



MARICOPA COUNTY REPUBLICAN COMMITTEE

10050 West Bell Road, Suite 49, Sun City, AZ 85351

623-977-4532

A. J. LaFaro, Chairman

April Riggins, 1st Vice Chairman

Jose Borrajero, 2nd Vice Chairman

Jeni White, Secretary

David Ludwig, Treasurer

September 18, 2014

Mr. Thomas M. Collins
Executive Director
Arizona Citizens Clean Elections Commission
1616 W. Adams St., Suite 110
Phoenix, Arizona 85007
Office: 602-364-3477

Re: Campaign Finance Complaint v Arizona Grassroots Action

Dear Mr. Collins:

I wish to file a campaign finance complaint against Arizona Grassroots Action (AGA), which lists its address at 300 West Clarendon, Suite 460, Phoenix, AZ, 85013. We encourage anyone who reads this complaint to "google" the address to see who is really located there.

AGA conducted independent expenditures in multiple Legislative Districts (LD) in multiple counties to effect the outcome of Precinct Committeemen (PC) races. However, AGA never registered as a political committee, nor has it disclosed its donors or its expenditures. We went to a great deal of effort to verify that AGA was not filed with the Arizona Secretary of State's Office and with the various counties in which it campaigned, etc.

AGA is also not registered with the Arizona Corporation Commission. It appears that AGA is a name selected to mimic an old campaign committee that was called Arizona Grassroots PAC and was closed in March of 2014. It is also the precise name of a federal PAC formed to benefit GOP Congressional candidates Martha McSally and Andy Tobin. However, the federal PAC uses a Virginia address and appears to be quite separate. So the selection of the name seems to be purposefully for the sake of creating confusion.

At this time we do not have a firm idea on exactly how many expenditures were made, however we have proof that AGA used a series of up to three mailers per precinct that was targeted in their Graham County efforts, two to three mailers per targeted precinct along with robo calls here in Maricopa County. PCs have reported receiving and seeing AGA's campaign literature in LD23, LD25, LD28, and LD29.

14SEP22 PM 2:04 CCEC

We have put the word out asking people to report if AGA's campaign literature was used in their LDs and will update our list as we get more responses.

While races for Precinct Committeemen do not attract the media attention that larger offices do, they are very important to the candidates who participate in them. The outcome of those races determine the makeup of party leadership both at the county and state level, and control of that leadership includes the ability to speak for the party as well as control over the party's purse strings. These races can be very high-stakes. As such, the strategic advantage that accrues to a group that knowingly violates election law in order to gain a stealth advantage is tremendous. You do not have time to gather an effort to counter something that you have no idea is coming.

The penalties for failing to file a committee and failing to file reports that detail contributions and expenditures are substantial and are laid out in ARS 16-904 for example. The failure to file and report are both violations of ARS 16-902, 16-902.01, 16-904, 16-912, 16-913 and potentially 16-913.01 and 16-914.02 depending on the source and nature of the funds used to pay for this electioneering and expressed advocacy.

Furthermore, AGA failed to notify the candidates who were listed on their mailers of their independent expenditures in a timely manner as prescribed by ARS 16-917. The penalties for failing to do this shall be three times the cost of the literature.

Lastly, AGA would be required to list any individuals, corporations, LLCs and labor organizations paying for these expenditures should the source of any of this money come from any of these individuals, corporations, LLCs and labor organizations. There is no such disclosure save for "Paid for by Arizona Grassroots Action" and the penalties for failing to properly disclose are up to three times the cost of the literature.

It is too late to undo the damage done to the candidates who were disadvantaged by these unannounced and unreported mailings. However, your office can and should send a strong message to this group and those groups who would mimic this technique in the future that their actions carry severe financial penalties.

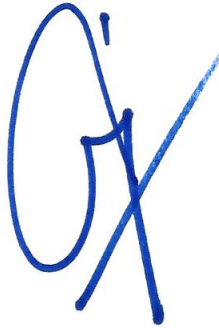
People and organizations that feel they are above the law by not registering with the appropriate state and county agencies so they can use their dirty money to fund their egregious acts of misleading and confusing the voters is totally unacceptable.

September 18, 2014

Page 3

It is quite obvious AGA has violated election laws by not registering as a political committee or filing campaign finance reports, and I am requesting a full and thorough investigation into this heinous matter. Please consider this complaint a "class action complaint" on behalf of the thousands of individuals that have been wronged.

Respectfully yours,

A handwritten signature in blue ink, appearing to be 'A. J. LaFaro', with a large, stylized 'A' and a long, sweeping horizontal stroke.

A. J. LaFaro

Chairman, Maricopa County Republican Committee (MCRC)

Office: 480-752-9164, E-mail: aj_ml@hotmail.com

Evidence is attached

Please note the mailing address for the Maricopa County Republican Committee has changed to:

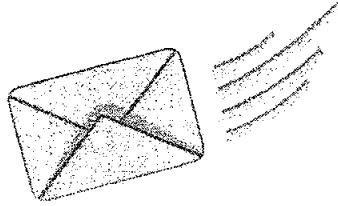
Maricopa County Republican Committee (MCRC)

c/o Mr. David Ludwig

4242 N 19th Ave # 150

Phoenix, Arizona 85015

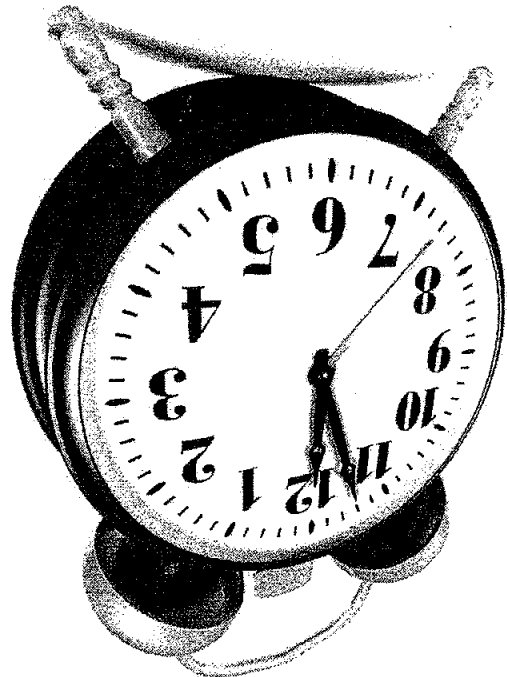
EXHIBIT 1



**SEE THE REVERSE SIDE OF THIS CARD FOR A FULL LIST
OF OUR GRASSROOTS TEAM. AND REMEMBER TO
MAIL IN YOUR BALLOT, TODAY!**

We still have a chance to elect strong, conservative, hard-
working Republican Precinct Committeemen.. but we need
YOUR vote if we are going to win!
To elect more Republicans throughout our state, we must
support our grassroots slate!
Don't forget to mail in your ballot today.. and vote for our
ENTIRE Republican Precinct Committeemen team.

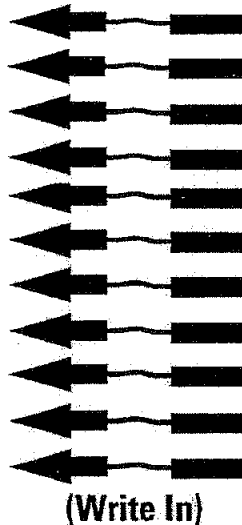
IT'S NOT TOO LATE...
but time is running out!



Here is our Grassroots Slate of Republican Precinct Committeemen.

**CONNECT THE ARROWS AND VOTE FOR ALL OF THEM
BEFORE MAILING IN YOUR BALLOT!**

- ★ Patricia M. Shaler
- ★ Michael J. Minnaugh
- ★ Christine H. O'Connor
- ★ David W. Leicken
- ★ Douglas H. Reed
- ★ Alexander Meluskey
- ★ Karen Garrett
- ★ Sheila K. Muehling
- ★ Roberta J. Meluskey
- ★ Adam Paul Bronnenkant
- ★ Daniel H. Garrett
- ★ Roderick John O'Connor III



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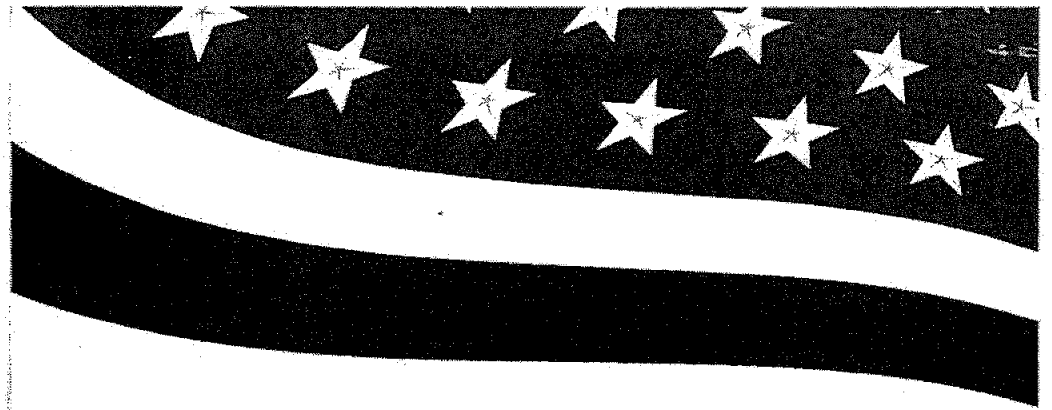
300 West Clarendon
Phoenix, AZ 85013
**ARIZONA
GRASSROOTS
ACTION**

**Ballots must be mailed
in by Friday, August 22
to make sure they are
counted!**



Printed
U.S. Postage
PAID
CMA

EXHIBIT 2




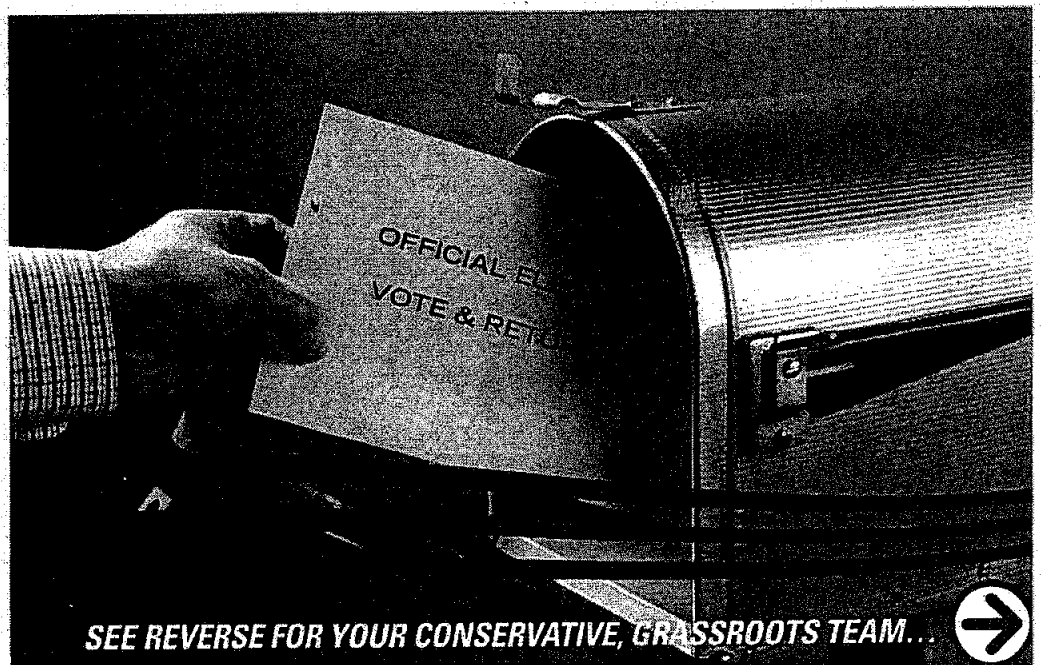
**ARIZONA REPUBLICANS NEED YOU
TO VOTE IN THIS YEAR'S PRIMARY ELECTION
FOR STRONG, CONSERVATIVE PRECINCT
COMMITTEEMEN TO LEAD OUR PARTY.**

THE CANDIDATES LISTED HERE REPRESENT A NEW
GENERATION OF LEADERSHIP AND OPPORTUNITY FOR
ARIZONA REPUBLICANS AND GRASSROOTS ACTIVISTS.

THEY NEED OUR SUPPORT!

TO VOTE:

- ① REMEMBER TO VOTE YOUR ENTIRE BALLOT.
- ② CONNECT THE ARROW FOR OUR CONSERVATIVE GRASSROOTS
PRECINCT COMMITTEEMAN CANDIDATES. 
- ③ MAIL IN YOUR BALLOT TODAY!



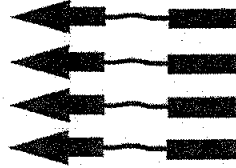
SEE REVERSE FOR YOUR CONSERVATIVE, GRASSROOTS TEAM...



**Our Grassroots Slate of Republican
Committeemen will Stand Up for Our
Conservative Principles.**

VOTE FOR:

- ★ Keith Alexander
- ★ Charlotte Alexander
- ★ Bill Brandau
- ★ Jared Hancock



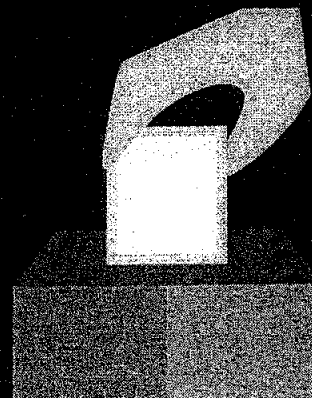
Your Polling Location: *(Polls are open from 6am to 7pm)*

Any of the below locations:
Solomon School Gym - 2285 S. Stevens Ave., Solomon
AG Bldg., Fair Grounds - 3805 S. US Hwy 191, Safford
St. Rose of Lima Catholic Church - 311 Central Avenue, Safford
Eastern AZ College Fine Arts Auditorium - 663 N. Stadium Ave., Thatcher
Pima Junior High Multi-Purpose Room - 192 E. 200 S., Pima
Fl. Thomas School Gym - 15502 Hwy 70, Ft. Thomas

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300 West Clarendon
Phoenix, AZ 85013
**ARIZONA
GRASSROOTS
ACTION**

**Please take this
card with you to your
polling location.**



First Std
U.S. Postage
PAID
CMA

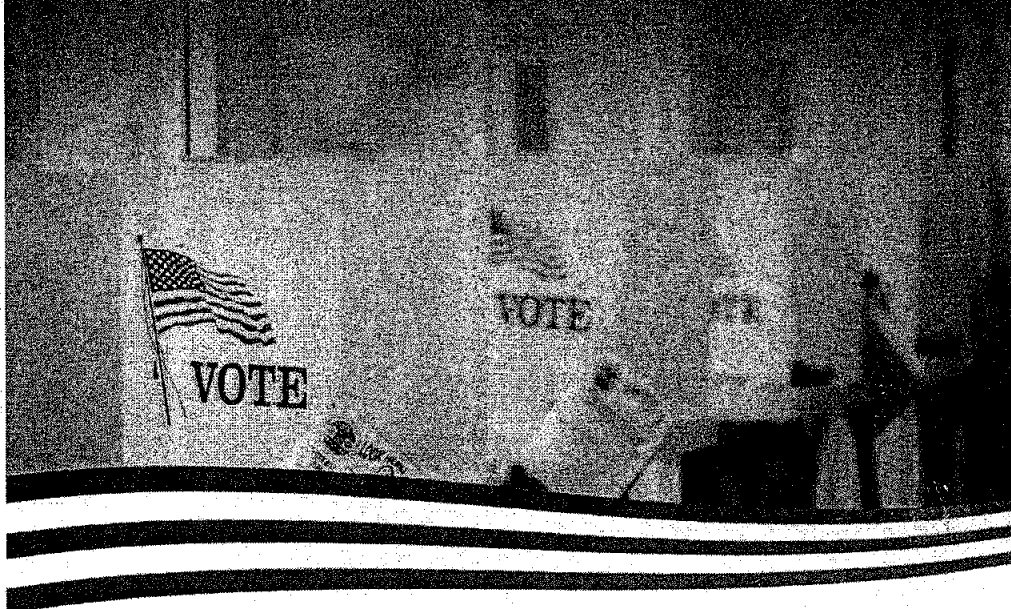
EXHIBIT 3

VOTE ON TUESDAY

To Strengthen Our Republican Party

Your vote is critical to helping elect conservative, hard-working Republican Precinct Committeemen.

If you haven't mailed in your ballot, you must drop it off or vote in person at your precinct listed on the back of this card.



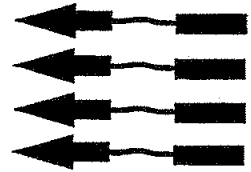
***And don't forget to vote for our
ENTIRE REPUBLICAN PRECINCT
COMMITTEEMEN TEAM!***

Paid for by Arizona Grassroots Action PAC. Not authorized by any candidate or candidate's committee.
300 West Clarendon, Phoenix, AZ 85013

**The CONSERVATIVE,
GRASSROOTS
team for Precinct
Committeeman in
your neighborhood.**



- ★ Keith Alexander
- ★ Charlotte Alexander
- ★ Bill Brandau
- ★ Jared Hancock



**Remember to vote for all of them
before returning your ballot!**

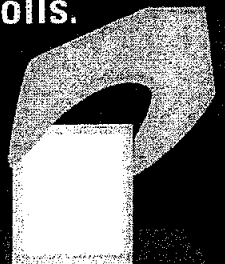
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Paid for by Arizona Grassroots Action
300 W Clarendon, Suite 460
Phoenix, AZ 85013

Printed
U.S. Postage
PAID
CMA

**If you plan to vote
on Election Day,
please take this
card with you to
the polls.**



Janice K. Brewer
Governor

Thomas M. Collins
Executive Director



Timothy J. Reckart
Chair

Louis J. Hoffman
Thomas J. Koester
Mitchell C. Laird
Steve M. Titla
Commissioners

State of Arizona
Citizens Clean Elections Commission

1616 W. Adams - Suite 110 - Phoenix, Arizona 85007 - Tel (602) 364-3477 - Fax (602) 364-3487 - www.azcleanelections.gov

September 24, 2014

A.J. LaFaro
Maricopa County Republican Committee
10050 West Bell Road, Ste. 49
Sun City, AZ 85351
Aj_ml@hotmail.com

RE: CCEC MUR No. 14-022

Dear Mr. LaFaro,

This letter is to notify you that on September 22, 2014, the Arizona Citizens Clean Elections Commission ("Commission") received your complaint filed against Arizona Grassroots Action.

Commission rules require a complaint to comply with Arizona Administrative Code Section R2-20-203. In order for a complaint to comply with R2-20-203, a complaint must contain all of the following:

- The full name and address of the complainant;
- The contents of the complaint shall be sworn to and signed in the presence of a notary and notarized; and,
- Contain a clear and concise recitation of the facts which describe a violation of a statute or rule over which the Commission has jurisdiction.

Your complaint is not in compliance with R2-20-203 because the contents are not sworn to and notarized. Additionally, the complaint does not appear to provide information regarding a violation of a statute or rule over which the Commission has jurisdiction. From the information provided in your complaint, Arizona Grassroots Action's election activity appears limited to local candidate or party elections. Another agency, such as the Secretary of State, or the Maricopa County Elections Department may be appropriate.

Please contact me if you have any questions at (602) 364-3477 or by e-mail at sara.larsen@azcleanelections.gov.

Sincerely,

Sara A. Larsen
Financial Affairs & Compliance Officer
Citizens Clean Elections Commission

Enclosure