

STATE OF ARIZONA
CITIZENS CLEAN ELECTIONS COMMISSION

MUR: No. 14-009 JUSTIN PIERCE

STATEMENT OF REASONS OF EXECUTIVE DIRECTOR

On behalf of the Citizens Clean Elections Commission (“Commission”), the Executive Director hereby provides the Statement of Reasons showing reason to believe that violations of the Citizens Clean Elections Act and or the Commission rules (collectively, the “Act”) may have occurred.

I. Procedural Background

On July 24, 2014, Allan Merrell (“Complainant”) filed a complaint against Justin Pierce, a participating candidate for the office of Secretary of State, and Gary Pierce, as a solicitor for the Justin Pierce for Arizona candidate campaign committee (“Respondents”). **(Exhibit A)** Complainant alleges Respondents violated campaign finance laws by soliciting contributors to sign \$5 qualifying contribution forms without providing the accompanying \$5 contribution. On August 7, 2014, Lee Miller, counsel for Respondents and the Justin Pierce for Arizona committee, filed with the Commission a Response to the Complaint. **(Exhibit B)**

II. Alleged Violations

Complainant alleges Gary Pierce solicited a \$5 qualifying contribution from him in support of the Justin Pierce for Arizona candidate campaign committee at the Pinal County Fair in the spring of 2014. Complainant alleges Gary Pierce asked him to sign the \$5 qualifying contribution form but did not ask for the accompanying \$5 contribution. Respondent Gary Pierce acknowledges that he did solicit \$5 qualifying contributions for the Justin Pierce for Arizona campaign committee at the Pinal County Fair in March 2014. However, Respondent

Gary Pierce denies he solicited \$5 qualifying contributions in the manner alleged by the Complainant. Respondents provide seven sworn statements from individuals who were present when Respondent Gary Pierce solicited \$5 qualifying contributions on behalf of the Justin Pierce for Arizona campaign committee.

1. Solicitation of Prohibited Contributions

A \$5 qualifying contribution must in the sum of \$5 exactly, made by a qualified elector, and must be accompanied by a three-part reporting slip containing the signature of the contributor. A.R.S. §16-946(B). A person may not make a contribution in the name of another person, or permit their name to be used to effect such a contribution. A.R.S. §16-907(A). A person who solicits \$5 qualifying contributions on behalf of a participating candidate must sign a sworn statement declaring the named contributor contributed the \$5. A.A.C. R2-20-105(D).

Complainant states he was asked by Respondent Gary Pierce to sign the qualifying contribution form but was not asked to provide the monetary \$5 qualifying contribution required. Complainant did not sign the contribution form or give a \$5 qualifying contribution to the Justin Pierce for Arizona campaign committee.

Respondent Gary Pierce admits solicited \$5 qualifying contributions as the Pinal County Fair. He states that he spoke with Complainant about the Clean Elections program and the ways an individual may contribute a \$5 qualifying contribution. Respondent believes the Complainant misunderstood the information he provided because the Complainant walked away in the midst of their discussion without understanding the Clean Elections process. He states the Complainant refused to accept any further information from him regarding the qualifying contributions.

Based on Complainant's acknowledgement that he did not provide a \$5 qualifying contribution or sign the \$5 qualifying contribution form and that Respondent Justin Pierce did

not report a \$5 qualifying contribution from Allan Merrill on his June 30th Campaign Finance Report, the Executive Director recommends that the Commission find no reason to believe a violation of A.R.S. §§16-907(A), 16-946(B), and A.A.C. R2-20-105(D) occurred for the solicitation of \$5 qualifying contributions.

III. 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 19th day of August, 2014.

By: 
Thomas M. Collins, Executive Director

EXHIBIT A

14 JUL 24 PM 3:21 CCEC

Allan Dale Merrell

1753 E Primera Dr

Casa Grande, AZ 85122

Hello,

In connection with commission rule A.A.C. R2-20-203 I am providing the following as my sworn statement.

When speaking with the father of Justin Pierce at the Pinal County fair I was asked to swiftly sign the bottom of a sheet of paper and simply told that it was for clean elections. Having earlier in the day given a \$5 contribution in behalf of Darla Dewald I was familiar with the form. When I asked Mr. Pierce about the \$5 mentioned on the form he told me that he had it covered and that I did not need to worry about that part. He further said that "suppose I gave you \$5, who am I to tell you how to spend it". The obvious implication of this statement was that I should just play along as if he had given me \$5 and I had decided to donate it to the clean elections fund. The Justin Pierce campaign tried to make me a part of election fraud. This gives reason to believe that others were treated in this same fashion. That is why I am requesting that you investigate this campaign for elections fraud. Please contact me for further details or questions.

Note: My wife Tess Renee Merrell was present when these events took place and can add a confirming testimony to the one I have provided.

 7-24-2014

Allan Merrell

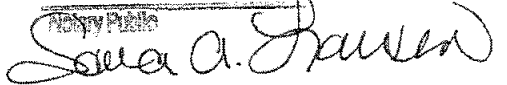
520.705.3166

allanmerrell@hotmail.com

STATE OF ARIZONA
COUNTY OF Marcopa

Subscribed and sworn (or affirmed) before me this 24th day of
July, 2014

Notary Public





SARA A. LARSEN
Notary Public—Arizona
Marcopa County
Expires 06/01/2016

EXHIBIT B

Lee Miller

Attorney at law

lee@leemillerlaw.com
602.300.5829 (direct line)

August 7, 2014

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

RE: MUR #14-009

Dear Ms. Larsen:

This firm represents the Justin Pierce for Arizona candidate committee (the "Pierce Committee"). Please accept this as our response to the complaint filed against the Pierce Committee by Allan Merrell. As more specifically set forth below, no violations of the Citizen Clean Election Commission's (the "Commission's") laws or regulations have occurred and there is no reason for the Commission to proceed any further in this matter. We urge the Executive Director to recommend the matter be dismissed as there is no basis to proceed.

Mr. Merrell alleges that Gary Pierce, Justin Pierce's father and a volunteer for the Pierce Committee, solicited him to sign a \$5 Qualifying Contribution form without also requiring Mr. Merrell to provide the necessary \$5 contribution. The Pierce Committee and Gary Pierce categorically deny that any such improper solicitation occurred. Attached for your review is an Affidavit provided by Gary Pierce denying such a solicitation occurred as well as additional statements from him, and a wide variety of individuals that the Pierce Committee enlisted to assist it in obtaining Qualifying Contributions and Forms. In each case these individuals assert they were briefed by Gary Pierce on the rules for soliciting Qualifying Contributions and that Mr. Pierce always insisted that Contributions and Forms be obtained in complete compliance with the Commission's laws and regulations. This is true even where these third parties inquired whether they might provide incentives to persons for obtaining Forms and Contributions. There is no factual basis for believing that in this one particular instance Mr. Pierce would have deviated from a well-established track record of working within the Commission's Rules and Regulations.

Keep in mind that, as Mr. Merrell notes, his encounter with Mr. Pierce took place at the Pinal County Fair and the entire engagement, which Mr. Pierce remembers quite well, took place in under two minutes. This was an event where there were many potential contributors and the Pierce Committee and Mr. Pierce were working hard to engage with members of the crowd that were passing by the Committee's booth. The Committee's goal was to engage with as many potential contributors as it could but also to disengage as quickly as possible with those unlikely to provide a contribution and signed form.

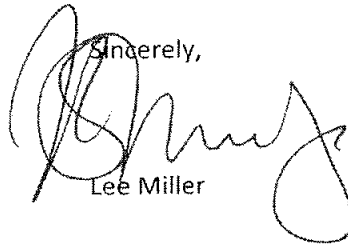
We have no doubt Mr. Merrell thinks he is accurately remembering a two minute interaction that occurred in March of 2014. We also have no doubt that the filing of the complaint was timed to coincide with the distribution of early ballots. We are confident that in the more than four months between the actual encounter and July 24, what actually occurred and what Mr. Merrell remembers are two different things. In the hurly burly of the fair the Pierce Committee apologizes if there was any miscommunication

14 AUG 7 PM 4:07 CCEC

or misunderstanding between Mr. Merrell and Gary Pierce. What is absolutely clear is that Gary Pierce has a long track record over many years and on behalf of many clean elections candidates (including himself) of successfully working within the rules and regulations of the Commission and there is no factual basis for thinking that he deviated from the established record. Indeed, Mr. Merrell's alleged belief that his encounter with Gary Pierce must have been typical of others' experience is sheer speculation, unsupported by the evidence presented here. What we know is what Mr. Merrell thinks he remembers 4 months after a 2 minute conversation at a county fair. From there we leap to the world of make believe to assume that others had the same experience and engaged in improper conduct by signing a form with a promise by Gary Pierce to pay their \$5 for them. This being the case, the level of speculation required, combined with the suspicious timing of the complaint, demonstrate that further investigation of this matter would be nothing more than a fishing expedition, and would allow the Commission to be improperly used as a political tool to adversely affect the Justin Pierce for Arizona campaign at a time when early ballots have arrived and Arizona voters are casting their votes.

We urge the Executive Director to recommend that there is no basis to proceed further with this Complaint and for the Commission to unanimously accept the Executive Director's recommendation.

I am available for any questions, comments or concerns.

Sincerely,

Lee Miller

enclosures

cc: J. Pierce
G. Pierce

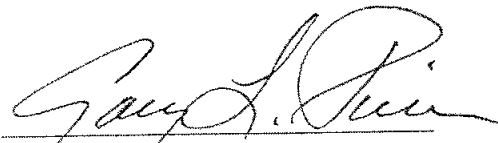
STATE OF ARIZONA)
)
COUNTY OF MARICOPA)

BEFORE ME, the undersigned Notary, Gary Pierce, who is a resident of Maricopa County, Arizona, personally came before me and makes this his statement and General Affidavit upon oath and affirmation of belief and personal knowledge that the following matters, facts and things set forth are true and correct to the best of his knowledge:


1. I have read and reviewed a copy of the complaint filed with the Clean Elections Commission by Allan D. Merrell on or about July 24, 2014.
2. I have successfully run for the Arizona Corporation Commission as a Participating Candidate in 2010 and also successfully run for the Corporation Commission as a traditionally funded candidate in 2006. Prior to my runs for Corporation Commission I successfully ran several times for the Arizona Legislature. I consider myself as someone who is familiar with Arizona's election laws, including the Clean Elections Act and its implementing regulations.
3. I am aware that in soliciting Qualifying Contributions one may not pay anything of value or any compensation.
4. I am aware that qualifying contributions must:
 - a. Be made by a qualified elector,
 - b. Be made without an exchange of value, and
 - c. Be exactly five dollars (\$5.00).
5. During my own campaigns and while I was acting as a volunteer for many other campaigns, including the Justin Pierce for Arizona campaign committee during 2013 and 2014, I never obtained an executed \$5 Qualifying Contribution Form from a qualified elector without also receiving a contribution from the same elector, be it in cash or check.
6. I entirely deny Mr. Merrell's allegations that I solicited him to provide me with a signed Qualifying Contribution Form without also providing a Qualifying Contribution.

Further, affiant sayeth naught.

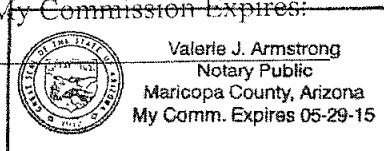
DATED this the 7th day of August, 2014.


Gary Pierce, Affiant

SWORN to and subscribed before me, this 7th day of August, 2014.


NOTARY PUBLIC

My Commission Expires:



August 7, 2014

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

Re: CCEC MUR #14-009

Dear Sara,

In addition to my affidavit, I wanted to also provide the Commission with my best recollection of the events described in the complaint. While I am 100% certain of the statements in the affidavit, the events at issue here took place nearly five months ago during a brief two minute conversation at a county fair. Thus, no one can be certain the exact word-for-word statements of who said what to whom, let alone how those statements were heard or interpreted during this brief exchange. Indeed, as time passes I don't recall most of the thousands of individuals I have spoken with at various campaign events; however, I do have a recollection of the exchange with Mr. Merrell because of the frustration I felt as I tried to explain the Clean Elections process to him. He obviously has a different recollection of the event than I do. The following is my best recollection of my encounter with Mr. Merrell.

During our brief conversation at the Pinal County fair in March 2014 when I was soliciting him to give a \$5 qualifying contribution to the Pierce campaign, he abruptly cut me off and said that he thought I was proposing something inappropriate and that he did not want to speak to me anymore. I was confused by this, and told him that he must have heard me incorrectly and I attempted to be clearer but he cut me off again and told me our conversation was over, and began to walk away. Knowing that he must have misunderstood our discussion, I called after him to come back because I did not want him going away with the obvious misunderstanding he had. It was to no avail.

He needed to hear me out because when soliciting donations I occasionally talk about various scenarios under which Clean Elections contributions can and cannot be collected. Apparently he was not paying attention, did not hear, or partially heard my words when I described to him the various ways a person can contribute \$5 if they did not currently have the money with them. Now, several months later, I cannot remember if that was the issue for him, but I certainly did not offer to take care of his contribution. As the collection process requires a bit of salesmanship, I simply explained my understanding of the law regarding scenarios under which he could get \$5 to contribute – this often gets people who may be claiming not to have \$5 on them to look deeper into their wallets and find that they actually do. And normally, at the end of a conversation with someone who is still reluctant to participate, I simply invite them to take a campaign envelope and mail the form and the five dollars. That was going to be my next step with Mr. Merrell, which became unavailable as an option when he quickly walked away. Frankly, in the many years of experience helping collect thousands of \$5 contributions for various Clean Elections candidates' campaigns, it was the strangest interaction I have ever had –

so much so that I immediately turned to my son Kyle Pierce, who was at the booth with me, and explained what had just occurred and he was as perplexed as I was.

Mr. Merrell refers in his complaint to "the obvious implication" of an alleged quoted statement that he attributes to me. Unfortunately, because Mr. Merrell did not fully hear or otherwise misunderstood what I said, the alleged "obvious implication" was in his mind alone. My intent absolutely was not what he apparently concluded.

I have been edited and taken out of context by the best in the media. I am not surprised when such things happen; I am very disappointed it has happened in this complaint. It is unreasonable to infer intent to engage in fraud in the true context of the conversation that actually took place.

Mr. Merrell's allegation that his wife can support his complaint is incorrect. She was present but distracted due to attending to their children. I do not recall even speaking to her and at most she was partially involved and even had a look of surprise when her husband suddenly exited the conversation and hustled them off. All of this can be confirmed by Kyle Pierce. Consequently, anything Mrs. Merrell learned about the conversation was from her husband's perspective as they walked away, just as what Kyle learned from me was my perspective, as the Merrell's walked away.

Finally, and critically important to the context of this complaint, I am curious and extremely suspicious of these kinds of allegations surfacing just as early ballots are sent out for the Primary Election. If an opposing campaign is involved, certainly any complaint brought at this time should be treated with even more suspicion and contempt. The strategy of using the Arizona Clean Elections Commission as a candidate distraction and a vehicle for negative news stories should be strongly discouraged.

Good people can disagree on the true meaning and context of a conversation and I prefer to think that is what occurred here. If I had been given the chance, nearly five months ago, this could all have been avoided.

I have included statements from three individuals of the many of whom were getting five dollar forms and five dollar contributions from their organizations. Two are notarized and one from David Godlweski is not yet notarized because he is out of town at a National Home Builders Conference and could not get to a notary in time for this submittal.

I have also included statements from Jeff and Marina Dewit who were at the Pinal County Fair and witnessed me in the process of speaking with, and collecting fives, from many individuals. Sean Dollman was at the Yuma County Fair, the Maricopa County Fair and gun shows. Additionally, a number of volunteers who were present at gun shows, and other political events will make statements on what they witnessed in my conduct as I made the case for Justin and received five dollars.

These submissions demonstrate from first-hand witnesses that even if the exchange between Mr. Merrell and I resulted in an unfortunate misunderstanding, this misunderstanding was not at all typical of my experience collecting qualifying contributions. These statements are first-hand

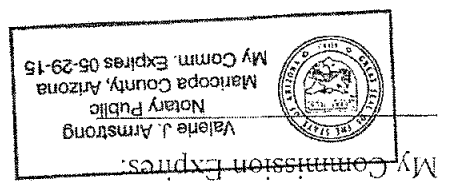
accounts by people who were with me the vast majority of the time that I was collecting
qualifying contributions, and demonstrate that I always did it in accordance with the law. As a
result, I respectfully request that the Executive Director recommend closing this matter at the
earliest convenience.

Sincerely,

Gary A. Pierce
Gary Pierce

SWORN to and subscribed before me, this 2nd day of August, 2014.

Valerie J. Armstrong
NOTARY PUBLIC



STATE OF ARIZONA)
)
COUNTY OF MARICOPA)

BEFORE ME, the undersigned Notary, _____, who is a resident of Maricopa County, Arizona, personally came before me and makes this their statement and General Affidavit upon oath and affirmation of belief and personal knowledge that the following matters, facts and things set forth are true and correct to the best of their knowledge:

1. I have read and reviewed a copy of the complaint filed with the Clean Elections Commission by Allan D. Merrell on or about July 24, 2014.
2. I have accompanied Gary Pierce many times to assist the Justin Pierce for Arizona campaign in obtaining Clean Elections Qualifying Contributions.
3. I personally witnessed Gary Pierce solicit these many times contributions.
4. I never witnessed Gary Pierce solicit a Qualifying Contribution Form without also obtaining the actual contribution from the signatory as well.
5. I believe the allegations made by Mr. Merrell are false.

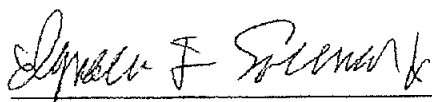
Further, affiant sayeth naught.

DATED this the 6 day of August, 2014.



Tixoc monor, Affiant
(print name)

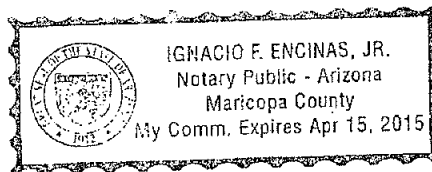
SWORN to and subscribed before me, this 6 day of August, 2014.



NOTARY PUBLIC

My Commission Expires:

4/15/2015



STATE OF ARIZONA)
)
COUNTY OF MARICOPA)

BEFORE ME, the undersigned Notary, _____, who is a resident of Maricopa County, Arizona, personally came before me and makes this their statement and General Affidavit upon oath and affirmation of belief and personal knowledge that the following matters, facts and things set forth are true and correct to the best of their knowledge:

1. I have read and reviewed a copy of the complaint filed with the Clean Elections Commission by Allan D. Merrell on or about July 24, 2014.
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3. I personally witnessed Gary Pierce solicit these many times contributions.
4. I never witnessed Gary Pierce solicit a Qualifying Contribution Form without also obtaining the actual contribution from the signatory as well.
5. I believe the allegations made by Mr. Merrell are false.

Further, affiant sayeth naught.

DATED this the 06 day of August, 2014.

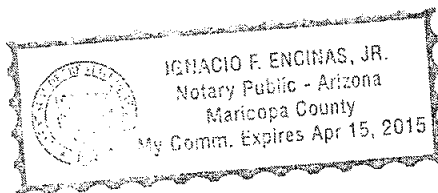
Justin Pierce Jr.
Justin Pierce Jr., Affiant
(print name)

SWORN to and subscribed before me, this 6 day of August, 2014.

Ignacio F. Encinas Jr.
NOTARY PUBLIC

My Commission Expires:

4/15/2015



TATE'S
AUTO GROUP
CORPORATE OFFICE

P.O. BOX 3006, SHOW LOW, AZ 85902
928-537-4201 PHONE • 928-537-8979 FAX

SHOW LOW
TATE'S
NISSAN

SHOW LOW
TATE'S
BUICK • GMC

HOLBROOK
TATE'S
AUTO CENTER

WINSLOW
TATE'S
AUTO CENTER

GALLUP
TATE'S
AUTO CENTER

August 4, 2014

RE: CCEC MUR #14-009

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

Dear Ms. Larsen,

In March, I spoke by phone with Gary Pierce about helping Justin Pierce get five dollar contributions to qualify for Clean Elections Funding.

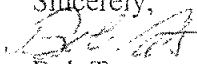
I asked Gary if the company could provide any incentive for employees that participate and Gary said no.

We followed that directive.

If you have any questions, I may be reached at:

602-881-7038— Mobile

Sincerely,


Bob Tate
Corporation Manager

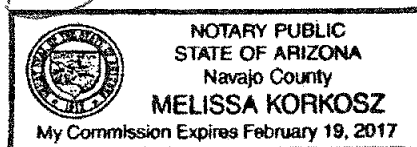
DATED this the 5 day of August, 2014.

SWORN to and subscribed before me, this 5 day of August, 2014.


NOTARY PUBLIC

My Commission Expires:

Feb 19, 2017



www.shoptates.com



August 4, 2014

RE: CCEC MUR #14-009

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

Dear Ms. Larsen:

On February 18, 2014 I met with Gary Pierce in my office at the Chapman Automotive Group Headquarters in Chandler to discuss helping Justin Pierce get five dollar contributions to qualify for Clean Elections Funding.

In the course of the conversation I asked Gary if our company could provide any incentive for employees that participate. Gary said no and we complied.

If you have any questions, I may be reached at:

480-970-0704 -- Office
480-980-7111 -- Mobile

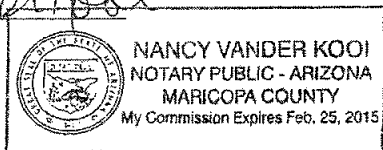
Sincerely,

Eddie Davault
Chief Executive Officer

DATED this the 4th day of August, 2014.

SWORN to and subscribed before me, this 4th day of August, 2014.

NOTARY PUBLIC



My Commission Expires:

02/25/2015

August 4, 2014

RE: CCEC MUR #14-009

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

Dear Ms. Larsen,

In April I met with Gary Pierce at the offices of the Southern Arizona Home Builders Association (SAHBA) about helping Justin Pierce get five dollar contributions to qualify for Clean Elections Funding in his race for Secretary of State.

I was certain that many of our members would be anxious to help.

I was aware and Gary reminded me that the SAHBA could provide no incentive for anyone who participated.

And, of course we provided no incentive to those who participated.

If you have any questions, I may be reached at:

Office – 520-795-5114
Mobile- 520-548-7267

Sincerely,

David Godlewski,
President
SAHBA

August 5, 2014

To Whom It May Concern:

I, Jeff DeWit, am a candidate for Arizona State Treasurer and as such went all over Arizona collecting petition signatures for myself to be on the ballot. In total, I turned in approximately 16,700 signatures. There have been numerous times from approximately February through May that I would be collecting signatures at an event next to other candidates or their representatives, and several of those times I was next to Gary Pierce.

I have witnessed Gary Pierce collect at a minimum hundreds of signatures and clean elections \$5 qualifying contributions on behalf of Justin Pierce. Of the many events we attended simultaneously, I was also next to him for multiple days at the Pinal County Fair at the Republican booth where we both worked very hard, and many times collected signatures from the same people. Here is a picture from the Pinal County Fair, where Mr. Merrell's letter describes, with myself, my wife Marina, and Kyle Pierce that I believe was taken for us by Gary Pierce, and notice in the bottom left of the picture the \$5 clean election forms are clearly visible:



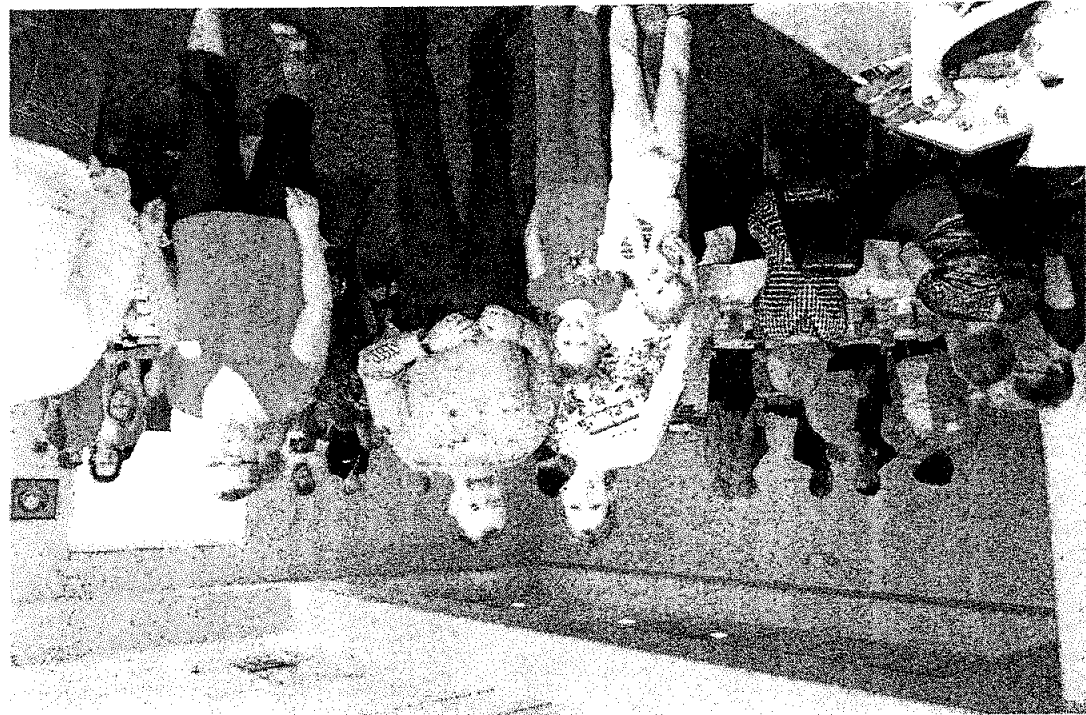
We were in very close proximity, and it should be clear to see that I could easily see and overhear the interactions between Mr. Pierce and people signing the Pierce form, and I tried to be as close as possible in order to have people then sign my sheets right after they completed one.

Here is a picture from a Yuma event we both attended where I witnessed Gary Pierce fill out \$5 forms. My daughters are in the foreground, and Gary Pierce is visible speaking to the crowd:

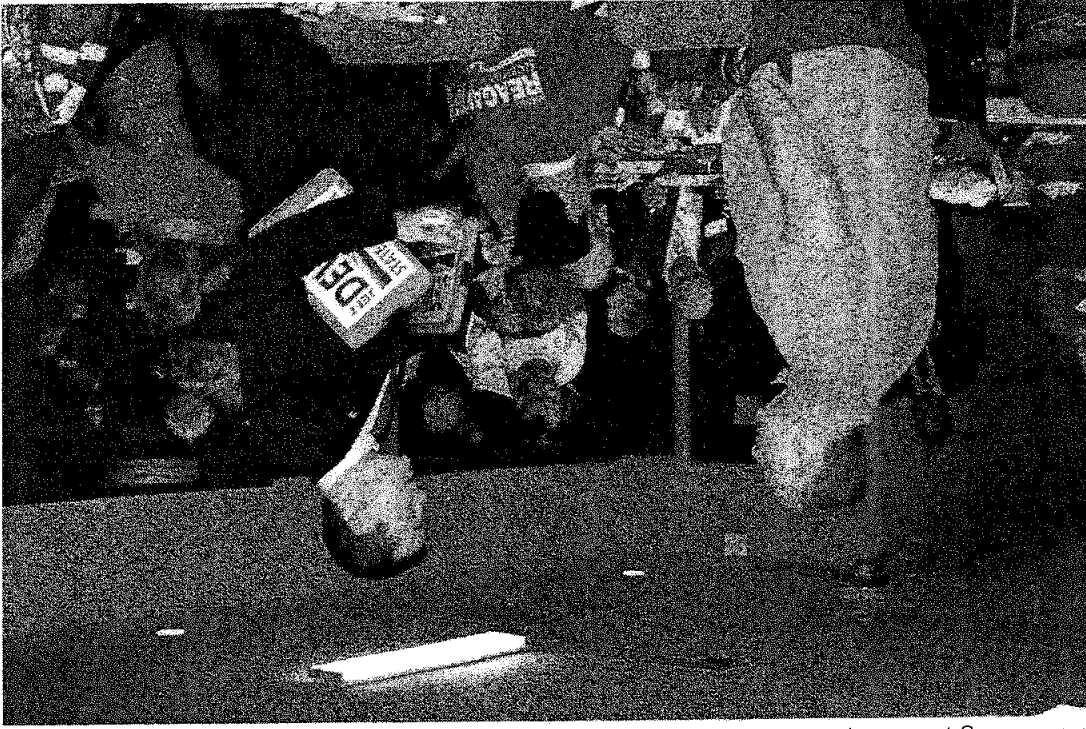


Here is a picture from a different Pinal County event where I witnessed Mr. Pierce collect \$5 forms. My wife and I are in the foreground, and behind us you can see Mr. Pierce with the forms in his possession:





At a Yuma County Republican Women meeting I took this picture of my wife and daughters with the Yuma County Sheriff, and behind to the right is Mr. Pierce:



Another event, this time in Pima County, where I collected signatures in very close proximity to Mr. Pierce collecting \$5 forms, and we both are visible in this picture talking to voters about that:

There are many other events we attended simultaneously. I have heard Gary Pierce ask for the \$5 contributions countless times as well as personally witnessed him collect the \$5 from individuals. I never witnessed Mr. Pierce do anything as described in the letter from Mr. Merrell, nor anything improper. Based on my interactions with him I believe Mr. Pierce to be an extremely honest man, and I personally witnessed him do everything 'by the book' and properly when collecting both signatures and clean election contributions. I personally watched people hand Mr. Pierce their own \$5 each time that I witnessed someone sign the form, and also remember times where someone did not have \$5 and Mr. Pierce would then direct the person to the campaign website and ask them to donate and fill out the form online, or ask them to mail the completed form along with their \$5 later.

I am always available to speak further about this, please do not hesitate to contact me with any questions.

Sincerely,



Jeff DeWit
Arizona State Treasurer Candidate
Jeff@JeffDeWit.com

STATE OF ARIZONA)
)
COUNTY OF MARICOPA)

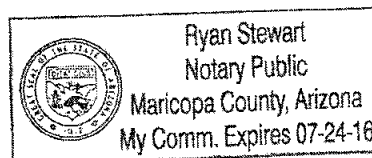
SWORN to and subscribed before me, this 6th day of August, 2014.



NOTARY PUBLIC

My Commission Expires:

July 24 2016



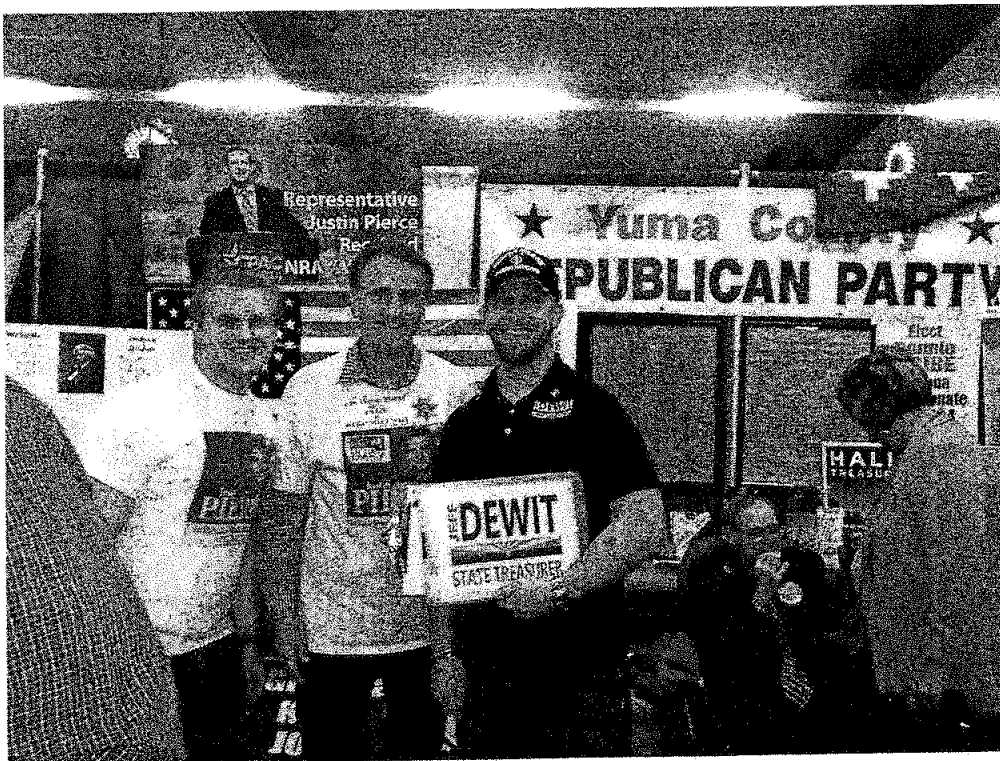
August 6, 2014

To Whom It May Concern:

My name is Sean Ray Dollman, and I worked this year at many events collecting signatures for Jeff DeWit's campaign for Arizona State Treasurer. While out gathering signatures I collected them in the same location, or next to, Gary Pierce and others from of Justin Pierce's campaign. I have been to every county in Arizona and saw Mr. Pierce gathering signatures at multiple locations. Many times I was right next to him when he was gathering these petition signatures and \$5 contribution signatures. Gary was also the person who assisted me when I myself also filled out a \$5 contribution form for Justin.

While I was collecting signatures for Jeff DeWit, I stood right next to Gary Pierce and his son Kyle during the Yuma County Fair while they gathered \$5 donations and signatures. I have never heard Gary ask anyone to do something along the lines of fraud, or even remotely close to the letter from Mr. Merrell. I never witnessed anyone signing that did not contribute the \$5 of their own money.

Here is a picture of myself, Gary Pierce, and Kyle Pierce at the Yuma County Fair on April 2, 2014:



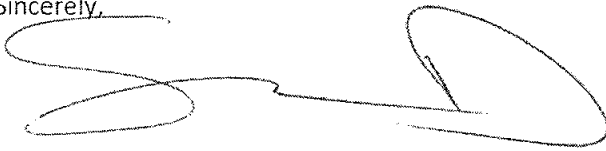
I was also at a gun show, in Glendale, at the University of Phoenix Stadium at a table right next to the Pierce campaign. Gary was collecting \$5 donations himself. In both places where I was right next to

Gary and the Pierce Campaign I never witnessed anyone signing that did not contribute the \$5, and I did witness many people give their own \$5 when signing for Justin Pierce. Gary has always displayed himself as a man of integrity, and it is hard for me to believe that Gary would ever ask anyone to commit fraud.

I believe in doing what is honest and what is morally right, therefore I am informing you that I witnessed Gary Pierce and others with the Pierce campaign always working hard to be compliant with all campaign rules.

Feel free to contact me with any questions.

Sincerely,



Sean Ray Dollman

SeanDollman@Gmail.com

STATE OF ARIZONA)

)

COUNTY OF MARICOPA)

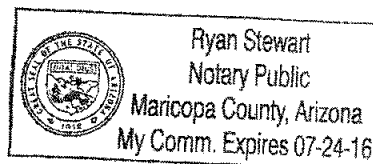
SWORN to and subscribed before me, this 6th day of August, 2014.



NOTARY PUBLIC

My Commission Expires:

July 24 2016



August 5, 2014

To Whom It May Concern:

My name is Marina DeWit, my husband Jeff DeWit is running for Arizona State Treasurer. I have traveled to a great number of events on the campaign trail, and through the end of May was very active at these events in gathering signatures for Jeff to be on the ballot.

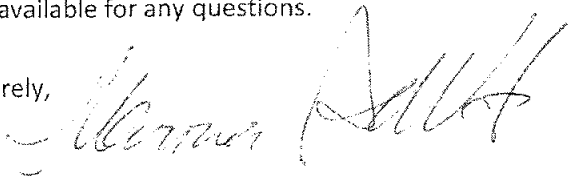
There were many times that I was next to Mr. Gary Pierce, when often we would both be seeking signatures from the same people. While my husband ran a traditionally funded campaign, I witnessed enough people collect the \$5 clean election contribution forms to become very familiar with those.

I personally saw Mr. Pierce collect a lot of \$5 clean elections contribution forms, including over multiple days at the Pinal County Fair where my husband and I were within a few feet of Mr. Pierce. Many times we would even eavesdrop on each other, so I would know when someone was just finishing filling out a form for Justin Pierce and I could get them to sign Jeff's signature sheet before they would leave.

I always saw Mr. Pierce collect \$5 from individuals when they filled out a form for Justin. I never witnessed Mr. Pierce do anything described in Mr. Merrell's letter, nor do I think that he would. I found Mr. Pierce to be very strict about adhering to all the rules related to campaigning, and watched him tell people that they had to supply the \$5 on their own. I also witnessed what Mr. Pierce would do when someone wanted to help but did not have \$5, which is that Mr. Pierce would then ask them to please do it online instead, or mail it back at their convenience.

I am available for any questions.

Sincerely,



Marina DeWit

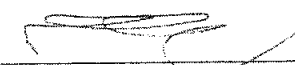
Email: Marina@JeffDeWit.com

STATE OF ARIZONA)

)

COUNTY OF MARICOPA)

SWORN to and subscribed before me, this 6th day of August, 2014.


NOTARY PUBLIC

My Commission Expires:

July 24 2016

