

My name is Susan Allen Gehl.


My full address is 1414 E Shangri La Road, Phoenix, AZ 85020

I reviewed the 2017 campaign finance reports for Jacob Bell and discovered what appears to be a violation of the Clean Elections rules. It is my understanding that the Clean Elections rules require, "A participating candidate must adhere to expenditure limits, and may not make expenditures in excess of the cash on hand. This includes both early contributions received and candidate funding (A.R.S. 16-941)." [http://www.azcleelections.gov/en/candidates/running-for-office]

It appears that on December 19, 2017, Jacob Bell's campaign account made a \$500 expenditure that exceeded his cash on hand. His campaign then made three other expenditures while exceeding his campaign account's cash on hand. It also appears that this was not rectified by December 31, 2017.

It appears Bell's campaign account used \$5 Clean Elections contributions monies to cover the checks written on his campaign accounts for operating expenses.

I request the Clean Elections Commission review my complaint and his campaign finance report for 2017, investigate, and take appropriate measures.

EXECUTED this 17 day of January, 2018, by the incorporator.  
  
\_\_\_\_\_  
Signature

Susan Allen Gehl  
Printed Name

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SUBSCRIBED AND SWORN to me this 17<sup>th</sup> day of January, 2018.



  
Notary Public

<b>Income for period</b> <b>11/9/2016 to 12/31/2017</b>	<b>Amount</b>
Personal and Family Contributions (C1)	\$0.00
Individual Contributions (C2)	<u>\$107.00</u>
Contributions from Political Committees (C3)	\$0.00
Business Contributions (C4)	\$0.00
Small Contributions (C5)	\$0.00
CCEC Funding (C6)	\$0.00
Qualifying Contributions (C7)	<u>\$660.00</u>
Loans Made to this Committee (L1)	<u>\$402.00</u>
Other Receipts incl. Interest & Dividends (R1)	\$0.00
Transfers from Other Committees (T1)	\$0.00
Cash Surplus from Previous Committee (S1)	\$0.00
<b>Total Income</b>	<b>\$1,169.00</b>

Income Individual Contributions (C2) Qualifying Contributions (C7) Loans Made to this Committee (L1) C2 C7 L1

<b>Expenditures for period</b> <b>11/9/2016 to 12/31/2017</b>	<b>Amount</b>
Operating Expenses (E1)	<u>\$733.92</u>
Independent Expenditures (E2)	\$0.00
Contributions to Other Committees (E3)	\$0.00
Other Expenses (E4)	\$0.00
Transfers to other Committees (T1)	\$0.00
Loans Made by This Committee (L2)	\$0.00
Expenditure of In-Kind Contributions (C8)	\$0.00
Disposal of Surplus Cash (S1)	\$0.00
<b>Total Expenditures</b>	<b>\$733.92</b>

Bill Payments for Previous Expenditures (D1) \$0.00

Total Disbursed \$733.92

Schedule E1 - Operating expenses Covers period 11/9/2016 to 12/31/2017

Name / Address	Date	Amount	Cycle To Date
Wix Website Design Service PO Box 40190, San Francisco, CA 94140	09/23/2017	\$16.00	\$64.00
Walmart Checks 702 SW 8th St, Bentonville, AR 72716	09/30/2017	\$10.55	\$10.55
Costco 1510 W Bethany Home Rd, , Phoenix, AZ 85013	10/23/2017	\$0.20	\$20.71
Costco 1510 W Bethany Home Rd, Phoenix, AZ 85015	10/23/2017	\$10.65	\$10.65
Wix Website Design Service PO Box 40190, San Francisco, CA 94140	10/24/2017	\$16.00	\$64.00
J&R Graphics and Printing 638 W Indian School Rd, Phoenix, AZ 85013	10/25/2017	\$73.85	\$73.85
Costco 1510 W Bethany Home Rd, , Phoenix, AZ 85013	11/15/2017	\$20.51	\$20.71
Wix Website Design Service PO Box 40190, San Francisco, CA 94140	11/24/2017	\$16.00	\$64.00
DESERT SCHOOLS PO Box 2945, , Phoenix, AZ 85062	11/25/2017	\$7.00	\$14.00
COSTCO 3801 N 33rd Ave, , Phoenix, AZ 85017	12/14/2017	\$30.36	\$30.36
ARIZONA DEMOCRATIC PARTY 2910 N Central Ave, Phoenix, AZ 85012	12/19/2017	\$500.00	\$500.00
Wix Website Design Service PO Box 40190, San Francisco, CA 94140	12/24/2017	\$16.00	\$64.00
DESERT SCHOOLS	12/25/2017	\$7.00	\$14.00

<b>Name / Address</b>	<b>Date</b>	<b>Amount</b>	<b>Cycle To Date</b>
PO Box 2945, , Phoenix, AZ 85062			

USPS			
3905 N 7th Ave, , Phoenix, AZ 85013	12/29/2017	\$9.80	\$9.80

Schedule C2 - Individual contributions Covers period 11/9/2016 to 12/31/2017

<b>Name / Address</b>	<b>Date</b>	<b>Amount</b>	<b>Cycle To Date</b>
Garrett, Bruce			
1500 N Estate Dr, Tucson, AZ 85715	12/07/2017	\$7.00	\$7.00
Unemployed, No employer			
Holden, Jaelyn			
63 Village View Hts, Williamstown, VT 05679	12/10/2017	\$100.00	\$100.00
Americorps VISTA, CNCS			

Schedule L1 - Loans Made to This Committee Covers period 11/9/2016 to 12/31/2017

<b>Name / Address</b>	<b>Date</b>	<b>Amount</b>
New Loan		
Bell, Jason K		
Original amount of Loan: \$100.00	09/22/2017	\$100.00
Original Transaction Date: 09/22/2017		
Loan Payment	12/21/2017	(\$50.00)
Loan Payment	12/29/2017	(\$48.00)
		Balance: \$2.00

New Loan

Bell, Jason K		
Original amount of Loan: \$400.00	12/05/2017	\$400.00
Original Transaction Date: 12/05/2017		
		Balance: \$400.00

Dear Commissioners:

My name is Jason "Jake" Bell and I am running for Arizona Corporation Commission as a Clean Elections candidate. APR 2 11 53 AM CCEC

On behalf of my campaign and all its supporters, I would like to thank Ms. Gehl for bringing this to our attention as, given the current state of the corporation commission, it is not enough for a candidate like myself to be simply "not corrupt," but rather we must strive to be beyond the shadow of any possible corruption. Her diligence and attention to detail are admirable, and her inability to correctly spell my first name should not detract from that.

The importance of the Clean Elections system cannot be overstated as, without it, it's nearly impossible to imagine a scenario where a working class candidate like myself would have any hope of challenging affluent, out-of-touch, careerist politicians who stand for nothing but their own advancement and thus lose more elections than they win because they offer voters nothing but platitudes and "name recognition" while doing nothing to address the struggles of working families in this state. It is specifically because of that importance that challenges like this one—while seemingly without merit on its face—must be addressed and given all due scrutiny.

Ms. Gehl's complaint posits that four separate expenditures were made by my campaign that exceeded my account's cash on hand. Per Ariz. Admin Code R2-20-104(D)(4), candidates must "conduct all campaign activity through a single campaign account." As such early contributions and \$5 qualifying contributions are intermingled in one account. Ariz. Admin Code R2-20-702 states that a "participating candidate shall use funds in the candidate's current campaign account to pay for goods and services for direct campaign purposes."

In effect, all contributions go into one bucket, from which any campaign expense is drawn. Due to the nature of when contributions enter the account from various sources such as PayPal, ActBlue, or physical deposits of checks of cash, there are times where a large expense could include some of the \$5 contributions that will later be "replaced" by so-called "seed money," which, in this case, happened early in January. Ultimately, what matters is that the balance of qualifying contributions be accurate when a candidate applies for clean elections funding. However, as I stated above, given the need for a campaign such as mine to remain free of any taint of potential corruption I thank Ms. Gehl for drawing our attention to this. Unlike other candidates in this race who have run for this office before, losing a combined four times in five attempts as Democrats, this is my first time running and my first time using the Clean Elections system. That said, being new to the system is no excuse. So I sincerely apologize to all voters of Arizona for any actions that may even give the wrong impression that money is being misused and vow there will be no such misunderstanding in the future.

Some may dismiss Ms. Gehl's complaint as frivolous, a tired tactic employed by an increasingly irrelevant campaign that fears its vast resources cannot hide from voters the vacuous lack of substance to its candidates' message, and/or a textbook example of why more than half of

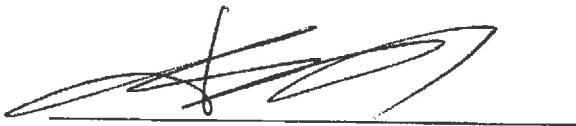
voters in this country are disengaged because they see politicians as opportunists who "work the refs" and hold their own self-interest in higher regard than the interests of those they hope to represent when elected. To those people, I would say that I understand their frustration, but I would encourage them not to lose faith.

Indeed, the most heartening thing about this election cycle has been the number of candidates I have met who are running specifically because they, too, are fed up with voting for politicians who are tone deaf to the needs of their constituency, and have, like myself, taken on the challenge of campaigning while holding down full-time jobs in order to change the status quo.

Rest assured, Ms. Gehl, the days of do-nothing candidates who run for office solely to stroke their own egos is coming to an end.

JASON BECC

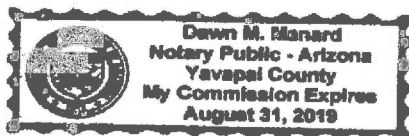
Printed Name



Signature

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SUBSCRIBED AND SWORN to be this 2nd day of February 2018.



Dawn M. Manard

Notary Public

**Doug Ducey**  
Governor

**Thomas M. Collins**  
Executive Director



**Damien R. Meyer**  
Chair

**Steve M. Titla**  
**Mark S. Kimble**  
**Galen D. Paton**  
**Amy B. Chan**  
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](http://www.azcleanelections.gov)

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Jason Bell  
349 N. 11th St., #108  
Phoenix, Az 85006  
Bell2018@jakebell.com

**Via E-Mail Only**  
Re: MUR 18-02

Dear Mr. Bell:

We have received your response to the Complaint. Because the response shows that you did not incur debt or make expenditures beyond cash on hand, I am closing the Complaint. Participating candidates may use the money collected in qualifying contributions, provided at the time of qualifying they have sufficient cash on hand to submit the necessary dollar amount.

At this time, the Commission will not take any action in this matter based on the information that is available. Please contact me if you have any questions at (602) 364-3477 or by e-mail at [thomas.collins@azcleanelections.gov](mailto:thomas.collins@azcleanelections.gov).

Sincerely,  
S/Thomas M. Collins  
Executive Director

cc: Susan Gehl, Regular Mail.  
Sara Larsen, E-Mail