (No response.)
20 CHAIRMAN KIMBLE: Commissioner Titla, I
21 believe you're on mute still.
22 COMMISSIONER TITLA: Okay. Can you hear me?
23 CHAIRMAN KIMBLE: Yes.
24 COMMISSIONER TITLA: Yeah, I have a question
25 on the motion made by counsel. She said that the

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1 motion was to expedite the litigation, I think, and
2 then also about following instructions as made in
3 the -- in the executive session, is that true?
4 CHAIRMAN KIMBLE: That's basically right,
5 Commissioner Titla. I'll let Commissioner Werther
6 restate her motion.
7 COMMISSIONER WERTHER: Yes. Mr. Chairman and
8 Commissioner Titla, I had moved to instruct outside
9 legal counsel to expedite the Commission v. Fontes
10 lawsuit consistent with other instructions given in
11 executive session.
12 COMMISSIONER TITLA: Yeah. And the reason I
13 say it is, I can understand the first part about
14 expediting and I support that; but with regard to
15 "other instructions," I'm puzzled about that. So I
16 know that probably we can't talk about it in this
17 session, but I'm puzzled by "other instructions."
18 CHAIRMAN KIMBLE: Okay. So we're voting on
19 the motion as Commissioner Werther stated it. Do you
20 vote aye or nay?
21 COMMISSIONER TITLA: I vote nay.
22 CHAIRMAN KIMBLE: Okay. Thank you,
23 Commissioner Titla.
24 Chair votes aye. The motion is approved
25 4-to-nothing -- 4-to-1. Sorry.

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1 Item V, annual budgetary calculations and
2 2026 spending plan. Item V is a discussion and
3 possible action on the annual budgetary calculations
4 and the 2026 spending plan. Annually we authorize a
5 spending plan and make determinations relating to the
6 Commission's spending capacity. Tom has a brief
7 summary of the statutory discussions, and Mike is
8 available to discuss details of the budget plan.
9 Tom.
10 MR. COLLINS: Yes. As soon as I find my
11 notes I will be ready. I'm looking for -- I have the
12 memo that I made for myself, so just bear with me. Oh,
13 here we go. Sorry.
14 So I wanted to -- especially because we have
15 new -- new or newish Commission Members, I wanted to
16 spend a little time just, you know, identifying, you
17 know, what's in the memorandum you have and what's in
18 the background material, because it's -- it's kind of
19 an ornate process for putting this together.
20 And basically -- so basically what we're
21 asking you to do today is -- we have it as one set of
22 decisions, and it really is one set of decisions, but
23 there are two components to it. The first component is
24 these calculations that the statute requires us to make
25 about essentially the capacity of the fund and some

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1 worst-case scenario situations and those kinds of
2 things. It also requires us to identify a cap on
3 certain expenditures.
4 So you'll see in the memo that there is an
5 administrative enforcement cap number that is at
6 10 percent of the overall spending cap, which -- and
7 then -- and then public education at 10 percent. We
8 have some voter education funding under 16-956 that
9 is -- that is not capped, and it can't be, because that
10 includes the Voter Education Guide and the debates, and
11 the prices on -- the costs of those things are highly
12 variable. So if you put an arbitrary cap on those,
13 then we would have a problem. And then candidate
14 funding.
15 So as we do this, the kind of most confusing
16 thing that the Commission does, in my view, is estimate
17 the projected revenues assuming that you're at the
18 spending cap, that you actually get to the spending
19 cap, that is to say, you spend to the spending cap each
20 year. And what that tells us is, based on the fund
21 balance and the -- and the income to the fund, that
22 tells us that if we were to spend -- actually spend
23 money at the cap each year, the fund would very quickly
24 go into the red. What that means, as a practical
25 matter, is that we don't have excess funds in the

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1 thing.
2 So there is a -- so the formula is -- you
3 know, sort of basically articulates a deficit, if you
4 will, that does not exist except on paper, because we
5 don't spend at that clip, but it does dictate whether
6 or not there are excess funds in the -- in the Clean
7 Elections fund itself, and there are not.
8 Similarly, you know, we do candidate
9 funding -- we do a candidate funding projection that
10 says if basically all the candidates showed up, would
11 we run into a shortage of dollars available for those
12 candidates, and what -- in which case there are some
13 other mechanics that happen. Again, that -- that
14 calculation does not yield a shortfall.
15 So really what you're doing is you're -- it's
16 a kind of a stress test of a worst-case scenario
17 spending proposition and a sort of worst-case scenario
18 candidate -- I mean, it wouldn't be worst-case
19 scenario, I guess it would be best-case scenario, but
20 you know what I mean. But a, you know -- you know,
21 it's essentially a stress test in the statute that
22 looks at those two things. And the formulas are --
23 because it's a stress test, the formulas aren't
24 designed to be based on the actual spending. They're
25 designed to look at scenarios that are set up in the

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1 statute.
2 Then we get into the staff budget
3 projections, right, so -- and there, you know,
4 obviously you'll see some -- you know, especially if
5 you're new to the Commission budget, there are some
6 numbers there that are high, that cost -- you know,
7 things -- some of these things cost quite a bit of
8 money. And the most expensive thing that we do --
9 single thing that we do is the Voter Education Guide,
10 because it requires distribution to every household in
11 the state with a registered voter and it's mailed.
12 And we -- nevertheless, we know from our
13 research that that is our -- I think it's our top,
14 right, Gina -- our top most-recognized asset that we
15 do. It's the thing that people rely on. It's the
16 thing that people, when you ask -- when you ask -- when
17 people ask me what I do for a living I say, you know
18 that guide you get? And that's -- that is -- that
19 is -- so that is our flagship product in many ways. So
20 that's the most expensive thing that we do.
21 Likewise, the debates are a mandatory
22 expenditure, and that also, in order to deliver it in a
23 way that is effective, you know, has some costs
24 associated with it.
25 Finally, the Voters' Right to Know Act asks

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1 us to look at the -- there's a -- what is it, a
2 1 percent -- there's a 1 percent surcharge on fines and
3 fees that goes to the VRKA subaccount of the Clean
4 Elections fund, and it asked us to look at that
5 number and make an assessment of whether or not that --
6 that we need to continue that. And for the time being,
7 our view is we ought to because, you know, the --
8 although we have -- and we've not spent -- you know,
9 we've had cost-effective attorneys, nevertheless, the
10 amount we've taken in there is about -- about half a
11 million dollars, I think.
12 And so, you know, given the -- given the
13 other -- you know, we have this entire new round of
14 briefing, we have the additional potential other
15 litigation that may happen next year, and then provided
16 that litigation, you know, is resolved favorably, you
17 know, we have a bunch of improvements we would like to
18 make. For example, the candidate -- not the
19 candidate -- the Prop 200 filing mechanisms, those
20 kinds of things, which are not exactly where we would
21 like them to be, but -- but, you know -- so those are
22 our -- those are the main things.
23 So, you know, typically what we've asked is
24 that -- is to -- essentially a motion on the entire
25 package. I want to stress -- I mean, I'm talking a

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1 lot, but Mike, you know, spends months putting this all
2 together and working with Paula and Gina and me and
3 Avery and Alec on -- Alec has stuff, so I want to -- in
4 the event that -- in the event you -- no, but I think
5 that's important. I mean, I just want to make sure
6 that I'm not -- I did think it was important to say
7 something here, but I want to also make sure that folks
8 are -- that people understand that, you know, we do
9 take a lot of time on this and Mike puts a lot of work
10 into making sure that this all works and we hope
11 makes -- we hope makes sense.
12 So that was my kind of thoughts on that,
13 Mr. Chairman, and then I think either Mike or I are
14 available for questions if you have any.
15 CHAIRMAN KIMBLE: Okay. Thank you, Tom.
16 Before we go to questions, I just want to
17 point out a typo in the memo. On the first page under
18 public education there's a zero left out. The public
19 education expenditures are projected -- that should be
20 $3 million, I believe, not --
21 MR. COLLINS: Yes.
22 CHAIRMAN KIMBLE: There's a -- there's a zero
23 left out.
24 MR. COLLINS: Oh, okay. That's correct.
25 CHAIRMAN KIMBLE: Any questions or comments

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from Members of the Commission --
COMMISSIONER PATON: I had one.
CHAIRMAN KIMBLE: -- for staff?
Commissioner Paton.
COMMISSIONER PATON: So the fund is replenished each year. And how are we with the funding for the past year?
MR. COLLINS: I'll take a shot at that.
COMMISSIONER PATON: Because for a while there it was going down.
MR. COLLINS: I think -- I mean, Mike, correct me if I'm wrong, but I think we think that it's kind of stabilized at, I would say, about a million less than what it came in pre COVID, is that right?
MR. BECKER: Yes.
MR. COLLINS: So it's around 5 annually now. It was around 6 pre COVID. That may change, you know, it may go down over time. I mean, we're -- it kind of depends on the -- a lot of it's revenue from parking tickets and those kinds of things, so, you know, post COVID there's a lot less traffic downtown, for example, in Phoenix and other places. That's an impact, so, you know -- but it hasn't changed very much. The immediate drop was right around -- about four or five years ago there was a -- but that seems to be stable now.

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COMMISSIONER PATON: Okay.
CHAIRMAN KIMBLE: Any other questions or comments from Members of the Commission?
(No response.)
CHAIRMAN KIMBLE: If there's no further discussion, I would entertain a motion to approve the statutory determinations outlined in the staff memo and the 2026 spending plan.
COMMISSIONER WERTHER: Mr. Chairman, I move to approve the -- can I see your language -- the statutory determinations outlined in the Director's memo and the 2026 spending plan.
CHAIRMAN KIMBLE: Thank you, Commissioner Werther.
Is there a second?
COMMISSIONER PATON: I'll second.
CHAIRMAN KIMBLE: Thank you.
It's been moved and seconded that we approve the statutory determinations outlined in the staff memo and the 2026 spending plan. I will call the roll.
Commissioner Werther.
COMMISSIONER WERTHER: Aye.
CHAIRMAN KIMBLE: Commissioner Paton.
COMMISSIONER PATON: Aye.
CHAIRMAN KIMBLE: Commissioner Crump.

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COMMISSIONER CRUMP: Aye.
CHAIRMAN KIMBLE: Commissioner Titla.
COMMISSIONER TITLA: Aye.
CHAIRMAN KIMBLE: Chair votes aye. The motion is approved 5-to-nothing.
Item VI, probable cause, MUR 25-01, Hector Jaramillo. Item VI is discussion on whether probable cause exists to believe violations occurred in MUR 25-01 involving Hector Jaramillo, a 2024 participating legislative candidate.
Commissioners, you have the Executive Director's brief. Do Commissioners have any questions?
(No response.)
CHAIRMAN KIMBLE: Tom, is there anything you want to add?
MR. COLLINS: Yeah, if I may. Commissioners, you know, we -- we -- so the next step in the enforcement process after reason to believe is called probable cause to believe. Under the -- under the rules I file a brief that, you know, articulates the basis for why there's probable cause to believe here. In effect, the facts are unchanged from the reason to believe, and I think that the -- although there's an evidentiary distinction there and a -- and a terminology distinction there in the sense that the

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probable cause process is moving closer to a finding that would ultimately result in an administrative order, you know, that's -- that's part of that process.
So we think that -- that the facts and law fairly well establish that both there was late filing and that Mr. Jaramillo did not, you know, until after we got pretty far along in the process, begin to provide information to the staff.
Now, that said, one thing that I have -- have done here specifically -- sometimes we will do -- go straight from the probable cause into the fine matter. Here I have bifurcated those, in part because I am still in communication with Mr. Jaramillo and -- and, you know, have some confidence that we'll be able to resolve this matter. And there is a specific part of the process under Rule 216 that talks about the formal conciliation process. So we tried conciliating ahead of time, but, you know, there's a -- there's a -- there's a formal opportunity there as well, so -- so --
And then with respect to Mr. Jaramillo's presence, you know, I will just tell you that I have -- personally have a good understanding of his work schedule, and in this particular instance because I -- you know, I have articulated to him my need to move this case along, I did not have the expectation that he

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would be here, nor did I, you know, have him make -- you know, I would --

So from my vantage point, his presence here or not here for this hearing is not a negative. It is simply this is a step that is necessary. He did communicate back to me that he did not plan to respond, but he is in communication with me and I am -- so I just would -- to the extent that that is a question, I would just say that although I'm not in a position to excuse an absence, per se, I see nothing in the absence here that is meaningful to me in terms of his, you know, current level of responsiveness to communications from staff.

CHAIRMAN KIMBLE: Thank you, Tom.

Are there any comments or questions from Members of the Commission?

(No response.)

CHAIRMAN KIMBLE: If not, I'd entertain a motion regarding probable cause.

COMMISSIONER WERTHER: Mr. Chairman, I move on probable cause to believe violations of the Act or rules occurred on MUR 25-01, Hector Jaramillo, 2024 participating legislative candidate.

CHAIRMAN KIMBLE: Thank you, Commissioner Werther.

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Is there a second?

COMMISSIONER PATON: I'll second.

CHAIRMAN KIMBLE: Thank you, Commissioner Paton.

It's been moved and seconded that we believe cause exists to believe violations occurred in MUR 25-01 involving Hector Jaramillo. I will call the roll.

Commissioner Werther.

COMMISSIONER WERTHER: Aye.

CHAIRMAN KIMBLE: Commissioner Paton.

COMMISSIONER PATON: Aye.

CHAIRMAN KIMBLE: Commissioner Crump.

COMMISSIONER CRUMP: Aye.

CHAIRMAN KIMBLE: Commissioner Titla.

COMMISSIONER TITLA: Aye.

CHAIRMAN KIMBLE: Chair votes aye. The motion is approved 5-to-nothing.

Item VII, proposed 2026 meeting dates, January through July. We are -- we plan to meet next year on January 29th, February 19th, March 26th, April 23rd, May 28th, June 25th, and July 23rd. Is there a motion to approve the meeting dates?

COMMISSIONER WERTHER: Mr. Chair, I move to approve the proposed meeting dates for January through

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July 2026.

CHAIRMAN KIMBLE: Thank you, Commissioner Werther.

Is there a second?

COMMISSIONER PATON: I'll second.

CHAIRMAN KIMBLE: Thank you, Commissioner Paton.

It's been moved and seconded that we approve the proposed meeting dates. I'll call the roll.

Commissioner Werther.

COMMISSIONER WERTHER: Aye.

CHAIRMAN KIMBLE: Commission Paton.

COMMISSIONER PATON: Aye.

CHAIRMAN KIMBLE: Commissioner Crump.

COMMISSIONER CRUMP: Aye.

CHAIRMAN KIMBLE: Commissioner Titla.

COMMISSIONER TITLA: Aye.

CHAIRMAN KIMBLE: Chair votes aye. The meeting dates are approved 5-to-nothing.

Item VIII, public comment. This is the time for comments and suggestions from the public. Please limit your remarks to items within the Commission's authority. Action taken as a result of public comment is limited by statute to directing staff to study the matter, responding to criticism, or scheduling it for

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further consideration.

Does anyone here in person or on Zoom wish to make a comment?

(No response.)

CHAIRMAN KIMBLE: Hearing no one. You may also send comments to the Commission at ccec@azcleanelections.gov.

Item IX, adjournment. If there's no further business, I would entertain a motion to adjourn.

COMMISSIONER WERTHER: Mr. Chairman, I move to adjourn.

CHAIRMAN KIMBLE: Thank you, Commissioner Werther.

Is there a second?

COMMISSIONER PATON: I'll second.

CHAIRMAN KIMBLE: Thank you, Commissioner Paton.

Before I call the roll, I want to wish everyone happy holidays, and we will see you back here in January, I hope not sooner.

Commissioner Werther.

COMMISSIONER WERTHER: Aye.

CHAIRMAN KIMBLE: Commissioner Paton.

COMMISSIONER PATON: Aye.

CHAIRMAN KIMBLE: Commissioner Crump.

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COMMISSIONER CRUMP: Aye.
CHAIRMAN KIMBLE: Commissioner Titla.
COMMISSIONER TITLA: Aye.
CHAIRMAN KIMBLE: Chair votes aye. We are adjourned. Thank you.
(The meeting concluded at 11:37 a.m.)

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STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

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

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

DATED at Tempe, Arizona, this 15th day of December, 2025.

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

December 22, 2025

9:30 a.m.

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Reported By:
Angela Furniss Miller, RPR
Certified Reporter (AZ 50127)

PUBLIC MEETING, BEFORE THE CITIZENS CLEAN ELECTIONS COMMISSION, convened virtually at 9:30 a.m. on December 22, 2025, in the presence of the following Board Members:

Mr. Mark S. Kimble, Chairman
Mr. Sam Crump
Mr. Galen D. Paton
Ms. Christina Werther
Mr. Steve Titla

OTHERS PRESENT:

Thomas M. Collins, Executive Director
Paula Thomas, Executive Officer
Mike Becker, Policy Director
Gina Roberts, Voter Education Director
William Richards, Richards & Moskowitz
Samantha Fox, Richards & Moskowitz
Cathy Herring, KCA

P R O C E E D I N G

CHAIRMAN KIMBLE: Good morning. I'm Mark Kimble, Chair of the Citizens Clean Elections Commission.

It is 9:30 a.m. on Monday, December 22nd, 2025. I call this meeting of the Citizens Clean Elections Commission to order.

With that, we will take attendance. Commissioners, please identify yourselves for the record.

COMMISSIONER WERTHER: Christina Werther.

COMMISSIONER PATON: Galen Paton.

COMMISSIONER CRUMP: Sam Crump.

CHAIRMAN KIMBLE: Commissioner Titla? Are you with us?

(No audible response.)

CHAIRMAN KIMBLE: I show you still muted, Commissioner Titla.

(No audible response.)

CHAIRMAN KIMBLE: Well we'll proceed and, Commissioner Titla, if you can hear us unmute yourself and let us know you're here.

At this time we have four Commissioners here which constitutes a quorum. And I believe we have Commissioner Titla here, but we'll wait to resolve that.

Item II. Discussion, possible action on Clean

Elections Commission versus Fontes; the Arizona Democratic Party versus Fontes; and the Arizona -- excuse me, and the Republican National Committee versus Fontes.

The purpose of this meeting is to have an update from our attorneys and consider any recommendations they have related to the three cases that have been filed against the Secretary of State for his decision to attempt to rename the No Labels Party as the Independent Party.

I also want to take a moment to focus on what the suits are about and what they are not about.

The suits are about whether the Secretary had the authority or properly decided that the No Labels Party could rename itself in this ad hoc manner in the middle of the election cycle. The Secretary's attempt to make this change directly undermines the terms of the Clean Elections Act and rules, and the Commission's independent express authority to communicate with voters, contributors, and candidates.

It will also cause deep confusion for voters and confound other election administrators' efforts to ensure 2026 elections go off without a hitch.

One doesn't have to think hard to imagine a close primary headed to a recount in which a number of voters either believe they were given the wrong ballot based on their party status or a mistake in affiliation.

Those who minimize this risk are ignoring the

concerns of the vast majority of County Recorders and others who work in this area.

Before we entertain a motion to go into executive session, I wanted to ask my fellow Commissioners if they have any comments or questions that our staff or our attorneys can answer in open session.

Commissioners?

COMMISSIONER TITLA: Yeah. Chairman?

CHAIRMAN KIMBLE: Yes, Commissioner Titla.

COMMISSIONER TITLA: Yeah, this is Steve Titla. I was on the phone calling in but I could hear you guys, but you could not hear me speak. So I ended the call and went on Zoom and now I can hear you. But I'm traveling back from the Valley up to San Carlos, so I'll be going through hills and mountains and so I may lose you here and there, but I'll -- I'll try to call again right away.

Thanks.

CHAIRMAN KIMBLE: Okay. Thank you, Commissioner Titla.

And the record will show that we have all five Commissioners with us present.

Any comments or questions for staff or attorneys before we discuss whether to go into executive session?

(No audible response.)

CHAIRMAN KIMBLE: If not, are there any

members of the public who wish to speak on this item?
If you're on Zoom, please use the "raise hand" feature and state your first and last name for the record.
(No audible response.)
CHAIRMAN KIMBLE: I don't see anyone.
Cathy, do you?
MS. HERRING: I do not.
CHAIRMAN KIMBLE: Okay, thank you.
Unless there -- there are further questions or discussions, I would entertain a motion to go into executive session.
COMMISSIONER WERTHER: Mr. Chairman, I move that we go into executive session for Item II.
CHAIRMAN KIMBLE: Thank you, Commissioner Werther.
Is there a second?
COMMISSIONER PATON: I'll second. Paton.
CHAIRMAN KIMBLE: Thank you, Commissioner Paton.
It's been moved and seconded that we go into executive session. I will call the roll.
Commissioner Crump.
COMMISSIONER CRUMP: Aye.
CHAIRMAN KIMBLE: Commissioner Werther.
COMMISSIONER WERTHER: Aye.

CHAIRMAN KIMBLE: Commissioner Paton.
COMMISSIONER PATON: Aye.
CHAIRMAN KIMBLE: Commissioner Titla.
COMMISSIONER TITLA: Aye.
CHAIRMAN KIMBLE: Chair votes aye. The vote is five-to-nothing. We will go into executive session; thank you.
MS. HERRING: Thank you. And Tom, can you please confirm who should participate in the executive session breakout room?
MR. COLLINS: I think the Commissioners and me and Bill and Sam and Gina I think in case we need any expert...
MS. HERRING: Okay. Thank you.
(Whereupon the proceeding is in executive session from 9:36 a.m. until 10:03 a.m.)

* * * * *

(Whereupon all members of the public are present and the proceeding resumes in general session.)
MS. HERRING: Chairman Kimble, if you are speaking you are on mute.
CHAIRMAN KIMBLE: I'm sorry.
We're back in regular session -- okay, we have all

five Commissioners with us now. Thank you.
Item III on our agenda is public comment. This is the time for comments and suggestions from the public. Please limit your remarks to items within the Commission's authority. Action taken as a result of public comment is limited by statute to directing staff to study the matter, responding to criticism or scheduling it for further consideration.
Do I have anyone in person or on Zoom who wishes to comment?
(No audible response.)
CHAIRMAN KIMBLE: I don't see anyone.
Cathy, no one that you are aware of?
MS. HERRING: Correct.
CHAIRMAN KIMBLE: Okay, thank you.
You may also send comments to the Commission at ccec@azcleanelections.gov.
Item IV, adjournment. Is there a motion to adjourn?
COMMISSIONER WERTHER: Mr. Chairman, I move to adjourn.
CHAIRMAN KIMBLE: Thank you, Commissioner Werther.
Is there a second?
COMMISSIONER PATON: I'll second. This is

Paton.
CHAIRMAN KIMBLE: Thank you, Commissioner Paton.
It's been moved and seconded that we adjourn. I will call the roll.
Commissioner Crump?
COMMISSIONER CRUMP: Aye.
CHAIRMAN KIMBLE: Commissioner Werther.
COMMISSIONER WERTHER: Aye.
CHAIRMAN KIMBLE: Did you say "aye," Commissioner Werther?
COMMISSIONER WERTHER: I did, yes. Aye.
CHAIRMAN KIMBLE: Okay, thank you.
Commissioner Paton.
COMMISSIONER PATON: Aye.
CHAIRMAN KIMBLE: Commissioner Titla.
COMMISSIONER TITLE: Aye.
CHAIRMAN KIMBLE: Chair votes aye.
We are adjourned. Thank you very much for your time.
(Whereupon the meeting concludes at 10:06 a.m.)

C E R T I F I C A T E

STATE OF ARIZONA)
) ss.
COUNTY OF MARICOPA)

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

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

I FURTHER CERTIFY that I have complied with the requirements set forth in ACJA 7-206. Dated at Litchfield Park, Arizona, this 26th of December, 2025.

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

* * *

I CERTIFY that Miller Certified Reporting, LLC, has complied with the requirements set forth in ACJA 7-201 and 7-206. Dated at LITCHFIELD PARK, Arizona, this 26th of December, 2025.

Miller Certified Reporting, LLC
Arizona RRF No. R1058

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CITIZENS CLEAN ELECTIONS COMMISSION
EXECUTIVE DIRECTOR REPORT
January 29, 2026

Announcements:

Local elections will occur on March 10, 2026. The City of Tempe has three council seats on the ballot and Pima County has Propositions 418 and 419. Both are ballot by mail elections.

- Voter Registration Deadline: February 9, 2026
- Voting Begins: February 11, 2026

Participating candidates began filing for funding on January 2.

Voter Education and Outreach:

- Gina, Avery, and Captain Activate! participated in and facilitated workshops for high school students at the inaugural Civics Matters Summit at State Farm Stadium, engaging thousands of high school students.

- Avery will present to students participating in the Kids Voting Legal Counsel program, with a focus on media literacy and voter education.
- Avery and Captain Activate! will appear at Tempe FanCon at the Tempe Public Library to distribute civic-themed comics and engage with the public.

- Avery met with Korey Martinez, Civics Coordinator at Scottsdale Community College, to discuss upcoming collaboration with Clean Elections on a civil discourse event during the spring semester.
- Gina spoke with the Washington Secretary of State's Office regarding our Voter Education Guide production and candidate portal. Avery continues to serve on the Youth Committee for the Arizona African American Legislative Council and the Arizona Civic Coalition and leads a Voter Outreach Workgroup focused on coordinated community engagement.

Administration:

- Eleven participating candidate workshops have been completed, with twenty-six candidates having attended. The schedule for the 2026 workshops is available on the Commission's website.
- Staff is working with two ASU organizations on interagency service agreements.
    - Center for an Independent and Sustainable Democracy
        - Conduct a series of focus groups with Generation Z voters (aged under 30) in Arizona. The objective is to better understand the political attitudes, thoughts, and concerns of this crucial demographic, as well as their participation in elections.
        - CISD will work with Arizona Clean Elections on a joint announcement of the findings and will co-present the results through media briefings and other public-facing venues.
        - Cost: $40,000
    - Mechanics of Democracy Laboratory at ASU Election Science, Reform, and Administration Conference, June 1-4.
        - Live Commission hearing at the Conference
        - Support for largest national elections research conference.
        - Exhibit space for Clean Elections.
        - Cost: TBD.

Legal:

- Center for Arizona Policy v. Arizona Secretary of State, Arizona Supreme Court No. CV-24-0295-PR.
    - Awaiting decision. 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.).
    - Awaiting decision following May Oral Argument.

- Montenegro v. Fontes, Arizona Supreme Court No. CV-24-0166-PR.
    - The Superior Court held a hearing last Thursday on the legislative leaders' motions for a preliminary injunction and judgment on the pleadings. Their principle claim is that Proposition 211 is unconstitutional on separate of powers/delegation grounds. The court denied the MJP from the bench. The Commission and other defendants and the leaders will file proposed findings of fact and conclusions of law.

- 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. Ongoing.

Appointments:

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

Complaints:

- MUR 24-01, Barnett
- MUR 25-01, Jaramillo
- MUR 25-03, Timberlake
- MUR 25-04, Turning Point
- MUR 25-05, Turning Point
- MUR 25-06, Timberlake

2026 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:

- Notices of Docket Opening:
  - 32 A.A.R. 266 (use of funds), apps.azsos.gov/public_services/register/2026/4/contents.pdf.
  - 31 A.A.R. 2255 (revision and addition of funding rules), https://apps.azsos.gov/public_services/register/2025/27/contents.pdf.
- Notices of Proposed Rulemaking:
  - 32 A.A.R. 245 (use of funds), apps.azsos.gov/public_services/register/2026/4/contents.pdf.
  - 31 A.A.R. 2141 (revision and addition of funding rules), https://apps.azsos.gov/public_services/register/2025/27/contents.pdf.
- Supplemental Notices: 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.**

2026 Legislative Update

HB 2001 - Elections; early voting; tabulation

Sponsor
Selina Bliss (R)

Summary
Makes broad updates to election procedures, focusing on early voting, polling locations, and ballot handling. It tightens identification and chain-of-custody requirements, adds new deadlines and penalties for mishandling early ballots, and updates rules for mailing, returning, and processing ballots. The bill also authorizes counties to use voting centers and implement on-site tabulation of early ballots with strict verification, staffing, and security protocols.

Action Taken

HB 2006 - Sample ballots; mailing date

Sponsor
Nick Kupper (R)

Summary
Requirements are imposed to mail sample ballots at least fourteen days before primary and general elections to each household with registered voters, excluding those on active early voting lists. Sample ballots must include a disclaimer that they cannot be used as official ballots, and the state or local seal with "official voting materials" must be displayed on the mailing. Provisions clarify the preparation, review, and distribution process of sample ballots for primary, general, city, town, and special district elections, including cost reimbursement to the secretary of state.

Action Taken

HB 2009 - Constitutional amendments; foreign contributions prohibited

Sponsor
Nick Kupper (R)

Summary
Contributions from foreign nationals are prohibited for committees primarily organized to influence Arizona constitutional amendment ballot propositions, including signature collection and campaign support. Committees must verify contributors' status, disclose funding sources, return prohibited contributions, and include disclaimers if over 20% of funding is from nonresidents, with violations classified as class 1 misdemeanors subject to civil penalties. Definitions clarify foreign nationals, residents, and nonresidents, and exceptions apply to federal political committees, independent expenditures, and volunteer services.

Action Taken
Passed House Federalism, Military Affairs& Elections 4-3

HB 2022 - Elections; July primary; curing; observers

Sponsor
Alexander Kolodin (R)

Summary
Primary elections are rescheduled from the first Tuesday in August to the last Tuesday in July starting in 2026, with related adjustments to election dates for political subdivisions. Signature cure periods for early ballots are extended, and daily updates of voters with signature issues are required to be provided to qualified political parties. Provisions for ballot replacement centers, party observers, and challenger appointments at polling places are clarified, and nomination and initiative petitions with the former primary date are validated for the 2026 election.

Action Taken
Passed House Federalism, Military Affairs & Elections 5-2

SB 1003 - Elections; canvass; certification; acknowledgment

Sponsor
John Kavanagh (R)

Summary
Sections 16-642 and 16-646 of the Arizona Revised Statutes are amended to specify deadlines and procedures for canvassing and acknowledging election results by county, state, and local governing bodies. Requirements are imposed for the content, certification, and mailing of official canvass statements, including the use of a uniform electronic format for transmitting election results to the secretary of state to facilitate statewide canvassing. Provisions clarify postponement rules for canvass acknowledgments and designate permanent public record maintenance responsibilities for official canvass documents.

Action Taken
Passed Senate Judiciary and Elections 4-3

SB 1006 - Campaign finance; aggregate report; amount

Sponsor
John Kavanagh (R)

Summary
Campaign finance reporting requirements are amended to increase the threshold for itemizing in-state individual contributions from $100 to $200 per election cycle and to allow non-disclosure of residential addresses for protected individuals. Aggregate reporting of contributions under $200 is required unless contributors consent to identification, and detailed itemization of receipts and disbursements is maintained with expanded categories. Independent expenditure and ballot measure expenditure reporting thresholds and content requirements are also specified.

Action Taken
Passed Senate Judiciary and Elections 4-3

SB 1027 - Public notices; government website posting

Sponsor
John Kavanagh (R)

Summary
Requirements are imposed for government entities in Arizona to post public notices electronically on their official websites, including maintaining the full text in a designated public notices section with a prominent homepage link and retaining the notice for the entire required publication period. A reference advertisement must also be published in a newspaper, meeting specific size, content, and contact information criteria, to direct the public to the online notice. Compliance with these provisions is deemed legally equivalent to traditional newspaper publication, and government entities must keep a permanent electronic record of the posting.

Action Taken

SB 1029 - Candidate committees; posthumous closure

Sponsor
John Kavanagh (R)

Summary
Posthumous closure procedures for candidate committees are established, allowing designated individuals to act as treasurer and manage surplus funds after a candidate's death. Campaign finance reporting penalties are modified to permit waiver of fines for reports due after a candidate's death. Surplus committee funds are regulated for transfer, donation, or repayment, with specific conditions for contributions to other candidate committees and officeholder expense accounts.

Action Taken
Passed Senate Judiciary and Elections 7-0

SB 1037 - Voting; equipment; internet; custody; violation

Sponsor
Mark Finchem (R)

Summary

SB 1037 imposes strict security requirements on voting equipment, mandating that all vote recording and tabulating machines lack internet connectivity, prohibit remote access, and maintain detailed user logs and tamper-proof custody records. It requires the secretary of state to certify voting systems based on federal standards and cybersecurity best practices, with penalties for unauthorized use or modifications. Additionally, continuous video recording of counting center activities must be posted online, and chain-of-custody protocols must ensure bipartisan oversight of all election equipment and data storage devices.

Action Taken
Passed Senate Judiciary and Elections 4-3

SB 1038 - Cast vote record; public record

Sponsor
Mark Finchem (R)

Summary
Requirements are imposed on county recorders in Arizona to make voter information and cast vote records publicly available within one hour after polls close for each election. The public record must include the name, voter identification number, political party registration, and a sortable cast vote record without any randomization or alteration of the original files. These records are explicitly designated as public under the new section 16-407.04 added to Title 16, Chapter 4, Article 1 of the Arizona Revised Statutes.

Action Taken
Passed Senate Judiciary and Elections 4-2

SB 1040 - Voter registration rolls; internet access

Sponsor
Mark Finchem (R)

Summary
Access to voter registration rolls is required to be provided through a public internet portal without fees, and county recorders are mandated to supply school district precinct registers upon request. Provisions for the preparation, contents, and distribution of precinct registers are updated, including electronic transmission and detailed voter information sharing with political parties. Restrictions on the use and dissemination of voter registration data are reinforced, with penalties for unauthorized use, and a statewide voter registration database is maintained under uniform standards.

Action Taken
Passed Senate Judiciary and Elections 4-2

SB 1057 - Watermark; paper ballots

Sponsor
Mark Finchem (R)

Summary
Section 16-504 of the Arizona Revised Statutes is repealed and replaced to require vendors providing ballot paper with antifraud measures to hold ISO 27001, ISO 17025, or ISO 9001:2015 certification. Ballot fraud countermeasures must include at least three specified security features such as unique watermarked security paper, secure holographic foils, branded holograms, complex security backgrounds, variable digital infill, specialized inks, stealth numbering, micro-numismatic ultraviolet designs, forensic fraud detection technology, or unique bar/QR codes accessible only to voters for ballot tracking. These provisions aim to enhance the security and integrity of paper ballots used in elections.

Action Taken
Passed Senate Judiciary and Elections 4-2

SB 1060 - Voter registration; temporary absence

Sponsor
Wendy Rogers (R)

Summary
Sections 16-103 and 16-593 of the Arizona Revised Statutes are amended to allow qualified persons temporarily absent from Arizona to register to vote via affidavit or federal postcard application, with registration permitted up to 7:00 p.m. on election day for those covered under the Uniformed and Overseas Citizens Absentee Voting Act. Eligibility to vote using a federal write-in early ballot is extended to U.S. citizens who have never resided in the U.S. but have a parent registered to vote in Arizona. Rules clarifying voter residence determination are updated to reflect these provisions and specify conditions under which residence is maintained or lost.

Action Taken
Passed Senate Judiciary and Elections 3-2

HCR 2002 - Legislature; lifetime term limits; salary

Sponsor
Stacey Travers (D)

Summary
Lifetime term limits are imposed on Arizona state legislators beginning in 2027, restricting senators and representatives to a maximum of four terms each in their respective chambers during their lifetime, regardless of consecutive service. Legislative salaries are set at $35,000 per year starting with the 2027 legislature and are adjusted biennially based on changes in the consumer price index. A commission on salaries for elective state officers is authorized to recommend pay rates for elected officials, with legislative salary recommendations subject to voter approval at the next general election.

Action Taken

HCR 2004 - Photo enforcement systems; prohibition

Sponsor
Teresa Martinez (R)

Summary
HCR 2004 prohibits the use of photo enforcement systems by local authorities and state agencies to identify traffic violations related to excessive speed or failure to obey traffic control devices. It repeals existing statutes authorizing such systems and emphasizes that law enforcement must remain with trained officers, preventing outsourcing to private entities. The measure is submitted to voters for approval to become law.

Action Taken

HCR 2005 - Legislative session; adjournment

Sponsor
Justin Wilmeth (R)

Summary
An amendment to the Arizona Constitution is proposed to require the legislature to hold annual sessions beginning the second Monday of January and adjourning no later than April 30 each year. The governor is authorized to call special sessions limited to specified subjects outlined in the call. The amendment is submitted for voter approval at the next general election.

Action Taken

SCR 1004 - Photo enforcement systems; prohibition

Sponsor
Wendy Rogers (R)

Summary
Photo enforcement systems are prohibited from use by local authorities or state agencies to identify violations of speed limits or traffic control devices. Sections of Arizona Revised Statutes related to photo enforcement are repealed or amended to remove authorization for such systems. Enforcement authority is reserved exclusively for trained law enforcement officers, preventing outsourcing to private entities and aiming to prioritize public safety over revenue generation.

Action Taken
Passed Senate Appropriations, Transportation, and Technology 6-4

SCR 1005 - Elections; foreign contributions; prohibition

Sponsor
Mark Finchem (R)

Summary
Foreign contributions from corporations, persons, or nongovernmental sources are prohibited from being given, accepted, or used to influence the outcome of elections on ballot measures in Arizona. Entities required to file campaign finance reports must certify under penalty of perjury that they have not accepted or used such foreign contributions. Federally recognized sovereign tribal nations are exempt from these restrictions.

Action Taken
Passed Senate Judiciary and Elections 4-3

HB 2431 - Appropriation; consolidated elections facility

Sponsor
Selina Bliss (R)

Description
$15 million is appropriated from the state general fund in fiscal year 2026-2027 to the Arizona state treasurer for distribution to Yavapai County to support a consolidated elections facility. Distribution of funds requires Yavapai County to provide at least 50% matching capital costs in writing. The appropriation is exempt from lapsing until June 30, 2029.

Action Taken

HB 2221 - Elections; tribal consultation; voting locations

Sponsor
Brian Garcia (D)

Description
Section 16-411 of the Arizona Revised Statutes is amended to require county boards of supervisors to consult with tribal representatives when designating polling places, combining or splitting precincts, and authorizing voting centers or emergency voting centers in counties with tribal lands. Provisions are added to ensure tribal consultation in election precinct boundary adjustments, polling place designations, and the use of voting centers, while maintaining requirements for public notification, emergency designations, and voter wait time management. Coordination with state agencies to provide state-owned facilities as voting locations is also mandated beginning in 2026.

Action Taken

HB 2318 - School districts; elections; term limits

Sponsor
Matt Gress (R)

Description
Term limits are imposed on school district governing board members in Arizona for districts with at least 250 students, prohibiting candidacy after eight consecutive years of service unless four years have passed since the last term. Election procedures are amended to require rotation of candidate name positions on ballots and clarify term lengths for newly formed or restructured boards. Current board members may complete their terms, but all future candidates are subject to the new term limits under HB 2318.

Action Taken

HB 2506 - Voting centers; board of supervisors

Sponsor
Stephanie Stahl Hamilton (D)

Description
Voting centers and early voting drop-off centers are authorized for use in Arizona elections, allowing any county voter to cast ballots at designated locations regardless of precinct. Election boards for voting centers must include representatives from the two largest political parties and may include minors under specific conditions. Provisions are established for early ballot requests, replacement ballots, emergency voting centers, and notification of provisional ballot status, with updated procedures for polling place designation, electioneering restrictions, and voter registration updates.

Action Taken

HB 2512 - Municipal; county measures; filings; actions

Sponsor
Stephanie Stahl Hamilton (D)

Description
Section 19-141 of the Arizona Revised Statutes is amended to clarify that city or town clerks, county election officers, and recorders cannot reject initiative or referendum filings based on constitutionality and must follow specified procedures for distribution, filing deadlines, and challenges. Actions contesting the validity of initiatives or referenda must be filed within five calendar days, with expedited court hearings and appeals to ensure timely resolution before elections. Penalties are imposed on contractors for late mailing of pamphlets, and courts are required to expedite litigation to allow for proper ballot preparation and distribution.

Action Taken

HB 2510 - Early voting; hours; emergency voting

Sponsor
Stephanie Stahl Hamilton (D)

Description
Early voting locations are required to remain open until 7:00 p.m. on the weekend preceding election day and at least until 3:00 p.m. on the Monday before the election, with possible extension to 7:00 p.m. County boards of supervisors are authorized to establish emergency voting centers with specified locations and hours, allowing voter registration updates on-site. Polling place designations and consolidations are regulated to ensure adequate access, with provisions for emergency designations restricting electioneering within facility property, and methods to reduce voter wait times are mandated.

Action Taken

HB 2505 - Early voting; hours; weekends; emergencies

Sponsor
Stephanie Stahl Hamilton (D)

Description
Early voting locations are required to remain open until 7:00 p.m. on the Saturday and Sunday immediately preceding election day, with extended hours on the Monday before the election as determined by the county recorder. Emergency balloting procedures are expanded to allow qualified electors experiencing unforeseen circumstances after 7:00 p.m. on the Friday before the election to request special voting accommodations, including updating voter registration information. Early ballot request and distribution processes are clarified, including penalties for improper handling of request forms by candidates or organizations.

Action Taken

HB 2366 - Voting centers ban; precinct size

Sponsor
Rachel Keshel (R)

Description
Precinct boundaries are limited to a maximum of 2,500 registered voters, and the use of voting centers is prohibited except for emergency voting centers authorized by a specific board resolution. Election boards must be appointed for each precinct or voting location with specified party representation, and minors aged 16 or older may serve as election clerks under supervision. Early ballot procedures are expanded to allow on-site tabulation at designated polling places or voting centers, with strict identification and affidavit requirements, while electioneering restrictions are reinforced within 75 feet of polling places and early voting locations.

Action Taken

HB 2656 - Election worker harassment task force

Sponsor
Seth Blattman (D)

Description
An election worker harassment task force is established within the Arizona Secretary of State's office, composed of appointed members from the Attorney General's office, law enforcement, election workers, and election officers representing multiple political parties. The task force is charged with coordinating, investigating, prosecuting, or referring election worker harassment violations and must submit annual reports on its activities to state leadership and post them online. Administrative support, meeting space, and record retention are provided by the Secretary of State.

Action Taken

HB 2511 - Early ballot collection; limitations; repeal

Sponsor
Stephanie Stahl Hamilton (D)

Description
Limitations on early ballot collection are repealed, allowing only voters, their family members, household members, or caregivers to handle or return ballots. Penalties for ballot abuse, including unauthorized collection or handling of ballots, are clarified and maintained, with specific felony classifications for violations. Instructions for voters and election officers are updated to reflect these changes, emphasizing lawful ballot handling and signature requirements for mail-in ballots.

Action Taken

SB 1168 - Ballots; categories; count

Sponsor
Shawnna Bolick (R)

Description
Requirements are imposed on Arizona election officials to maintain and publicly post detailed counts of physical and electronic ballots by category, including early, regular, provisional, and federal-only ballots. Hand counts are mandated for selected precincts and races with specific procedures for random selection, party involvement, and thresholds for expanding recounts, including full jurisdictional hand counts if discrepancies exceed designated margins. A vote count verification committee is established to set and review these margins, oversee hand count accuracy, and ensure transparency through public reporting and source code review when necessary.

Action Taken
Passed Senate Judiciary and Elections 4-3

SB 1229 - Early voting; identification; emergency voting

Sponsor
Brian Fernandez (D)

Description
Early voting procedures are expanded to include extended hours for on-site voting locations and emergency balloting provisions for voters experiencing emergencies shortly before elections. Identification requirements are clarified, allowing voters to verify identity when returning early ballots at voting locations, which are then processed without additional signature verification. Signature cure processes are enhanced with daily updates to political parties, and strict chain of custody protocols are imposed for early ballots returned at polling places on election day.

Action Taken

HB 2220 - Polling places; accessible equipment

Sponsor
Brian Garcia (D)

Description
Requirements are imposed for accessible voting devices at polling places in Arizona, mandating that each device be programmed to offer all ballot styles for the entire jurisdiction regardless of location. Election officials must notify political party chairmen of device inspection times before elections, ensure sufficient voting booths and devices are provided, and designate independent observers for election software installation and modifications. These provisions amend Arizona Revised Statutes section 16-447 to enhance accessibility and transparency in election administration.

Action Taken

HB 2628 - Ballot delivery; collection

Sponsor
Lorena Austin (D)

Description
Requirements are imposed on ballot handling and delivery in Arizona, including prohibitions on collecting early ballots from non-family members except under specific conditions, and mandates for voter instructions emphasizing lawful ballot return. Penalties for ballot abuse, including unauthorized collection, solicitation, or possession of ballots, are clarified and classified as felonies, with enhanced penalties for patterns of ballot fraud. Mail ballot affidavit procedures and voter assistance disclosures are updated to include new delivery options and signature requirements effective 2026 under HB 2628.

Action Taken

HB 2902 - Electoral college; support

Sponsor
Steve Montenegro (R)

Description
Section 16-410.01 is added to Arizona Revised Statutes affirming the importance of the Electoral College in presidential elections, emphasizing its constitutional foundation, role in ensuring nationwide participation, and its function in guaranteeing election outcome certainty.

Action Taken

HB 2901 - Voting equipment; requirements; origin

Sponsor
Steve Montenegro (R)

Description
Requirements are imposed on vote recording and tabulating machines used in Arizona elections, mandating that beginning January 1, 2029, all parts and components must be sourced and assembled entirely within the United States. Certification and use of voting equipment must comply with the Help America Vote Act and be approved by a designated committee, with provisions for emergency use and revocation of certification for noncompliance. Exemptions are provided for machines acquired before January 1, 2028.

Action Taken

HB 2508 - Ballot measures; descriptive title; summary

Primary Sponsor
Stephanie Stahl Hamilton (D)

Description
Requirements are imposed on the form and content of ballot measures in Arizona, including numbering conventions, official and descriptive titles, and the inclusion of an impartial summary of principal provisions not exceeding fifty words. The secretary of state and attorney general must approve and prominently post the impartial summary online at least thirty days before ballots and publicity pamphlets are printed, and provide the summary to the filing committee. Notices regarding the amendment restrictions under Proposition 105 (1998) must be printed on ballots for state statutory measures, and alternative concise ballot formats with specific content elements are authorized.

Action Taken

HB 2805 - Electronic signatures; nomination petitions

Sponsor
John Gillette (R)

Description
A secure online signature collection system is established by the Secretary of State for nomination petitions for candidates in specified local districts, including school, community college, hospital, and multi-county water conservation districts. Equal access to the system is mandated for all candidates in certain elections regardless of political party affiliation or nomination method, with uniform application of rules and prohibitions on discriminatory restrictions. The system must verify elector identity and transmit filings to election officials, allowing candidates to collect all petition signatures electronically.

Action Taken

HB 2504 - Ballot measure amendments

Sponsor
Stephanie Stahl Hamilton (D)

Description
Sections 19-102.01 and 19-111.01 of Arizona Revised Statutes are repealed, and a new section 19-111.01 is added to allow political committees to submit proposed ballot measure descriptions to the attorney general for pre-approval and legal sufficiency review. Requirements are imposed on registration and regulation of paid and non-resident circulators for statewide initiative and referendum petitions, including application details, disqualification criteria, and enforcement mechanisms. Ballot measure numbering, official and descriptive title formatting, and impartial summary posting procedures are revised to enhance transparency and restore the people's right to legislate by initiative and referendum under the Arizona Constitution.

Action Taken

HB 2509 - Campaign finance; corporate contributions; registration

Sponsor
Stephanie Stahl Hamilton (D

Description
Requirements are imposed on corporations, limited liability companies, and labor organizations to register and report contributions exceeding specified thresholds to political action committees or similar entities in Arizona. Contribution disclosures must include detailed information about the contributor, recipient, candidate supported or opposed, and contribution date, with notarized verification required within five days. Civil penalties up to three times the contribution amount and misdemeanor charges are established for noncompliance or false filings under HB 2509.

Action Taken

HB 2655 - Election committee; security standards; practices

Sponsor
Seth Blattman (D)

Description
An election security standards and practices committee is established by the Secretary of State in consultation with local election officials and technical experts to develop and disseminate required and recommended election security controls and a self-assessment questionnaire for jurisdictions. A process and schedule are imposed for regular review and updates of security standards, including public comment opportunities, with biennial submission of updated standards and compliance questionnaires by jurisdictions. Compliance with the standards is confirmed through self-assessments submitted to the Secretary of State every even-numbered year.

Action Taken

HB 2372 - School board candidates; electronic signatures

Sponsor
Stacey Travers (D)

Description
Section 16-317 of the Arizona Revised Statutes is amended to require the Secretary of State to provide a secure online system for qualified electors to sign nomination petitions for city, county, school board, justice of the peace, constable, and precinct committeeman candidates. Candidates may collect up to 110% of the minimum required nomination petition signatures through this online system starting in 2025, expanding from the previous allowance through 2024. The system must verify elector identity and transmit filings to the appropriate election officer.

Action Taken

HB 2630 - Election officers; privacy protections

Primary Sponsor(s)
Lorena Austin (D)

Description
HB 2630 expands privacy protections for election officers and other eligible persons by prohibiting public access to their personal identifying information in county recorder, assessor, treasurer, and Department of Transportation records upon court order. It establishes procedures for eligible persons to file affidavits requesting redaction or sealing of such information to reduce threats to their safety, and criminalizes the unauthorized dissemination of election officers' personal information when it poses an imminent threat. The measure also clarifies definitions and extends confidentiality provisions to include family and household members of election officers.

Action Taken

HB 2507 - Early ballot return; voter intimidation

Sponsor
Stephanie Stahl Hamilton (D)

Description
Section 16-1018 of the Arizona Revised Statutes is amended to classify as a class 2 misdemeanor the act of knowingly interfering with or harassing individuals delivering or attempting to deliver voted ballots to lawful recipients or receptacles. Additional unlawful acts related to voting, such as electioneering near polling places, removing ballots, and soliciting voters to show ballots, are reaffirmed and detailed. These provisions regulate conduct to protect the integrity and security of early ballot return and voting processes in Arizona.

Action Taken

HB 2789 - Nominating petitions; in lieu fee

Sponsor
Lupe Diaz (R)

Description
An in-lieu filing fee option is established for candidates seeking ballot access in Arizona elections beginning in 2028, allowing payment of a fee instead of submitting nomination petition signatures. The Secretary of State is required to set and publish the fee and provide a notarized form for candidates to declare payment in lieu of petitions. This option excludes candidates for U.S. Senator, Representative in Congress, and President or Vice President.

Action Taken

HB 2219 - Ballot receptacles; electioneering limits

Sponsor
Brian Garcia (D)

Description
Seventy-five-foot limits are extended to include designated ballot receptacles, prohibiting electioneering and unauthorized presence within these areas while accessible to the public. Election officials, party representatives, and challengers are restricted from displaying political materials or electioneering within these limits, and photography is prohibited. Violations of these provisions and other specified unlawful acts related to voting conduct are classified as class 2 misdemeanors under HB 2219.

Action Taken

HB 2557 - Candidate petitions; felony disclosure

Primary Sponsor(s)
Quang Nguyen (R)

Description
Sections 13-911, 16-314, and 16-341 of the Arizona Revised Statutes are amended to require candidates submitting nomination petitions to disclose any felony sexual offense convictions involving a minor, including those sealed or expunged. Procedures for sealing criminal records are clarified, specifying exceptions for certain offenses and mandating disclosure of relevant convictions on nomination petitions. Nomination petitions must include a candidate-completed statement regarding such felony convictions, enhancing transparency in candidate qualifications.

Action Taken

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

Via Email

January 27, 2026

Clean Elections Commission
C/O Paula Thomas, Executive Officer
1802 W. Jackson St. #129
Phoenix, Arizona 85007

Hector Jaramillo
6926 N 74th Ave.
Glendale AZ 85303

Craig Morgan
2555 East Camelback Road
Phoenix, AZ 85016
Independent Counsel to the Commission

Notice of Hearing re: MUR 25-01 & Summary of Proposed Order

Commissioners and Mr. Jaramillo,

Included with the email delivering this letter is a draft Order and Notice of Appealable Agency Action in the matter of Hector Jaramillo, MUR 25-01.

This letter also serves as **notice** to Mr. Jaramillo that this matter will be considered at 10 a.m. January 29, 2026 at the Commission's Office, 1110 W. Washington, Suite 250, Phoenix, Arizona 85007, or via Zoom
https://us02web.zoom.us/j/81538032016
Meeting ID: **815 3803 2016**, One tap mobile
+1-346-248-7799,,81538032016# US

Finally, this letter provides a summary of the findings of fact and conclusions of law in the proposed order and my proposed disposition.

Factual Background

Mr. Jaramillo applied for and was certified as a participating candidate under the Citizens Clean Elections Act in 2024. As part of that certification, he agreed to comply with the Act and Commission rules, to timely file all required campaign finance reports, to maintain and produce books and records upon request, and to cooperate with audits and examinations conducted by the Commission or its designated auditors.

Mr. Jaramillo qualified for Clean Elections funding and reallocated a portion of that funding to the primary election period pursuant to A.R.S. § 16-952. In total, he received $31,760 in Clean Elections funds.

Reporting and Audit Issues

Following receipt of Clean Elections funding, Mr. Jaramillo ceased filing required periodic campaign finance reports after his pre-primary report. As a result, he failed to report both the receipt and expenditure of Clean Elections funds for extended periods. In addition, Mr. Jaramillo did not respond to repeated efforts by Commission staff and designated auditors to obtain records necessary to conduct the required audit. Auditors reported that they were unable to perform required audit procedures due to the absence of cooperation and documentation.

The Commission previously entered a repayment order, after which Mr. Jaramillo began filing reports and providing records. That repayment order was later vacated. Ultimately, after the initiation of enforcement proceedings, Mr. Jaramillo produced records sufficient for auditors to determine that Clean Elections funds were used for direct campaign purposes.

Enforcement History and Findings

On October 7, the Commission found reason to believe that Mr. Jaramillo had violated the Act and Commission rules, and the Executive Director issued a compliance order on October 15. After continued noncompliance, the Commission determined on December 11 that there was probable cause to believe violations had occurred.

The draft Order concludes that Mr. Jaramillo violated:

- A.R.S. § 16-942(B) and A.A.C. R2-20-110(A) by failing to timely file required campaign finance reports; and
- A.A.C. R2-20-104(C), R2-20-115, and R2-20-403 by failing to maintain and timely produce required books and records and by failing to cooperate with the audit.

The Order details the statutory penalty structure applicable to reporting violations, including the per-day penalty and the statutory multiplier triggered when the amount unreported exceeds the applicable threshold. A table in the Order summarizes the number of days late, the amounts not reported, and the resulting statutory penalty exposure for each delinquent report. Because Mr. Jaramillo did not qualify for the general election, staff did not pursue penalties for reports due after the primary election.

Mitigation and Penalty Recommendation

The draft Order recognizes mitigating factors. Although Mr. Jaramillo failed to timely report and failed to cooperate with the audit for an extended period, he ultimately produced records that allowed auditors to confirm that Clean Elections funds were used for direct campaign purposes. The record does not support a finding that he intended to deceive or gain an unfair advantage.

Considering the seriousness of the reporting failures, the length of noncompliance, the eventual cooperation, and penalties imposed in similar cases, the draft Order proposes a mitigated total civil penalty of $16,000. This consists of:

- $15,000 for failure to timely file required campaign finance reports; and
- $1,000 for failure to provide books and records upon request of the Commission.

Procedural Rights

If approved an Order assessing penalties constitutes an appealable agency action. Mr. Jaramillo is advised of his right to request an administrative hearing within 30 days of receipt of the Order, as well as the availability of an informal settlement conference under A.R.S. § 41-1092.06. The Order also addresses interest accrual, collection, and other enforcement provisions.

Sincerely,

Thomas M. Collins
Executive Director

STATE OF ARIZONA

CITIZENS CLEAN ELECTIONS COMMISSION

In the Matter of:	Case No.: 25-01
Hector Jaramillo, RESPONDENT	**ORDER AND NOTICE OF APPEALABLE AGENCY ACTION**

The Citizens Clean Elections Commission ("Commission") shall enforce the provisions of the Citizens Clean Elections Act ("Act"). Pursuant to those duties, the Commission hereby issues this Order and Notice of Appealable Agency Action.

FINDINGS OF FACT AND CONCLUSIONS OF LAW

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

B. As a participating candidate, Respondent agreed to:

1. Comply with all requirements of the Act and Commission rules.
2. Be subject to all enforcement actions by the Commission as authorized by the Act and Commission rules.
3. Have the burden of proving that expenditures made by or on behalf of the candidate were for direct campaign purposes.
4. 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.
5. 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.

6. Pay any civil penalties included in a conciliation agreement or otherwise imposed against the candidate.

7. File all campaign finance reports with the Secretary of State in an electronic format in a timely manner.

Id.

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

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

E. Respondent ceased filing periodic campaign finance reports after his pre-primary report on July 23, 2024. Exhibit 1. Consequently, Respondent delayed reporting the acceptance of the clean elections funding nor any expenditure of those funds.

F. Respondent ignored efforts to contact him made by Clean Elections designated auditors and Clean Elections staff members. Exhibit 1. As a result of Respondent's actions, the Clean Elections auditors were "unable to review any of the expenses, contributions, or perform any other procedure as required for our testing of the [Respondent's] Clean Elections funding." *Id.*

G. The Commission entered a repayment order against Respondent and he began filing campaign finance reports and provided records to auditors. That order was later vacated by the Commission. Exhibit 1.

H. On October 7, 2025 the Commission determined there was reason to believe that Respondent had violated the Act and Rules. Exhibit 1.

I. On October 15, 2025, the Executive Director issued a compliance order to Respondent. Exhibit 4

J. On December 11, 2025, the Commission concluded that there was probable cause to believe the Respondent had violated the Act and Rules. Exhibit 5.

K. Participating candidates are required to file campaign finance reports "that include all receipts and disbursements for their current campaign account." A.A.C. R2-20-110(A). Reports must be filed on the dates established in A.R.S. § 16-927 and Commission rules. Failure to file is subject to penalties under A.R.S. § 16-942(B).

L. Respondent had failed to file multiple required reports in a timely manner.

M. Because Respondent failed to file required reports for extended periods and only took limited corrective action after the Commission initiated enforcement, there is probable cause to believe he violated A.R.S. § 16-942(B) and A.A.C. R2-20-110(A).

N. Respondent agreed to these requirements when submitting his 2024 Candidate Statement of Organization and Clean Elections Agreement.

O. Penalties under § 16-942(B) for reporting violations are $210 per day (legislative candidates), up to twice the amount unreported, doubled when the amount exceeds 10 percent of a statutory threshold. Penalties under this section are not to exceed twice the amount not reported.

Table 1

Report	Days Late	Amount not reported	$420
2024 - Pre-Primary Election	30 Days Late	51 dollars	Executive Director recommends waiver
2024 Qualifying Period Recap Report	234 Days Late	Total Cash Receipts this Reporting Period: $35,981.55 Total Cash Disbursements this Reporting Period: $33,260.35 Total: $69,241.90	30 x $420 $136,080
2024 Primary Recap report	227 Days Late	Total Cash Receipts this Reporting Period: $31,760.00 Total Cash Disbursements this Reporting Period: $30,000.00 Total: $61,760.00	227 x $420 $95,340

Because the candidate did not qualify for the general election, the Executive Director elects not to pursue penalties for reports after the primary. Ten percent of the 2023–2024 adjusted primary limit (A.R.S. § 16-952 one-party dominant) is $3,176. Ten percent of the 2023–2024 adjusted general limit (A.R.S. § 16-952 one-party dominant) is $2,117.

P. Participating candidates must maintain and preserve books and records of campaign transactions. A.A.C. R2-20-115(A), (B). Candidates must produce such records to the Commission and auditors upon request. A.A.C. R2-20-104(C); R2-20-403.

Q. Respondent agreed to these requirements when submitting his 2024 Candidate Statement of Organization and Clean Elections Agreement. Despite repeated requests from staff and auditors, Respondent did not provide required documentation until after the Commission considered a repayment order.

R. Respondent's failure to provide records impaired the Commission's ability to confirm proper use of Clean Elections funds, including whether monies were used for direct campaign purposes or returned as required by A.R.S. § 16-953.

S. Based on Respondent's failure to cooperate with the audit and his failure to produce required books and records, there is probable cause to believe he violated A.A.C. R2-20-104(C), R2-20-115, and R2-20-403.

T. If the Commission has reason to believe by a preponderance of the evidence that a participating candidate is not in compliance with the Act or Commission rules, then in addition to other penalties under law, the Commission may decertify a candidate, deny or suspend funding, order repayment of funds, or impose a penalty not to exceed $1,000 for a participating candidate for the legislature. A.A.C. R2-20-222(A).

U. The Commission has good cause for reducing the penalty. Respondent provided records and evidence to auditors allowing the determination that clean elections funds were used for direct campaign purposes. Respondent did not intend to deceive or gain unfair advantage. Penalties in similar matters have ranged but for candidates rarely exceeded $10,000 except in circumstances involving the misused of funds or intent to deceive.

FAILURE TO COMPLY

After the October 15 Order informing Respondent that the Commission had determined that there was reason to believe Respondent had violated requirements of the Act, the expiration of fourteen days, and service of an order requiring compliance, Respondent remained out of compliance. Accordingly, the

Commission has made a public finding that the Respondent violated the Act issues this Order assessing a civil penalty in accordance with A.R.S. § 16-942 and R2-20-109(F)(3), and R2-20-222(A).

PENALTIES

The Commission imposes a mitigated total penalty of $16,000. The penalty reflects a $15,000 fine regarding the failure to file reports and the fact that the Respondent eventually provided records that demonstrated that his expenses were direct campaign expenses, but reflects the seriousness of the failure to file timely reports.

The total penalty also includes $1,000 for failure to provide records on request of the Commission.

ORDER

WHEREFORE, the Citizens Clean Elections Commission hereby imposes a civil penalty of $16,000. This civil penalty will be satisfied upon receipt of payment to the Citizens Clean Elections Commission at its mailing address 1802 W. Jackson St. #129, Phoenix, Arizona 85007. Interest shall accrue and become immediately payable on any amount that remains unpaid thirty days after the date of this Order, unless the Respondent has requested an administrative hearing. Interest shall accrue at the statutory rate of prime plus one (1) percent (7.75%) pursuant to A.R.S. § 44-1201(A). This Order constitutes a fine, penalty, or forfeiture payable to and for the benefit of a governmental unit, and not compensation for actual pecuniary loss; and pursuant to 11 USC § 523 such obligations are not subject to discharge in bankruptcy. In the event legal action is necessary to enforce collection hereunder, Respondent shall additionally pay all costs and expenses of collection, including, without limitation, reasonable attorneys' fees.

Respondent may request an administrative hearing to contest this Order by submitting a written request for a hearing within 30 days of receipt of this Order. The written request for a hearing shall be sent to the Citizens Clean Elections Commission mailing address, 1802 W. Jackson St. #129, Phoenix, Arizona 85007.

If you request a hearing, you may request an informal settlement conference pursuant to A.R.S. § 41-1092.06.

Individuals with a disability may request reasonable accommodation by contacting the Citizens Clean Elections Commission mailing address 1802 W. Jackson St. #129, Phoenix, Arizona 85007, Telephone: (602) 364-3477; and during a hearing by contacting the Office of Administrative Hearings, 1400 West Washington, Suite 101, Phoenix, Arizona 85007, Telephone: (602) 542-9826. Requests should be made as early as possible to allow time to arrange the accommodation.

Dated this ___ day of January, 2026.

By: _____
Thomas M. Collins, Executive Director

Exhibit

STATE OF ARIZONA
CITIZENS CLEAN ELECTIONS COMMISSION
MUR 25-01
Hector Jaramillo
STATEMENT OF REASONS OF THE EXECUTIVE DIRECTOR

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

Hector Jaramillo ("Respondent") chose to become a participating candidate for the 2024 election cycle. He qualified for funding by collecting qualifying contributions from registered voters and submitting them to the Secretary of State for review by the county recorder's office. The Clean Elections Fund provided $31,760 for his campaign. Because he did not file the campaign finance reports required by the Act and Rules in a timely manner and failed to respond to multiple efforts from Clean Elections staff and auditors to obtain evidence accounting for his use of funds until after the Commission entered a repayment order against him, there is reason to believe he violated multiple provisions of the Clean Elections Act and Rules.

I. Factual Background

Respondent applied for certification as a participating candidate on June 24, 2024. Respondent provided sufficient qualifying contributions to meet the statutory requirements for clean elections funding on July 22, 2024. Respondent reallocated

a portion of clean elections funding to the primary election period pursuant to A.R.S. § 16-952. Consequently, Respondent received $31,760 in clean elections funding for the primary. *Id.* Respondent did not advance\ to the general election.

Respondent ceased filing periodic campaign finance reports after filing a pre-primary report three days late on July 23, 2024.

The Executive Director issued a Complaint against Respondent on January 8, 2025 along with a copy of the audit report. See Complaint Attached. Respondent did not respond or acknowledge the Complaint. In March the Executive Director recommended that the Commission order repayment of the full funding amount. See Attached Repayment Order. On around the date of the Commission's hearing on the Repayment Order, Respondent first responded to Commission staff and began filing campaign finance reports.

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 indicates the status of Respondent's filings as of January 8, 2025.

Table 1 (January 8, 2025)

(Indicates Amended Reports Exist)

CSV | Print | Column visibility

Page 1 of 2

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

Table 2 represents the state of filing as of the October 5, 2025.

Table 2 (October 5, 2025)

Reports Previously Filed

(Indicates Amended Reports Exist) Show 10 entries

CSV Print Column visibility

Page 1 of 2

Report Due Date	Date Filed	Report Name	Report Filings	Status
01/15/2025		2024 - Post-General Election (Q4)		263 Day(s) Late Fines Due $6350.00
11/12/2024		2024 - General Recap Report		327 Day(s) Late
10/26/2024		2024 - Pre-General Election		344 Day(s) Late Fines Due $8375.00
10/15/2024		2024 - Post-Primary Election (Q3)		355 Day(s) Late Fines Due $8650.00
08/12/2024	03/27/2025	2024 - Primary Recap Report	PDF	227 Day(s) Late
08/05/2024	03/27/2025	2024 - Qualifying Period Recap Report	PDF	234 Day(s) Late
07/20/2024	07/23/2024	2024 - Pre-Primary Election	PDF	3 Day(s) Late Fines Due $30.00
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

Showing 1 to 10 of 19 entries

Page 1 of 2

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

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

B. Failure to provide records

The Clean Elections Act and Rules contain multiple provisions to prevent misuse of monies from the Clean Elections Fund. Most of these requirements reflect common-sense financial management practices that any campaign or small business project would follow.

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).

As a check on the use of funds, Ariz. Admin. Code R2-20-104(C) requires candidates to provide records to the Commission and its auditors. See Exhibit 3 to the Attached Complaint (Respondent's agreement to abide by these terms) and Figure 1 (excerpt from signed agreement). Similarly Ariz. Admin. Code R2-20-403 requires candidates to cooperate with Commission auditors.

Figure 1

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

Because Respondent did not comply with requests for records or respond to auditors until after the repayment order issued, there is reason to believe a violation of R2-20-104 and R2-20-403 occurred.

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 may, 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.

Dated this 5th day of October 2025

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

Complaint

Thomas M. Collins
Executive Director

State of Arizona
Citizens Clean Elections Commission

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

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

January 8, 2025

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

RE: CEC MUR 25-01

Dear Mr. Jaramillo,

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Sincerely,

S/Thomas M. Collins

Executive Director
Citizens Clean Elections Commission

Enclosures

Complaint

Hector Jaramillo For State Representative - District 24

Transactions

Demographic Information

Filer Name:

Hector Jaramillo for State Representative - District 24

Status:

Active

Filer ID:

101580

Filer Type:

Candidate (participating in Clean Elections)

Registration Date:

02/04/2024

Last Amended Date:

02/04/2024

County:

Last Reported:

Mailing Address:

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

Filer Address:

6926 N 74th Ave
Glendale AZ 85303

Chairman:

Serna, Ricardo

Treasurer:

Abeytia, Anna

Candidate:

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

Designee:

Office Sought:

State Representative - District 24

Party Affiliation:

Reports Previously Filed

(Indicates Amended Reports Exist)

CSV | Print | Column visibility

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

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ADRIAN FONTES
SECRETARY OF STATE
STATE OF ARIZONA

;

Complaint

CITIZENS CLEAN ELECTIONS COMMISSION

Report on Agreed-Upon Procedures

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

Complaint

FESTER & CHAPMAN PLLC
CERTIFIED PUBLIC ACCOUNTANTS

Independent Accountants' Report on
Applying Agreed-Upon Procedures

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

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

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

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

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

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

Fester & Chapman, PLLC

December 9, 2024

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

Summary of Procedures and Findings

1. Preliminary Procedures

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

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

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

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

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

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

2. Fieldwork Procedures

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

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

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

Finding
See comment in a) above.

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

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

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

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

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

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

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

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

(i) The candidate accepted contributions only from individuals.

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Complaint

FILED
JUN 24 2024
ARIZONA SECRETARY OF STATE

0000562081

☐ Initial Application
☐ Amended Application

STATE OF ARIZONA
APPLICATION FOR CERTIFICATION AS A PARTICIPATING CANDIDATE

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

COMMITTEE ID NUMBER 101580				
NAME OF CANDIDATE: HECTOR JARAMILLO			DATE: 06/21/2024	
OFFICE SOUGHT: STATE REPRESENTATIVE - DISTRICT 24	PARTY AFFILIATION:	ELECTION CYCLE: 2024		
CANDIDATE'S ADDRESS: 6926 N 74TH AVE	CITY: GLENDALE	STATE: AZ	ZIP: 85303	
CANDIDATE'S TELEPHONE #: (623) 986-4192	CANDIDATE'S FAX #:	CANDIDATE'S EMAIL ADDRESS: TREASURY4AZHEC@GMAIL.COM		
NAME OF POLITICAL COMMITTEE: HECTOR JARAMILLO FOR STATE REPRESENTATIVE - DISTRICT 24				
COMMITTEE ADDRESS: 6926 N 74TH AVE	CITY: GLENDALE	STATE: AZ	ZIP: 85303	
COMMITTEE MAILING ADDRESS (if different from above): 6926 N 74TH AVE	CITY: GLENDALE	STATE: AZ	ZIP: 85303	
COMMITTEE TELEPHONE #: (623) 986-4192	COMMITTEE FAX #:	COMMITTEE EMAIL ADDRESS: HEC4AZ@GMAIL.COM		
~~NAME OF DESIGNATED INDIVIDUAL WITH AUTHORITY TO WITHDRAW FUNDS (IF APPLICABLE) (A.R.S. §16-948)~~				
~~DESIGNATED INDIVIDUAL'S ADDRESS~~	CITY	STATE	ZIP	
~~DESIGNATED INDIVIDUAL'S TELEPHONE #~~	~~DESIGNATED INDIVIDUAL'S FAX #~~	DESIGNATED INDIVIDUAL'S EMAIL		
LIST THE NAME OF THE FINANCIAL INSTITUTION FROM WHICH THE CANDIDATE AND THE DESIGNATED INDIVIDUAL WILL CONDUCT ALL FINANCIAL ACTIVITY FOR THE CANDIDATE'S CAMPAIGN COMMITTEE (Do not list account numbers). (A.R.S. §16-948(A))				
NAME OF FINANCIAL INSTITUTION: MARISOL				

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

Candidate's Signature

Date 6/24/24

Office Revision 9/07

Complaint

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

Application for Certification – Part II

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

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

State of Arizona)
County of Maricopa)) ss.

Candidate's Signature

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

Notary Public

State of Arizona)
County of_____)) ss.

Designated Individual's Signature

SUBSCRIBED AND SWORN TO before me this_____day of_____20_____.

Notary Public

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

Repayment Order

" FINAL "

Final 3-27

STATE OF ARIZONA

CITIZENS CLEAN ELECTIONS COMMISSION

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Dated this 27 day March 2025.

By: _____

Citizens Clean Elections Commission

0000562081

☐ Initial Application
☐ Amended Application

STATE OF ARIZONA
APPLICATION FOR CERTIFICATION AS A PARTICIPATING CANDIDATE

FILED
JUN 24 2024
ARIZONA SECRETARY OF STATE

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

COMMITTEE ID NUMBER: 101580

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

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

Candidate's Signature

Date 6/24/24

Office Revision 9/07

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

Application for Certification – Part II

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

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

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

State of Arizona)
) ss.
County of Maricopa)

Candidate's Signature

SUBSCRIBED AND SWORN TO before me this 24th day

of June 20 24.

Notary Public

State of Arizona)
) ss.
County of_____)

Designated Individual's Signature

SUBSCRIBED AND SWORN TO before me this_____day

of_____20_____.

Notary Public

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

Exhibit 2

Gmail [redacted]

Qualified for Funding - Hector Jaramillo

1 message

Campaign Finance <campaignfinance@azsos.gov> Mon, Jul 22, 2024 at 2:48 PM
To: "hec4az@gmail.com" <hec4az@gmail.com>
Cc: Campaign Finance <campaignfinance@azsos.gov>, "ccec@azcleanelections.gov" <ccec@azcleanelections.gov>

Dear Hector Jaramillo,

The Secretary of State's Office received notification from the County Recorders' Office regarding the sample results for the Qualifying Contributions you submitted to qualify for funding under the Citizens Clean Elections Act.

The results met the threshold under A.R.S. § 16-950(D), which means you have met the statutory requirements to receive Clean Elections funding.

This message will serve as your official notification. Should you have further questions related to your participating status, please contact the Citizens Clean Elections Commission by email at ccec@azcleanelections.gov, or by phone at (602) 364-3477.

Thanks,

Email: campaignfinance@azsos.gov
Arizona Secretary of State | https://azsos.gov
1700 W. Washington St., 7th Fl. | Phoenix, AZ 85007

This message and any messages in response to the sender of this message may be subject to a public records request.

TP

We are not able to provide legal or financial advice specific to any situation. We will do our best to provide appropriate assistance, but if you have specific questions about how you should proceed, you may need to seek legal counsel.

Exhibit 3

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

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 23, 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: **Hector Jaramillo**
Office Sought: **State House of Representatives, District 24**
Vendor Number: **VC*81251**

*X*_____ _____
Funding Received By *Date*

Exhibit 5

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

October 15, 2025

Via E-Mail

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

RE: CEC MUR 25-01

Re: Order of Compliance and Deadline to Comply

Dear Mr. Jaramillo:

This letter serves to inform you that the Arizona Citizens Clean Elections Commission has determined that there is reason to believe you have committed violations of the Clean Elections Act and Rules.

Pursuant to the Commission's October 7, 2025 determination, which is attached to the email delivering this Order and incorporated by reference, you are ordered to comply within 14 days. Ariz. Admin Code R2-20-208. During this period, you "may provide any explanation to the Commission, comply with the order, or enter into a public administrative settlement with the Commission." *Id.* **The deadline to comply with this order is October 29, 2025.**

As you have been previously informed, neither the Commission nor its staff may provide legal assistance to you, although you should give serious consideration to engaging an attorney.

Sincerely,

S/Thomas M. Collins
Executive Director

Attachment: Reason to Believe Determination

Exhibit 5

Thomas M. Collins
Executive Director

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

Brief of the Executive Director
PROBABLE CAUSE RECOMMENDATION AND NOTICE OF POSSIBLE PENALTIES

To: Commissioners
From: Thomas M. Collins, Executive Director
Date: December 1, 2025
Subject: MUR 25-01 (Hector Jaramillo)

I. Factual and Procedural Background

Hector Jaramillo (Respondent) applied for certification as a participating candidate on June 24, 2024. On July 22, 2024, Respondent submitted a sufficient number of qualifying contributions to receive Clean Elections funding. Respondent reallocated a portion of these monies to the primary election period pursuant to A.R.S. § 16-952 and received a total of $31,760 in primary election funds. Respondent did not advance to the general election.

Respondent ceased filing periodic campaign finance reports after submitting a pre-primary report three days late on July 23, 2024. He thereafter failed to file any required reports, respond to Commission staff, or produce required documentation.

On January 8, 2025, the Executive Director served Respondent with an internal Complaint and the audit report. Respondent did not respond. In March 2025, the Executive Director recommended that the Commission issue a repayment order for the full amount of funding received. Respondent first contacted Commission staff and began filing certain campaign finance reports only around the date of the Commission's repayment-order hearing—more than seven months after he stopped filing reports and after multiple attempts by staff and auditors to obtain required information. Respondent has not provided complete records required by the Act and Rules. The Commission made a reasonable to believe determination on October 7, 2015. A Compliance Order was issued on October 15, 2015. These documents are attached as Exhibit 1 and incorporated herein.

II. Questions Presented and Brief Answers

A. Question: Is there probable cause to believe Respondent violated the reporting requirements of the Act by failing to timely file campaign finance reports?

Answer: Yes. Respondent failed to file required campaign finance reports for months, failed to respond to Commission communications, and remains in violation of A.A.C. R2-20-110(A) and A.R.S. § 16-942(B).

Analysis

Participating candidates are required to file campaign finance reports "that include all receipts and disbursements for their current campaign account." A.A.C. R2-20-110(A). Reports must be filed on the dates established in A.R.S. § 16-927 and Commission rules. Failure to file is subject to penalties under A.R.S. § 16-942(B).

As of January 8, 2025, Respondent had failed to file multiple required reports. By October 5, 2025, Respondent still had not filed all required reporting and remained out of compliance. The Secretary of State's Campaign Finance Reporting System, (seemoneyaz.gov) reflected significant late-fee liability based on unfiled reports. Respondent's filings were made only after the Commission initiated repayment proceedings.

Because Respondent failed to file required reports for extended periods and only took limited corrective action after the Commission initiated enforcement, there is probable cause to believe he violated A.R.S. § 16-942(B) and A.A.C. R2-20-110(A).

Possible Penalty

Penalties under § 16-942(B) for reporting violations are $210 per day (legislative candidates), up to twice the amount unreported. *See* Table 1.

Table 1

Report	Days Late	Amount not reported	$420 (§ 16-942 doubled because 10 percent threshold exceeded not to exceed 2x amount not reported)
2024 - Pre-Primary Election	30 Days Late	51 dollars	Executive Director recommends waiver
2024 Qualifying Period Recap Report	234 Days Late	Total Cash Receipts this Reporting Period: $35,981.55 Total Cash Disbursements this Reporting Period: $33,260.35 Total: $69,241.90	30 x $420 $136,080
2024 Primary Recap report	227 Days Late	Total Cash Receipts this Reporting Period: $31,760.00 Total Cash Disbursements this Reporting Period: $30,000.00 Total: $61,760.00	227 x $420 $95,340

Note: Because candidate did not qualify for the general election, Executive Director elects not to pursue penalties for reports after the primary.
10 percent of the 2023-2024 adjusted primary limit (16-952 one-party dominant)
$3,176
10 percent of the 2023-2024 adjusted general limit (16-952 one-party dominant)
$2,117

B. Question: Is there probable cause to believe Respondent failed to provide books and records as required by the Act and Rules?

Answer: Yes. Respondent failed to produce records to staff and auditors until after the repayment hearing, in violation of A.A.C. R2-20-115, R2-20-104, and R2-20-403.

Analysis

Participating candidates must maintain and preserve books and records of campaign transactions. A.A.C. R2-20-115(A)–(B). Candidates must produce such records to the Commission and auditors upon request. A.A.C. R2-20-104(C); R2-20-403.

Respondent agreed to these requirements when submitting his 2024 Candidate Statement of Organization and Clean Elections Agreement. Despite repeated requests from staff and auditors, Respondent did not provide required documentation until after the Commission considered a repayment order.

Respondent's failure to provide records impaired the Commission's ability to confirm proper use of Clean Elections funds, including whether monies were used for direct campaign purposes or returned as required by A.R.S. § 16-953.

Based on Respondent's failure to cooperate with the audit and his failure to produce required books and records, there is probable cause to believe he violated A.A.C. R2-20-104(C), R2-20-115, and R2-20-403.

Possible Penalty

If the Commission has reason to believe by a preponderance of the evidence that a participating candidate is not in compliance with the Act or Commission rules, then in addition to other penalties under law, the Commission may decertify a candidate, deny or suspend funding, order repayment of funds, or impose a penalty not to exceed $1,000 for a participating candidate for the legislature. A.A.C. R2-20-222(A).

III. Conclusion

For the foregoing reasons, I recommend that the Commission find probable cause that Respondent violated the Act on Items II(A)–(B).

IV. Procedure

If the Commission determines by an affirmative vote of at least three members that there is probable cause to believe Respondent violated the Act, the Commission shall authorize the Executive Director to notify Respondent by order stating the nature of the violation. A.A.C. R2-20-215(A).

The Executive Director then may recommend to the Commission that the Commission authorize the issuance of an order and assessment of civil penalties pursuant to A.R.S. § 16-957(B). A.A.C. R2-20-217(A).

The Commission may, by an affirmative vote of at least three of its members, authorize the Executive Director to issue an order and assess civil penalties pursuant to A.R.S. § 16-957(B). A.A.C. R2-20-217(B).

Dated this 3rd day of December, 2025

By:_____
Thomas M. Collins
Executive Director