

**STATE OF ARIZONA**  
**CITIZENS CLEAN ELECTIONS COMMISSION**

MUR: No. 14-005 KEN BENNETT

STATEMENT OF REASONS BY EXECUTIVE DIRECTOR

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On behalf of the Citizens Clean Elections Commission (“Commission”), the Executive Director hereby provides the Statement of Reasons.

**I. Procedural Background**

On April 17, 2014, Timothy La Sota (“Complainant”) filed a complaint (“Complaint”) against Ken Bennett (“Respondent”), a participating candidate for Governor, alleging the Respondent violated Arizona’s campaign finance laws by accepting a contribution from the Arizona Correctional Peace Officers Association PAC (“ACPA”) (**Exhibit A**). On April 25, 2014, Respondent submitted his Response to the Complaint (**Exhibit B**). Complainant filed a supplement to the Complaint on April 28, 2014 (**Exhibit C**). Respondent submitted his supplemental Response on May 8, 2014 (**Exhibit D**).

**II. Factual Background**

On November 25, 2013, ACPA purchased magnetic signs from Arrowhead Signs totaling \$348.00 (as reported on ACPA’s January 31<sup>st</sup> Campaign Finance Report) (**Exhibit E**). The magnetic signs state, “Law Enforcement Supports Bennett for Governor” and “Paid for by Arizona Correctional Peace Officers Association PAC” (**Exhibit F**). In January 2014, Respondent paid ACPA \$60, from personal funds, for two of the magnetic signs. Respondent has displayed the magnetic signs on his personal vehicle since making the purchase.

**III. Legal Background, Alleged Violations, and Responses**

**A. Accepted Prohibited Campaign Contribution**

A.R.S. § 16-901(5) defines a contribution as “any gift, subscription, loan, advance or deposit of money or anything of value made for the purpose of influencing an election.” An in-kind contribution is a contribution of a good or service or anything of value and not a monetary contribution. *Id.* § 16-901(15). A.R.S. §§ 16-941(A) and -945(A) prohibit participating candidates from accepting early contributions from any entity other than an individual. Upon applying for certification as a participating candidate, the candidate certifies, under oath, that “the candidate will comply with the requirements of § 16-941, subsection A during the remainder of the election cycle and, specifically, will not accept private contributions” A.R.S. § 16-947(B)(3).

Complainant alleges Respondent violated A.R.S. §§ 16-941(A), -943(A) and -945(A) by accepting a prohibited contribution (the magnetic signs) from a political action committee. Complainant also argues Respondent’s certification as a participating candidate is not valid under A.R.S. § 16-947(B)(3) due to the alleged violation of A.R.S. § 16-941(A).

Respondent argues the signs were purchased from ACPA with personal funds and will be reported on his June 30 campaign finance report as a personal in-kind contribution. Respondent argues the personal in-kind contribution does not violate A.R.S. §16-941(A) and in fact, such contributions are permitted under A.R.S. §16-941(A)(2) which allows participating candidates to use a limited amount of personal monies for campaign expenditures.

### **B. Independent Expenditure Violation**

A.R.S. §16-901(14) provides the legal standard for an independent expenditure. “‘Independent expenditure’ means an expenditure by a person or political committee, other than a candidate’s campaign committee, that expressly advocates the election or defeat of a clearly identified candidate, that is made without cooperation or consultation with any candidate or

committee or agent of the candidate and that is not made in concert with or at the request or suggestion of a candidate, or any committee or agent of the candidate.”

In his supplemental complaint, Complainant alleges that the magnetic signs fail to meet the definition of “independent expenditure” set forth at A.R.S. §16-901(14). Rather, Complainant believes the ACPA’s expenditure meets the definition of an in-kind contribution because Respondent allegedly coordinated with ACPA to make an expenditure on his behalf. Complainant argues the magnetic signs state they were “Paid for by Arizona Correctional Peace Officers Association PAC” (in accordance with A.R.S. §16-912) rather than Respondent’s campaign committee and if the Respondent’s campaign committee paid for the signs it should be correctly displayed on the sign. Complainant uses this as an example of the coordination between the two committees.<sup>1</sup>

In his supplemental response, Respondent states that upon personally purchasing the magnetic signs from ACPA, he didn’t think to alter the “paid for by” disclaimer on the signs. Respondent also states there was no coordination or cooperation between his campaign and ACPA for the magnetic sign expenditure. Respondent states ACPA printed and purchased the signs without his knowledge; he only knew about and purchased the signs from ACPA after the magnetic signs had already been printed.

#### **IV. Analysis**

Arizona law defines “independent expenditure” in part as “an expenditure by a person or a political committee, *other than a candidate’s campaign committee*, that expressly advocates the election or defeat of a clearly identified candidate.” A.R.S. § 16-901(14). The issue here is whether Respondent accepted an in-kind contribution by purchasing two magnetic signs that were, under these facts, otherwise produced by the ACPA “without cooperation or consultation

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<sup>1</sup> Nothing in the Complaint, nor the subsequent materials provided by either Complainant or Respondent or reviewed by the Commission indicates that the value of the signs is in dispute.

with any candidate . . . and . . . not made in concert with or at the request or suggestion of a candidate.” See A.R.S. § 16-917 (“An expenditure by a political committee . . . that does not meet the definition of an independent expenditure is an in-kind contribution to the candidate and a corresponding expenditure by the candidate unless otherwise exempted.”); see also F.E.C Advisory Opinion 2011-11 at 9 (explaining that where company made independent expenditure advertisements for distribution by a committee, they would constitute in-kind contributions). In this case the two signs were produced without coordination and were fully paid for by the Respondent after they were produced for ACPA. Respondent will report the expenditure on his June 30th Campaign Finance Report. Consequently, the Commission need not address any other issue and should take no further action.

Nor is there a violation of § 16-912(A). That subsection “does not apply to bumper stickers, pins, buttons, pens and similar small items on which the statements . . . to signs paid for by a candidate with campaign monies or by a candidate's campaign committee . . .” Because the paid for by is not required for a candidate expenditure, an incorrect paid for by in this case is not a violation of the law. How Respondent chooses to address the potential confusion is in his discretion.

#### **V. Investigation After Reason to Believe Finding**

If the Commission determines by an affirmative vote of at least three (3) of its members that it has reason to believe a respondent has violated a statute or rule over which the Commission has jurisdiction, the Commission shall notify such respondent of the Commission's finding setting forth: (i) the sections of the statute or rule alleged to have been violated; (ii) the alleged factual basis supporting the finding; and (iii) an order requiring compliance within fourteen (14) days. During that period, the Respondent may provide any explanation to the


Commission, comply with the order, or enter into a public administrative settlement with the Commission. A.R.S. § 16-957(A) & A.A.C. R2-20-208(A).

After the Commission finds reason to believe that a violation of a statute or rule over which the Commission has jurisdiction has occurred, the Commission shall conduct an investigation. A.A.C. R2-20-209(A). The Commission may authorize the Executive Director to subpoena all of the Respondent's records documenting disbursements, debts, or obligations to the present, and may authorize an audit.

Upon expiration of the 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. A.A.C. 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 of an order and assess civil penalties pursuant to A.R.S. § 16-957(B). A.A.C. R2-20-217.

Dated this 14<sup>th</sup> day of May, 2014.

By:   
Thomas M. Collins, Executive Director

# EXHIBIT A

\*14 APR 17 PM 4 55 CCEC

Timothy A. La Sota

303 W. Stella Ln.  
Phoenix, Arizona 85013

April 17, 2014

Mr. Thomas Collins  
Executive Director  
Arizona Clean Elections Commission  
1616 W. Adams, Suite 110  
Phoenix, AZ 85007

Re: Complaint pursuant to R2-20-204, Arizona Administrative Code

Dear Mr. Collins:

Pursuant to R2-20-204 of the Arizona Administrative Code, I write to inform you of violations of the Arizona Clean Elections Act committed by the candidate committee Bennett for Governor and Ken Bennett (collectively, the Respondent). I also write to point out that as a result of these violations, Bennett for Governor's certification as a participating candidate under the Arizona Clean Elections Act is invalid and must be rescinded by the Clean Elections Commission. Unless noted, all factual assertions are based on my personal knowledge.

As you know, as a Clean Elections candidate, Ken Bennett is strictly prohibited from accepting any contributions other than "early contributions only from individuals..." A.R.S. §§ 16-945(A); 16-941(A)(1)(Emphasis added).

The attached photos depict Mr. Bennett's car, and it has a large magnate sign on it. (Attachment 1). The sign states, in large letters, "Law Enforcement Supports Bennett for Governor." The sign also states that it is "Paid for by Arizona Correctional Peace Officers Association PAC."

This sign is a political sign designed to influence an election, to wit, the primary election for Arizona Governor. As such, it falls squarely within the definition of "contribution" under Arizona law: "'Contribution' means any gift, subscription, loan, advance or deposit of money or anything of value made for the purpose of influencing an election..." A.R.S. § 16-901(5). In this case, the sign is a "gift...of value made for the purpose of influencing an election."

It should also be noted that, according to documents filed with the Secretary of State's Office, the Arizona Correctional Peace Officers Association PAC has listed independent expenditures for the benefit of Mr. Bennett on their January 31 campaign finance report. (Attachment 2). Specifically, they have spent a total of \$827.20 on "Signs and bumper stickers" to benefit his candidacy. These expenditures may very well have purchased the magnate sign that Mr. Bennett is now using (illegally) to bolster his campaign.

Mr. Collins  
Page 2 of 3  
April 17, 2014

There are a couple of consequences that flow from this. The first is that Mr. Bennett has committed a violation of the Clean Elections Act by accepting an illegal contribution from a political action committee (PAC). A.R.S. §§ 16-941(A); 16-943(A); 16-945(A).

In addition, Mr. Bennett's certification as a Clean Elections candidate must be revoked. Being a "participating candidate" under the Clean Elections Act requires that the candidate certify, under oath, that:

1. The candidate has complied with the restrictions of section 16-941, subsection A during the election cycle to date.

...

3. The candidate will comply with the requirements of section 16-941, subsection A during the remainder of the election cycle and, specifically, will not accept private contributions.

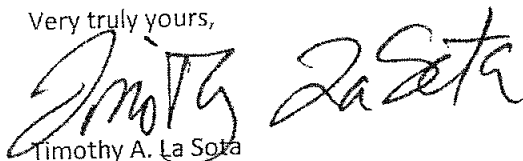
A.R.S. § 16-947(B)(Emphasis added).

Clearly Mr. Bennett's candidate certification is not valid because he has not adhered to the requirements of it in that he has collected early contributions from entities other than individuals. A.R.S. §§ 16-945(A); 16-941(A). As such, the Commission is without legal authority to provide him funding as a Clean Elections Act candidate under A.R.S. § 16-950 and Mr. Bennett must be decertified as a Clean Elections Act candidate.

Lastly, assuming the \$827.20 expended by the Arizona Correctional Peace Officers Association PAC paid for the magnet sign, Mr. Bennett must be ordered to amend his January 31 report to include the value of the magnet signs. If this contribution was made to him subsequent to that reporting period, he must list the value of these signs in his June 30 report.

Mr. Bennett is responsible for a number of enforcement duties related to campaign finance matters. In order to preserve public confidence, it is important that he too adhere to the law. He has not done so, and I urge you take appropriate action to remedy these violations.

Very truly yours,

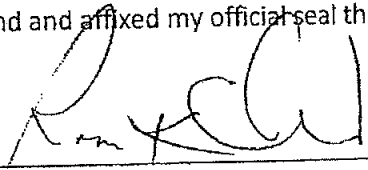
  
Timothy A. La Sota



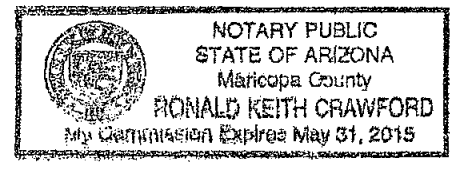
Mr. Collins  
Page 3 of 3  
April 17, 2014

State of Arizona        )  
                                  )        ss.:  
County of Maricopa     )

I hereby certify that Timothy A. La Sota personally appeared before me. IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal this 17<sup>th</sup> day of April, 2014.

Notary Public 

Commission Expires 05/31/15



# EXHIBIT B

April 25, 2014

Sara A. Larsen  
Campaign Finance Manager  
Citizens Clean Elections Commission  
1616 W. Adams, Suite 110  
Phoenix, AZ 85007

RE: CCEC MUR #14-005

14APR25 PM11:28 CCEC

Dear Sara,

This letter is my response to the above complaint filed by Timothy La Sota on April 21, 2014.

There have been two magnetic signs, as shown in the complaint, on my personal vehicle since sometime in January of this year. A member of the Arizona Correctional Peace Officers Association offered the signs to me. Since the signs were paid for by the Association's PAC, I paid them for the cost of the signs, which they said was \$30 each, from my personal funds. We will be reporting the \$60 as part of the personal funds I am allowed to contribute to my campaign in the June 30 Report. This \$60 does not put me above the maximum cumulative contribution allowed, which I believe is \$1,390.

I believe this to be in compliance with State Law and CCEC regulations. If not, please let me know what I need to do to be in compliance, as that is my obvious intent.

Thank you for your consideration of this matter.

Sincerely,

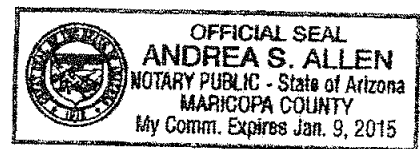


Ken Bennett  
Candidate

State of Arizona        )  
                                  )        ss.  
County of Maricopa    )

I hereby certify that Ken Bennett personally appeared before me. IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal this 25<sup>th</sup> day of April, 2014.

Notary Public Andrea S. Allen  
Commission Expires January 9, 2015



# EXHIBIT C

Timothy A. La Sota

303 W. Stella Ln.  
Phoenix, Arizona 85013

April 28, 2014

Mr. Thomas Collins  
Executive Director  
Arizona Clean Elections Commission  
1616 W. Adams, Suite 110  
Phoenix, AZ 85007

Re: Ken Bennett's response to my Clean Elections Act complaint

Dear Mr. Collins:

In his response to my complaint alleging violations of the Clean Elections Act by gubernatorial candidate Ken Bennett, Mr. Bennett stated that he paid \$30 each for two signs from the Arizona Correctional Peace Officers Association PAC at issue. He also stated that he paid for these signs out of personal funds and he would record \$60 in contributions from himself to his campaign committee on his June 30 report.

Mr. Bennett is correct that it is lawful for him to make limited personal contributions to his campaign under the Clean Elections Act. However, he is not correct in claiming that his act of paying for these signs made the transaction lawful. It did not, for at least two reasons.

The first reason is that A.R.S. § 16-912 requires a political committee to indicate on campaign material that it was "paid for by" that committee. Mr. Bennett states that his campaign paid for the signs (he contributed \$60 to his campaign and his campaign in turn purchased the signs), and yet the signs clearly state that they were "Paid for by Arizona Correctional Peace Officers Association PAC." Compliance with the law requires that the entity that actually paid for the campaign material be the one identified.

Secondly, and more importantly, Mr. Bennett's actions in this instance constitute illegal coordination with an independent expenditure committee.

Arizona law defines an "independent expenditure" as follows:

"Independent expenditure" means an expenditure by a person or political committee, other than a candidate's campaign committee, that expressly advocates the election or defeat of a clearly identified candidate, that is made without cooperation or consultation with any candidate or committee or agent of the candidate and that is not made in concert with or at the request or suggestion of a candidate.

A.R.S. § 16-901(14)(emphasis added). Clearly this is a textbook case of a candidate coordinating with a group engaged in independent expenditure activity on his behalf. You will recall that the Arizona

14 APR 29 PM 12:26 CCEC

Mr. Collins  
April 28, 2014  
Page Two

Correctional Peace Officers Association PAC itself listed \$1,119 in independent expenditures on behalf of Mr. Bennett in their January 31 report of this year.

Under A.R.S. § 16-917(C), “[a]n expenditure by a political committee, corporation, limited liability company, labor organization or a person that does not meet the definition of an independent expenditure is an in-kind contribution to the candidate and a corresponding expenditure by the candidate unless otherwise exempted.”

The expenditures by the Arizona Correctional Peace Officers Association PAC on which Mr. Bennett coordinated constitute an in-kind contribution to his committee. And because Mr. Bennett is a Clean Elections candidate, he cannot take even \$1 from a PAC, so all of these expenditures are illegal in-kind contributions. See A.R.S. §§ 16-945(A); 16-917(C).

This Commission needs to determine exactly how much money has been expended by the Arizona Correctional Peace Officers Association PAC on illegal in-kind contributions to Mr. Bennett’s campaign, because that will drive the amount of the penalty. See A.R.S. § 16-942 (candidate subject to a fine of ten times the amount of contributions received in violation of the Clean Elections Act).

It is important to note that the actions by Mr. Bennett in coordinating with a PAC do not constitute simply a technical violation of the law. When candidates participate in the Clean Elections system, they make a pact with the voters of Arizona. The candidate is provided with public money, and the critical commitment that the candidate makes in return is that they will not accept PAC money and will only take limited contributions from individuals.

This is the way the Clean Elections Commission puts it:

The Citizens Clean Elections Act was passed by the people of Arizona in 1998 to restore citizen participation and confidence in our political system. The Act allows candidates running for the Legislature or statewide offices the opportunity to **forgo special interest money** by collecting a certain number of \$5 donations. **In return, candidates receive full funding for their campaigns.**

<http://www.cleanelections101.com/>

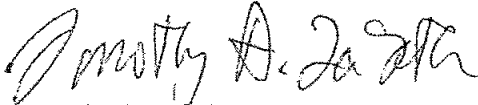
Mr. Bennett is fond of echoing this sentiment on the campaign trail. This is what he said in an April 17 press release: “I’m especially proud we were able to fund our campaign with contributions from everyday Arizonans, not special interests, who might expect something in return.” (<http://bennettarizona.com/bennett-signatures-contributions-confirmed-state-election-officials/>, Attachment 1; see also <http://bennettarizona.com/support/>, Attachment 2).

Mr. Collins  
April 28, 2014  
Page Three

Unfortunately, Mr. Bennett's rhetoric has not matched reality. Mr. Bennett has not kept up with his end of the bargain to forego contributions from special interests.

The clean elections system, when it operates as the law provides, allows candidates to gather necessary funds outside of the traditional "special interest" fundraising circuit. At the heart of this is the prohibition against participating candidates raising money from these special interests. It is critical that this Commission act to protect the credibility of the clean elections system by requiring participating candidates to adhere to the legal requirements.

Very truly yours,



Timothy A. LaSota

# Attachment 1



## Bennett signatures and contributions confirmed by State Election Officials

Posted on April 17, 2014 | [Uncategorized \(http://bennettarizona.com/category/uncategorized/\)](http://bennettarizona.com/category/uncategorized/)

“Over the past few months, we’ve been able to connect with voters on the issues that matter most; a growing economy and a world-class education system that strengthens our communities and prepares our children for the future. Now that we’re fully funded, we can focus on sharing our vision with Arizona’s voters.”

Less than a week after Ken Bennett filed 5,615 \$5 contributions from voters around the state, elections officials have determined Secretary Bennett has exceeded the required number of contributions and funded his campaign with \$753,616. When combined with \$55,910 in early contributions, the campaign has up to \$809,526 to spend on the August 26<sup>th</sup> Primary Election.

Gubernatorial participants in the state’s Clean Elections program must submit 4,500 \$5 individual contributions to qualify for funding. Candidates are prohibited from raising money from PACs, corporations, political parties and labor unions. More than 700 candidates since have participated in the state’s Clean Elections system since 1998. Funding is comprised from civil penalties, criminal fines and contributions collected by participating candidates, and not taxpayer money.


“We’re extremely pleased that our campaign is off to such a great start,” said Bennett. “I’m especially proud we were able to fund our campaign with contributions from everyday Arizonans, not special interests, who might expect something in return.”


“Over the past few months, we’ve been able to connect with voters on the issues that matter most; a growing economy and a world-class education system that strengthens our communities and prepares our children for the future. Now that we’re fully funded, we can focus on sharing our vision with Arizona’s voters.”

“As a County Supervisor and business owner, I know what fiscal responsibility is all about,” said Maricopa County Supervisor Clint Hickman. “Ken’s experience in public service and career in small business make him the best candidate for Governor. With his campaign fully funded, it confirms what many already know; his viability as a candidate and position as the front-runner.”

Born in Tucson and raised in Prescott, Ken Bennett is a 5<sup>th</sup> generation Arizonan who served as CEO of Bennett Oil for more than 20 years. Mr. Bennett’s remarkable public service career began on the Prescott City Council and continued as President of the State Board of Education. He would later serve eight years in the state Senate, four of those as President. In 2009, Mr. Bennett was appointed by Governor Jan Brewer

to serve out her term as Secretary of State and was subsequently elected in 2010 for a second term as the state's second highest elected official. Secretary Bennett serves on the Board of Directors of the Arizona Charter Schools Association and Cancer Treatment Centers of America in Goodyear.

Tweet  0

Share  0

## Events

### Gubernatorial Forum – Ken Bennett 2014 (/event/gubernatorial-forum-ken-bennett-2014-10/)

May 1st, 2014 | Add to Calendar (<http://bennettarizona.com/ics.php?startdate=20140501T173000Z&enddate=20140501T193000Z&loc=&link=http://bennettarizona.com/event/gubernatorial-forum-ken-bennett-2014-10/&summary=Gubernatorial Forum – Ken Bennett 2014>)

### Gubernatorial Forum – Ken Bennett 2014 (/event/gubernatorial-forum-ken-bennett-2014-9/)

April 28th, 2014 | Add to Calendar (<http://bennettarizona.com/ics.php?startdate=20140428T183000Z&enddate=20140428T203000Z&loc=&link=http://bennettarizona.com/event/gubernatorial-forum-ken-bennett-2014-9/&summary=Gubernatorial Forum – Ken Bennett 2014>)



Ken Bennett

Like

883 people like Ken Bennett.



Facebook social plugin

## Attachment 2

## To qualify for the ballot, we need your support.

This is how you can help.

### Sign my online petition

Every candidate must collect signatures from qualified voters in order to get on the election ballot. We need to collect more than 5,000 ballot signatures to qualify.

You can now sign my petition online using the e-Qual system.

SIGN MY PETITION ([HTTPS://WWW.AZSOS.GOV/APPS/EPS/PETITION/VOTERPETHAUTH.ASPX](https://www.azsos.gov/apps/eps/petition/voterpetnauth.aspx))

### Contribute \$5

\* [ I've decided to run clean and not accept special-interest or PAC money so my campaign needs to collect a certain number of \$5 donations in order to receive funding. Clean Elections funding DOES NOT come from any taxpayer money, it is funded purely from civil and criminal fines.

DONATE \$5 TO KEN'S CAMPAIGN ([HTTPS://WWW.AZSOS.GOV/APPS/EPS/QC/CCECVOTERAUTH.ASPX](https://www.azsos.gov/apps/eps/qc/ccecvoterauth.aspx))

Download and print the form ([http://bennettarizona.com/wp-content/uploads/bennett\\_5\\_dollars.pdf](http://bennettarizona.com/wp-content/uploads/bennett_5_dollars.pdf))

### Volunteer and/or Join my email list

If you are looking for other ways to help, please tell us what your interests are, and how you might be willing to help.

You could adopt a yard sign, host a meet & greet, send emails to friends, family and neighbors or even walk

# EXHIBIT D

\*14MAY 8 PM 2:20 CCEC

May 8, 2014

Sara A. Larsen  
Campaign Finance Manager  
Citizens Clean Elections Commission  
1616 W. Adams, Suite 110  
Phoenix, AZ 85007

RE: CCEC MUR #14-005

Dear Sara,

This letter is my response to the supplemental filing by Timothy LaSota regarding the above complaint.

Upon purchasing the magnetic signs personally, I did not think to cut off or modify the "paid for by ..." disclaimer on the signs. I will do so before the signs are put back into use. By the way, I have not been displaying the signs since the complaint was filed, pending the Commission's decision.

To his second "and more important.." point, there was no cooperation or consultation between me or my campaign and the Arizona Correctional Peace Officers Association PAC in the making of their expenditure. Neither was the expenditure made "in concert with or at the suggestion of" me, the candidate.

We had no knowledge that AZCPOA decided to have some magnetic signs made in support of my campaign, nor did we request that they do so. ARS 16-901(14) is clearly intended to prohibit IE's and campaigns from coordinating expenditures to free up resources within the campaign for other purposes ("you guys do TV and we'll do radio" etc.). It does not preclude the fact that the efforts of an IE won't become known to the campaign, and acknowledged publicly. If an IE prints up some campaign buttons, is a candidate not allowed to put on one? If an IE does some yard signs, is the candidate prohibited from taking a picture of one and tweeting it out? What is prohibited is the campaign and IE arranging for the IE to do the buttons or the yard signs as part of the campaign strategy.

Ms. Larsen  
May 8, 2014  
Page 2

In conclusion, we did not cooperate or consult with AZCPOA in the making of this expenditure. We look forward to the Commission's decision.

Sincerely,



Ken Bennett  
Candidate

State of Arizona            )  
  )        ss.  
County of Maricopa        )

I hereby certify that Ken Bennett personally appeared before me. IN WITNESS WHEREOF, I have hereunto set my hand and affixed my official seal this 8<sup>th</sup> day of May, 2014.

Notary Public Andrea S Allen  
Commission Expires January 9, 2015



# EXHIBIT E



# State of Arizona



## Campaign Finance Report

ARIZONA CORRECTIONAL PEACE OFFICERS ASSOCIATION PAC  
Committee #: 200602735

Treasurer: Holly, McCormick  
1414 W Broadway Rd, Ste 142, Tempe, AZ 85282  
Phone: (602) 263-8929  
Email: jmccormick@azcpoa.org

### 2014 January 31st Report

Election Cycle: 2013-2014  
Date Filed: January 13, 2014  
Reporting Period: November 27, 2012-December 31, 2013

### Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$8,764.56
Total Cash Receipts this Reporting Period:	\$5,884.00
Total Cash Disbursements this Reporting Period:	\$1,119.63
Cash Balance at End of Reporting Period:	\$13,528.93

Report ID: 88671

**Schedule E2 - Independent expenditures**

Name:	Address:	Category:	Memo:	Benefits:	Name:	Address:	Category:	Memo:	Benefits:	Date	Amount	Cycle To Date	
Custom Teez	5408 W Camelback Rd, Ste 3, Glendale, AZ 85301	Signs and bumper stickers	Signs and bumper stickers	BENNETT FOR GOVERNOR - Primary						10/29/2013	\$479.20	Cash	\$479.20
Arrowhead Signs	16148 Boones Ferry Rd, Lake Oswego, OR 97035	Communications - Signs	Signs and bumper stickers	BENNETT FOR GOVERNOR - Primary						11/25/2013	\$348.00	Cash	\$640.43
Arrowhead Signs	16148 Boones Ferry Rd, Lake Oswego, OR 97035	Communications - Bumper stickers	Signs and bumper stickers	BENNETT FOR GOVERNOR - Primary						12/31/2013	\$292.43	Cash	\$640.43
Total of Independent Expenditures Total of Refunds, Rebates, and Credits Received Net Total of Independent Expenditures													
Total of Independent Expenditures Total of Refunds, Rebates, and Credits Received Net Total of Independent Expenditures													