



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

Virtual Meeting: Citizens Clean Elections Commission

Zoom Meeting: <https://us02web.zoom.us/j/83417755836>

Meeting ID: 834 1775 5836

One tap mobile: +1-669-444-9171,,83417755836# US

Commission Address: 1110 W. Washington, Suite 250, Phoenix,
Arizona 85007

Date: Wednesday, September 2, 2026

Time: 2:00 p. m.

Pursuant to A.R.S. § 38-431.02, notice is hereby given to the Commissioners of the Citizens Clean Elections Commission and the general public that the Citizens Clean Elections Commission will hold a regular meeting, which is open to the public on September 2, 2026. **This meeting will be held at 2:00 p.m. This meeting will be held virtually. The Zoom meeting room will be open by 1:45 p.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.

Join Zoom Meeting

<https://us02web.zoom.us/j/83417755836>

Meeting ID: 834 1775 5836

One tap mobile

[+1-669-444-9171](tel:+16694449171),,83417755836# US

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

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

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

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

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

The agenda for the meeting is as follows:

- I. Call to Order.
- II. Review, Consideration, Discussion, Analysis and Possible Action on Dr. Ralph Heap's August 28, 2026 request to withdraw as a participating candidate under the Arizona Citizens Clean Elections Act.

The Commission may vote to go into Executive Session, which will not be open to the public, for discussion or consultation for legal advice with the attorney or attorneys of the public body. A.R.S. § 38-431.03(A)(3).
- III. 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.

IV. 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 31st day of August, 2026
Citizens Clean Elections Commission
Thomas M. Collins, Executive Director

Timothy A. La Sota, PLC
2198 E. Camelback Rd., Suite 305
Phoenix, Arizona 85016
P 602-515-2649
tim@timlasota.com

August 28, 2026

Via email to:

Mr. Thomas Collins
Executive Director
Arizona Citizens Clean Elections Commission
1110 W. Washington Street, Suite 250
Phoenix, Arizona 85007

Dear Mr. Collins:

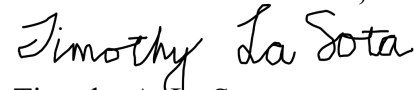
This firm represents Dr. Ralph Heap.

Pursuant to Arizona Administrative Code Rule R2-20-108(A). Dr. Heap elects to withdraw as a participating candidate under the Arizona Citizens Clean Elections Act, Arizona Revised Statutes § 16-941 *et seq.*

The reason for the withdrawal are as stated by me at the hearing yesterday. Dr. Heap will be returning all funds to Clean Elections, unspent.

Very truly yours,

TIMOTHY A. LA SOTA, PLC



Timothy A. La Sota



RALPH HEAP

Approved this 28th day of August, 2026:

ITEM II - RENEWED WITHDRAW REQUEST

Memorandum

To: Clean Elections Commissioners

From: Tom Collins

CC: Tim La Sota, Attorney for Ralph Heap

Craig Morgan, Independent Legal Advisor to the Commission MUR 26-06

Paula Thomas Executive Officer

Date: August 31, 2026

Re: MUR 26-06 Chronology of Actions and Communications Since August 14.

This memorandum is intended solely to provide the Commission with a chronology of staff actions, communications, and material developments following the Commission's August 14, 2026 Reason to Believe determination in MUR 26-06. It does not address the merits of the pending investigation.

Background

The Commission staff received a complaint regarding sign production and distribution against Dr. Ralph Heap, a participating candidate, in June.

Dr. Heap was notified he had qualified for funding on July 20, but that he had not submitted the sworn statement required by R2-20-106(A).

Dr. Heap requested to withdraw from the program July 31, but the Commission denied the request on August 4.

Dr. Heap submitted the statement under R2-20-106(A).

On August 14, the Commission directed that Dr. Heap's campaign receive funding.

In a separate action, the Commission determined there was reason to believe Dr. Heap had violated the Clean Elections Act and Rules.'

Chronology

August 17 —Request for Campaign Records

On August 17, staff sent Dr. Heap, through counsel, a written request for records in MUR 26-06. The request cited A.R.S. § 16-956(A)(7), A.A.C. R2-20-104(C)(6),

and Dr. Heap's agreement to participate in the Clean Elections program, and initially requested production by 5:00 p.m. August 24. Exhibit 1.

The request concerned the campaign's finances and the transaction underlying the Reason to Believe determination. It requested: campaign-account statements and records of transactions from accounts used for campaign purposes; agreements for services provided to the campaign; receipts, invoices, or other records supporting services, in-kind contributions, use of personal monies, or other transactions of value; and communications concerning the purchase and placement of the Mesa Sign Shop signs. *Id.* If a transaction lacked a written receipt or agreement, staff asked only that Heap identify the transaction, the persons involved, and the date the good or service was received. *Id.*

August 20–24 — Mesa Sign Shop Subpoena and Contact with Owner Jim Torgeson

On August 20, staff transmitted a subpoena directed to Mesa Sign Shop and owner Jim Torgeson to Mr. La Sota, along with a request that Dr. Heap return unspent primary monies pursuant to A.R.S. § 16-953 and communicate with the Commission staff regarding his debate obligations. Exhibit 2

The subpoena was tied specifically to Mr. Torgeson's August 7 declaration and to the Commission's August 14 reason-to-believe determination. It sought the underlying business records concerning the Heap sign order, including the order, quote or estimate, invoice, production records, dates of completion and availability, pickup or delivery records, account statements, payment terms, and related communications. Exhibit 3

Mr. La Sota advised staff on August 22 that he did not represent Mesa Sign Shop and could not accept service of the subpoena on its behalf. Exhibit 4. Staff acknowledged that response and proceeded to communicate directly with Mr. Torgeson concerning service and the subpoena.

Following direct communication with Mr. Torgeson, staff sent him a follow-up email on August 24. Exhibit 5. Staff expressly told Torgeson that it was not permitted to give him legal advice and explained that his declaration had been submitted as part of the response of a party whom staff was investigating. Staff advised Torgeson he should consider obtaining counsel.

August 22–24 — Dr. Heap Requests and Receives Additional Time

On August 22, Mr. La Sota responded to the August 17 document request by stating, without waiving objections, that production by the following Monday was “completely unrealistic.” Exhibit 6. He requested an extension until the next Monday. *Id.*

On August 24, staff granted the requested one-week extension. Exhibit 7. In granting the extension, staff noted that campaign-account statements and records supporting approximately \$8,500 in reported campaign expenses appeared to be materials Dr. Heap should have had available as candidate and treasurer, but nevertheless granted the requested additional time. *Id.*

August 24 — La Sota Seeks Discussion of Resolution

Also on August 24, Mr. La Sota invoked the Commission’s rules concerning settlement and conciliation and asked staff to discuss resolution of MUR 26-06. Exhibit 8. He observed that the alternative appeared to be a lengthy enforcement process in the middle of an election. *Id.*

Staff responded by asking Mr. La Sota provide a written proposal to the attorney engaged by Staff for purposes of MUR 26-06. Exhibit 9.

August 25 — Staff circulates enforcement process details and Proposed Order

On August 25, in response to Mr. La Sota’s August 18 demand for the notice required by R2-20-208(A), staff provided Mr. La Sota, Commission counsel, and the Commission with a detailed memorandum explaining the enforcement process under A.R.S. § 16-957 and the Commission’s rules, together with a proposed compliance order. Exhibit 10.

The memorandum explained that following a reason-to-believe determination, a respondent may provide an explanation, comply with the order, or enter into a public administrative settlement; that the reason-to-believe determination also begins an investigation; and that the rules thereafter provide for probable-cause briefing, Commission consideration, conciliation, and possible penalties. Exhibit 11.

August 27 — Torgeson Requests and Receives Additional Time

On the morning of August 27, Mr. Torgeson contacted staff and stated that he was attempting to retain an attorney, was encountering conflicts, and needed a few additional days. Exhibit 12. He expressly stated that he was not attempting to obstruct the investigation and intended to comply with the subpoena with the assistance of counsel. *Id.*

Staff granted the request that afternoon. It extended the deadline for objections to September 7 and the deadline for compliance with the subpoena to September 15. Exhibit 13.

August 27 — Commission Acts on Heap's Request for a Compliance Order

On August 27, the Commission considered the compliance-order issue that La Sota had asked it to address. The Commission approved an order consistent with the Reason to Believe determination.

At the Commission Meeting, Mr. La Sota addressed the Commission. *August 27, 2026 Clean Elections Commission Meeting*, YouTube, beginning at 15:21 (Aug. 27, 2026), <https://youtu.be/xvu1Zl16fxQ?t=921>. During the course of his statement, Mr. La Sota said that Dr. Heap has been “bombarded” with Complaints, that the process was “byzantine” and that “Dr. Heap does not want to anything to do with this program anymore and he’s requesting now that he be allowed to withdraw.” He also objected to Staff’s response to his request to discuss a conciliation or public administrative settlement.¹

The order expressly stated that the investigation would continue during and after the compliance period. Exhibit 14. Staff transmitted the approved order to La Sota and the Commission’s independent legal advisor for MUR 26-06 afternoon. *Id.*

August 28 — Renewed Withdrawal Request

On August 28, Mr. La Sota transmitted a letter signed by Heap stating that Heap elected to withdraw as a participating candidate under R2-20-108(A), that his reasons were those stated at the prior day’s hearing, and that he would return all Clean Elections funds unspent. Exhibit 15.

¹ One additional complaint concerning Dr. Heap, MUR 26-09, is pending. Mr. La Sota has submitted a response, and staff is reviewing that matter separately in the ordinary course.

Staff immediately circulated the request to the Commission, quoted the provision on which Dr. Heap's request relied. Exhibit 16. Staff stated in an email to the Commission, its independent advisor, and Mr. La Sota, that the request raised the same issue the Commission had considered previously. *Id.* Staff recommended that the Commission consider the renewed request within one week. Exhibit 17.

Dr. Heap's campaign delivered a check to the Commission's Mail and Delivery address August 28.

MUR 26-06 Request

1 message

Thomas Collins <thomas.collins@azcleaselections.gov>
To: "tim@timlasota.com" <tim@timlasota.com>

Mon, Aug 17, 2026 at 4:15 PM

Tim
Please see the attached letter.
Thank you
Tom

--
Thomas M. Collins
Executive Director
Arizona Citizens Clean Elections Commission
www.azcleaselections.gov
Office: 602-364-3477
Mobile: 602-397-6362

**MUR 26 06 Dr Ralph Heap 8_17_2026 Request.pdf**
164K

Thomas M. Collins
Executive Director



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

**REQUEST FOR STATEMENT OF ACCOUNTS FOR DR. RALPH HEAP CAMPAIGN
ACTIVITY**

Via E-Mail

August 17, 2026

Tim La Sota
Counsel for Dr. Ralph Heap
2198 E. Camelback Road, Suite 305
Phoenix, AZ 85016

Re: Request for Financial Records, MUR 26-06

Dear Mr. La Sota:

I am writing to you in your capacity as counsel for Dr. Ralph Heap in Mur 26-06 and your client's agreement to participate. Pursuant to A.R.S. § 16-956(A)(7), Ariz. Admin. Code R2-20-104(C)(6) (requests for information), and your agreement to participate in the Clean Elections funding program (paragraph 9 of the application for certification), I am requesting that you provide the following materials no later than 5 p.m. August 24, 2026. Each request covers all responsive materials through the date of your response.

1. Copies of any and all statements from any financial accounts that have been used for campaign purposes, including copies of all electronic transactions or cleared/cancelled checks issued.
2. Copies of any and all agreements to provide any services to the candidate or the campaign.
3. Copies of any and all receipts, invoices, or records regarding any service provided to the campaign, any in-kind contribution, any use of personal monies or any other transaction of value.
4. Any and all communications regarding the purchase of signs from Mesa Sign Shop or the placement of signs purchased.

If Dr. Heap or any agent of his committee did not receive a receipt or written agreement or confirmation for a particular transaction or in-kind contribution, please specify the nature of the transaction or in-kind contribution, the persons involved and the date Dr. Heap or any agent of his committee received the particular good or service.

Sincerely,

Tom Collins

Documents re: MUR 26-06, Dr. Heap's repayment obligations, and Debate advisement

1 message

Thomas Collins <thomas.collins@azcleelections.gov>

Thu, Aug 20, 2026 at 4:54 PM

To: "tim@timlasota.com" <tim@timlasota.com>

Bcc: [REDACTED]

Tim

Please find the following:

- 1) A letter from me directing the return of primary funds from Dr. Heap's campaign account pursuant to 16-953 and 16-945.
- 2) An advisement regarding participating candidates' debate obligations.
- 3) A subpoena of Mesa Sign Shop and Mr. Torgeson.

Please let me know as soon as possible if you cannot or do not accept service of the subpoena so I can deliver it by other means to the statutory agent.

Thank you

Tom

--
Thomas M. Collins
Executive Director
Arizona Citizens Clean Elections Commission
www.azcleelections.gov
Office: 602-364-3477
Mobile: 602-397-6362

3 attachments

MUR 26 06 Dr Ralph Heap 8_20_2026 Advisement on Return of Monies Final.pdf
170K



MUR 26 06 Dr Ralph Heap 8_20_2026 Debate advisement Final.pdf
163K



MUR 26-06 Heap Mesa Sign Shop Subpoena Final.pdf
901K

Thomas M. Collins
Executive Director



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

ADVISEMENT OF REPAYMENT OBLIGATIONS

Via E-Mail

August 20, 2026

Tim La Sota
Counsel for Dr. Ralph Heap
2198 E. Camelback Road, Suite 305
Phoenix, AZ 85016

Re: Return of Primary Funds Under A.R.S. § 16-953

Dear Mr. La Sota:

I am writing to you in your capacity as counsel for Dr. Ralph Heap in Mur 26-06 and your client's agreement to participate.

Section 16-953(A) provides:

At the end of the primary election period, a participating candidate who has received monies pursuant to section 16-951, subsection A, paragraph 1 shall return to the fund all monies in the candidate's campaign account above an amount sufficient to pay any unpaid bills for expenditures made during the primary election period and for goods or services directed to the primary election.

Further, a "participating candidate shall pay all uncontested and unpaid bills referenced in this section no later than thirty days after the primary . . . election [and] [a]ny monies in a candidate's campaign account after payment of bills shall be returned promptly to the fund." A.R.S. § 16-953(C).

The Primary Election ended on July 21, 2026. Consequently, any outstanding money is due to the fund Thursday July 20. "All funds returned to the Commission . . . shall be returned to the Fund by a cashier's check drawn on the candidate's campaign bank account." A.A.C. R2-20-106(I).

Dr. Heap's post primary report does not show any information that indicates any outstanding bills. <https://seethemoney.az.gov/PublicReports/2026/BBCAA802-1F92-4BFE-9FA4-268366B0EE75.pdf>.

Dr. Heap shows a cash balance of a little over \$9,000. Any of that \$9,000 that has not already been sent to the fund as part of qualifying, must also be turned over to the fund. A.R.S. § 16-945(B) ("Any early contributions not spent by the end of the qualifying period shall be paid to the fund.").

Therefore, please arrange to deliver a cashier's check for \$147,836 plus whatever cash the account had on hand at the end of the qualifying period as soon as possible. The check should be paid to the Clean Elections Fund.

Hand delivery may be made to the Commission's mailing and delivery address 1802 W. Jackson St. #129 Phoenix, AZ 85284. Otherwise please arrange with me to meet at a location where I can receive the check from you.

If you have already attended to these obligations when this reaches, thank you for your cooperation.

Sincerely,

Tom Collins

Thomas M. Collins
Executive Director



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

ADVISEMENT OF DEBATE OBLIGATIONS

Via E-Mail

August 20, 2026

Tim La Sota
Counsel for Dr. Ralph Heap
2198 E. Camelback Road, Suite 305
Phoenix, AZ 85016

Re: Debate Participation under AAC R2-20-107

Dear Mr. La Sota:

I am writing to you in your capacity as counsel for Dr. Ralph Heap in Mur 26-06 and your client's agreement to participate.

Commission rule R2-20-107(F) states that "unless exempted, if a participating candidate fails to participate in any Commission-sponsored debate, the participating candidate shall be fined \$500.00. For purposes of this Section, each primary or general election shall be considered a separate election."

The rule provides for a request for an exemption. A.A.C. R2-20-107(G). The current date scheduled for the debate is October 9, 2026. Although the exemption request deadline is "at least one week" before the debate, A.A.C. R2-20-107(G)(1), I wanted to make clear that our flexibility to accommodate schedule changes becomes limited as time goes on.

Currently candidates Thompson, Pratt and Hill have confirmed. Please let us know at your earliest convenience whether Dr. Heap intends to participate or will need an exemption, so we can provide time for Commission review if necessary.

Sincerely,

Tom Collins

THE STATE OF ARIZONA
ARIZONA CITIZENS CLEAN ELECTIONS COMMISSION

26-06 Ralph Heap

TO:

Mesa Sign Shop, LLC
James E. "Jim" Torgeson,
Member
c/o James E. Torgeson,
Statutory Agent
756 W. Main St.,
Mesa, AZ 85201

YOU ARE HEREBY REQUIRED, pursuant to A.R.S. § 16-956(B) and R2-20-211(A), to produce and permit inspection and copying of all Documents in your possession, custody, or control related to your Declaration in CCEC MUR 26-06 dated August 7, 2026 and the determination there is reason to believe violations occurred made by the Commission on August 14, 2026, with the Arizona Citizens Clean Elections Commission. See A.R.S. § 16-956(B); A.A.C. R2-20-211. This information is requested in connection with an inquiry authorized pursuant to A.R.S. § 16-956(A)(7) and A.A.C. R2-20-209(A).

This Subpoena Duces Tecum requires that you produce the following

1 materials:

2 **General Definitions**

3
4 “Mesa Sign Shop” means Mesa Sign Shop, LLC, including its owners,
5 employees, agents, representatives, and persons acting on its behalf.

6 “Dr. Heap” means Dr. Ralph Heap, his candidate committee, and any person
7 acting on behalf of either.

8 “Heap Sign Order” means the order for Dr. Heap’s Corporation Commission
9 campaign signs described in James “Jim” Torgeson’s August 7, 2026
10 declaration.

11 “Declaration” means the Declaration submitted by James “Jim” Torgeson in
12 the Response submitted for Dr. Ralph Heap in MUR 26-06.

13 “Document” means any written, printed, electronic, or recorded material,
14 including emails, text messages, invoices, estimates, quotes, work orders,
15 account statements, accounting records and entries, customer account
16 histories, contracts, correspondence, internal notes, and electronically
17 stored information.

18 “Communication” means any written, electronic, or recorded
19 communication, including email and text messages.

20 **Requests**

- 21 1) All Documents relating to the Heap Sign Order, including any order,
22 work order, quote, estimate, invoice, proof, production record, unit
23 price, total price, date ordered, date completed, and date made
24 available for pickup, pickup or delivery record, account statement,
25 and the payment terms applicable to the Heap Sign Order, including
26

1 but not limited to information referenced in paragraphs 3, 4, and 5 of
2 the Declaration. All Documents and Communications relating to the
3 content, design, placement, or distribution of the signs comprising the
4 Heap Sign Order, including any Communication between Mesa Sign
5 Shop and Dr. Heap, including but not limited to information
6 referenced in paragraph 11 of the Declaration, and communications
7 with any other person concerning the Heap Sign Order.
8

- 9 2) Documents sufficient to establish Mesa Sign Shop's standard pricing
10 during the 2025-2026 election cycle for 4-foot-by-4-foot coroplast
11 signs in quantities comparable to the Heap Sign Order, including
12 price lists, rate sheets, and pricing schedules, including but not
13 limited to information referenced in paragraphs 3 and 7 of the
14 Declaration.
- 15 3) Documents sufficient to identify and establish the pricing of the
16 political and nonpolitical customer orders upon which Jim Torgeson
17 relied in stating that Dr. Heap's campaign was invoiced the same per-
18 unit price charged to other political and nonpolitical customers for
19 comparable sign orders, including Documents showing the customer,
20 quantity, specifications, order date, unit price, and total price,
21 including but not limited to information referenced in paragraphs 3
22 and 7 of the Declaration.
- 23 4) Documents sufficient to establish Mesa Sign Shop's standard
24 practice during 2025 and 2026 concerning when established or
25 creditworthy customers are invoiced after an order is completed,
26
27

1 delivered, or made available for pickup and when payment is then
2 due, including the “normal payment window” and payment terms
3 ordinarily extended to such customers, including but not limited to
4 information referenced in paragraphs 4, 5, and 6 of the Declaration.

- 5 5) All Documents relating to the “large, non-political institutional client”
6 identified in paragraph 6 of the Declaration as having not paid Mesa
7 Sign Shop for signs delivered more than four months earlier,
8 including the order, invoice, delivery record, payment terms, account
9 statements, collection Communications, and Documents showing the
10 current status or ultimate disposition of the account.
- 11 6) Mesa Sign Shop’s accounts-receivable aging reports or equivalent
12 records for April 1 through August 7, 2026, sufficient to evaluate Jim
13 Torgeson’s statement that invoices outstanding for two to four
14 months are a routine part of Mesa Sign Shop’s accounts-receivable
15 cycle, together with Documents sufficient to identify each political and
16 nonpolitical customer whose invoice remained outstanding for two to
17 four months and to show, for each, the amount, order completion or
18 delivery date, invoice date, due date, payment terms, and payment
19 date, including but not limited to information referenced in paragraphs
20 5 and 6 of the Declaration.
- 21 7) Documents sufficient to identify the political and nonpolitical
22 customers whose invoices remained outstanding for two to four
23 months, together with Documents showing the amount, order
24 completion or delivery date, invoice date, due date, payment terms,
25
26
27

1 and payment date for each identified transaction, including but not
2 limited to information referenced in paragraph 6 of the Declaration.

3
4 8) Documents sufficient to establish the policies, standards, criteria, or
5 practices used by Mesa Sign Shop during 2025 and 2026 to
6 determine whether a customer is sufficiently creditworthy to receive
7 goods or services without prepayment, including credit policies, credit
8 applications, internal guidelines, and standard terms, including but
9 not limited to information referenced in paragraphs 4, 8, 9, and 10 of
10 the Declaration.

11 9) All Documents and Communications reflecting Mesa Sign Shop's
12 assessment of the creditworthiness of Dr. Heap or its decision to
13 produce or release the Heap Sign Order without prepayment,
14 including Documents concerning his reputation, professional
15 standing, occupation, financial capacity, cash on hand, anticipated
16 revenues, ability to pay, or any other factor considered in making that
17 decision, including but not limited to information referenced in
18 paragraphs 8, 9, and 10 of the Declaration.

19 10) Documents sufficient to identify the "other clients of comparable
20 creditworthiness and order size" referenced in paragraph 8 of the
21 Declaration, and to show, for each, the basis upon which Mesa Sign
22 Shop extended credit without prepayment and the terms of that
23 credit.

24 11) Documents sufficient to establish Mesa Sign Shop's standard
25 practices for collection of unpaid invoices, including when invoices
26

1 are considered due or delinquent and when collection activity
2 ordinarily begins, and all Documents reflecting any request for
3 payment, invoice, statement, reminder, demand, or other collection
4 activity concerning the Heap Sign Order, including but not limited to
5 information referenced in paragraph 5 of the Declaration.
6

7 12) All Documents created after August 7, 2026 relating to invoicing,
8 payment, collection, forgiveness, adjustment, write-off, or other
9 disposition of the amount owed for the Heap Sign Order.

10
11 **TIME AND DATE OF PRODUCTION: 5 p.m., September 3, 2026**

12 **PLACE OF PRODUCTION:** Arizona Citizens Clean Elections
13 Commission Main Office
14 1110 W. Washington, Ste. 250
15 Phoenix, Arizona 85007

16 **Note:**

17 You have been subpoenaed by the Citizens Clean Elections Commission's
18 Executive Director, whose attorney's name, address and telephone
19 number is: Mary O'Grady, 2929 North Central Ave, Suite 2000
20 Phoenix, AZ 85012, 602-640-9000

21 **Your Duties In Responding to This Subpoena**

22 You have a duty to produce the documents requested as they are kept by
23 you in the usual course of business, or you may organize the documents
24 and label them with the categories set forth in this subpoena.

25 If a claim of privilege is asserted with respect to any Document or you
26 refuse to disclose any Document requested herein on any other ground,
27 state separately for each Document withheld the basis for your claim that
such Document need not be disclosed with such specificity as will permit

1 the Commission or a Court of Law to determine the legal sufficiency of
2 your objection or position.

3 If this subpoena asks you to produce or permit inspection of designated
4 books, papers, documents, tangible things, or the inspection of premises,
5 you need not appear to produce the items unless the subpoena states you
6 must appear. If relevant records are not in your possession, please provide
an index identifying the records and who is in possession of such records.

7 Your Right to Object

8 You may object if you feel that you should not be required to respond to
9 the request made. Under A.A.C. R2-20-213, you have a right, prior to the
10 time specified herein for compliance, but in no event more than five days
11 after the receipt of this subpoena, to apply to the Citizens Clean Elections
12 Commission to quash or modify it. Such application must include the
reasons therefore. The Commission may deny the application, quash the
subpoena, or modify the subpoena.

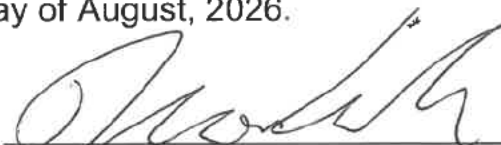
13 **Failure to comply with this subpoena may subject you to proceedings**
14 **in Superior Court to enforce its requirements.**

ADA Notification

**REQUESTS FOR REASONABLE ACCOMMODATIONS FOR PERSONS
WITH DISABILITIES MUST BE MADE TO THE COMMISSION AT LEAST
THREE DAYS IN ADVANCE OF A SCHEDULED PROCEEDING.**

SIGNED AND SEALED this 20th day of August, 2026.

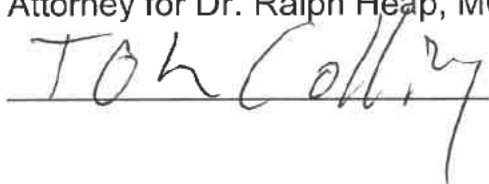
By:



Thomas M. Collins
Executive Director
Citizens Clean Elections
Commission

ORIGINAL of this Subpoena
sent by email this
20th day of August, 2026 to:

Tim La Sota
tim@timlasota.com
Attorney for Dr. Ralph Heap, MUR 26-06





Gmail

Exhibit 4

Thomas Collins <thomas.collins@azcleelections.gov>

Re: Documents re: MUR 26-06, Dr. Heap's repayment obligations, and Debate advisement

1 message

tim timlasota.com <tim@timlasota.com>

Sat, Aug 22, 2026 at 9:58 AM

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

I don't represent Mesa Sign Shop so I can't accept service for them
Sent from my iPhone

On Aug 20, 2026, at 4:55 PM, Thomas Collins <Thomas.Collins@azcleelections.gov> wrote:

Tim

Please find the following:

- 1) A letter from me directing the return of primary funds from Dr. Heap's campaign account pursuant to 16-953 and 16-945.
- 2) An advisement regarding participating candidates' debate obligations.
- 3) A subpoena of Mesa Sign Shop and Mr. Torgeson.

Please let me know as soon as possible if you cannot or do not accept service of the subpoena so I can deliver it by other means to the statutory agent.

Thank you

Tom

--

Thomas M. Collins

Executive Director

Arizona Citizens Clean Elections Commission

www.azcleelections.gov

Office: 602-364-3477

Mobile: 602-397-6362

<MUR 26 06 Dr Ralph Heap 8_20_2026 Advisement on Return of Monies Final.pdf>

<MUR 26 06 Dr Ralph Heap 8_20_2026 Debate advisement Final.pdf>

<MUR 26-06 Heap Mesa Sign Shop Subpoena Final.pdf>



Gmail

Exhibit 5

Thomas Collins <thomas.collins@azcleaselections.gov>

Follow up

1 message

Thomas Collins <thomas.collins@azcleaselections.gov>

Mon, Aug 24, 2026 at 11:46 PM

To: [REDACTED]

Jim

I had neglected to remember I have to take my mom to the doctor tomorrow morning.

In the meantime, here is my recommendation. I'm not permitted to give you legal advice. Your declaration is part of the response of a party that my office is investigating.

I would urge you to retain an attorney of your own if Mr. La Sota cannot do it.

I would recommend [REDACTED]

I say this with respect: for a decade I have heard stories about you dog walking city attorneys much smarter than me.

I think it's worth the time and money for you to consult with someone on this and to do so quickly.

Thank you

Tom

--
Thomas M. Collins
Executive Director
Arizona Citizens Clean Elections Commission
www.azcleaselections.gov
Office: 602-364-3477
Mobile: 602-397-6362

Re: MUR 26-06 Request

1 message

tim timlasota.com <tim@timlasota.com>

Sat, Aug 22, 2026 at 10:01 AM

To: Thomas Collins <Thomas.Collins@azcleaselections.gov>

Tom without waiving any rights of objection, a response by 5 PM Monday is completely unrealistic. I request an extension until the following Monday.

Sent from my iPhone

On Aug 17, 2026, at 4:16 PM, Thomas Collins <Thomas.Collins@azcleaselections.gov> wrote:

Tim
Please see the attached letter.
Thank you
Tom

--
Thomas M. Collins
Executive Director
Arizona Citizens Clean Elections Commission
www.azcleaselections.gov
Office: 602-364-3477
Mobile: 602-397-6362
<MUR 26 06 Dr Ralph Heap 8_17_2026 Request.pdf>



Gmail

Exhibit 7

Thomas Collins <thomas.collins@azcleaselections.gov>

Re: MUR 26-06 Request

1 message

Thomas Collins <thomas.collins@azcleaselections.gov>
To: "tim timlasota.com" <tim@timlasota.com>

Mon, Aug 24, 2026 at 8:25 PM

Tim

A week's extension is fine with me.

I don't want to belabor the point, but statements of the campaign account & the 8,500 in expenses Dr. Heap has reported shouldn't be a heavy lift. These are things I think he'd have on hand as treasurer and under the act.

I'll see you Thursday for the Order request discussion. It'll be virtual.

Thanks,

Tom

On Sat, Aug 22, 2026 at 10:01 AM tim [timlasota.com](mailto:tim@timlasota.com) <tim@timlasota.com> wrote:

Tom without waiving any rights of objection, a response by 5 PM Monday is completely unrealistic. I request an extension until the following Monday.

Sent from my iPhone

On Aug 17, 2026, at 4:16 PM, Thomas Collins <Thomas.Collins@azcleaselections.gov> wrote:

Tim

Please see the attached letter.

Thank you

Tom

--

Thomas M. Collins

Executive Director

Arizona Citizens Clean Elections Commission

www.azcleaselections.gov

Office: 602-364-3477

Mobile: 602-397-6362

<MUR 26 06 Dr Ralph Heap 8_17_2026 Request.pdf>

--

Thomas M. Collins

Executive Director

Arizona Citizens Clean Elections Commission

www.azcleaselections.gov

Office: 602-364-3477

Mobile: 602-397-6362

Discussions

1 message

tim timlasota.com <tim@timlasota.com>

Mon, Aug 24, 2026 at 5:35 PM

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

Tom, as you know, there are a number of Commission rules that contemplate early settlement of enforcement actions. See, e.g., Rule R2-20-216(A) ("Upon a Commission finding of probable cause to believe that the respondent has violated a statute or rule over which the Commission has jurisdiction, the Executive Director shall attempt to settle the matter as authorized by A.R.S. § 16 957(A) by informal methods of administrative settlement or conciliation, and shall attempt to reach a tentative conciliation agreement with the respondent.")

I would like to discuss this with you. It seems as if the alternative is a lengthy process in the middle of an election.

Thank you,

Timothy La Sota

Principal



Timothy A. La Sota PLC
2198 E. Camelback Rd., Ste 305
Phoenix, AZ 85016
(o) (480) 207-1881
(m) (602) 515-2649
tim@timlasota.com

-
This transmission may be protected by the attorney client privilege or the attorney work product doctrine. If you are not the intended recipient, please delete all copies of the transmission and advise the sender immediately.

Re: Discussions

1 message

Thomas Collins <thomas.collins@azcleelections.gov>
To: "tim timlasota.com" <tim@timlasota.com>

Mon, Aug 24, 2026 at 7:41 PM

If you have something to propose I suppose the easiest thing would be for you to send it to Mary, who I work with.

On Monday, August 24, 2026, tim [timlasota.com](mailto:tim@timlasota.com) <tim@timlasota.com> wrote:

Tom, as you know, there are a number of Commission rules that contemplate early settlement of enforcement actions. See, e.g., Rule R2-20-216(A) ("Upon a Commission finding of probable cause to believe that the respondent has violated a statute or rule over which the Commission has jurisdiction, the Executive Director shall attempt to settle the matter as authorized by A.R.S. § 16 957(A) by informal methods of administrative settlement or conciliation, and shall attempt to reach a tentative conciliation agreement with the respondent.")

I would like to discuss this with you. It seems as if the alternative is a lengthy process in the middle of an election.

Thank you,

Timothy La Sota
Principal



Timothy A. La Sota PLC
2198 E. Camelback Rd., Ste 305
Phoenix, AZ 85016
(o) (480) 207-1881
(m) (602) 515-2649
tim@timlasota.com

-
This transmission may be protected by the attorney-client privilege or the attorney work product doctrine. If you are not the intended recipient, please delete all copies of the transmission and advise the sender immediately

--
Thomas M. Collins
Executive Director
Arizona Citizens Clean Elections Commission
www.azcleelections.gov
Office: 602-364-3477
Mobile: 602-397-6362



Heap request for Notice Under ARS 16-957

1 message

Thomas Collins <thomas.collins@azcleelections.gov>

Tue, Aug 25, 2026 at 12:29 PM

To: Paula Thomas [REDACTED], "Morgan, Craig" [REDACTED], "tim@timlasota.com" <tim@timlasota.com>

Bcc: [REDACTED]

Commissioners and Mr. La Sota

Please see the correspondence related to Mr. La Sota's request and a related draft order.

Paula, these are the items from me for the Dr. Heap item.

Thank you

Tom

--
Thomas M. Collins
Executive Director
Arizona Citizens Clean Elections Commission
www.azcleelections.gov
Office: 602-364-3477
Mobile: 602-397-6362

3 attachments

MUR 2606 Heap Compliance Letter to Commission and LaSota 8_25_2026.pdf
297K



MUR 2606 Heap Draft Compliance Order 8_25.pdf
147K



Collins.request notice.pdf
135K

Exhibit 11



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

Via E-Mail

August 25, 2026

Clean Elections Commissioners
Mailing & Delivery
1802 W. Jackson St. #129
Phoenix, AZ

Tim La Sota
Counsel for Dr. Ralph Heap
2198 E. Camelback Road, Suite 305
Phoenix, AZ 85016

Re: MUR 26-06 Enforcement Process Overview

Dear Commissioners and Mr. La Sota:

By letter dated August 18, 2026, Mr. La Sota requested a notice that is required by A.A.C. R2-20-208(A). This is a notice to a respondent issued after a Commission reason-to-believe finding that “set[s] forth the sections of the statute or rule alleged to have been violated and the alleged factual basis supporting that finding.” A.A.C. R20-208(A). The rule implements A.R.S. § 16-957(A)’s requirement that after a reason to believe finding, the Commission “shall serve on that person an order stating with reasonable particularity the nature of the violation and requiring compliance within fourteen days.” We often refer to this notice as a compliance order. The request is attached to the email delivering this letter.

As the Commission considers the notice, I write to address the purpose and operation of the compliance process established by A.R.S. § 16-957. Because that process governs both the opportunity afforded to a respondent following a reason-to-believe finding and the Commission’s authority to proceed thereafter, it is useful to set out the statutory framework and the procedures established by the Commission’s existing enforcement rules.

The following discussion is intended to clarify how the enforcement procedures in statute and Commission rules operate together and, in particular, the respective roles of compliance, explanation, investigation, probable-cause proceedings, settlement, and any eventual determination concerning penalties.

Section 16-957

Section 16-957 sets out a step-by-step enforcement process. It begins when the Commission finds reason to believe that a person violated the Act. The Commission then serves an order “stating with reasonable particularity the nature of the violation and requiring compliance within fourteen days.” A.R.S. § 16-957(A). During those fourteen days, the alleged violator may “provide any explanation to the commission, comply with the order, or enter into a public administrative settlement with the commission.” *Id.* If the Commission later finds that the person “remains out of compliance,” the statute provides for a civil penalty. A.R.S. § 16-957(B). But the Commission may reduce or excuse that penalty if it makes findings of fact and conclusions of law showing “good cause.” *Id.*

The Commission’s rules fill out this process. Upon a reason-to-believe finding, R2-20-208(A) requires the Commission to notify the respondent of the finding, setting forth the sections alleged to have been violated and the factual basis supporting it, and to serve an order requiring compliance within fourteen days. Like the statute, the rule says that the respondent may provide an explanation, comply with the order, or enter into a public administrative settlement. *Id.*

The reason-to-believe finding also starts an investigation. A.A.C. R2-20-209(A). The investigation may include audits, field work, and other efforts to gather information. A.A.C. R2-20-209(B). The Commission may also require sworn written answers and use subpoenas to obtain testimony and records. A.A.C. R2-20-209 to -211.

After the investigation, the matter moves to probable-cause briefing. The Executive Director prepares a brief that addresses “the factual and legal issues of the case” and recommends whether there is probable cause to believe that a violation “has occurred or is about to occur.” A.A.C. R2-20-214(A). The respondent receives the Executive Director’s brief and may file a response addressing those issues. A.A.C. R2-20-214(B)–(C). The Commission then decides whether there is probable cause to believe that the respondent “has violated” a

statute or rule. A.A.C. R2-20-215(A). If so, the Commission issues an order stating “the nature of the violation, pursuant to A.R.S. § 16-957” *Id.*

A probable-cause finding does not end the process. The rules next require an effort to resolve the matter through settlement or conciliation. A.A.C. R2-20-216(A). If the matter is not resolved and the respondent “remains out of compliance,” the Executive Director may recommend a civil penalty under § 16-957(B). A.A.C. R2-20-217(A). The rules allow further efforts to settle the matter even after the Commission authorizes a penalty. A.A.C. R2-20-217(C).

The statute and rules therefore address different questions at different stages.

1. First, is there reason to believe a violation occurred?
2. Next, what does the respondent do during the fourteen-day period? What does the investigation show?
3. Is there probable cause to find that the respondent violated the law?
4. Can the matter be settled?
5. Does the respondent remain out of compliance? And, if so, should a penalty be imposed, reduced, or excused? A.R.S. § 16-957; A.A.C. R2-20-208 to - 217.

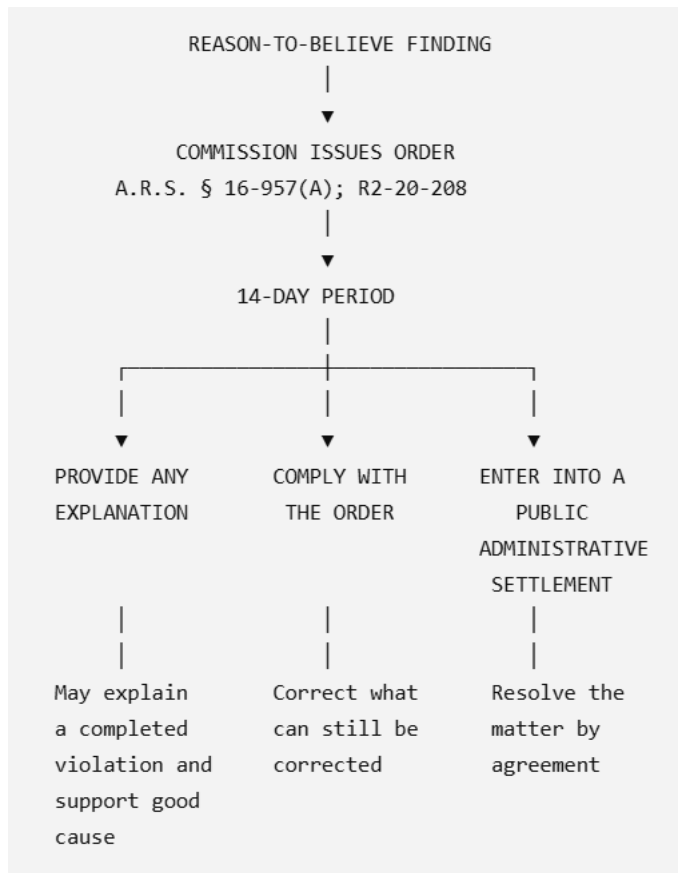
This structure helps explain what the fourteen-day compliance order does and does not require. The order gives the respondent a real opportunity to comply before a civil penalty is imposed. But neither the statute nor the rules say that every violation must still be capable of being completely remedied when the order is issued. The statute also sets no deadline for the Commission to issue the order after a reason to believe determination occurs. *See* A.R.S. § 16-957. This letter turns to these issues next.

Compliance Orders Need Not Provide for Complete Compliance

As detailed above, A.R.S. § 16-957 provides a respondent with several opportunities to address an alleged violation before the Commission imposes a civil penalty. After the Commission finds reason to believe a violation occurred, it serves an order stating with reasonable particularity the nature of the violation and requiring compliance within fourteen days. During that fourteen-day period, the respondent may provide any explanation to the Commission, comply with the order, or enter into a public administrative settlement with the Commission. At the end of the period, if the Commission finds that the respondent remains out of

compliance, it may assess a civil penalty, subject to its authority to reduce or excuse the penalty for good cause. A.R.S. § 16-957(A)–(B).

The fact that the statute uses the terms “order requiring compliance” and “remains out of compliance” can lead some to reach the incorrect conclusion that a “compliance order” is a get out trouble free card the Commission must offer. That is not so. Some violations simply cannot be undone and so compliance may not be possible. Section 16-957(B) provides for this common occurrence.



Take a missed filing deadline as an easy example. Once the deadline passes, a person cannot go back in time and file on time. The person may file the missing report, but that does not change the fact that it was late. The person will “remain[] out of compliance,” A.R.S. § 16-957(B), for the period of time when the report was not filed but should have been. For that period of time, the public was deprived of information it was required by law to have access to, and that lack of required public information cannot be undone by a late filing. By “requiring compliance within fourteen days” the statute does not mean that every violation can be completely cured. That reading would suggest, for example, that a late-filing violation could evade all penalties if the candidate files the late reports. Nothing in § 16-957 says that

completed violations are exempt from enforcement and penalties. The statute makes this plain by offering respondent other choices during the fourteen-day period. Section 16-957(A) does not say only that the respondent may comply. It says the respondent may “provide any explanation,” comply with the order, or enter into a public administrative settlement. The Commission repeated those same choices in R2-20-208(A).

The right to “provide any explanation” is especially important for a violation that cannot be undone. A person who missed a filing deadline cannot make the filing

timely. But the person can file the late report and explain why the deadline was missed. That explanation may help the Commission decide whether there is “good cause for reducing or excusing the penalty,” as § 16-957(B) expressly allows. The fourteen-day period therefore still serves an important purpose even when the original violation cannot be erased. A.R.S. § 16-957(A)–(B); *Stambaugh v. Killian*, 242 Ariz. 508, 509 ¶ 7 (2017) (explaining that statutory terms are read in context, considering the statute as a whole and, when appropriate, statutes *in pari materia* to give effect to all relevant provisions.).

The opposite reading, that a compliance order must mean full remediation of all violations is possible, would limit to the Commission’s good-cause authority that is provided for in the statute. If a completed violation cannot go through the enforcement process because it is considered to be remedied by belated respondent actions, the Commission could never decide whether good cause exists to reduce or excuse a penalty for that violation. In other words, the Commission could consider good cause for violations that can be cured but were not, but not for violations that cannot be cured but for which some late corrective action was taken. Section 16-957 does not make that distinction. In both situations, the Commission may, at the appropriate time in the enforcement process, exercise good cause to establish penalties. In fact, a completed violation is the situation where the respondent’s right to “provide any explanation” matters most. *See Nicaise v. Sundaram*, 245 Ariz. 566, 568 ¶ 11 (2019) (“A cardinal principle of statutory interpretation is to give meaning, if possible, to every word and provision so that no word or provision is rendered superfluous.”).

The Commission has adopted that reflect this statutory framework. The rules call for an investigation after a reason to believe finding. R2-20-209(A). R2-20-214 then requires briefing on whether there is probable cause to believe that a violation “has occurred or is about to occur.” Most importantly, R2-20-215(A) directs the Commission to decide whether there is probable cause to believe that the respondent “has violated” the law and, if so, to issue an order stating “the nature of the violation.”

The rules do not ask only whether a respondent is committing an ongoing violation that can still be stopped. They ask whether a violation “has occurred” and whether the respondent “has violated” the law. Those decisions come after the order requiring compliance within fourteen days and after an investigation. The rules

therefore expressly provide for the Commission to consider past violations after the fourteen-day period has run. A.A.C. R2-20-208, -209, -214, -215.

Reading § 16-957 another way would add several limits that the voters did not put in the statute. It would create an exemption for completed violations, impose an unstated deadline for Commission enforcement, and prevent the Commission from considering good cause for violations that cannot be undone. In other words, it would render meaningless substantial remedial powers of the Commission.

The deadline to issue the order

Although Mr. La Sota has demanded an order under R2-20-208(A), the statute does not provide a deadline for its issuance. Section 16-957 does not impose a deadline for the Commission to issue a compliance order after determining reason to believe. That is consistent with the enforcement process established by the Commission's rules, which allows the Commission to receive a complaint, determine whether there is reason to believe a violation occurred, and then investigate and develop the factual and legal issues before the matter proceeds through probable-cause review. *See* A.A.C. R2-20-208 to -215. A fixed deadline for issuing the compliance order would restrict that investigative and enforcement process, and neither § 16-957 nor the Commission's rules impose one.

To be sure, if the Commission were to conclude that it should issue the Compliance order, Mr. La Sota's request for the notice should not drive the timing of the notice. The Commission made its reason-to-believe finding which triggers the staff investigation under R2-20-209(A). Mr. LaSota had the opportunity to respond to the Complaint, received the Executive Director's reason-to-believe recommendation, and had the opportunity to address the issues at the Commission meeting. Commission staff cooperated with Mr. La Sota's request for an extension to respond to the complaint initially and, more recently, approved Mr. La Sota's request for an additional week to produce copies of Dr. Heap's campaign bank account statements as requested by Commission staff.

Conclusion

I have informed Mr. La Sota I have no objection to the Commission considering this issue as an agenda item as soon as possible. I have attached a draft order for the Commission's consideration to the email delivering this letter.

Sincerely,

Thomas M. Collins
Executive Director

Cc: Craig Morgan, Independent Legal Advisor to the Commission
Paula Thomas, Executive Officer



Gmail

Exhibit 12

Thomas Collins <thomas.collins@azcleaselections.gov>

Mesa Sign Shop Subpeona

1 message

Admin . [REDACTED]
To: thomas.collins@azcleaselections.gov

Thu, Aug 27, 2026 at 9:52 AM

Sir,

I am trying to retain an attorney for this situation. I will say that I am not trying to be difficult nor obstruct your investigation in any way, shape or form.

It's in my best interest to make sure I comply with the best and most relevant information and will do so as told with an attorney involved. It does appear that many attorneys have conflicts, so give me a few days as to not be "non-compliant."

Respectfully,

Jim Torgeson
[REDACTED]



Mesa Sign Shop

For all your Sign & Printing Needs | *Experts in Real Estate & Political printing*

signs - banners - business/palm cards - flyers/brochures - decorated apparel - vehicle graphics

Check out MesaSignPromotions.com for your Advertising & Promotional needs

[REDACTED]

[REDACTED]

MesaSignShop.com

[REDACTED]

NEED SWAG?



Gmail

Exhibit 13

Thomas Collins <thomas.collins@azcleelections.gov>

Re: Mesa Sign Shop Subpeona

1 message

Thomas Collins <thomas.collins@azcleelections.gov>

Thu, Aug 27, 2026 at 1:38 PM

To: "Admin ." [REDACTED]

Mr. Torgeson (Jim)

We can extend the deadline for objections and compliance by one week. That would make your objections due Monday September 7, 2026, and the deadline for compliance with the subpoena would be Tuesday, September 15, 2026.

Thank you for reaching out,

Tom

On Thu, Aug 27, 2026 at 9:53 AM Admin . <[REDACTED]> wrote:

Sir,

I am trying to retain an attorney for this situation. I will say that I am not trying to be difficult nor obstruct your investigation in any way, shape or form.

It's in my best interest to make sure I comply with the best and most relevant information and will do so as told with an attorney involved. It does appear that many attorneys have conflicts, so give me a few days as to not be "non-compliant."

Respectfully,

Jim Torgeson
[REDACTED]

--



Mesa Sign Shop

For all your Sign & Printing Needs | *Experts in Real Estate & Political printing*

signs - banners - business/palm cards - flyers/brochures - decorated apparel - vehicle graphics

Check out [MesaSignPromotions.com](https://mesasignpromotions.com) for your Advertising & Promotional needs

480-593-7500

admin@mesasignshop.com

MesaSignShop.com

756 W Main st. Mesa, Az 85201

NEED SWAG?

Compliance Notice as Approved 8_27

1 message

Thomas Collins <thomas.collins@azcleaselections.gov>

Thu, Aug 27, 2026 at 5:01 PM

To: "tim@timlasota.com" <tim@timlasota.com>, "Morgan, Craig" [REDACTED]

Mr. La Sota and Mr. Morgan

Please find for your use and records the order as approved.

Thank you

Tom

--
Thomas M. Collins
Executive Director
Arizona Citizens Clean Elections Commission
www.azcleaselections.gov
Office: 602-364-3477
Mobile: 602-397-6362

 **MUR 2606 Heap Compliance Order 8_27_26 as a approved.pdf**
147K

In re: MUR 26-06, Ralph Heap
DRAFT Compliance Order

Pursuant to A.R.S. § 16-957 and A.A.C. R2-20-208, the following compliance order is issued:

Background

1. Dr. Ralph Heap is a participating candidate for the Arizona Corporation Commission.
2. As a participating candidate, Dr. Heap agreed to the requirements of the Citizens Clean Elections Act and Commission rules, including restrictions on the source and amount of contributions, limits on personal monies, the requirement to conduct campaign financial activity through a single campaign account, campaign-finance reporting requirements, and restrictions on incurring debt before qualifying for Clean Elections funding.
3. The Commission received a complaint from Lisa Everett alleging that Dr. Heap authorized campaign signs placed throughout the state but did not account for the expense of those signs on his campaign-finance reports. The Commission also received sworn statements concerning the signs and a sworn response submitted by Dr. Heap's counsel.
4. Jim Torgeson, owner of Mesa Sign Shop, stated that Mesa Sign Shop received an order for signs for Dr. Heap's candidacy in April 2026 and completed the order in late May 2026. His declaration did not state the number of signs ordered or the price. It stated that an invoice had been prepared but had not yet been sent to Dr. Heap.
5. Dr. Heap was certified as a participating candidate on March 20, 2026. He was notified on July 20, 2026 that he had submitted sufficient qualifying contributions to qualify for Clean Elections funding, but funding was not authorized because he had not submitted the declaration required by A.A.C. R2-20-106(A).
6. The Commission found reason to believe that violations of the Citizens Clean Elections Act and Commission rules may have occurred and authorized an investigation. The Executive Director's Recommendation along with its exhibits are attached hereto and incorporated by this reference.

The sworn statement of Gina Swoboda is attached hereto and incorporated by reference.

Violations

I. There is reason to believe that Dr. Heap violated A.R.S. § 16-941(A).

Section 16-941(A) limits the sources and amounts of contributions a participating candidate may accept and limits the amount of the candidate's personal monies that may be contributed to the campaign.

A. Mesa Sign Shop contribution.

Mesa Sign Shop produced campaign signs ordered for Dr. Heap's candidacy in April 2026 and completed the order in late May 2026. The transaction was not reported by the campaign. The available evidence indicates that Mesa Sign Shop provided an advance, loan, or other thing of value for the purpose of influencing Dr. Heap's election. The extension-of-credit exemption does not apply because the evidence does not establish that credit was extended on the committee's behalf, on substantially similar terms to nonpolitical debtors of similar risk and size of obligation, or that Mesa Sign Shop made a commercially reasonable attempt to collect the debt.

Rather, Mesa Sign Shop Declaration emphasized that the advance or loan was offered because of Dr. Heap's personal credit, without consideration for the campaign or its circumstances at all. Because there is no exception to allow Dr. Heap to accept such a loan or advance from an LLC, for his campaign there is reason to believe that Dr. Heap violated A.R.S. §16-941(A).

B. Dr. Heap's loan or expenditure

Mesa Sign Shop's declaration states that it relied on Dr. Heap's personal character, profession, financial capacity, and creditworthiness in extending credit. To the extent Dr. Heap personally assumed or financed the campaign obligation, that transaction was a contribution or loan to his campaign and was subject to the limits in A.R.S. § 16-941(A), including the applicable limit on personal monies.

II. There is reason to believe that Dr. Heap violated A.R.S. § 16-948(A).

Section 16-948(A) requires a participating candidate to conduct all financial activity through a single campaign account of the candidate's campaign committee. Mesa Sign Shop's declaration indicates that the extension of credit was based on Dr. Heap personally rather than on the committee. Additionally, the transaction is omitted from Dr. Heap's campaign finance reports. There is therefore reason to believe that a campaign financial transaction occurred outside the campaign's single campaign account in violation of A.R.S. § 16-948(A).

III. There is reason to believe that Dr. Heap violated A.R.S. §§ 16-947 and 16-942(B) by failing to report the Mesa Sign Shop transaction.

The campaign-finance reports do not account for the April 2026 sign order, the resulting obligation to Mesa Sign Shop, or any related personal loan or contribution by Dr. Heap. Because the extension-of-credit exemption does not apply, the transaction was reportable. The agreement with Mesa Sign Shop should have been reported when it was made. Failure to include this information in the campaign finance reports establishes reason to believe that Dr. Heap violated A.R.S. §§ 16-947 and 16-942(B).

IV. There is reason to believe that Dr. Heap violated A.A.C. R2-20-104(D)(6).

Before qualifying for Clean Elections funding, a participating candidate may not incur debt or make an expenditure in excess of cash on hand. Dr. Heap's campaign reports indicate that the campaign did not have sufficient cash on hand to pay for the Mesa Sign Shop order when it was placed in April, when the order was completed in late May, or before Dr. Heap qualified for Clean Elections funding. The available evidence therefore provides reason to believe that the campaign incurred debt in excess of cash on hand before qualification in violation of A.A.C. R2-20-104(D)(6).

Order

Within fourteen (14) days after service of this Order, Dr. Heap shall:

1. Amend his campaign-finance reports to disclose the Mesa Sign Shop transaction, including the date the obligation was incurred, the full amount of the obligation, and the nature of the transaction, consistent with the Act and Commission rules.

2. Amend his campaign finance reports to disclose any personal loan, advance, payment, or other contribution by the candidate arising from or used to satisfy the Mesa Sign Shop obligation, including the amount and date of each transaction.
3. Conduct all campaign financial activity through the single campaign account required by A.R.S. § 16-948(A), including any payment to Mesa Sign Shop and any repayment of a loan or advance by Dr. Heap.
4. Provide documentation sufficient to establish the accuracy of any amended campaign finance reports, which shall include the complete terms and amount of the Mesa Sign Shop transaction (“Heap Sign Order”), including
 - a. All Documents relating to the Heap Sign Order, including any order, work order, quote, estimate, invoice, proof, production record, unit price, total price, date ordered, date completed, and date made available for pickup, pickup or delivery record, account statement, and the payment terms applicable to the Heap Sign Order, including but not limited to information referenced in paragraphs 3, 4, and 5 of Mr. Torgeson’s Declaration. All Documents and Communications relating to the content, design, placement, or distribution of the signs comprising the Heap Sign Order, including any Communication between Mesa Sign Shop and Dr. Heap, including but not limited to information referenced in paragraph 11 of Mr. Torgeson’s Declaration, and communications with any other person concerning the Heap Sign Order.
 - b. All Documents and Communications reflecting Mesa Sign Shop’s assessment of the creditworthiness of Dr. Heap or its decision to produce or release the Heap Sign Order without prepayment, including Documents concerning his reputation, professional standing, occupation, financial capacity, cash on hand, anticipated revenues, ability to pay, or any other factor considered in making that decision, including but not limited to information referenced in paragraphs 8, 9, and 10 of Mr. Torgeson’s Declaration. This paragraph only applies to the the participating candidate and his campaign committee.
5. All Documents created after August 7, 2026 relating to invoicing, payment, collection, forgiveness, adjustment, write-off, or other disposition of the amount owed for the Heap Sign Order.
6. Provide documentation sufficient to establish that the campaign is using a single campaign account for all of its transactions:
 - a. Copies of any and all statements from any financial accounts that have been used for campaign purposes, including copies of all electronic transactions or cleared/cancelled checks issued.
 - b. Copies of any and all agreements to provide any services to the candidate or the campaign.
 - c. Copies of any and all receipts, invoices, or records regarding any service provided to the campaign, any in-kind contribution, any use of personal monies or any other transaction of value.

With respect to this paragraph, if Dr. Heap or any agent of his committee did not receive a receipt or written agreement or confirmation for a particular transaction or in-kind contribution, please specify the nature of the transaction or in-kind contribution, the persons involved and the date Dr. Heap or any agent of his committee received the particular good or service.

7. Provide an explanation regarding Dr. Heap's apparent violations of A.R.S. §§ 16-941, 16-947, 16-948, and A.A.C. R2-20-104(D)(6).

The Commission's investigation shall continue during and after the compliance period as provided by law and Commission rules. This is not an appealable agency action.

Approved this 27th day of August

Vote of the Clean Elections Commission



Gmail

Exhibit 15

Thomas Collins <thomas.collins@azcleelections.gov>

Notice of withdrawal

1 message

tim timlasota.com <tim@timlasota.com>

Fri, Aug 28, 2026 at 10:42 AM

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

Please see attached correspondence.

Timothy La Sota

Principal



Timothy A. La Sota PLC
2198 E. Camelback Rd., Ste 305
Phoenix, AZ 85016
(o) (480) 207-1881
(m) (602) 515-2649
tim@timlasota.com

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Collins.8.28.26 withdraw.pdf

137K

Timothy A. La Sota, PLC
2198 E. Camelback Rd., Suite 305
Phoenix, Arizona 85016
P 602-515-2649
tim@timlasota.com

August 28, 2026

Via email to:

Mr. Thomas Collins
Executive Director
Arizona Citizens Clean Elections Commission
1110 W. Washington Street, Suite 250
Phoenix, Arizona 85007

Dear Mr. Collins:

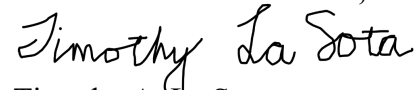
This firm represents Dr. Ralph Heap.

Pursuant to Arizona Administrative Code Rule R2-20-108(A). Dr. Heap elects to withdraw as a participating candidate under the Arizona Citizens Clean Elections Act, Arizona Revised Statutes § 16-941 *et seq.*

The reason for the withdrawal are as stated by me at the hearing yesterday. Dr. Heap will be returning all funds to Clean Elections, unspent.

Very truly yours,

TIMOTHY A. LA SOTA, PLC



Timothy A. La Sota



RALPH HEAP

Approved this 28th day of August, 2026:

**Ralph Heap Notice of Withdrawal**

1 message

Thomas Collins <thomas.collins@azcleelections.gov>

Fri, Aug 28, 2026 at 11:13 AM

To: "Morgan, Craig" [REDACTED], Paula Thomas [REDACTED], "tim@timlasota.com"

<tim@timlasota.com>

Bcc: [REDACTED]

Dear Commissioners:

Today we received the attached letter from Mr. La Sota (copied on this email) regarding Dr. Heap's decision to withdraw from the clean funding program.

He states that "The reason for the withdrawal are as stated by me at the hearing yesterday." and that "Dr. Heap will be returning all funds to Clean Elections, unspent."

He seeks withdrawal under A.A.C. R2-20-108(a), which states:

A candidate may voluntarily request termination of his or her participating candidate status at any time prior to notification by the Commission that such candidate has qualified for Clean Elections funding. To withdraw from participating candidate status, a candidate shall send a letter to the Commission stating the candidate's intent to withdraw and the reason for the withdrawal. The candidate shall not accept any private monies until the withdrawal is approved by the Commission. The Commission shall act on the withdrawal request within seven days. If the Commission takes no action within the seven-day time period, the withdrawal is automatic.

Accordingly, this raises, in my view, the same issues the Commission addressed at its meeting on August 4.

Sincerely,

Tom Collins

--
Thomas M. Collins
Executive Director
Arizona Citizens Clean Elections Commission
www.azcleelections.gov
Office: 602-364-3477
Mobile: 602-397-6362

----- Forwarded message -----

From: "tim timlasota.com" <tim@timlasota.com>

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

Cc:

Bcc:

Date: Fri, 28 Aug 2026 17:42:00 +0000

Subject: Notice of withdrawal

**Re: Ralph Heap Notice of Withdrawal**

1 message

Thomas Collins <thomas.collins@azcleelections.gov>

Fri, Aug 28, 2026 at 11:51 AM

To: "Morgan, Craig" [REDACTED]

Cc: Paula Thomas [REDACTED], "tim@timlasota.com" <tim@timlasota.com>

Craig and Tim,

My recommendation would be that the Commission take this up within 1 week.

Thank you

Tom

On Fri, Aug 28, 2026 at 11:16 AM Morgan, Craig [REDACTED] wrote:

How can I be of service here?

Taft/**Craig Morgan**

Phoenix Partner-In-Charge

2555 East Camelback Road, Suite 1050
Phoenix, AZ 85016

*Admitted in Arizona and New Mexico

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NOREPMorgan

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DISCMorgan

From: Thomas Collins <thomas.collins@azcleelections.gov>**Sent:** Friday, August 28, 2026 11:13 AM**To:** Morgan, Craig [REDACTED] Paula Thomas [REDACTED]; tim@timlasota.com**Subject:** Ralph Heap Notice of Withdrawal

Dear Commissioners:

Today we received the attached letter from Mr. La Sota (copied on this email) regarding Dr. Heap's decision to withdraw from the clean funding program.

He states that "The reason for the withdrawal are as stated by me at the hearing yesterday." and that "Dr. Heap will be returning all funds to Clean Elections, unspent."