

**STATE OF ARIZONA**  
**CITIZENS CLEAN ELECTIONS COMMISSION**  
MUR: No. 17-01 JESUS RUBALCAVA  
STATEMENT OF REASONS OF EXECUTIVE DIRECTOR

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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**

Jesus Rubalcava (“Respondent”), a 2016 participating candidate for State Representative of Legislative District 4, was selected for a random primary election audit on September 15, 2016. Based on findings from the random audit (**Exhibit A**), the Commission approved a comprehensive audit and review for Respondent and Respondent’s candidate campaign committee on January 19, 2017. On April 28, 2017, the independent auditors, Fester & Chapman P.C., submitted the final comprehensive audit to the Commission (**Exhibit B**).

On May 23, 2017, the Executive Director served Respondent with an internal Complaint regarding the findings of the comprehensive audit and review (**Exhibit C**). The Complaint alleges Respondent may have violated the Clean Elections Act and Rules by: (1) accepting contributions other than individual contributions and \$5 qualifying contributions; (2) making expenditures in excess of the personal money contribution limit; (3) making expenditures in excess of the adjusted primary election spending limit; (4) making expenditures in excess of the adjusted general election spending limit; (5) failing to comply with A.R.S. §16-948 regarding campaign accounts; and (6) failing to comply with A.R.S. §16-953 regarding the return of unused monies to the Citizens Clean Elections Fund. The Complaint also noticed Respondent of potential reporting violations and related penalties.

On May 30, 2017, Respondent submitted a Response to the Complaint (**Exhibit D**).

Because of the audit and Respondent’s related admissions noted below, it is clear that numerous violations may have occurred. The failure to document transactions properly, coupled with the usage of funds and dual bank accounts noted in the audits, gives rise to potentially serious violations. An investigation will determine whether there is probable cause to believe a violation has occurred, as well as the scope of the violation.

**II. Alleged Violations**

**A. Exceeding early contribution limit**

Pursuant to A.R.S. §16-941(A)(1), a participating candidate shall not accept any contributions, other than a limited number of five-dollar qualifying and early individual contributions.

The auditors found that Respondent made transfers from a separate bank account to the campaign bank account totaling \$1,869.33 and made additional deposits, whose purpose cannot be determined, into the campaign bank account in the amount of \$3,945.54. Respondent's Amended June 30<sup>th</sup> Report details that Respondent collected \$1,415 in qualifying contributions (**Exhibit E**). Respondent's Amended Qualifying Period Recap Report details that Respondent received \$177 in personal and family contributions, \$525 in early individual contributions, and \$60 in small contributions (**Exhibit F**). The total combined amount of received contributions as reported by Respondent is \$2,177. Respondent deposited into his bank account a total of \$5,814.87 (not including Clean Elections Funding); this is \$3,637.87 more than the total combined qualifying contributions, individual contributions, small contributions, and personal and family contributions Respondent reported on his campaign finance reports.

In his Response, Respondent states he did accept contributions other than the \$5 qualifying contributions, but he received early contributions from individuals and referenced his campaign finance reports as an exhibit. However, the campaign finance reports referenced by Respondent do not match the deposits made in the bank account. Moreover, Respondent does not "disput[e] the outcome of the audit." Clean Elections Commission Meeting, 5/18/2017, Tr. 30:8-11 ("I do acknowledge and I am taking responsibility that there was poor accounting and practices during this campaign cycle.") (**Exhibit G**); *accord* Response at 1 ("Please acknowledge that I am not by any means challenging the results of the review, nor I am denying any wrong doing."). Additionally, Respondent failed to provide sufficient documentation for all campaign activity in his campaign finance reports, pursuant to R2-20-104. As such, the auditors and Commission staff are unable to determine if contributions comply with the limits. A.R.S. § 16-941(A)(1) ("[A] participating candidate. . . [s]hall not accept any contributions, other than a limited number of five-dollar qualifying contributions as specified in section 16-946 and early contributions as specified in section 16-945, except in the emergency situation specified in section 16-954, subsection F.").

For the reasons set forth above, I recommend the Commission find reason to believe a violation may have occurred.

## **B. Exceeding the limit for expenditures paid with personal monies**

Pursuant to A.R.S. §16-941(A)(2), a participating legislative candidate shall not make expenditures of more than a total of seven hundred and twenty dollars of the candidate's personal monies.

The auditors found that Respondent had made transfers from a separate bank account to the campaign bank account totaling \$1,869.33 and made additional deposits, whose purpose cannot be determined, into the campaign bank account in the amount of \$3,945.54. If Respondent only received \$2,000 from his qualifying contributions, early individual contributions, and small contributions combined, as reported on his campaign finance reports, then Respondent received \$3,814.87 in personal and family contributions. Respondent only reported receiving \$177 in personal and family contributions.

In his Response, Respondent states he contributed \$177 of his personal money to his campaign. However, Respondent failed to provide sufficient documentation for all campaign activity, as required by R2-20-104. Again, Respondent does not “disput[e] the outcome of the audit.” Clean Elections Commission Meeting, 5/18/2017, Tr. 30:8-11 (“I do acknowledge and I am taking responsibility that there was poor accounting and practices during this campaign cycle.”); *accord* Response at 1 (“Please acknowledge that I am not by any means challenging the results of the review, nor I am denying any wrong doing.”). As such, the auditors and Commission staff are unable to determine if use of personal monies is within the limits. A.R.S. § 16-941(A)(2)(“[A] participating candidate. . . shall not make expenditures of more than a total of five hundred dollars of the candidate's personal monies for a candidate for the legislature or more than one thousand dollars for a candidate for statewide office.”).

For the reasons set forth above, I recommend the Commission find reason to believe a violation may have occurred.

### **C. Exceeding general election spending limit**

Pursuant to A.R.S. §§16-941(A)(3) and -941(A)(4), a participating candidate shall not make expenditures exceeding the adjusted primary spending limit (\$16,044) and adjusted general spending limit (\$1,415).

The auditors found that Respondent made a total of \$3,677.16 in expenditures from the campaign bank account during the general election period (August 31, 2016 through November 8, 2016). Respondent’s adjusted general election spending limit was \$1,415 since Respondent was not contested in the general election. Respondent made a total of \$2,262.16 in excess expenditures during the general election period.

In his Response, Respondent states that he “did not exceed the amount of the general election spending limit.” He also states that he did not receive general election funding because he was unopposed and learned that he was unopposed in late September. However, Respondent did receive general funding on August 31, 2016 (**Exhibit H**) but it was determined that Respondent would be unopposed in the general election; therefore, the next day on September 1, 2016, Respondent was notified by the Executive Director, through e-mail and overnight delivery, that he would need to return \$22,651 in general election funding and he could only retain the amount of the \$5 qualifying contributions (\$1,415) he submitted to the Secretary of State’s Office (**Exhibit I**). Respondent acknowledged the notification the same day but did not return the general election funds until September 28, 2016.

Respondent also provides his campaign finance reports as evidence that he did not exceed the general election spending limit. However, the auditors found that Respondent’s campaign finance reports do not accurately reflect the campaign finance activity in the Respondent’s campaign bank account. Respondent does not “disput[e] the outcome of the audit.” Clean Elections Commission Meeting, 5/18/2017, Tr. 30:8-11 (“I do acknowledge and I am taking responsibility that there was poor accounting and practices during this campaign cycle.”); *accord* Response at 1 (“Please acknowledge that I am not by any means challenging the results of the review, nor I am denying any wrong doing.”). The auditors found that \$2,829.61 in expenditures

from the campaign bank account during the general election period were not reported on Respondent's campaign finance reports.

The auditors requested supporting documentation for the expenditures but Respondent claimed to have been unable to "locate the box" containing the information. Every Clean Elections candidate has the burden of proving expenditures are made for direct campaign purposes, pursuant to A.A.C. R2-20-104(C). We are unable to determine whether expenditures were for direct campaign purposes and in compliance with the adjusted general spending limit. A.R.S. § 16-941(A)(4)("[A] participating candidate . . . [s]hall not make expenditures in the general election period in excess of the adjusted general election spending limit.").

For the reasons set forth above, I recommend the Commission find reason to believe a violation may have occurred.

**D. Failure to return unused monies to the Commission after the primary and general elections and exceeding the primary election spending limit.**

Pursuant to A.R.S. § 16-941(A)(5), participating candidates must comply with A.R.S. §16-953 stating that at the end of the primary and general elections participating candidates must return monies in the campaign account to the Commission.

The auditors found a transfer from the Respondent's campaign bank account to Respondent's personal account equaling \$604.42. Respondent made \$4,653.41 in non-campaign withdrawals from the campaign bank account. An additional \$3,635.41 was withdrawn and auditors were unable to provide a determinable purpose. Participating candidates must return Clean Elections funding that was not used for direct campaign purposes, as required by R2-20-704(B).

On October 18, 2016, the auditors contacted Respondent regarding a high ending balance on the Primary Recap Report (**Exhibit J**). At that time Respondent should have returned \$7,046.72 in unspent primary election funding based on the timely filing of his Primary Recap Report (**Exhibit K**). On November 1, 2016, Respondent filed amendments to his campaign finance reports. The new ending balance on the Amended Primary Recap Report was -\$2.44 (**Exhibit L**).

The auditors found that Respondent made \$17,501.51 in expenditures from the campaign bank account during the primary election period. Since Respondent could have only potentially deposited \$18,221 into the campaign bank account during the primary period (based upon primary election funding, early contributions, \$5 qualifying contributions, small contributions and personal contributions), Respondent should have returned to the Clean Elections Fund at least \$710.49. This does not take into account the expenditures that were made for personal use and should have also been returned to the fund. Moreover, absent evidence to support the expenditures during the primary, Respondent may have exceeded the primary spending limit he took on himself.



Respondent states that “according to the reports filed with the Arizona Secretary of State, there wasn’t [sic] any unused monies that were not returned to the Citizens Clean Elections Commission.” And that because his personal bank account and campaign account were linked, he “began to use the filing report with the Secretary of State as [his] accounting and balance.” However, Respondent amended his reports several months after the transactions had taken place so it is improbable that he was able to utilize the Secretary of State’s campaign finance reporting system to keep track of his campaign finance activity. Confirming this, Respondent does not “disput[e] the outcome of the audit.” Clean Elections Commission Meeting, 5/18/2017, Tr. 30:8-11 (“I do acknowledge and I am taking responsibility that there was poor accounting and practices during this campaign cycle.”); *accord* Response at 1 (“Please acknowledge that I am not by any means challenging the results of the review, nor I am denying any wrong doing.”).

For the reasons set forth above, I recommend the Commission find reason to believe a violation may have occurred. A.R.S. § 16-941(A)(3) (“[A] [participating candidate. . . [s]hall not make expenditures in the primary election period in excess of the adjusted primary election spending limit.”); § 16-941(A)(5)([A] participating candidate. . . [s]hall comply with section . . . section 16-953 regarding returning unused monies to the citizens clean elections fund described in this article.”).

#### **E. Failure to conduct campaign activity through a single bank account**

Pursuant to A.R.S. § 16-941(A)(5), participating candidates must comply with A.R.S. § 16-948 stating that all financial campaign activity must be conducted through a single campaign account and a participating candidate shall not make any deposits into the campaign bank account other than early and qualifying contributions. A.R.S. § 16-948(C) and R2-20-114(A) require candidates who establish a petty cash account to adhere to an aggregate limit of \$1,420 and each expenditure may not exceed \$160. Participating candidates utilizing petty cash accounts must include additional, detailed information on their campaign finance reports, as required by A.A.C. R2-20-115.

On June 15, 2016, Respondent physically received his check for the primary election. Bank records show that \$16,044 was deposited into a personal bank account and \$13,280.22 was transferred from Respondent’s personal bank account to a campaign bank account on June 17, 2016. The difference of \$2,763.78 was not transferred to the campaign account. The auditors noted transfers from a separate bank account to the campaign account equaling \$1,869.33 and other deposits with undeterminable purposes equating to \$3,945.54. The deposits cannot be verified due to Respondent’s failure to provide supporting documentation.

Respondent neglected to establish a petty cash account and provide detailed information on campaign finance reports. The auditors found ATM withdrawals totaling \$683.50 that Respondent failed to document on his campaign finance reports. The withdrawals cannot be verified due to the lack of supporting documentation. Respondent does not “disput[e] the outcome of the audit.” Clean Elections Commission Meeting, 5/18/2017, Tr. 30:8-11 (“I do acknowledge and I am taking responsibility that there was poor accounting and practices during this campaign cycle.”); *accord* Response at 1 (“Please acknowledge that I am not by any means challenging the results of the review, nor I am denying any wrong doing.”).

For the reasons set forth above, I recommend the Commission find reason to believe a violation may have occurred. A.R.S. § 16-941(A)(5) ([A] participating candidate . . . [s]hall comply with section 16-948 regarding campaign accounts. . . .”).

#### **F. Failure to report expenditures and receipts**

Pursuant to A.R.S. § 16-941, participating candidates shall comply with A.R.S. § 16-948 stating that candidates are required to report expenditures made directly from their campaign bank account, as required by A.R.S. § 16-948(C). Information to be provided on the campaign finance reports includes recipient’s full name, address, nature of good and services, and compensation. A.A.C. R2-20-703 requires candidates to report all receipts and disbursements from the campaign account similarly. In addition, A.A.C. R2-20-115 contends that participating candidates maintain books and records of financial transactions in a single location, and such records be accessible upon request.

The auditors found that Respondent failed to report an aggregate of \$9,209.72 in expenditures and \$4,852.55 in deposits on his campaign finance reports. It could not be determined if an additional \$1,362.32 was reported because of insufficient records.

Respondent states that out of confusion he “began to use the filing report with the Secretary of State as [his] accounting and balance.” As required by A.A.C. R2-20-110, participating candidates’ campaign finance reports are to include all receipts and disbursements for their current campaign account. However, Respondent does not “disput[e] the outcome of the audit.” Clean Elections Commission Meeting, 5/18/2017, Tr. 30:8-11 (“I do acknowledge and I am taking responsibility that there was poor accounting and practices during this campaign cycle.”); *accord* Response at 1 (“Please acknowledge that I am not by any means challenging the results of the review, nor I am denying any wrong doing.”). The comprehensive audit revealed several expenditures were made and not reported. Respondent made reference to his campaign finance reports submitted to the Secretary of State as proof against allegations of excess spending, but information in reports is recorded by the candidate and numerous expenditures and deposits were never documented by Respondent.

For the reasons set forth above, I recommend the Commission find reason to believe a violation may have occurred. A.R.S. § 16-942(B); Ariz. Admin. Code R2-20-109 (2016).

#### **G. Failure to utilize Clean Elections funding for direct campaign expenditures**

Pursuant to A.R.S. §16-941, participating candidates shall comply with A.R.S. §16-948 stating that Clean Elections funding must be utilized only for direct campaign expenditures. Additionally, A.A.C. R2-20-702(C) prohibits participating candidates from using funds within the candidate’s campaign account for personal use.

Auditors noted that Respondent transferred \$604.42 from his campaign bank account to Respondent’s personal account. Respondent made \$4,653.41 in non-campaign withdrawals from the campaign bank account. An additional \$3,635.41 was withdrawn and auditors were unable to provide a determinable purpose. Non-campaign withdrawals are exemplified by, but not limited

to, Respondent's expenditures for: airline fees, hotel fees in the states of Tennessee, California, and the District of Columbia, and AT&T bill payments.

However, Respondent failed to provide sufficient documentation for all campaign activity including possible direct campaign expenditures, as required by R2-20-104. . Respondent does not "disput[e] the outcome of the audit." Clean Elections Commission Meeting, 5/18/2017, Tr. 30:8-11 ("I do acknowledge and I am taking responsibility that there was poor accounting and practices during this campaign cycle."); *accord* Response at 1 ("Please acknowledge that I am not by any means challenging the results of the review, nor I am denying any wrong doing."). As such, the auditors and Commission staff are unable to determine if any of the expenditures were for direct campaign purposes as required by A.R.S. §§16-941 and -948, A.A.C. R2-20-104 and R2-20-702(C) .

For the reasons set forth above, I recommend the Commission find reason to believe a violation may have occurred. *See* A.R.S. § 16-941(A).

### **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 further audits. I request that the Commission authorize such subpoenas now to allow the investigation to proceed in due course.

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), including removal from office. A.A.C. R2-20-217. The Commission may order the repayment of funds expended in violation of A.A.C. R2-20-702. A.A.C. R2-20-704(B).

Dated this 19<sup>th</sup> day of June, 2017  
Thomas M. Collins, Executive Director

# EXHIBIT A

**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Jesus Rubalcava  
Participating Candidate for  
State Representative – District No. 4  
Primary Election 2016**

**Independent Accountants' Report on  
Applying Agreed-Upon Procedures**

Chairman and Members of the Commission  
Citizens Clean Elections Commission  
Phoenix, Arizona

We (the Contractor) have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Rubalcava for House (the Candidate) Campaign Finance Reports for both the Pre-Primary (June 1, 2016 to August 18, 2016) and the Post-Primary (August 19, 2016 to September 19, 2016) reporting periods were prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Pre-Primary and Post-Primary Campaign Finance Reports. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and the associated findings are as follows:

1. Preliminary Procedures

- a) Commission Staff will obtain a copy of the candidate's campaign finance report for the reporting period and provide the records to the Contractor.

**Finding**

We obtained both the Pre-Primary (June 1, 2016 to August 18, 2016) and Post-Primary (August 19, 2016 to September 19, 2016) Campaign Finance Reports from the Arizona Secretary of State's website.

- b) Perform a desk review of the receipts reported in the candidate's campaign finance report as follows:

- (i) Determine whether the candidate accepted contributions only from individuals.

**Finding**

The contributions received during the periods reviewed appeared to be only from individuals.

- (ii) Determine whether any contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the periods reviewed did not exceed the \$160 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the periods reviewed did not exceed the \$4,011 limit for a legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Early contributions received during the periods reviewed did not exceed the \$720 limit for a legislative candidate.

- c) Perform a desk review of the disbursements reported in the candidate's campaign finance report to identify any unusual items requiring follow-up during fieldwork.

**Finding**

We noted six disbursements to family members of the candidate, however the Campaign finance report did not indicate that the expenditures were made to family members. Per the Citizens Clean Elections Act & Rules Manual rule R2-20-701(C)(4), all payments made to family members or to enterprises owned in whole or part by the candidate or a family member shall be clearly itemized and indicated as such in all campaign finance reports.

In addition, there were three loans outstanding on the Post-Primary finance report that were made to the Campaign by the Candidate in December 2015, totaling \$69.93, that do not appear to have been repaid to the Candidate. In addition, supporting documentation for these loans was not maintained by the Campaign. Per the Citizens Clean Elections Act & Rule Manual rule R2-20-104(E), if the loan is to be repaid, the loans shall be repaid promptly upon receipt of Clean Elections funds if the participating candidate qualifies for Clean Elections funding. The Campaign received its Clean Elections funding on June 15, 2016.

It was further noted that the Campaign finance report had significantly fewer transactions than what was shown on the Campaign bank statements. Per discussion with the Candidate, the financial institution linked his personal bank account with the Campaign bank account, and therefore when he used his personal debit card, the Campaign bank account was debited. We noted approximately forty-one personal transactions consisting of out of state restaurant purchases, travel and other non-Campaign related items on the Campaign bank statement, totaling \$3,461.74; three ATM withdrawals, totaling \$243.50; five overdraft fees, totaling \$175.00; and three transfers from the Campaign bank account to the Candidate's personal bank account, totaling \$223.42. The Candidate indicated that he reimbursed the Campaign for these personal transactions, however deposits for these specific amounts was not provided. We noted eleven possible reimbursements to the Campaign on the bank statements, totaling \$2,270.19.

- d) Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

### **Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.



## 2. Fieldwork Procedures

- a) Commission staff will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates chosen for a Primary Election Audit shall provide records from the Pre-Primary Election Report and the Post-Primary Election Report. Candidates chosen for a General Election Audit shall provide records from the Pre-General Election Report and the Post-General Election Report.

### **Finding**

Commission staff sent an initial notice of primary random audit selection to the Candidate and informed the Candidate that we would be contacting him. We then communicated to the Candidate in a written request, the purpose of the engagement, agreed-upon procedures to be performed, documentation needed and potential future requirements of the Candidate.

- b) Commission staff will provide the records to the Contractor upon receipt. The Contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

### **Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

### **Finding**

The Candidate provided written bookkeeping policies and procedures utilized by the campaign committee.

- (i) Review the names of the candidate's family members. Family members include parents, grandparents, spouse, children, siblings and a parent or spouse of any of those persons.

### **Finding**

We obtained and reviewed the names of the Candidate's family members.

- (ii) Review bank statements for each of the months in the reporting period and perform the following:
  - Select a sample of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance report.

### **Finding**

We selected five deposits and five withdrawals from the bank statements for the periods reviewed and determined that none appeared to be properly recorded in the Candidate's campaign finance reports.

The five withdrawals tested were personal purchases, made by the Candidate, totaling \$1,454.72. Per discussion with the Candidate, the financial institution linked his personal bank account with the Campaign bank account, and therefore when he used his personal debit card, the Campaign bank account was debited. He indicated that he reimbursed the Campaign for the personal purchases, however deposits for these specific amounts was not provided. He further indicated that the errors continued after he notified the financial institution.

The five deposits tested, per discussion with the Candidate, were reimbursements to the Campaign for personal purchases made in error by the financial institution, totaling \$1,717.99.

It was further noted that the Campaign finance report included the Primary Election Commission funding totaling \$16,044.00 on 6/15/16. The Campaign bank account did not include a corresponding deposit for this amount, however it did include a transfer from the Candidate's personal bank account for \$13,280.22, which represents a variance of \$2,763.78 of Commission monies that does not appear to have been deposited into the Campaign bank account. Per the Citizens Clean Elections Act & Rules Manual rule 16-948(A), a participating candidate shall conduct all financial activity through a single campaign account of the candidate's campaign committee.

- Perform a proof of receipts and disbursements for the reporting period.

### **Finding**

After performing proof of cash procedures, we calculated a Post-Primary ending cash balance of \$20,181.06, however the Amended Post-Primary campaign finance report reflected an ending balance of \$23,202.06, reflecting a variance of \$3,021.00, and indicating that the Campaign overspent by this amount. Per the Citizens Clean Elections Act & Rules Manual rule 16-941 (A)(3), a participating candidate: shall not make expenditures in the primary election period in excess of the adjusted primary election spending limit.

In addition, during this testwork it was noted that ten of the expenditure items in the Post-Primary campaign finance report, totaling \$2,214.50, had not cleared the bank as of September 30, 2016. Per discussion with the Candidate, he paid these vendors with cash, however no petty cash fund had been set up for the Campaign, and these expenditures were not reported as reimbursements to the Candidate on the Campaign finance report.

- d) Judgmentally select a sample of early contributions reported in the candidate's campaign finance report and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$50, which reflects the contributor's address, occupation and employer.

### **Finding**

We reviewed the supporting documentation for one early contribution (total population) reported in the Candidate's campaign finance report, and determined the name of the contributor for the contribution was included on the support. For individuals who contributed greater than \$50, we determined that the contributor's address, occupation and employer were also included on the support.

- (i) For other types of cash receipts reported in the candidate's campaign finance report, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

### **Finding**

No other types of cash receipts were reported in the Candidate's campaign finance reports during the periods reviewed.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

### **Finding**

No in-kind contributions were reported in the Candidate's campaign finance reports during the periods reviewed.

- e) Judgmentally select a sample of cash expenditures reported in the candidate's campaign finance report and perform the following:
  - (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance report.

### **Finding**

We reviewed five expenditures and agreed amounts to supporting invoices or other documentation and to the Candidate's finance report, with no exceptions noted.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance report.

### **Finding**

We reviewed five expenditures and agreed the name, address and nature of goods or services provided to the information reported in the Candidate's Campaign finance report with no exceptions noted, however three of the expenditures tested were made were to family members of the Candidate and the Campaign finance report did not indicate that they were family members. Per the Citizens Clean Elections Act & Rules Manual rule R2-20-701(C)(4), all payments made to family members or to enterprises owned in whole or part by the candidate or a family member shall be clearly itemized and indicated as such in all campaign finance reports.

Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed five expenditures and agreed amounts to the campaign account bank statements with one exception. The Campaign finance report included a \$264.50 expenditure for newspaper advertising, however this amount was not present on the Campaign bank statement. Per discussion with the Candidate, he paid this vendor in cash, however no petty cash fund had been set up for the Campaign and this expenditure was not reported as a reimbursement to the Candidate on the Campaign finance report.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed five expenditures and agreed the name, address and nature of goods or services provided to the information reported in the Candidate's Campaign finance report with no exceptions noted.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

None of the expenditures we tested appeared to be for joint expenditures.

- f) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,420.

### **Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the periods reviewed, however per review of the Campaign bank statement, several ATM withdrawals were made and per discussion with the Candidate, multiple vendors were paid with cash.

- (i) If applicable, judgmentally select a sample of expenditures made from the Candidate's petty cash fund(s) and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$160 limit on petty cash expenditures.

### **Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the periods reviewed.

- g) Determine whether a legal defense fund has been established.

### **Finding**

Based on inquiry of the Candidate, the campaign did not establish a legal defense fund.

- (i) If a legal defense fund was established, how were these funds accounted for?

### **Finding**

Based on inquiry of the Candidate, the campaign did not establish a legal defense fund.

- h) Contact the Candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the Candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

### **Finding**

We discussed our findings with the Candidate and the Candidate did not provide responses to our findings.

We were not engaged to and did not conduct an examination, the objective of which would be the expression of an opinion on the Pre-Primary and Post-Primary Campaign Finance Reports of Rubalcava for House. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the Citizens Clean Elections Commission, and is not intended to be and should not be used by anyone other than this specified party.

A handwritten signature in black ink that reads "Aster & Chapman P.C." The signature is written in a cursive, stylized font.

December 13, 2016

# EXHIBIT B



**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Jesus Rubalcava  
Participating Candidate for  
State Representative – District No. 4  
2016 Election Cycle Finance Activity Comprehensive Review**

**Independent Accountants' Report on  
Applying Agreed-Upon Procedures**

Chairman and Members of the Commission  
Citizens Clean Elections Commission  
Phoenix, Arizona

We (the Contractor) have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Rubalcava for House (the Candidate), Campaign Finance Reports, Campaign bank account and corresponding documentation for expenditures and contributions for the 2016 election cycle (January 15, 2016 to January 31, 2017) were prepared or maintained in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign Finance Reports. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and the associated findings are as follows:

1. The Contractor shall review bank statements for each of the months in the election cycle and perform the following:
  - a) Select 100% of the deposits and withdrawals from the campaign bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance report.

### **Finding**

The Candidate provided the Campaign bank statements for all months of the election cycle, however the Candidate indicated that he was unable to identify or locate any documentation supporting the deposits and withdrawals from the Campaign bank statements. The attached Bank Statement Deposit Summary and Bank Statement Withdrawal Summary describe the deposits and withdrawals noted in the Campaign bank statements.

b) Select 100% of cash disbursements and withdrawals from the campaign bank statement and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance report.

### **Finding**

The Candidate indicated that he was unable to identify or locate any documentation supporting the withdrawals from the Campaign bank statements. The attached Bank Statement Withdrawal Summary describe the withdrawals noted in the Campaign bank statements.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance report.

### **Finding**

The Candidate indicated that he was unable to identify or locate any documentation supporting the withdrawals from the Campaign bank statements, therefore the name, address and nature of goods or services provided could not be agreed to the information reported in the Candidate's Campaign finance report. The attached Bank Statement Withdrawal Summary describe the withdrawals noted in the Campaign bank statements.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

The Candidate indicated that he was unable to identify or locate any documentation supporting the withdrawals from the Campaign bank statements, therefore expenditures made for a direct Campaign purpose could not be determined. The attached Bank Statement Withdrawal Summary describe the withdrawals noted in the Campaign bank statements.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

The Candidate indicated that he was unable to identify or locate any documentation supporting the withdrawals from the Campaign bank statements, therefore joint expenditures were unable to be identified. The attached Bank Statement Withdrawal Summary describe the withdrawals noted in the Campaign bank statements.

- c) Determine whether a legal defense has been established.

**Finding**

Based on inquiry of the Candidate, the Campaign did not establish a legal defense.

- (i) Has any Clean funding been used to pay for legal services?

**Finding**

Based on inquiry of the Candidate, the Campaign did not establish a legal defense.

- (ii) What is the cost or value of legal services being provided for the comprehensive audit and review of the finance activity?

**Finding**

Based on inquiry of the Candidate, the Campaign did not establish a legal defense.

- d) Contact the Candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this notification, the Contractor will advise the Candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We discussed our findings with the Candidate and the Candidate provided responses to our findings, which are included on pages 14-15 of this report.

We were not engaged to and did not conduct an examination, the objective of which would be the expression of an opinion on the comprehensive audit and review of the finance activity of Rubalcava for House. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the Citizens Clean Elections Commission, and is not intended to be and should not be used by anyone other than this specified party.

*Foster & Chapman P.C.*

April 28, 2017

## Bank Statement Deposit Summary

### January 2016

Date	Amount	Description	On Finance Report?
1/4/2016	\$ 200.00	ATM Cash Deposit	Undeterminable, significant number of contributions noted on report
1/4/2016	\$ 3.00	ATM Cash Deposit	No
1/4/2016	\$ 200.00	ATM Cash Deposit	Undeterminable, significant number of contributions noted on report
1/11/2016	\$ 2.00	Transfer from personal bank account	No
	<b>\$ 405.00</b>	<b>January Deposit Total:</b>	

January totals from above		Campaign Finance Report Totals	
\$ 2.00	Transfers from separate account	Included in Campaign Finance Report	\$ -
\$ 400.00	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ 5.00
\$ 3.00	Purpose not determinable	Undeterminable	\$ 400.00
\$ 405.00			\$ 405.00

### February 2016

Date	Amount	Description	On Finance Report?
No deposit activity noted			

### March 2016

Date	Amount	Description	On Finance Report?
3/10/2016	\$ 25.00	ATM Check Deposit	Yes
3/31/2016	\$ 100.00	ATM Cash Deposit	Yes
3/31/2016	\$ 60.00	ATM Cash Deposit	Undeterminable, significant number of contributions noted on report
	<b>\$ 185.00</b>	<b>March Deposit Total:</b>	

March totals from above		Campaign Finance Report Totals	
\$ -	Transfers from separate account	Included in Campaign Finance Report	\$ 125.00
\$ 125.00	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ -
\$ 60.00	Purpose not determinable	Undeterminable	\$ 60.00
\$ 185.00			\$ 185.00

### April 2016

Date	Amount	Description	On Finance Report?
4/4/2016	\$ 70.00	ATM Cash Deposit	Undeterminable, significant number of contributions noted on report
4/15/2016	\$ 30.00	Transfer from personal account	No
4/18/2016	\$ 30.00	Transfer from personal account	No
	<b>\$ 130.00</b>	<b>April Deposit Total:</b>	

April totals from above		Campaign Finance Report Totals	
\$ 60.00	Transfers from separate account	Included in Campaign Finance Report	\$ -
\$ -	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ 60.00
\$ 70.00	Purpose not determinable	Undeterminable	\$ 70.00
\$ 130.00			\$ 130.00

### May 2016

Date	Amount	Description	On Finance Report?
5/6/2016	\$ 600.00	Transfer from personal account	No
5/11/2016	\$ 607.12	eDeposit IN Branch/Store	Undeterminable
5/11/2016	\$ 75.00	ATM Check Deposit	Yes
5/12/2016	\$ 500.00	Transfer from personal account	No
5/17/2016	\$ 100.00	ATM Cash Deposit	Undeterminable, significant number of contributions noted on report
5/23/2016	\$ 25.00	ATM Check Deposit	Undeterminable, significant number of contributions noted on report
5/31/2016	\$ 90.00	Transfer from personal account	No
	<b>\$ 1,997.12</b>	<b>May Deposit Total:</b>	

May totals from above		Campaign Finance Report Totals	
\$ 1,190.00	Transfers from separate account	Included in Campaign Finance Report	\$ 75.00
\$ 75.00	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ 1,190.00
\$ 732.12	Purpose not determinable	Undeterminable	\$ 732.12
\$ 1,997.12			\$ 1,997.12

June 2016			
Date	Amount	Description	On Finance Report?
6/2/2016	\$ 100.20	ATM Check Deposit	Undeterminable, significant number of contributions noted on report
6/2/2016	\$ 45.00	Transfer from personal account	No
6/9/2016	\$ 52.85	Transfer from personal account	No
6/13/2016	\$ 53.00	Transfer from personal account	No
6/17/2016	\$ 13,280.22	Transfer from personal account	This is presumed to be part of the Commission Primary Election funding. Total funding = \$16,044.00, difference of \$2,763.78.
	<b>\$ 13,531.27</b>	<b>June Deposit Total:</b>	

June totals from above		Campaign Finance Report Totals	
\$ 150.85	Transfers from separate account	Included in Campaign Finance Report	\$ 13,280.22
\$ 13,280.22	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ 150.85
\$ 100.20	Purpose not determinable	Undeterminable	\$ 100.20
\$ 13,531.27			\$ 13,531.27

July 2016			
Date	Amount	Description	On Finance Report?
		No deposit activity noted	

August 2016			
Date	Amount	Description	On Finance Report?
8/4/2016	\$ 770.14	ATM Check Deposit	No
8/8/2016	\$ 77.00	eDeposit IN Branch/Store	Yes
8/9/2016	\$ 350.00	ATM Cash Deposit	No
8/29/2016	\$ 20.00	ATM Cash Deposit	No
8/29/2016	\$ 9.00	Transfer from personal account	No
8/30/2016	\$ 50.00	Transfer from personal account	No
	<b>\$ 1,276.14</b>	<b>August Deposit Total:</b>	

August totals from above		Campaign Finance Report Totals	
\$ 59.00	Transfers from separate account	Included in Campaign Finance Report	\$ 77.00
\$ 77.00	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ 1,199.14
\$ 1,140.14	Purpose not determinable	Undeterminable	\$ -
\$ 1,276.14			\$ 1,276.14

September 2016			
Date	Amount	Description	On Finance Report?
9/6/2016	\$ 24,066.00	eDeposit IN Branch/Store	Yes
9/6/2016	\$ 320.00	ATM Cash Deposit	No
9/19/2016	\$ 500.00	ATM Cash Deposit	No
	<b>\$ 24,886.00</b>	<b>September Deposit Total:</b>	

September totals from above		Campaign Finance Report Totals	
\$ -	Transfers from separate account	Included in Campaign Finance Report	\$ 24,066.00
\$ 24,066.00	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ 820.00
\$ 820.00	Purpose not determinable	Undeterminable	\$ -
\$ 24,886.00			\$ 24,886.00

October 2016			
Date	Amount	Description	On Finance Report?
10/3/2016	165.00	Transfer from personal account	No
10/5/2016	115.00	Transfer from personal account	No
10/12/2016	60.00	Transfer from personal account	No
10/24/2016	500.00	ATM Cash Deposit	No
10/24/2016	520.08	ATM Check Deposit	No
10/25/2016	33.00	Transfer from personal account	No
10/27/2016	34.48	Transfer from personal account	No
	<b>\$ 1,427.56</b>	<b>October Deposit Total:</b>	

October totals from above		Campaign Finance Report Totals	
\$ 407.48	Transfers from separate account	Included in Campaign Finance Report	\$ -
\$ -	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ 1,427.56
\$ 1,020.08	Purpose not determinable	Undeterminable	\$ -
\$ 1,427.56			\$ 1,427.56

November 2016			
Date	Amount	Description	On Finance Report?
No deposit activity noted			
December 2016			
Date	Amount	Description	On Finance Report?
No deposit activity noted			

Total Period Deposits			Campaign Finance Report Totals		
\$	0.58	Beginning Bank Balance, 01/01/16	Beginning Bank Balance, 01/01/16	\$	0.58
\$	1,869.33	Transfers from separate account	Included in Campaign Finance Report	\$	37,623.22
\$	38,023.22	Possible Campaign Deposits	Not included in Campaign Finance Report	\$	4,852.55
\$	3,945.54	Purpose not determinable	Undeterminable	\$	1,362.32
\$	43,838.67			\$	43,838.67



## Bank Statement Withdrawal Summary

### January 2016

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
1/4/2016	\$ 100.00	ATM Withdrawal	Not determinable	n/a	No
1/4/2016	\$ 2.12	Family Dollar	Not determinable	n/a	No
1/4/2016	\$ 100.00	ATM Withdrawal	Not determinable	n/a	No
1/7/2016	\$ 100.00	ATM Withdrawal	Not determinable	n/a	No
1/11/2016	\$ 54.00	Transfer to personal account	No	n/a	No
1/11/2016	\$ 30.00	Western Union	No	n/a	No
1/11/2016	\$ 19.10	Pride Travel Center	Yes	Fuel	Yes
<b><u>\$ 405.22 January Withdrawal Total</u></b>					

January totals from above		
\$ 300.00	ATM Withdrawals	
\$ 54.00	Transfers to personal account	
\$ 30.00	Non-Campaign Withdrawals	
\$ 19.10	Possible Campaign Withdrawals	
\$ 2.12	Purpose not determinable	
<b><u>\$ 405.22</u></b>		

Campaign Finance Report Totals		
Included in Campaign Finance Report	\$	386.12
Not included in Campaign Finance Report	\$	19.10
	<b>\$</b>	<b>405.22</b>

### February 2016

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
No bank statement activity noted					

### March 2016

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
3/17/2016	\$ 2.82	Quiktrip Tolleson AZ	Not determinable	n/a	No
3/18/2016	\$ 19.99	Western Union	No	n/a	No
3/18/2016	\$ 2.00	Swa Inflight Service	No	n/a	No
<b><u>\$ 24.81 March Withdrawal Total</u></b>					

March totals from above		
\$ -	ATM Withdrawals	
\$ -	Transfers to personal account	
\$ 21.99	Non-Campaign Withdrawals	
\$ -	Possible Campaign Withdrawals	
\$ 2.82	Purpose not determinable	
<b>\$ 24.81</b>		

Campaign Finance Report Totals		
Included in Campaign Finance Report	\$	-
Not included in Campaign Finance Report	\$	24.81
	<b>\$</b>	<b>24.81</b>

### April 2016

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
4/1/2016	\$ 10.25	Quiktrip Tolleson AZ	Not determinable	n/a	No
4/1/2016	\$ 60.00	ATM Withdrawal	No	n/a	No
4/4/2016	\$ 4.37	Burger King #9984 Buckeye AZ	Not determinable	n/a	No
4/4/2016	\$ 54.99	Western Union	No	n/a	No
4/6/2016	\$ 100.00	Check #101	Yes	Table fee for Yuma Co Fair	Yes
4/18/2016	\$ 10.01	Shell Service Station Gila Bend AZ	Not determinable	n/a	No
4/18/2016	\$ 27.99	Western Union	No	n/a	No
4/20/2016	\$ 4.82	Quiktrip Phoenix AZ	Not determinable	n/a	No
4/22/2016	\$ 8.00	Transfer to personal account	No	n/a	No
4/25/2016	\$ 5.41	Starbucks L3257 Los Angeles CA	No	n/a	No
<b><u>\$ 285.84 April Withdrawal Total</u></b>					

April totals from above		
\$ 60.00	ATM Withdrawals	
\$ 8.00	Transfers to personal account	
\$ 88.39	Non-Campaign Withdrawals	
\$ 100.00	Possible Campaign Withdrawals	
\$ 29.45	Purpose not determinable	
<b>\$ 285.84</b>		

Campaign Finance Report Totals		
Included in Campaign Finance Report	\$	100.00
Not included in Campaign Finance Report	\$	185.84
	<b>\$</b>	<b>285.84</b>

**May 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
5/9/2016	\$ 319.00	Transfer to personal account	No	n/a	No
5/11/2016	\$ 80.00	ATM Withdrawal	No	n/a	No
5/12/2016	\$ 59.50	Sams Club	Not determinable	n/a	No
5/23/2016	\$ 20.00	Sams Club	Yes	Fuel	Yes
5/31/2016	\$ 95.69	Renaissance Hotel Phoenix AZ	Not determinable	n/a	No

**\$ 574.19 May Withdrawal Total**

**May totals from above**

\$ 80.00	ATM Withdrawals
\$ 319.00	Transfers to personal account
\$ -	Non-Campaign Withdrawals
\$ 20.00	Possible Campaign Withdrawals
\$ 155.19	Purpose not determinable
<b>\$ 574.19</b>	

**Campaign Finance Report Totals**

Included in Campaign Finance Report	\$ 20.00
Not included in Campaign Finance Report	\$ 554.19
	<b>\$ 574.19</b>

**June 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
6/1/2016	\$ 52.13	Reathrey Sekon Phoenix AZ	Not determinable	n/a	No
6/1/2016	\$ 24.65	Lin's Buffet Phoenix AZ	Not determinable	n/a	No
6/2/2016	\$ 80.00	ATM Withdrawal	No	n/a	No
6/6/2016	\$ 18.91	Popeye's #10632 Phoenix AZ	Not determinable	n/a	No
6/8/2016	\$ 1,415.00	Check #102	Yes	Submittal of \$5 qualifying contributions	Yes
6/9/2016	\$ 35.00	Overdraft fee	No	n/a	No
6/13/2016	\$ 12.52	Dial Cab CO. Washington DC	No	n/a	No
6/13/2016	\$ 53.00	Cobalt Washington DC	No	n/a	No
6/13/2016	\$ 197.70	Uber	No	n/a	No
6/14/2016	\$ 35.00	Overdraft fee	No	n/a	No
6/14/2016	\$ 35.00	Overdraft fee	No	n/a	No
6/21/2016	\$ 14.97	Cracker Barrel 1780 S Yuma AZ	Yes	Meal expense	Yes
6/21/2016	\$ 23.00	Sam's Club Phoenix AZ	Not determinable	n/a	No
6/22/2016	\$ 439.19	AT&T*Bill Payment	No	n/a	No
6/22/2016	\$ 10.86	Panda Express #153 Goodyear AZ	Not determinable	n/a	No
6/23/2016	\$ 23.50	Love S Country0000 Gila Bend AZ	Not determinable	n/a	No
6/23/2016	\$ 12.41	McDonald's F1373 Washington DC	No	n/a	No
6/24/2016	\$ 25.00	American Air001028 Fort Worth TX	No	n/a	No
6/24/2016	\$ 21.80	Phx Delux Burger N Phoenix AZ	Not determinable	n/a	No
6/24/2016	\$ 28.45	Taxicharge- Washin Washington DC	No	n/a	No
6/24/2016	\$ 10.58	Dial Cab CO. Washington DC	No	n/a	No
6/24/2016	\$ 46.00	El Paso Cafe Arlington VA	No	n/a	No
6/24/2016	\$ 2,699.00	Check #103	Yes	Campaign literature & signs	Yes
6/27/2016	\$ 200.00	Southwest Title Loan	No	n/a	No
6/27/2016	\$ 63.50	ATM Withdrawal	No	n/a	No
6/27/2016	\$ 2.50	ATM fee	No	n/a	No
6/27/2016	\$ 46.00	Cafe Paradiso Washington DC	No	n/a	No
6/27/2016	\$ 12.16	Uber	No	n/a	No
6/27/2016	\$ 12.88	Uber	No	n/a	No
6/27/2016	\$ 25.00	District Kitchen L Washington DC	No	n/a	No
6/27/2016	\$ 8.80	Filiberto's Mexica Buckeye AZ	Yes	Meal expense	Yes
6/28/2016	\$ 25.17	Omni Shoreham Washington DC	No	n/a	No
6/28/2016	\$ 25.01	American Tap Room Arlington VA	No	n/a	No
6/28/2016	\$ 55.00	Sky Harbor Parking Phoenix AZ	No	n/a	No
6/28/2016	\$ 149.64	Omni Shoreham Washington DC	No	n/a	No
6/28/2016	\$ 29.00	Circle K 00225 Gila Bend AZ	Not determinable	n/a	No
6/29/2016	\$ 800.00	Check #104	Yes	VAN	Yes
6/30/2016	\$ 200.00	Check #107	Yes	Canvass	Yes
6/30/2016	\$ 104.96	Lowe's	Yes	Pounder/Wire	Yes
6/30/2016	\$ 30.43	Lowe's	Yes	Pounder	Yes
6/30/2016	\$ 3,374.91	Check #106	Yes	Signs/Lit/Paper	Yes

**\$ 10,478.63 June Withdrawal Total**

June totals from above		
\$ 143.50	ATM Withdrawals	
\$ -	Transfers to personal account	
\$ 1,483.21	Non-Campaign Withdrawals	
\$ 8,648.07	Possible Campaign Withdrawals	
\$ 203.85	Purpose not determinable	
\$ 10,478.63		

Campaign Finance Report Totals		
Included in Campaign Finance Report	\$	8,648.07
Not included in Campaign Finance Report	\$	1,830.56
	\$	10,478.63

**July 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
7/1/2016	\$ 100.00	Check #108	Not determinable	n/a	No
7/1/2016	\$ 150.00	Check #111	Not determinable	n/a	No
7/5/2016	\$ 7.01	The Home Depot 402 Yuma AZ	Not determinable	n/a	No
7/5/2016	\$ 255.85	Check #105	Yes	Rebar	Yes
7/6/2016	\$ 300.00	Cashed Check #116	Yes	Canvass	Yes
7/7/2016	\$ 29.00	Shell Service Station Gila Bend AZ	Not determinable	n/a	No
7/7/2016	\$ 138.42	Transfer to personal account	No	n/a	No
7/7/2016	\$ 29.41	Lin's Buffet Phoenix AZ	Not determinable	n/a	No
7/7/2016	\$ 100.00	ATM Withdrawal	No	n/a	No
7/7/2016	\$ 200.00	Check #114	Not determinable	n/a	No
7/7/2016	\$ 200.00	Check #112	Not determinable	n/a	No
7/8/2016	\$ 281.72	Frys Food 2626 83Rd Av Phoenix AZ	Not determinable	n/a	No
7/11/2016	\$ 30.88	Marisco's MI Lindo Phoenix AZ	Not determinable	n/a	No
7/11/2016	\$ 23.00	Sam's Club Avondale AZ	Not determinable	n/a	No
7/12/2016	\$ 26.00	Sam's Club Phoenix AZ	Not determinable	n/a	No
7/13/2016	\$ 110.00	Main Event/Mty Air CA	No	n/a	No
7/13/2016	\$ 30.00	Cracker Barrel 1780 S Yuma AZ	Not determinable	n/a	No
7/14/2016	\$ 186.96	Southwest	No	n/a	No
7/14/2016	\$ 15.00	Southwest	No	n/a	No
7/14/2016	\$ 5.47	Taco Bell #23212 Buckeye AZ	Not determinable	n/a	No
7/14/2016	\$ 15.00	Southwest	No	n/a	No
7/14/2016	\$ 24.00	Arco #42258 Ampm Yuma AZ	Yes	Fuel	Yes
7/14/2016	\$ 130.00	Cashed Check #120	Yes	Canvass	Yes
7/14/2016	\$ 852.86	Check #118	Yes	Lawn signs	Yes
7/14/2016	\$ 200.00	Check #115	Yes	Canvass	Yes
7/15/2016	\$ 49.40	Michaels Stores Inc206 Goodyear AZ	Not determinable	n/a	No
7/18/2016	\$ 40.88	Hooters Yuma Yuma AZ	Not determinable	n/a	No
7/18/2016	\$ 24.99	Western Union	No	n/a	No
7/18/2016	\$ 430.87	Hilton Advance Pur Memphis TN	No	n/a	No
7/18/2016	\$ 18.95	Uber	No	n/a	No
7/18/2016	\$ 18.81	Uber	No	n/a	No
7/18/2016	\$ 15.00	Chevron 0307165 Alpine CA	No	n/a	No
7/18/2016	\$ 22.00	Frys Food & Drug 11203 Yuma AZ	Not determinable	n/a	No
7/19/2016	\$ 54.00	Hilton Garden Inn San Diego CA	No	n/a	No
7/19/2016	\$ 86.00	Coaster Saloon San Diego CA	No	n/a	No
7/19/2016	\$ 14.99	Smartfinal499 Phoenix AZ	Not determinable	n/a	No
7/19/2016	\$ 23.50	Circle K 03397 Buckeye AZ	Yes	Fuel	Yes
7/19/2016	\$ 35.00	Transfer to personal account	No	n/a	No
7/19/2016	\$ 190.00	Check #119	Yes	Tradeshelper, Salt River Project	Yes
7/20/2016	\$ 8.20	Sheraton Phoenix P Phoenix AZ	Not determinable	n/a	No
7/20/2016	\$ 29.11	Uber	No	n/a	No
7/21/2016	\$ 35.00	Overdraft Fee	No	n/a	No
7/21/2016	\$ 22.00	Barrio Cafe T43003 Phoenix AZ	Not determinable	n/a	No
7/22/2016	\$ 35.00	Overdraft Fee	No	n/a	No
<b>\$ 4,594.28 July Withdrawal Total</b>					

July totals from above		
\$ 100.00	ATM Withdrawals	
\$ 173.42	Transfers to personal account	
\$ 1,074.69	Non-Campaign Withdrawals	
\$ 1,976.21	Possible Campaign Withdrawals	
\$ 1,269.96	Purpose not determinable	
\$ 4,594.28		

Campaign Finance Report Totals		
Included in Campaign Finance Report	\$	1,976.21
Not included in Campaign Finance Report	\$	2,618.07
	\$	4,594.28

**August 2016**

<b>Date</b>	<b>Amount</b>	<b>Vendor or Check #</b>	<b>Possible Campaign Purpose</b>	<b>Purpose</b>	<b>On Finance Report?</b>
8/5/2016	\$ 50.00	Transfer to personal account	No	n/a	No
8/5/2016	\$ 16.50	Sam's Club Avondale AZ	Not determinable	n/a	No
8/8/2016	\$ 57.87	Wal-Mart Super Center Phoenix AZ	Not determinable	n/a	No
8/8/2016	\$ 20.00	Circle K 03397 Buckeye AZ	Not determinable	n/a	No
8/8/2016	\$ 10.93	Little Caesars #32 Buckeye AZ	Not determinable	n/a	No
8/8/2016	\$ 48.57	Target T- 1515 N Litch Goodyear AZ	Not determinable	n/a	No
8/9/2016	\$ 150.00	Venmo 855-812-4430 NY	Not determinable	n/a	No
8/9/2016	\$ 378.84	AT&T*Bill Payment	No	n/a	No
8/17/2016	\$ 200.00	Check	Not determinable	n/a	No
8/22/2016	\$ 13.00	Charlie's Phoenix Phoenix AZ	Not determinable	n/a	No
8/24/2016	\$ 20.00	Loves Cntry St Gila Bend AZ	Not determinable	n/a	No
8/29/2016	\$ 44.54	American Air	No	n/a	No
8/29/2016	\$ 25.00	LA Tasca (King Str Alexandria VA	No	n/a	No
8/29/2016	\$ 18.19	Uber	No	n/a	No
8/30/2016	\$ 12.10	Georgetown Market Arlington VA	No	n/a	No
8/30/2016	\$ 27.00	Sky Harbor Parking Phoenix AZ	No	n/a	No
8/30/2016	\$ 55.00	Pullanos Pizza Glendale AZ	Not determinable	n/a	No

**\$ 1,147.54 August Withdrawal Total**

<b>August totals from above</b>	
\$ -	ATM Withdrawals
\$ 50.00	Transfers to personal account
\$ 505.67	Non-Campaign Withdrawals
\$ -	Possible Campaign Withdrawals
\$ 591.87	Purpose not determinable
\$ 1,147.54	

<b>Campaign Finance Report Totals</b>	
Included in Campaign Finance Report	\$ -
Not included in Campaign Finance Report	\$ 1,147.54
	\$ 1,147.54

**September 2016**

<b>Date</b>	<b>Amount</b>	<b>Vendor or Check #</b>	<b>Possible Campaign Purpose</b>	<b>Purpose</b>	<b>On Finance Report?</b>
9/7/2016	\$ 300.00	Check #192	Yes	Canvass	Yes
9/7/2016	\$ 300.00	Check #191	Yes	Canvass	Yes
9/8/2016	\$ 10.00	Quiktrip Phoenix AZ	Not determinable	n/a	No
9/12/2016	\$ 28.00	Charlie's Phoenix	Not determinable	n/a	No
9/13/2016	\$ 48.54	Pullanos Pizza Glendale AZ	Not determinable	n/a	No
9/13/2016	\$ 197.10	Tm *Sia	No	n/a	No
9/15/2016	\$ 250.00	Check #198	Not determinable	n/a	No
9/15/2016	\$ 300.00	Check #197	Not determinable	n/a	No
9/19/2016	\$ 11.20	American Air	No	n/a	No
9/19/2016	\$ 75.00	American Air	No	n/a	No
9/19/2016	\$ 36.33	Birrieria Obregon Phoenix AZ	Not determinable	n/a	No
9/19/2016	\$ 142.37	My Ticket Tracker	No	n/a	No
9/20/2016	\$ 21.00	Arco #42533 Ampm Phoenix AZ	Not determinable	n/a	No
9/23/2016	\$ 56.00	Mariscos Altata Phoenix AZ	Not determinable	n/a	No
9/23/2016	\$ 306.50	Centurylink/Speedp	No	n/a	No
9/26/2016	\$ 127.21	Fairfield Inn & Su Phoenix AZ	No	n/a	No
9/26/2016	\$ 8.28	Federicos Buckeye AZ	Not determinable	n/a	No
9/26/2016	\$ 27.00	Circle K 00225 Gila Bend AZ	Not determinable	n/a	No
9/29/2016	\$ 35.00	Arizona List Tucson AZ	Not determinable	n/a	No
9/29/2016	\$ 247.55	4Imprint	Yes	Table runner	Yes

**\$ 2,527.08 September Withdrawal Total**

<b>September totals from above</b>	
\$ -	ATM Withdrawals
\$ -	Transfers to personal account
\$ 859.38	Non-Campaign Withdrawals
\$ 847.55	Possible Campaign Withdrawals
\$ 820.15	Purpose not determinable
\$ 2,527.08	

<b>Campaign Finance Report Totals</b>	
Included in Campaign Finance Report	\$ 847.55
Not included in Campaign Finance Report	\$ 1,679.53
	\$ 2,527.08

**October 2016**

<b>Date</b>	<b>Amount</b>	<b>Vendor or Check #</b>	<b>Possible Campaign Purpose</b>	<b>Purpose</b>	<b>On Finance Report?</b>
10/11/2016	60.00	Under Review Sport Surprise AZ	Not determinable	n/a	No
10/18/2016	520.08	Marriott San Jose San Jose CA	No	n/a	No
10/19/2016	200.00	Check	Not determinable	n/a	No
10/19/2016	300.00	Check	Not determinable	n/a	No
10/21/2016	35.00	NSF Return Item Fee	No	n/a	No
10/24/2016	22,651.00	Check	Yes	Return of CCEC funds	Yes
10/25/2016	35.00	Overdraft Fee	No	n/a	No

**\$ 23,801.08 October Withdrawal Total**

<b>October totals from above</b>	
\$ -	ATM Withdrawals
\$ -	Transfers to personal account
\$ 590.08	Non-Campaign Withdrawals
\$ 22,651.00	Possible Campaign Withdrawals
\$ 560.00	Purpose not determinable
<b>\$ 23,801.08</b>	

<b>Campaign Finance Report Totals</b>	
Included in Campaign Finance Report	\$ 22,651.00
Not included in Campaign Finance Report	\$ 1,150.08
	<b>\$ 23,801.08</b>

**November 2016**

<b>Date</b>	<b>Amount</b>	<b>Vendor or Check #</b>	<b>Possible Campaign Purpose</b>	<b>Purpose</b>	<b>On Finance Report?</b>
No withdrawal activity noted					

**December 2016**

<b>Date</b>	<b>Amount</b>	<b>Vendor or Check #</b>	<b>Possible Campaign Purpose</b>	<b>Purpose</b>	<b>On Finance Report?</b>
No withdrawal activity noted					

<b>Total Election Cycle Withdrawals</b>	
\$ 683.50	ATM Withdrawals
\$ 604.42	Transfers to personal account
\$ 4,653.41	Non-Campaign Withdrawals
\$ 34,261.93	Possible Campaign Withdrawals
\$ 3,635.41	Purpose not determinable
<b>\$ 43,838.67</b>	

<b>Campaign Finance Report Totals</b>	
Included in Campaign Finance Report	\$ 34,628.95
Not included in Campaign Finance Report	\$ 9,209.72
	<b>\$ 43,838.67</b>

April 28, 2017

To: Chairman and Members of the Commission  
Citizens Clean Elections Commission

From: Jesus Rubalcava, Participating Candidate  
for State Representative – District No. 4

Re: 2016 Election Cycle Finance Activity Comprehensive Review

Dear Chairman and Members,

I would like to start off by thanking you for the opportunity to participate as a participating candidate in the 2016 Election Cycle. Please acknowledge that I am not by any means challenging the results of the review, nor am I denying any wrong doing. More so, this is acknowledgement that my campaign finances were not effectively run and that my lesson has been learned. Moving forward, should I be given the opportunity, I now know what to do and what not to do. This letter is to explain and clarify some questions you may have in regards to the issues and concerns brought before you.

It is important to know that this was my first time running for such position. I had never had to file full campaign accounts and never had to form a committee for the purpose of running for office. Many things I did not know. For example, I did not know that I needed to set up a petty cash account. I did not know where or how to disclose family members that worked for my campaign. I did not know that I needed to hire legal counsel. I did call the Citizens Clean Elections Commission office twice to ask for 1) what or how much to pay individuals working for the campaign and 2) where to obtain a mileage reimbursement form. I did not receive a concrete answer for either questions, rather was told to attend the CCEC Orientation again. Again, this is not justification or an excuse.

The biggest issue with my campaign was that I used my bank account that linked with my campaign account. For example, I would deposit a check into what I thought was one account and it would end up

in another. Another example, I would use my campaign debit card for a transaction and it would withdraw from my personal account. Because this was so confusing to me, I began to use the filing report with the Secretary of State as my accounting and balance.

I was not able to provide additional documentation other than my bank statements for the following reason. I am a Special Education teacher in the Buckeye Elementary School District. When going through my initial audit, I had all of my campaign documents in my classroom. Over holiday break, I was moved into different classrooms 2 times. During this time, many of my personal belongings and documents were misplaced. I still have not been able to relocate them.

I ask the commission to please consider the reasoning for such flaws in this campaign finance. I accept the report on findings as a way to acknowledge and learn from what was done incorrectly and how to do things the correct way. I am willing to accept the consequences of my wrongdoing and ask that the commission allow me to take corrective actions in order to comply; whether this be repaying back any unaccounted monies and fees set forth by the commission.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in dark ink, appearing to read 'JR' followed by a stylized surname.

Jesus A Rubalcava

# EXHIBIT C



**Doug Ducey**  
Governor

**Thomas M. Collins**  
Executive Director



**Steve M. Titla**  
Chair

**Damien R. Meyer**  
**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.azcanelections.gov](http://www.azcanelections.gov)

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**NOTICE OF COMPLAINT AND OPPORTUNITY TO RESPOND**  
**Via Federal Express and E-mail**

May 23, 2017

The Honorable Jesus Rubalcalva  
Arizona House of Representatives  
1700 W. Washington  
Phoenix, AZ 85007

806 W. Margaret St.  
Gila Bend, AZ 85337

**RE: CCEC MUR #17-01**

Dear Representative Rubalcalva:

This letter serves as an internal complaint against you by the Executive Director of the Arizona Citizens Clean Elections Commission.

**Complaint**

Recently, the Arizona Citizens Clean Elections Commission accepted an audit of your campaign finances from the 2016 election. This comprehensive review, which followed a random audit related to the primary period, raised a number of issues related to the financing of your campaign as a participating candidate under the Citizens Clean Elections Act. Indeed, the audit provides substantial evidence that you may have violated a number of provisions of the Clean Elections Act and Rules.

According to the audit, you are unable to locate any documentation supporting your withdrawals from the campaign bank account, nor the identities or any contact information relating to goods and services purchases reported on your campaign finance reports, documentation of direct campaign expenditures or joint expenditures. The two audit reviews also confirm that you maintained more than one bank account that was used for campaign purposes throughout the campaign. Additionally, the reviews show that at no time did you deposit the entirety of your primary clean funding into your campaign bank account, that more than the primary and general limits applicable to you passed through the campaign bank account, and that bank account records and your campaign finance reports do not match. Among other things, the auditors were unable to reconcile deposits with claimed contributions noted on your campaign finance reports.

These allegations raise numerous potential violations. Participating candidates:

1. Shall not accept any contributions, other than a limited number of five-dollar qualifying contributions as specified in section 16-946 and early contributions as specified in section 16-945, except in the emergency situation specified in section 16-954, subsection F.
2. Shall not make expenditures of more than a total of five hundred dollars of the candidate's personal monies for a candidate for the legislature or more than one thousand dollars for a candidate for statewide office.
3. Shall not make expenditures in the primary election period in excess of the adjusted primary election spending limit.
4. Shall not make expenditures in the general election period in excess of the adjusted general election spending limit.
5. Shall comply with section 16-948 regarding campaign accounts and section 16-953 regarding returning unused monies to the citizens clean elections fund described in this article.

A.R.S. § 16-941(A). The audits provide evidence none of these requirements were complied with.

For example, A.R.S. § 16-953 (A) and (B) provide that “[a]t the end of the [primary or general] election period, a participating candidate. . . shall return to the fund all monies in the candidate's campaign account above an amount sufficient to pay any unpaid bills for expenditures made during the . . . election period and for goods or services directed to the . . . election.” In the absence of evidence that monies provided from the Clean Elections Commission were used for campaign expenditures, any unaccounted dollars became due to the fund under A.R.S. §§ 16-941 and 953.

Likewise, A.R.S. § 16-948 provides that a participating candidate “shall conduct *all financial activity* through a single campaign account of the candidate's campaign committee. A participating candidate shall not make any deposits into the campaign account other than those permitted under section 16-945 or 16-946.” (Emphasis added). Here, the audit reports are replete with indications you used more than one bank account and made multiple deposits from undetermined sources. This provides substantial evidence of ongoing violations on A.R.S. 16-941(A)(5) throughout the campaign, as well as 941(A)(1) and (A)(2).

Additionally, the auditors were unable to determine if direct campaign expenditures, joint expenditures, or other expenditures and contributions were made or accepted and properly reported. *See* Ariz. Admin. Code §§ R2-20-104, 109, 110, 111, 702, 703, 704 (2016).

Penalties for violating the Citizens Clean Elections Act and Rules include fines, repayment, and other penalties, including, in certain cases, removal from office. *See* A.R.S. §16-942(A)-(D); Ariz. Admin. Code §§ R2-20-222, -704.

### Opportunity for Response

Commission rules require notification to be given to the Respondent of a Complaint. Ariz. Admin. Code § R2-20-204(A). Additionally, the rules provide that you be advised of compliance procedures. Those procedures are set forth in Article 2 of the Commission’s Rules (Arizona Administrative Code Sections R2-20-201 to R2-20-228) as well as the Clean Elections

Act (specifically Arizona Revised Statutes §§ 16-940 to 16-961), which are available on the Commission website at [www.azcleanelections.gov](http://www.azcleanelections.gov).

The Commission's rules provide that a Respondent "be afforded an opportunity to demonstrate that no action should be taken on the basis of a complaint by submitting, *within five days from receipt of a written copy of the complaint*, a letter or memorandum setting forth reasons why the Commission should take no action." Ariz. Admin. Code R2-20-205(A). Your response must be notarized, or the Commission will not consider it. Ariz. Admin. Code R2-20-205(C). Generally, a failure to respond to a complaint within five days may be viewed as an admission to the allegations. *Id.*

Commission rules require that you be given this notice and Complaint. The issuance of this notice and Complaint do not constitute a finding related to the Complaint. A finding, if any, may be made only after the Commission has reviewed the matter. Additionally, I would recommend you seek legal counsel, as the Commission and its staff cannot provide legal advice to you.

Please contact us if you have any questions at (602) 364-3477 or by e-mail at [ccec@azcleanelections.gov](mailto:ccec@azcleanelections.gov).

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas M. Collins", written in a cursive style.

Thomas M. Collins  
Executive Director  
Arizona Citizens Clean Elections Commission

Enclosure: Approved Audit Report

cc: Sara Larsen, Financial Affairs & Compliance Officer (email only)



**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Jesus Rubalcava  
Participating Candidate for  
State Representative – District No. 4  
Primary Election 2016**

**Independent Accountants' Report on  
Applying Agreed-Upon Procedures**

Chairman and Members of the Commission  
Citizens Clean Elections Commission  
Phoenix, Arizona

We (the Contractor) have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Rubalcava for House (the Candidate) Campaign Finance Reports for both the Pre-Primary (June 1, 2016 to August 18, 2016) and the Post-Primary (August 19, 2016 to September 19, 2016) reporting periods were prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Pre-Primary and Post-Primary Campaign Finance Reports. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and the associated findings are as follows:

1. Preliminary Procedures

- a) Commission Staff will obtain a copy of the candidate's campaign finance report for the reporting period and provide the records to the Contractor.

**Finding**

We obtained both the Pre-Primary (June 1, 2016 to August 18, 2016) and Post-Primary (August 19, 2016 to September 19, 2016) Campaign Finance Reports from the Arizona Secretary of State's website.

- b) Perform a desk review of the receipts reported in the candidate's campaign finance report as follows:

- (i) Determine whether the candidate accepted contributions only from individuals.

**Finding**

The contributions received during the periods reviewed appeared to be only from individuals.

- (ii) Determine whether any contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the periods reviewed did not exceed the \$160 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the periods reviewed did not exceed the \$4,011 limit for a legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Early contributions received during the periods reviewed did not exceed the \$720 limit for a legislative candidate.

- c) Perform a desk review of the disbursements reported in the candidate's campaign finance report to identify any unusual items requiring follow-up during fieldwork.

**Finding**

We noted six disbursements to family members of the candidate, however the Campaign finance report did not indicate that the expenditures were made to family members. Per the Citizens Clean Elections Act & Rules Manual rule R2-20-701(C)(4), all payments made to family members or to enterprises owned in whole or part by the candidate or a family member shall be clearly itemized and indicated as such in all campaign finance reports.

In addition, there were three loans outstanding on the Post-Primary finance report that were made to the Campaign by the Candidate in December 2015, totaling \$69.93, that do not appear to have been repaid to the Candidate. In addition, supporting documentation for these loans was not maintained by the Campaign. Per the Citizens Clean Elections Act & Rule Manual rule R2-20-104(E), if the loan is to be repaid, the loans shall be repaid promptly upon receipt of Clean Elections funds if the participating candidate qualifies for Clean Elections funding. The Campaign received its Clean Elections funding on June 15, 2016.

It was further noted that the Campaign finance report had significantly fewer transactions than what was shown on the Campaign bank statements. Per discussion with the Candidate, the financial institution linked his personal bank account with the Campaign bank account, and therefore when he used his personal debit card, the Campaign bank account was debited. We noted approximately forty-one personal transactions consisting of out of state restaurant purchases, travel and other non-Campaign related items on the Campaign bank statement, totaling \$3,461.74; three ATM withdrawals, totaling \$243.50; five overdraft fees, totaling \$175.00; and three transfers from the Campaign bank account to the Candidate's personal bank account, totaling \$223.42. The Candidate indicated that he reimbursed the Campaign for these personal transactions, however deposits for these specific amounts was not provided. We noted eleven possible reimbursements to the Campaign on the bank statements, totaling \$2,270.19.

- d) Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

### **Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.



## 2. Fieldwork Procedures

- a) Commission staff will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates chosen for a Primary Election Audit shall provide records from the Pre-Primary Election Report and the Post-Primary Election Report. Candidates chosen for a General Election Audit shall provide records from the Pre-General Election Report and the Post-General Election Report.

### **Finding**

Commission staff sent an initial notice of primary random audit selection to the Candidate and informed the Candidate that we would be contacting him. We then communicated to the Candidate in a written request, the purpose of the engagement, agreed-upon procedures to be performed, documentation needed and potential future requirements of the Candidate.

- b) Commission staff will provide the records to the Contractor upon receipt. The Contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

### **Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

### **Finding**

The Candidate provided written bookkeeping policies and procedures utilized by the campaign committee.

- (i) Review the names of the candidate's family members. Family members include parents, grandparents, spouse, children, siblings and a parent or spouse of any of those persons.

### **Finding**

We obtained and reviewed the names of the Candidate's family members.

- (ii) Review bank statements for each of the months in the reporting period and perform the following:
  - Select a sample of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance report.

### **Finding**

We selected five deposits and five withdrawals from the bank statements for the periods reviewed and determined that none appeared to be properly recorded in the Candidate's campaign finance reports.

The five withdrawals tested were personal purchases, made by the Candidate, totaling \$1,454.72. Per discussion with the Candidate, the financial institution linked his personal bank account with the Campaign bank account, and therefore when he used his personal debit card, the Campaign bank account was debited. He indicated that he reimbursed the Campaign for the personal purchases, however deposits for these specific amounts was not provided. He further indicated that the errors continued after he notified the financial institution.

The five deposits tested, per discussion with the Candidate, were reimbursements to the Campaign for personal purchases made in error by the financial institution, totaling \$1,717.99.

It was further noted that the Campaign finance report included the Primary Election Commission funding totaling \$16,044.00 on 6/15/16. The Campaign bank account did not include a corresponding deposit for this amount, however it did include a transfer from the Candidate's personal bank account for \$13,280.22, which represents a variance of \$2,763.78 of Commission monies that does not appear to have been deposited into the Campaign bank account. Per the Citizens Clean Elections Act & Rules Manual rule 16-948(A), a participating candidate shall conduct all financial activity through a single campaign account of the candidate's campaign committee.

- Perform a proof of receipts and disbursements for the reporting period.

### **Finding**

After performing proof of cash procedures, we calculated a Post-Primary ending cash balance of \$20,181.06, however the Amended Post-Primary campaign finance report reflected an ending balance of \$23,202.06, reflecting a variance of \$3,021.00, and indicating that the Campaign overspent by this amount. Per the Citizens Clean Elections Act & Rules Manual rule 16-941 (A)(3), a participating candidate: shall not make expenditures in the primary election period in excess of the adjusted primary election spending limit.

In addition, during this testwork it was noted that ten of the expenditure items in the Post-Primary campaign finance report, totaling \$2,214.50, had not cleared the bank as of September 30, 2016. Per discussion with the Candidate, he paid these vendors with cash, however no petty cash fund had been set up for the Campaign, and these expenditures were not reported as reimbursements to the Candidate on the Campaign finance report.

- d) Judgmentally select a sample of early contributions reported in the candidate's campaign finance report and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$50, which reflects the contributor's address, occupation and employer.

### **Finding**

We reviewed the supporting documentation for one early contribution (total population) reported in the Candidate's campaign finance report, and determined the name of the contributor for the contribution was included on the support. For individuals who contributed greater than \$50, we determined that the contributor's address, occupation and employer were also included on the support.

- (i) For other types of cash receipts reported in the candidate's campaign finance report, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's campaign finance reports during the periods reviewed.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's campaign finance reports during the periods reviewed.

- e) Judgmentally select a sample of cash expenditures reported in the candidate's campaign finance report and perform the following:
  - (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance report.

**Finding**

We reviewed five expenditures and agreed amounts to supporting invoices or other documentation and to the Candidate's finance report, with no exceptions noted.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance report.

**Finding**

We reviewed five expenditures and agreed the name, address and nature of goods or services provided to the information reported in the Candidate's Campaign finance report with no exceptions noted, however three of the expenditures tested were made were to family members of the Candidate and the Campaign finance report did not indicate that they were family members. Per the Citizens Clean Elections Act & Rules Manual rule R2-20-701(C)(4), all payments made to family members or to enterprises owned in whole or part by the candidate or a family member shall be clearly itemized and indicated as such in all campaign finance reports.

Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed five expenditures and agreed amounts to the campaign account bank statements with one exception. The Campaign finance report included a \$264.50 expenditure for newspaper advertising, however this amount was not present on the Campaign bank statement. Per discussion with the Candidate, he paid this vendor in cash, however no petty cash fund had been set up for the Campaign and this expenditure was not reported as a reimbursement to the Candidate on the Campaign finance report.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed five expenditures and agreed the name, address and nature of goods or services provided to the information reported in the Candidate's Campaign finance report with no exceptions noted.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

None of the expenditures we tested appeared to be for joint expenditures.

- f) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,420.

### **Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the periods reviewed, however per review of the Campaign bank statement, several ATM withdrawals were made and per discussion with the Candidate, multiple vendors were paid with cash.

- (i) If applicable, judgmentally select a sample of expenditures made from the Candidate's petty cash fund(s) and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$160 limit on petty cash expenditures.

### **Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the periods reviewed.

- g) Determine whether a legal defense fund has been established.

### **Finding**

Based on inquiry of the Candidate, the campaign did not establish a legal defense fund.

- (i) If a legal defense fund was established, how were these funds accounted for?

### **Finding**

Based on inquiry of the Candidate, the campaign did not establish a legal defense fund.

- h) Contact the Candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the Candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

### Finding

We discussed our findings with the Candidate and the Candidate did not provide responses to our findings.

We were not engaged to and did not conduct an examination, the objective of which would be the expression of an opinion on the Pre-Primary and Post-Primary Campaign Finance Reports of Rubalcava for House. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the Citizens Clean Elections Commission, and is not intended to be and should not be used by anyone other than this specified party.

*Foster & Chapman P.C.*

December 13, 2016

## EXHIBIT B



**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Jesus Rubalcava  
Participating Candidate for  
State Representative – District No. 4  
2016 Election Cycle Finance Activity Comprehensive Review**

**Independent Accountants' Report on  
Applying Agreed-Upon Procedures**

Chairman and Members of the Commission  
Citizens Clean Elections Commission  
Phoenix, Arizona

We (the Contractor) have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Rubalcava for House (the Candidate), Campaign Finance Reports, Campaign bank account and corresponding documentation for expenditures and contributions for the 2016 election cycle (January 15, 2016 to January 31, 2017) were prepared or maintained in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign Finance Reports. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and the associated findings are as follows:

1. The Contractor shall review bank statements for each of the months in the election cycle and perform the following:
  - a) Select 100% of the deposits and withdrawals from the campaign bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance report.

### **Finding**

The Candidate provided the Campaign bank statements for all months of the election cycle, however the Candidate indicated that he was unable to identify or locate any documentation supporting the deposits and withdrawals from the Campaign bank statements. The attached Bank Statement Deposit Summary and Bank Statement Withdrawal Summary describe the deposits and withdrawals noted in the Campaign bank statements.

- b) Select 100% of cash disbursements and withdrawals from the campaign bank statement and perform the following:
  - (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance report.

### **Finding**

The Candidate indicated that he was unable to identify or locate any documentation supporting the withdrawals from the Campaign bank statements. The attached Bank Statement Withdrawal Summary describe the withdrawals noted in the Campaign bank statements.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance report.

### **Finding**

The Candidate indicated that he was unable to identify or locate any documentation supporting the withdrawals from the Campaign bank statements, therefore the name, address and nature of goods or services provided could not be agreed to the information reported in the Candidate's Campaign finance report. The attached Bank Statement Withdrawal Summary describe the withdrawals noted in the Campaign bank statements.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

The Candidate indicated that he was unable to identify or locate any documentation supporting the withdrawals from the Campaign bank statements, therefore expenditures made for a direct Campaign purpose could not be determined. The attached Bank Statement Withdrawal Summary describe the withdrawals noted in the Campaign bank statements.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

The Candidate indicated that he was unable to identify or locate any documentation supporting the withdrawals from the Campaign bank statements, therefore joint expenditures were unable to be identified. The attached Bank Statement Withdrawal Summary describe the withdrawals noted in the Campaign bank statements.

- c) Determine whether a legal defense has been established.

**Finding**

Based on inquiry of the Candidate, the Campaign did not establish a legal defense.

- (i) Has any Clean funding been used to pay for legal services?

**Finding**

Based on inquiry of the Candidate, the Campaign did not establish a legal defense.

- (ii) What is the cost or value of legal services being provided for the comprehensive audit and review of the finance activity?

**Finding**

Based on inquiry of the Candidate, the Campaign did not establish a legal defense.

- d) Contact the Candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this notification, the Contractor will advise the Candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We discussed our findings with the Candidate and the Candidate provided responses to our findings, which are included on pages 14-15 of this report.

We were not engaged to and did not conduct an examination, the objective of which would be the expression of an opinion on the comprehensive audit and review of the finance activity of Rubalcava for House. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the Citizens Clean Elections Commission, and is not intended to be and should not be used by anyone other than this specified party.

*Aster & Chapman P.C.*

April 28, 2017

## Bank Statement Deposit Summary

### January 2016

Date	Amount	Description	On Finance Report?
1/4/2016	\$ 200.00	ATM Cash Deposit	Undeterminable, significant number of contributions noted on report
1/4/2016	\$ 3.00	ATM Cash Deposit	No
1/4/2016	\$ 200.00	ATM Cash Deposit	Undeterminable, significant number of contributions noted on report
1/11/2016	\$ 2.00	Transfer from personal bank account	No
	<b>\$ 405.00</b>	<b>January Deposit Total:</b>	

January totals from above		Campaign Finance Report Totals	
\$ 2.00	Transfers from separate account	Included in Campaign Finance Report	\$ -
\$ 400.00	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ 5.00
\$ 3.00	Purpose not determinable	Undeterminable	\$ 400.00
\$ 405.00			\$ 405.00

### February 2016

Date	Amount	Description	On Finance Report?
No deposit activity noted			

### March 2016

Date	Amount	Description	On Finance Report?
3/10/2016	\$ 25.00	ATM Check Deposit	Yes
3/31/2016	\$ 100.00	ATM Cash Deposit	Yes
3/31/2016	\$ 60.00	ATM Cash Deposit	Undeterminable, significant number of contributions noted on report
	<b>\$ 185.00</b>	<b>March Deposit Total:</b>	

March totals from above		Campaign Finance Report Totals	
\$ -	Transfers from separate account	Included in Campaign Finance Report	\$ 125.00
\$ 125.00	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ -
\$ 60.00	Purpose not determinable	Undeterminable	\$ 60.00
\$ 185.00			\$ 185.00

### April 2016

Date	Amount	Description	On Finance Report?
4/4/2016	\$ 70.00	ATM Cash Deposit	Undeterminable, significant number of contributions noted on report
4/15/2016	\$ 30.00	Transfer from personal account	No
4/18/2016	\$ 30.00	Transfer from personal account	No
	<b>\$ 130.00</b>	<b>April Deposit Total:</b>	

April totals from above		Campaign Finance Report Totals	
\$ 60.00	Transfers from separate account	Included in Campaign Finance Report	\$ -
\$ -	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ 60.00
\$ 70.00	Purpose not determinable	Undeterminable	\$ 70.00
\$ 130.00			\$ 130.00

### May 2016

Date	Amount	Description	On Finance Report?
5/6/2016	\$ 600.00	Transfer from personal account	No
5/11/2016	\$ 607.12	eDeposit IN Branch/Store	Undeterminable
5/11/2016	\$ 75.00	ATM Check Deposit	Yes
5/12/2016	\$ 500.00	Transfer from personal account	No
5/17/2016	\$ 100.00	ATM Cash Deposit	Undeterminable, significant number of contributions noted on report
5/23/2016	\$ 25.00	ATM Check Deposit	Undeterminable, significant number of contributions noted on report
5/31/2016	\$ 90.00	Transfer from personal account	No
	<b>\$ 1,997.12</b>	<b>May Deposit Total:</b>	

May totals from above		Campaign Finance Report Totals	
\$ 1,190.00	Transfers from separate account	Included in Campaign Finance Report	\$ 75.00
\$ 75.00	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ 1,190.00
\$ 732.12	Purpose not determinable	Undeterminable	\$ 732.12
\$ 1,997.12			\$ 1,997.12

June 2016			
Date	Amount	Description	On Finance Report?
6/2/2016	\$ 100.20	ATM Check Deposit	Undeterminable, significant number of contributions noted on report
6/2/2016	\$ 45.00	Transfer from personal account	No
6/9/2016	\$ 52.85	Transfer from personal account	No
6/13/2016	\$ 53.00	Transfer from personal account	No
6/17/2016	\$ 13,280.22	Transfer from personal account	This is presumed to be part of the Commission Primary Election funding.
	<u>\$ 13,531.27</u>	<b>June Deposit Total:</b>	Total funding = \$16,044.00, difference of \$2,763.78.

June totals from above		Campaign Finance Report Totals	
\$ 150.85	Transfers from separate account	Included in Campaign Finance Report	\$ 13,280.22
\$ 13,280.22	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ 150.85
\$ 100.20	Purpose not determinable	Undeterminable	\$ 100.20
<u>\$ 13,531.27</u>			<u>\$ 13,531.27</u>

July 2016			
Date	Amount	Description	On Finance Report?
No deposit activity noted			

August 2016			
Date	Amount	Description	On Finance Report?
8/4/2016	\$ 770.14	ATM Check Deposit	No
8/8/2016	\$ 77.00	eDeposit IN Branch/Store	Yes
8/9/2016	\$ 350.00	ATM Cash Deposit	No
8/29/2016	\$ 20.00	ATM Cash Deposit	No
8/29/2016	\$ 9.00	Transfer from personal account	No
8/30/2016	\$ 50.00	Transfer from personal account	No
	<u>\$ 1,276.14</u>	<b>August Deposit Total:</b>	

August totals from above		Campaign Finance Report Totals	
\$ 59.00	Transfers from separate account	Included in Campaign Finance Report	\$ 77.00
\$ 77.00	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ 1,199.14
\$ 1,140.14	Purpose not determinable	Undeterminable	\$ -
<u>\$ 1,276.14</u>			<u>\$ 1,276.14</u>

September 2016			
Date	Amount	Description	On Finance Report?
9/6/2016	\$ 24,066.00	eDeposit IN Branch/Store	Yes
9/6/2016	\$ 320.00	ATM Cash Deposit	No
9/19/2016	\$ 500.00	ATM Cash Deposit	No
	<u>\$ 24,886.00</u>	<b>September Deposit Total:</b>	

September totals from above		Campaign Finance Report Totals	
\$ -	Transfers from separate account	Included in Campaign Finance Report	\$ 24,066.00
\$ 24,066.00	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ 820.00
\$ 820.00	Purpose not determinable	Undeterminable	\$ -
<u>\$ 24,886.00</u>			<u>\$ 24,886.00</u>

October 2016			
Date	Amount	Description	On Finance Report?
10/3/2016	165.00	Transfer from personal account	No
10/5/2016	115.00	Transfer from personal account	No
10/12/2016	60.00	Transfer from personal account	No
10/24/2016	500.00	ATM Cash Deposit	No
10/24/2016	520.08	ATM Check Deposit	No
10/25/2016	33.00	Transfer from personal account	No
10/27/2016	34.48	Transfer from personal account	No
	<u>\$ 1,427.56</u>	<b>October Deposit Total:</b>	

October totals from above		Campaign Finance Report Totals	
\$ 407.48	Transfers from separate account	Included in Campaign Finance Report	\$ -
\$ -	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ 1,427.56
\$ 1,020.08	Purpose not determinable	Undeterminable	\$ -
<u>\$ 1,427.56</u>			<u>\$ 1,427.56</u>

November 2016			
Date	Amount	Description	On Finance Report?
No deposit activity noted			
December 2016			
Date	Amount	Description	On Finance Report?
No deposit activity noted			

Total Period Deposits		Campaign Finance Report Totals	
\$ 0.58	Beginning Bank Balance, 01/01/16	Beginning Bank Balance, 01/01/16	\$ 0.58
\$ 1,869.33	Transfers from separate account	Included in Campaign Finance Report	\$ 37,623.22
\$ 38,023.22	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ 4,852.55
\$ 3,945.54	Purpose not determinable	Undeterminable	\$ 1,362.32
\$ 43,838.67			\$ 43,838.67



## Bank Statement Withdrawal Summary

### January 2016

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
1/4/2016	\$ 100.00	ATM Withdrawal	Not determinable	n/a	No
1/4/2016	\$ 2.12	Family Dollar	Not determinable	n/a	No
1/4/2016	\$ 100.00	ATM Withdrawal	Not determinable	n/a	No
1/7/2016	\$ 100.00	ATM Withdrawal	Not determinable	n/a	No
1/11/2016	\$ 54.00	Transfer to personal account	No	n/a	No
1/11/2016	\$ 30.00	Western Union	No	n/a	No
1/11/2016	\$ 19.10	Pride Travel Center	Yes	Fuel	Yes
	<b>\$ 405.22</b>	<b>January Withdrawal Total</b>			

January totals from above		
\$ 300.00	ATM Withdrawals	
\$ 54.00	Transfers to personal account	
\$ 30.00	Non-Campaign Withdrawals	
\$ 19.10	Possible Campaign Withdrawals	
\$ 2.12	Purpose not determinable	
<b>\$ 405.22</b>		

Campaign Finance Report Totals		
Included in Campaign Finance Report	\$	386.12
Not included in Campaign Finance Report	\$	19.10
	<b>\$</b>	<b>405.22</b>

### February 2016

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
No bank statement activity noted					

### March 2016

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
3/17/2016	\$ 2.82	Quiktrip Tolleson AZ	Not determinable	n/a	No
3/18/2016	\$ 19.99	Western Union	No	n/a	No
3/18/2016	\$ 2.00	Swa Inflight Service	No	n/a	No
	<b>\$ 24.81</b>	<b>March Withdrawal Total</b>			

March totals from above		
\$ -	ATM Withdrawals	
\$ -	Transfers to personal account	
\$ 21.99	Non-Campaign Withdrawals	
\$ -	Possible Campaign Withdrawals	
\$ 2.82	Purpose not determinable	
<b>\$ 24.81</b>		

Campaign Finance Report Totals		
Included in Campaign Finance Report	\$	-
Not included in Campaign Finance Report	\$	24.81
	<b>\$</b>	<b>24.81</b>

### April 2016

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
4/1/2016	\$ 10.25	Quiktrip Tolleson AZ	Not determinable	n/a	No
4/1/2016	\$ 60.00	ATM Withdrawal	No	n/a	No
4/4/2016	\$ 4.37	Burger King #9984 Buckeye AZ	Not determinable	n/a	No
4/4/2016	\$ 54.99	Western Union	No	n/a	No
4/6/2016	\$ 100.00	Check #101	Yes	Table fee for Yuma Co Fair	Yes
4/18/2016	\$ 10.01	Shell Service Station Gila Bend AZ	Not determinable	n/a	No
4/18/2016	\$ 27.99	Western Union	No	n/a	No
4/20/2016	\$ 4.82	Quiktrip Phoenix AZ	Not determinable	n/a	No
4/22/2016	\$ 8.00	Transfer to personal account	No	n/a	No
4/25/2016	\$ 5.41	Starbucks L3257 Los Angeles CA	No	n/a	No
	<b>\$ 285.84</b>	<b>April Withdrawal Total</b>			

April totals from above		
\$ 60.00	ATM Withdrawals	
\$ 8.00	Transfers to personal account	
\$ 88.39	Non-Campaign Withdrawals	
\$ 100.00	Possible Campaign Withdrawals	
\$ 29.45	Purpose not determinable	
<b>\$ 285.84</b>		

Campaign Finance Report Totals		
Included in Campaign Finance Report	\$	100.00
Not included in Campaign Finance Report	\$	185.84
	<b>\$</b>	<b>285.84</b>

**May 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
5/9/2016	\$ 319.00	Transfer to personal account	No	n/a	No
5/11/2016	\$ 80.00	ATM Withdrawal	No	n/a	No
5/12/2016	\$ 59.50	Sams Club	Not determinable	n/a	No
5/23/2016	\$ 20.00	Sams Club	Yes	Fuel	Yes
5/31/2016	\$ 95.69	Renaissance Hotel Phoenix AZ	Not determinable	n/a	No
	<b>\$ 574.19</b>	<b>May Withdrawal Total</b>			

May totals from above	
\$ 80.00	ATM Withdrawals
\$ 319.00	Transfers to personal account
\$ -	Non-Campaign Withdrawals
\$ 20.00	Possible Campaign Withdrawals
\$ 155.19	Purpose not determinable
<b>\$ 574.19</b>	

Campaign Finance Report Totals	
Included in Campaign Finance Report	\$ 20.00
Not included in Campaign Finance Report	\$ 554.19
	<b>\$ 574.19</b>

**June 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
6/1/2016	\$ 52.13	Reathrey Sekon Phoenix AZ	Not determinable	n/a	No
6/1/2016	\$ 24.65	Lin's Buffet Phoenix AZ	Not determinable	n/a	No
6/2/2016	\$ 80.00	ATM Withdrawal	No	n/a	No
6/6/2016	\$ 18.91	Popeye's #10632 Phoenix AZ	Not determinable	n/a	No
6/8/2016	\$ 1,415.00	Check #102	Yes	Submittal of \$5 qualifying contributions	Yes
6/9/2016	\$ 35.00	Overdraft fee	No	n/a	No
6/13/2016	\$ 12.52	Dial Cab CO. Washington DC	No	n/a	No
6/13/2016	\$ 53.00	Cobalt Washington DC	No	n/a	No
6/13/2016	\$ 197.70	Uber	No	n/a	No
6/14/2016	\$ 35.00	Overdraft fee	No	n/a	No
6/14/2016	\$ 35.00	Overdraft fee	No	n/a	No
6/21/2016	\$ 14.97	Cracker Barrel 1780 S Yuma AZ	Yes	Meal expense	Yes
6/21/2016	\$ 23.00	Sam's Club Phoenix AZ	Not determinable	n/a	No
6/22/2016	\$ 439.19	AT&T*Bill Payment	No	n/a	No
6/22/2016	\$ 10.86	Panda Express #153 Goodyear AZ	Not determinable	n/a	No
6/23/2016	\$ 23.50	Love S Country0000 Gila Bend AZ	Not determinable	n/a	No
6/23/2016	\$ 12.41	McDonald's F1373 Washington DC	No	n/a	No
6/24/2016	\$ 25.00	American Air001028 Fort Worth TX	No	n/a	No
6/24/2016	\$ 21.80	Phx Delux Burger N Phoenix AZ	Not determinable	n/a	No
6/24/2016	\$ 28.45	Taxicharge- Washin Washington DC	No	n/a	No
6/24/2016	\$ 10.58	Dial Cab CO. Washington DC	No	n/a	No
6/24/2016	\$ 46.00	El Paso Cafe Arlington VA	No	n/a	No
6/24/2016	\$ 2,699.00	Check #103	Yes	Campaign literature & signs	Yes
6/27/2016	\$ 200.00	Southwest Title Loan	No	n/a	No
6/27/2016	\$ 63.50	ATM Withdrawal	No	n/a	No
6/27/2016	\$ 2.50	ATM fee	No	n/a	No
6/27/2016	\$ 46.00	Cafe Paradiso Washington DC	No	n/a	No
6/27/2016	\$ 12.16	Uber	No	n/a	No
6/27/2016	\$ 12.88	Uber	No	n/a	No
6/27/2016	\$ 25.00	District Kitchen L Washington DC	No	n/a	No
6/27/2016	\$ 8.80	Filiberto's Mexica Buckeye AZ	Yes	Meal expense	Yes
6/28/2016	\$ 25.17	Omni Shoreham Washington DC	No	n/a	No
6/28/2016	\$ 25.01	American Tap Room Arlington VA	No	n/a	No
6/28/2016	\$ 55.00	Sky Harbor Parking Phoenix AZ	No	n/a	No
6/28/2016	\$ 149.64	Omni Shoreham Washington DC	No	n/a	No
6/28/2016	\$ 29.00	Circle K 00225 Gila Bend AZ	Not determinable	n/a	No
6/29/2016	\$ 800.00	Check #104	Yes	VAN	Yes
6/30/2016	\$ 200.00	Check #107	Yes	Canvass	Yes
6/30/2016	\$ 104.96	Lowe's	Yes	Pounder/Wire	Yes
6/30/2016	\$ 30.43	Lowe's	Yes	Pounder	Yes
6/30/2016	\$ 3,374.91	Check #106	Yes	Signs/Lit/Paper	Yes
	<b>\$ 10,478.63</b>	<b>June Withdrawal Total</b>			

June totals from above	
\$ 143.50	ATM Withdrawals
\$ -	Transfers to personal account
\$ 1,483.21	Non-Campaign Withdrawals
\$ 8,648.07	Possible Campaign Withdrawals
\$ 203.85	Purpose not determinable
<u>\$ 10,478.63</u>	

Campaign Finance Report Totals	
Included in Campaign Finance Report	\$ 8,648.07
Not included in Campaign Finance Report	\$ 1,830.56
	<u>\$ 10,478.63</u>

#### July 2016

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
7/1/2016	\$ 100.00	Check #108	Not determinable	n/a	No
7/1/2016	\$ 150.00	Check #111	Not determinable	n/a	No
7/5/2016	\$ 7.01	The Home Depot 402 Yuma AZ	Not determinable	n/a	No
7/5/2016	\$ 255.85	Check #105	Yes	Rebar	Yes
7/6/2016	\$ 300.00	Cashed Check #116	Yes	Canvass	Yes
7/7/2016	\$ 29.00	Shell Service Station Gila Bend AZ	Not determinable	n/a	No
7/7/2016	\$ 138.42	Transfer to personal account	No	n/a	No
7/7/2016	\$ 29.41	Lin's Buffet Phoenix AZ	Not determinable	n/a	No
7/7/2016	\$ 100.00	ATM Withdrawal	No	n/a	No
7/7/2016	\$ 200.00	Check #114	Not determinable	n/a	No
7/7/2016	\$ 200.00	Check #112	Not determinable	n/a	No
7/8/2016	\$ 281.72	Frys Food 2626 83Rd Av Phoenix AZ	Not determinable	n/a	No
7/11/2016	\$ 30.88	Marisco's MI Lindo Phoenix AZ	Not determinable	n/a	No
7/11/2016	\$ 23.00	Sam's Club Avondale AZ	Not determinable	n/a	No
7/12/2016	\$ 26.00	Sam's Club Phoenix AZ	Not determinable	n/a	No
7/13/2016	\$ 110.00	Main Event/Mty Air CA	No	n/a	No
7/13/2016	\$ 30.00	Cracker Barrel 1780 S Yuma AZ	Not determinable	n/a	No
7/14/2016	\$ 186.96	Southwest	No	n/a	No
7/14/2016	\$ 15.00	Southwest	No	n/a	No
7/14/2016	\$ 5.47	Taco Bell #23212 Buckeye AZ	Not determinable	n/a	No
7/14/2016	\$ 15.00	Southwest	No	n/a	No
7/14/2016	\$ 24.00	Arco #42258 Ampm Yuma AZ	Yes	Fuel	Yes
7/14/2016	\$ 130.00	Cashed Check #120	Yes	Canvass	Yes
7/14/2016	\$ 852.86	Check #118	Yes	Lawn signs	Yes
7/14/2016	\$ 200.00	Check #115	Yes	Canvass	Yes
7/15/2016	\$ 49.40	Michaels Stores Inc206 Goodyear AZ	Not determinable	n/a	No
7/18/2016	\$ 40.88	Hooters Yuma Yuma AZ	Not determinable	n/a	No
7/18/2016	\$ 24.99	Western Union	No	n/a	No
7/18/2016	\$ 430.87	Hilton Advance Pur Memphis TN	No	n/a	No
7/18/2016	\$ 18.95	Uber	No	n/a	No
7/18/2016	\$ 18.81	Uber	No	n/a	No
7/18/2016	\$ 15.00	Chevron 0307165 Alpine CA	No	n/a	No
7/18/2016	\$ 22.00	Frys Food & Drug 11203 Yuma AZ	Not determinable	n/a	No
7/19/2016	\$ 54.00	Hilton Garden Inn San Diego CA	No	n/a	No
7/19/2016	\$ 86.00	Coaster Saloon San Diego CA	No	n/a	No
7/19/2016	\$ 14.99	Smartfinal499 Phoenix AZ	Not determinable	n/a	No
7/19/2016	\$ 23.50	Circle K 03397 Buckeye AZ	Yes	Fuel	Yes
7/19/2016	\$ 35.00	Transfer to personal account	No	n/a	No
7/19/2016	\$ 190.00	Check #119	Yes	Tradeshelper, Salt River Project	Yes
7/20/2016	\$ 8.20	Sheraton Phoenix P Phoenix AZ	Not determinable	n/a	No
7/20/2016	\$ 29.11	Uber	No	n/a	No
7/21/2016	\$ 35.00	Overdraft Fee	No	n/a	No
7/21/2016	\$ 22.00	Barrio Cafe T43003 Phoenix AZ	Not determinable	n/a	No
7/22/2016	\$ 35.00	Overdraft Fee	No	n/a	No
<u>\$ 4,594.28</u>	July Withdrawal Total				

July totals from above	
\$ 100.00	ATM Withdrawals
\$ 173.42	Transfers to personal account
\$ 1,074.69	Non-Campaign Withdrawals
\$ 1,976.21	Possible Campaign Withdrawals
\$ 1,269.96	Purpose not determinable
<u>\$ 4,594.28</u>	

Campaign Finance Report Totals	
Included in Campaign Finance Report	\$ 1,976.21
Not included in Campaign Finance Report	\$ 2,618.07
	<u>\$ 4,594.28</u>

**August 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
8/5/2016	\$ 50.00	Transfer to personal account	No	n/a	No
8/5/2016	\$ 16.50	Sam's Club Avondale AZ	Not determinable	n/a	No
8/8/2016	\$ 57.87	Wal-Mart Super Center Phoenix AZ	Not determinable	n/a	No
8/8/2016	\$ 20.00	Circle K 03397 Buckeye AZ	Not determinable	n/a	No
8/8/2016	\$ 10.93	Little Caesars #32 Buckeye AZ	Not determinable	n/a	No
8/8/2016	\$ 48.57	Target T- 1515 N Litch Goodyear AZ	Not determinable	n/a	No
8/9/2016	\$ 150.00	Venmo 855-812-4430 NY	Not determinable	n/a	No
8/9/2016	\$ 378.84	AT&T*Bill Payment	No	n/a	No
8/17/2016	\$ 200.00	Check	Not determinable	n/a	No
8/22/2016	\$ 13.00	Charlie's Phoenix Phoenix AZ	Not determinable	n/a	No
8/24/2016	\$ 20.00	Loves Cntry St Gila Bend AZ	Not determinable	n/a	No
8/29/2016	\$ 44.54	American Air	No	n/a	No
8/29/2016	\$ 25.00	LA Tasca (King Str Alexandria VA	No	n/a	No
8/29/2016	\$ 18.19	Uber	No	n/a	No
8/30/2016	\$ 12.10	Georgetown Market Arlington VA	No	n/a	No
8/30/2016	\$ 27.00	Sky Harbor Parking Phoenix AZ	No	n/a	No
8/30/2016	\$ 55.00	Pullanos Pizza Glendale AZ	Not determinable	n/a	No
<b>\$ 1,147.54 August Withdrawal Total</b>					

August totals from above	
\$ -	ATM Withdrawals
\$ 50.00	Transfers to personal account
\$ 505.67	Non-Campaign Withdrawals
\$ -	Possible Campaign Withdrawals
\$ 591.87	Purpose not determinable
<b>\$ 1,147.54</b>	

Campaign Finance Report Totals	
Included in Campaign Finance Report	\$ -
Not included in Campaign Finance Report	\$ 1,147.54
	<b>\$ 1,147.54</b>

**September 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
9/7/2016	\$ 300.00	Check #192	Yes	Canvass	Yes
9/7/2016	\$ 300.00	Check #191	Yes	Canvass	Yes
9/8/2016	\$ 10.00	Quiktrip Phoenix AZ	Not determinable	n/a	No
9/12/2016	\$ 28.00	Charlie's Phoenix	Not determinable	n/a	No
9/13/2016	\$ 48.54	Pullanos Pizza Glendale AZ	Not determinable	n/a	No
9/13/2016	\$ 197.10	Tm *Sia	No	n/a	No
9/15/2016	\$ 250.00	Check #198	Not determinable	n/a	No
9/15/2016	\$ 300.00	Check #197	Not determinable	n/a	No
9/19/2016	\$ 11.20	American Air	No	n/a	No
9/19/2016	\$ 75.00	American Air	No	n/a	No
9/19/2016	\$ 36.33	Birrieria Obregon Phoenix AZ	Not determinable	n/a	No
9/19/2016	\$ 142.37	My Ticket Tracker	No	n/a	No
9/20/2016	\$ 21.00	Arco #42533 Ampm Phoenix AZ	Not determinable	n/a	No
9/23/2016	\$ 56.00	Mariscos Altata Phoenix AZ	Not determinable	n/a	No
9/23/2016	\$ 306.50	Centurylink/Speedp	No	n/a	No
9/26/2016	\$ 127.21	Fairfield Inn & Su Phoenix AZ	No	n/a	No
9/26/2016	\$ 8.28	Federicos Buckeye AZ	Not determinable	n/a	No
9/26/2016	\$ 27.00	Circle K 00225 Gila Bend AZ	Not determinable	n/a	No
9/29/2016	\$ 35.00	Arizona List Tucson AZ	Not determinable	n/a	No
9/29/2016	\$ 247.55	4Imprint	Yes	Table runner	Yes
<b>\$ 2,527.08 September Withdrawal Total</b>					

September totals from above	
\$ -	ATM Withdrawals
\$ -	Transfers to personal account
\$ 859.38	Non-Campaign Withdrawals
\$ 847.55	Possible Campaign Withdrawals
\$ 820.15	Purpose not determinable
<b>\$ 2,527.08</b>	

Campaign Finance Report Totals	
Included in Campaign Finance Report	\$ 847.55
Not included in Campaign Finance Report	\$ 1,679.53
	<b>\$ 2,527.08</b>

**October 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
10/11/2016	60.00	Under Review Sport Surprise AZ	Not determinable	n/a	No
10/18/2016	520.08	Marriott San Jose San Jose CA	No	n/a	No
10/19/2016	200.00	Check	Not determinable	n/a	No
10/19/2016	300.00	Check	Not determinable	n/a	No
10/21/2016	35.00	NSF Return Item Fee	No	n/a	No
10/24/2016	22,651.00	Check	Yes	Return of CCEC funds	Yes
10/25/2016	35.00	Overdraft Fee	No	n/a	No
<b>\$ 23,801.08 October Withdrawal Total</b>					

October totals from above	
\$ -	ATM Withdrawals
\$ -	Transfers to personal account
\$ 590.08	Non-Campaign Withdrawals
\$ 22,651.00	Possible Campaign Withdrawals
\$ 560.00	Purpose not determinable
<b>\$ 23,801.08</b>	

Campaign Finance Report Totals	
Included in Campaign Finance Report	\$ 22,651.00
Not included in Campaign Finance Report	\$ 1,150.08
	<b>\$ 23,801.08</b>

**November 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
No withdrawal activity noted					

**December 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
No withdrawal activity noted					

Total Election Cycle Withdrawals	
\$ 683.50	ATM Withdrawals
\$ 604.42	Transfers to personal account
\$ 4,653.41	Non-Campaign Withdrawals
\$ 34,261.93	Possible Campaign Withdrawals
\$ 3,635.41	Purpose not determinable
<b>\$ 43,838.67</b>	

Campaign Finance Report Totals	
Included in Campaign Finance Report	\$ 34,628.95
Not included in Campaign Finance Report	\$ 9,209.72
	<b>\$ 43,838.67</b>

April 28, 2017

To: Chairman and Members of the Commission  
Citizens Clean Elections Commission

From: Jesus Rubalcava, Participating Candidate  
for State Representative – District No. 4

Re: 2016 Election Cycle Finance Activity Comprehensive Review

Dear Chairman and Members,

I would like to start off by thanking you for the opportunity to participate as a participating candidate in the 2016 Election Cycle. Please acknowledge that I am not by any means challenging the results of the review, nor am I denying any wrong doing. More so, this is acknowledgement that my campaign finances were not effectively run and that my lesson has been learned. Moving forward, should I be given the opportunity, I now know what to do and what not to do. This letter is to explain and clarify some questions you may have in regards to the issues and concerns brought before you.

It is important to know that this was my first time running for such position. I had never had to file full campaign accounts and never had to form a committee for the purpose of running for office. Many things I did not know. For example, I did not know that I needed to set up a petty cash account. I did not know where or how to disclose family members that worked for my campaign. I did not know that I needed to hire legal counsel. I did call the Citizens Clean Elections Commission office twice to ask for 1) what or how much to pay individuals working for the campaign and 2) where to obtain a mileage reimbursement form. I did not receive a concrete answer for either questions, rather was told to attend the CCEC Orientation again. Again, this is not justification or an excuse.

The biggest issue with my campaign was that I used my bank account that linked with my campaign account. For example, I would deposit a check into what I thought was one account and it would end up

in another. Another example, I would use my campaign debit card for a transaction and it would withdraw from my personal account. Because this was so confusing to me, I began to use the filing report with the Secretary of State as my accounting and balance.

I was not able to provide additional documentation other than my bank statements for the following reason. I am a Special Education teacher in the Buckeye Elementary School District. When going through my initial audit, I had all of my campaign documents in my classroom. Over holiday break, I was moved into different classrooms 2 times. During this time, many of my personal belongings and documents were misplaced. I still have not been able to relocate them.

I ask the commission to please consider the reasoning for such flaws in this campaign finance. I accept the report on findings as a way to acknowledge and learn from what was done incorrectly and how to do things the correct way. I am willing to accept the consequences of my wrongdoing and ask that the commission allow me to take corrective actions in order to comply; whether this be repaying back any unaccounted monies and fees set forth by the commission.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'JR' followed by a stylized surname.

Jesus A Rubalcava





# EXHIBIT D

May 30, 2017

To: Tom Collins  
Citizens Clean Elections Commission

From: Jesus Rubalcava  
2016 Participating Candidate

RE: Notice of Complaint/Opportunity to Respond

Dear Executive Director Collins & Commission Members:

Thank you for the opportunity to respond to this complaint. Please acknowledge that I am not by any means challenging the results of the review, nor am I denying any wrong doing. More so, this is acknowledgement that my campaign finances were not effectively run and that my lesson has been learned. Moving forward, should I be given the opportunity, I now know what to do and what not to do. This memo is to explain and/or clarify the complaints brought forth.

**Complaint #1.**

I did accept contributions other than the \$5 contributions because it was my understanding that a candidate was allowed to receive early contributions with a limit on the amount a candidate could receive. According to the Citizens Clean Elections Commission and as posted on their website "individuals may contribute up to a maximum of \$160". The following Exhibit A. demonstrates the amounts received and the individuals who contributed.

*Exhibit A.*

Schedule C2 - Individual contributions Covers period 11/25/2014 to 11/8/2016			
Name / Address	Date	Amount	Cycle To Date
Wilson, Sandi 22943 W Durango St, Buckeye, AZ 85326 Manager, Palo Verde Elementary School District 49	12/08/2015	\$5.00	\$5.00
Bacon, Julia 8098 E Theresa Dr, Scottsdale, AZ 85255 Homemaker, Self	02/22/2016	\$100.00	\$100.00
Navarrete, Otoniel PO Box 18611, Phoenix, AZ 85005 Retired, None	02/25/2016	\$100.00	\$100.00
Ogle, Kathe 20418 N 98th Pl, Scottsdale, AZ 85255 homemaker, Homemaker	02/25/2016	\$100.00	\$100.00
Alvarado, M L 3834 W Ocotillo Rd, Phoenix, AZ 85019 Retired, Retired	03/04/2016	\$25.00	\$25.00

**Complaint #2.**

I did contribute \$177.00 of my personal money to the campaign. According to the Citizens Clean Elections Commission and website, it states that " Candidates may contribute his or her personal funds up to a maximum amount of \$740 for candidates for the legislature and \$1,460 for candidates running for a statewide office." Please see Exhibit B.

**Exhibit B.**

Schedule C1 - Personal and family contributions Covers period 11/25/2014 to 11/8/2016			
Name / Address	Date	Amount	Cycle To Date
Rubalcava, Jesus A 806 W Margaret St, Gila Bend, AZ 85337 Educator, Palo Verde ESD	12/04/2015	\$100.00	\$177.00
Rubalcava, Jesus A 806 W Margaret St, Gila Bend, AZ 85337 Educator, Palo Verde ESD	08/08/2016	\$77.00	\$177.00

**Complaint #3.**

According to the campaign finance reports submitted to the Secretary of State, I did not exceed the amount of the adjusted primary election spending limit. A copy of the finance reports filed with the Arizona Secretary of State are available for your review: Exhibit C, Exhibit D, Exhibit E, Exhibit G, and Exhibit H.

**Complaint #4.**

According to the campaign finance reports submitted to the Secretary of State, I did not exceed the amount of the adjusted general election spending limit. I did not receive funding for the general election because I was unopposed and learned I was unopposed until late September. The only expenditures were made were for payments made to individuals helping take down

signs after the election or those individuals working on the campaign in the case that I would have General Election opposition. A copy of the finance reports filed with the Arizona Secretary of State are available for your review: Exhibit C, Exhibit D, Exhibit E, Exhibit G, and Exhibit H.

**Complaint #5.**

According to the reports filed with the Arizona Secretary of State, there wasn't any unused monies that were not returned to the Citizens Clean Elections Commission. If I am mistaken, I ask that I be allowed to make the necessary arrangements to pay back whatever amount the commission feels is owed.

Executive Director Collins and Commission, please know that this was my first time running for such position. I had never had to file full campaign accounts and never had to form a committee for the purpose of running for office. Many things I did not know. For example, I did not know that I needed to set up a petty cash account. I did not know where or how to disclose family members that worked for my campaign. I did not know that I needed to hire legal counsel.

The biggest issue with my campaign was that I used my bank account that linked with my campaign account. For example, I would deposit a check into what I thought was one account and it would end up in another. Another example, I would use my campaign debit card for a transaction and it would withdraw from my personal account. Because this was so confusing to me, I began to use the filing report with the Secretary of State as my accounting and balance.

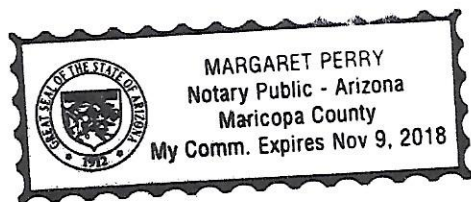
I ask the commission to please consider the reasoning for such flaws in this campaign finance. I accept the report on findings as a way to acknowledge and learn from what was done incorrectly and how to do things the correct way. I am willing to accept the consequences of my wrongdoing and ask that the commission allow me to take corrective actions in order to comply; whether this be repaying back any unaccounted monies and fees set forth by the commission.

Thank you for your time and consideration.

Sincerely,



Jesus A Rubalcava



*Margaret Perry*  
Commission expires Nov 9, 2018



# State of Arizona



## Campaign Finance Report

Treasurer: Nevarez, Rosa  
PO Box 863, Gila Bend, AZ 85337  
Phone: (602) 295-2102  
Email: [jesusarubalcava@gmail.com](mailto:jesusarubalcava@gmail.com)  
Candidate Name: Rubalcava, Jesus A  
Office Sought: State Representative - District 4

Rubalcava for House  
Committee #: 201600368

### Amended 2016 Interim Report

Election Cycle: 2015-2016  
Date Filed: May 12, 2016  
Reporting Period: January 1, 2016-January 11, 2016

### Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$127.00
Total Cash Receipts this Reporting Period:	\$10.00
Total Cash Disbursements this Reporting Period:	\$19.10
Cash Balance at End of Reporting Period:	\$117.90

Report ID: 163897

## Summary of Activity

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	\$0.00	\$0.00	\$0.00	\$100.00
Individual Contributions	C2	\$0.00	\$0.00	\$0.00	\$5.00
Contributions from Political Committees	C3	\$0.00	\$0.00	\$0.00	\$0.00
Business Contributions	C4	\$0.00	\$0.00	\$0.00	\$0.00
Small Contributions	C5	\$0.00	\$0.00	\$0.00	\$60.00
CCEC Funding and Matching	C6	\$0.00	\$0.00	\$0.00	\$0.00
Qualifying Contributions	C7	\$10.00	\$0.00	\$10.00	\$10.00
Loans Made to this Committee	L1	\$0.00	\$0.00	\$0.00	\$0.00
Other Receipts, including Interest and Dividends	R1	\$0.00	\$0.00	\$0.00	\$0.00
Transfers from Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Cash Surplus from Previous Committee	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Income</b>		\$10.00	\$0.00	\$10.00	\$175.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$19.10	\$0.00	\$19.10	\$127.03
Independent Expenditures	E2	\$0.00	\$0.00	\$0.00	\$0.00
Contributions to Other Committees	E3	\$0.00	\$0.00	\$0.00	\$0.00
Other Expenses	E4	\$0.00	\$0.00	\$0.00	\$0.00
Transfers to Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made by This Committee	L2	\$0.00	\$0.00	\$0.00	\$0.00
Expenditure of In-Kind Contributions	C8	\$0.00	\$0.00	\$0.00	\$0.00
Disposal of Surplus Cash	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Expenditures</b>		\$19.10	\$0.00	\$19.10	\$127.03
Bill Payments for Previous Expenditures	D1	\$0.00		\$0.00	\$0.00
<b>Total Cash Disbursed</b>		\$19.10		\$19.10	\$0.00

**Schedule C7 - Qualifying contributions**

<b>Name:</b>	Sanchez, Teresa	<b>Date</b>	01/01/2016	<b>Amount</b>	\$5.00 Cash	<b>Cycle To Date</b>	\$5.00
<b>Address:</b>							
<b>Name:</b>	Gonzalez, Armida	<b>Date</b>	01/04/2016	<b>Amount</b>	\$5.00 Cash	<b>Cycle To Date</b>	\$5.00
<b>Address:</b>							
Total of Clean Elections Qualifying Contributions							
Total of Refunds Given							
Net Total of Qualifying Contributions							



Exhibit D

# State of Arizona



## Campaign Finance Report

<b>Treasurer:</b> Nevarez, Rosa PO Box 863, Gila Bend, AZ 85337 Phone: (602) 295-2102 Email: <a href="mailto:jesusarubalcava@gmail.com">jesusarubalcava@gmail.com</a> Candidate Name: Rubalcava, Jesus A Office Sought: State Representative - District 4	<b>Rubalcava for House</b> Committee #: 201600368
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### Amended 2016 Primary Recap Report

Election Cycle:	2015-2016
Date Filed:	September 4, 2016
Reporting Period:	August 24, 2016-August 30, 2016

### Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$2,747.56
Total Cash Receipts this Reporting Period:	\$0.00
Total Cash Disbursements this Reporting Period:	\$2,750.00
Cash Balance at End of Reporting Period:	(\$2.44)

## Summary of Activity

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	\$0.00	\$0.00	\$0.00	\$177.00
Individual Contributions	C2	\$0.00	\$0.00	\$0.00	\$525.00
Contributions from Political Committees	C3	\$0.00	\$0.00	\$0.00	\$0.00
Business Contributions	C4	\$0.00	\$0.00	\$0.00	\$0.00
Small Contributions	C5	\$0.00	\$0.00	\$0.00	\$60.00
CCEC Funding and Matching	C6	\$0.00	\$0.00	\$0.00	\$16,044.00
Qualifying Contributions	C7	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made to this Committee	L1	\$0.00	\$0.00	\$0.00	\$0.00
Other Receipts, including Interest and Dividends	R1	\$0.00	\$0.00	\$0.00	\$0.00
Transfers from Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Cash Surplus from Previous Committee	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Income</b>		\$0.00	\$0.00	\$0.00	\$16,806.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$0.00	\$0.00	\$0.00	\$4,497.09
Independent Expenditures	E2	\$0.00	\$0.00	\$0.00	\$0.00
Contributions to Other Committees	E3	\$0.00	\$0.00	\$0.00	\$0.00
Other Expenses	E4	\$2,750.00	\$0.00	\$2,750.00	\$12,381.28
Transfers to Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made by This Committee	L2	\$0.00	\$0.00	\$0.00	\$0.00
Expenditure of In-Kind Contributions	C8	\$0.00	\$0.00	\$0.00	\$0.00
Disposal of Surplus Cash	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Expenditures</b>		\$2,750.00	\$0.00	\$2,750.00	\$16,878.37
Bill Payments for Previous Expenditures	D1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Cash Disbursed</b>		\$2,750.00	\$0.00	\$2,750.00	\$16,878.37

# State of Arizona



## Campaign Finance Report

<b>Treasurer:</b> Nevarez, Rosa <b>PO Box</b> 863, Gila Bend, AZ 85337 <b>Phone:</b> (602) 295-2102 <b>Email:</b> <a href="mailto:jesusarubalcava@gmail.com">jesusarubalcava@gmail.com</a> <b>Candidate Name:</b> Rubalcava, Jesus A <b>Office Sought:</b> State Representative - District 4	<b>Rubalcava for House</b> <b>Committee #:</b> 201600368
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### Amended 2016 June 30th Report

<b>Election Cycle:</b>	2015-2016
<b>Date Filed:</b>	November 1, 2016
<b>Reporting Period:</b>	January 1, 2016-May 31, 2016

### Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$127.00
Total Cash Receipts this Reporting Period:	\$1,935.00
Total Cash Disbursements this Reporting Period:	\$2,089.16
Cash Balance at End of Reporting Period:	(\$27.16)



## Summary of Activity

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	\$0.00		\$0.00	\$100.00
Individual Contributions	C2	\$520.00		\$0.00	\$520.00
Contributions from Political Committees	C3	\$0.00		\$0.00	\$0.00
Business Contributions	C4	\$0.00		\$0.00	\$0.00
Small Contributions	C5	\$0.00		\$0.00	\$60.00
CCEC Funding and Matching	C6	\$0.00		\$0.00	\$0.00
Qualifying Contributions	C7	\$1,415.00		\$0.00	\$1,415.00
Loans Made to this Committee	L1	\$0.00		\$0.00	\$0.00
Other Receipts, including Interest and Dividends	R1	\$0.00		\$0.00	\$0.00
Transfers from Other Committees	T1	\$0.00		\$0.00	\$0.00
Cash Surplus from Previous Committee	S1	\$0.00		\$0.00	\$0.00
<b>Total Income</b>		\$1,935.00		\$0.00	\$2,100.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$2,089.16		\$0.00	\$2,197.09
Independent Expenditures	E2	\$0.00		\$0.00	\$0.00
Contributions to Other Committees	E3	\$0.00		\$0.00	\$0.00
Other Expenses	E4	\$0.00		\$0.00	\$0.00
Transfers to Other Committees	T1	\$0.00		\$0.00	\$0.00
Loans Made by This Committee	L2	\$0.00		\$0.00	\$0.00
Expenditure of In-Kind Contributions	C8	\$0.00		\$0.00	\$0.00
Disposal of Surplus Cash	S1	\$0.00		\$0.00	\$0.00
<b>Total Expenditures</b>		\$2,089.16		\$0.00	\$2,197.09
Bill Payments for Previous Expenditures	D1	\$0.00		\$0.00	\$0.00
<b>Total Cash Disbursed</b>		\$2,089.16		\$0.00	\$2,197.09

# State of Arizona



## Campaign Finance Report

Treasurer: Nevarez, Rosa  
PO Box 863, Gila Bend, AZ 85337  
Phone: (602) 295-2102  
Email: [jesusarubalcava@gmail.com](mailto:jesusarubalcava@gmail.com)  
Candidate Name: Rubalcava, Jesus A  
Office Sought: State Representative - District 4

Rubalcava for House  
Committee #: 201600368

### Amended 2016 Post-Primary Election Report

Election Cycle: 2015-2016  
Date Filed: November 1, 2016  
Reporting Period: August 19, 2016-September 19, 2016

#### Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$2,747.56
Total Cash Receipts this Reporting Period:	\$24,066.00
Total Cash Disbursements this Reporting Period:	\$3,614.50
Cash Balance at End of Reporting Period:	\$23,199.06

Report ID: 163937



## Summary of Activity

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	\$0.00	\$0.00	\$0.00	\$177.00
Individual Contributions	C2	\$0.00	\$0.00	\$0.00	\$525.00
Contributions from Political Committees	C3	\$0.00	\$0.00	\$0.00	\$0.00
Business Contributions	C4	\$0.00	\$0.00	\$0.00	\$0.00
Small Contributions	C5	\$0.00	\$0.00	\$0.00	\$60.00
CCEC Funding and Matching	C6	\$24,066.00	\$0.00	\$24,066.00	\$40,110.00
Qualifying Contributions	C7	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made to this Committee	L1	\$0.00	\$0.00	\$0.00	\$0.00
Other Receipts, including Interest and Dividends	R1	\$0.00	\$0.00	\$0.00	\$0.00
Transfers from Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Cash Surplus from Previous Committee	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Income</b>		\$24,066.00	\$0.00	\$24,066.00	\$40,872.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$0.00	\$0.00	\$0.00	\$4,497.09
Independent Expenditures	E2	\$0.00	\$0.00	\$0.00	\$0.00
Contributions to Other Committees	E3	\$0.00	\$0.00	\$0.00	\$0.00
Other Expenses	E4	\$3,614.50	\$0.00	\$3,614.50	\$13,245.78
Transfers to Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made by This Committee	L2	\$0.00	\$0.00	\$0.00	\$0.00
Expenditure of In-Kind Contributions	C8	\$0.00	\$0.00	\$0.00	\$0.00
Disposal of Surplus Cash	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Expenditures</b>		\$3,614.50	\$0.00	\$3,614.50	\$17,742.87
Bill Payments for Previous Expenditures	D1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Cash Disbursed</b>		\$3,614.50	\$0.00	\$3,614.50	\$0.00

**Amended Post-Primary Election Report**  
Covers 08/19/2016 to 09/19/2016

**Amended Post-Primary Election Report**  
Covers 08/19/2016 to 09/19/2016

Exhibit G

# State of Arizona



## Campaign Finance Report

Treasurer: Nevarez, Rosa  
PO Box 863, Gila Bend, AZ 85337  
Phone: (602) 295-2102  
Email: [jesusarubalcava@gmail.com](mailto:jesusarubalcava@gmail.com)  
Candidate Name: Rubalcava, Jesus A  
Office Sought: State Representative - District 4

Rubalcava for House  
Committee #: 201600368

### Amended 2016 Pre-Primary Election Report

Election Cycle: 2015-2016  
Date Filed: November 2, 2016  
Reporting Period: June 1, 2016-August 18, 2016

#### Summary of Finances

Cash Balance at Beginning of Reporting Period:	(\$27.16)
Total Cash Receipts this Reporting Period:	\$14,706.00
Total Cash Disbursements this Reporting Period:	\$11,931.28
Cash Balance at End of Reporting Period:	\$2,747.56

Report ID: 163936



## Summary of Activity

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	\$77.00	\$0.00	\$77.00	\$177.00
Individual Contributions	C2	\$0.00	\$0.00	\$0.00	\$525.00
Contributions from Political Committees	C3	\$0.00	\$0.00	\$0.00	\$0.00
Business Contributions	C4	\$0.00	\$0.00	\$0.00	\$0.00
Small Contributions	C5	\$0.00	\$0.00	\$0.00	\$60.00
CCEC Funding and Matching	C6	\$16,044.00	\$0.00	\$16,044.00	\$16,044.00
Qualifying Contributions	C7	(\$1,415.00)	\$0.00	(\$1,415.00)	\$0.00
Loans Made to this Committee	L1	\$0.00	\$0.00	\$0.00	\$0.00
Other Receipts, including Interest and Dividends	R1	\$0.00	\$0.00	\$0.00	\$0.00
Transfers from Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Cash Surplus from Previous Committee	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Income</b>		\$14,706.00	\$0.00	\$14,706.00	\$16,806.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$2,300.00	\$0.00	\$2,300.00	\$4,497.09
Independent Expenditures	E2	\$0.00	\$0.00	\$0.00	\$0.00
Contributions to Other Committees	E3	\$0.00	\$0.00	\$0.00	\$0.00
Other Expenses	E4	\$9,631.28	\$0.00	\$9,631.28	\$9,631.28
Transfers to Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made by This Committee	L2	\$0.00	\$0.00	\$0.00	\$0.00
Expenditure of In-Kind Contributions	C8	\$0.00	\$0.00	\$0.00	\$0.00
Disposal of Surplus Cash	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Expenditures</b>		\$11,931.28	\$0.00	\$11,931.28	\$14,128.37
Bill Payments for Previous Expenditures	D1	\$0.00		\$0.00	\$0.00
<b>Total Cash Disbursed</b>		\$11,931.28			

# EXHIBIT E



# Campaign Finance Report

Rubalcava for House  
Committee #: 201600368

Treasurer: Nevarez, Rosa  
PO Box 863, Gila Bend, AZ 85337  
Phone: (602) 295-2102  
Email: [jesusarubalcava@gmail.com](mailto:jesusarubalcava@gmail.com)  
Candidate Name: Rubalcava, Jesus A  
Office Sought: State Representative - District 4

## Amended 2016 June 30th Report

Election Cycle: 2015-2016  
Date Filed: November 1, 2016  
Reporting Period: January 1, 2016-May 31, 2016

## Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$127.00
Total Cash Receipts this Reporting Period:	\$1,935.00
Total Cash Disbursements this Reporting Period:	\$2,089.16
Cash Balance at End of Reporting Period:	(\$27.16)

Report ID: 163894

## Summary of Activity

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	\$0.00	\$0.00	\$0.00	\$100.00
Individual Contributions	C2	\$520.00	\$0.00	\$520.00	\$525.00
Contributions from Political Committees	C3	\$0.00	\$0.00	\$0.00	\$0.00
Business Contributions	C4	\$0.00	\$0.00	\$0.00	\$0.00
Small Contributions	C5	\$0.00	\$0.00	\$0.00	\$60.00
CCEC Funding and Matching	C6	\$0.00	\$0.00	\$0.00	\$0.00
Qualifying Contributions	C7	\$1,415.00	\$0.00	\$1,415.00	\$1,415.00
Loans Made to this Committee	L1	\$0.00	\$0.00	\$0.00	\$0.00
Other Receipts, including Interest and Dividends	R1	\$0.00	\$0.00	\$0.00	\$0.00
Transfers from Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Cash Surplus from Previous Committee	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Income</b>		\$1,935.00	\$0.00	\$1,935.00	\$2,100.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$2,089.16	\$0.00	\$2,089.16	\$2,197.09
Independent Expenditures	E2	\$0.00	\$0.00	\$0.00	\$0.00
Contributions to Other Committees	E3	\$0.00	\$0.00	\$0.00	\$0.00
Other Expenses	E4	\$0.00	\$0.00	\$0.00	\$0.00
Transfers to Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made by This Committee	L2	\$0.00	\$0.00	\$0.00	\$0.00
Expenditure of In-Kind Contributions	C8	\$0.00	\$0.00	\$0.00	\$0.00
Disposal of Surplus Cash	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Expenditures</b>		\$2,089.16	\$0.00	\$2,089.16	\$2,197.09
Bill Payments for Previous Expenditures	D1	\$0.00		\$0.00	\$0.00
<b>Total Cash Disbursed</b>		\$2,089.16			

**Schedule C2 - Individual contributions**

		Date	Amount	Cycle To Date
<b>Name:</b>	Bacon, Julia	02/22/2016	\$100.00	\$100.00
<b>Address:</b>	8098 E Theresa Dr, Scottsdale, AZ 85255		Cash	
<b>Occupation:</b>	Homemaker, Self			
<b>Memo:</b>	PayPal			
<b>Name:</b>	Navarrete, Otoniel	02/25/2016	\$100.00	\$100.00
<b>Address:</b>	PO Box 18611, Phoenix, AZ 85005		Cash	
<b>Occupation:</b>	Retired, None			
<b>Memo:</b>	PayPal			
<b>Name:</b>	Ogle, Kathe	02/25/2016	\$100.00	\$100.00
<b>Address:</b>	20418 N 98th Pl, Scottsdale, AZ 85255		Cash	
<b>Occupation:</b>	homemaker, Homemaker			
<b>Name:</b>	Alvarado, M L	03/04/2016	\$25.00	\$25.00
<b>Address:</b>	3834 W Ocotillo Rd, Phoenix, AZ 85019		Cash	
<b>Occupation:</b>	Retired, Retired			
<b>Name:</b>	Lucero, Joanna	03/17/2016	\$20.00	\$20.00
<b>Address:</b>	2301 N 40th Dr, Phoenix, AZ 85009		Cash	
<b>Occupation:</b>	Office Manager, Non-Profit			
<b>Name:</b>	Knecht, Kathy	03/20/2016	\$100.00	\$100.00
<b>Address:</b>	6727 W Corrine Dr, Peoria, AZ 85381		Cash	
<b>Occupation:</b>	student, studen			
<b>Name:</b>	Otondo, Lisa	05/11/2016	\$75.00	\$75.00
<b>Address:</b>	1037 S 8th Ave, Yuma, AZ 85364		Cash	
<b>Occupation:</b>	State Rep, State of AZ			
Total of Individual Contributions			\$520.00	
Total of Refunds Given			\$0.00	
Net Total of Individual Contributions			\$520.00	

**Schedule C7 - Qualifying contributions**

	Date	Amount	Cycle To Date
<b>Name:</b> Sanchez, Teresa <b>Address:</b>	01/01/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Gonzalez, Armida <b>Address:</b>	01/04/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Fusco, Anthony D Jr. <b>Address:</b>	01/12/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Harris, Louis W <b>Address:</b>	01/12/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Peten, Geraldine <b>Address:</b>	01/12/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Peters, Karen <b>Address:</b>	01/12/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Stromberg, Ingrid S <b>Address:</b>	01/12/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Weston Salsman, Mary <b>Address:</b>	01/12/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Taylor, Patrick <b>Address:</b>	01/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Nelson, Daniel <b>Address:</b>	01/14/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Nelson, Theresa <b>Address:</b>	01/14/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Orozco, Brandon <b>Address:</b>	01/18/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Orozco, Jennifer <b>Address:</b>	01/18/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Orozco, Kaylen <b>Address:</b>	01/18/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Jennings, Edward Jr <b>Address:</b>	01/29/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Jennings, Edward Sr <b>Address:</b>	01/29/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Muse, LaGina <b>Address:</b>	01/29/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Trexler, Marilyn <b>Address:</b>	01/29/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Marquez, Ana L <b>Address:</b>	01/30/2016	\$5.00 Cash	\$5.00

**Schedule C7 - Qualifying contributions**

	Date	Amount	Cycle To Date
<b>Name:</b> Amezcua, Abraham <b>Address:</b>	02/01/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Amezcua, Edgar R <b>Address:</b>	02/01/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Amezcua, Erika <b>Address:</b>	02/01/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Bhakta, Natvarbhai M <b>Address:</b>	02/01/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Birchfield, Glen <b>Address:</b>	02/01/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Davis, Gina <b>Address:</b>	02/01/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Davis, Laura <b>Address:</b>	02/01/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Ortiz, Ruvy <b>Address:</b>	02/01/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Poqui, Luz A <b>Address:</b>	02/01/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Rodriguez, Manuela <b>Address:</b>	02/01/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Smith, Elizabeth <b>Address:</b>	02/01/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Conner, Marcia M <b>Address:</b>	02/03/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Stanberry, Jody <b>Address:</b>	02/03/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Carpenter, Earl <b>Address:</b>	02/08/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Carpenter, Shirley <b>Address:</b>	02/08/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Birchfield, Dayle G <b>Address:</b>	02/09/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Nevarez, Pedro B <b>Address:</b>	02/09/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Nevarez, Rosa I <b>Address:</b>	02/09/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Raygoza, Gladis G <b>Address:</b>	02/09/2016	\$5.00 Cash	\$5.00

**Schedule C7 - Qualifying contributions**

	Date	Amount	Cycle To Date
<b>Name:</b> Sly, Agustina <b>Address:</b>	02/10/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Stanberry, Justin <b>Address:</b>	02/10/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Cavanaugh, Kelly <b>Address:</b>	02/11/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Neal, James E <b>Address:</b>	02/11/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Neal, Janie <b>Address:</b>	02/11/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Amezcua, Valerie <b>Address:</b>	02/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Carpenter, Joanne <b>Address:</b>	02/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Carpenter, Joshua <b>Address:</b>	02/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Figueroa, Jose <b>Address:</b>	02/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Gonzalez, Jose R <b>Address:</b>	02/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Hecht, Christina <b>Address:</b>	02/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Hipp, Mike <b>Address:</b>	02/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Knutson, Elizabeth <b>Address:</b>	02/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Lopez, Maria <b>Address:</b>	02/13/2016	\$5.00 Cash	\$10.00
<b>Name:</b> Loter, Tammy <b>Address:</b>	02/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Osequeda, Cynthia <b>Address:</b>	02/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Ruiz Melendrez, Fabiola <b>Address:</b>	02/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Sanchez, Ericka <b>Address:</b>	02/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Sanchez, Melissa <b>Address:</b>	02/13/2016	\$5.00 Cash	\$5.00



**Schedule C7 - Qualifying contributions**

	Date	Amount	Cycle To Date
<b>Name:</b> Taylor, Wanda M <b>Address:</b>	02/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Villegas, Felipe <b>Address:</b>	02/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Villegas, Josefina <b>Address:</b>	02/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Villegas, Victor <b>Address:</b>	02/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Dupree, Mattie L <b>Address:</b>	02/15/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Lanford, Terry <b>Address:</b>	02/15/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Basaldua, Rudy <b>Address:</b>	02/16/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Celaya, Angelo <b>Address:</b>	02/16/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Cipriano, Willalee <b>Address:</b>	02/16/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Dempsey, Diane <b>Address:</b>	02/16/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Dempsey, Terry <b>Address:</b>	02/16/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Diaz, Augustine <b>Address:</b>	02/16/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Laborin, Albert <b>Address:</b>	02/16/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Manuel, Mary <b>Address:</b>	02/16/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Mattia, Wilbert <b>Address:</b>	02/16/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Miguel, Claret <b>Address:</b>	02/16/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Ortega, Ida <b>Address:</b>	02/16/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Ortiz, Edith <b>Address:</b>	02/16/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Osequeda, Ramona <b>Address:</b>	02/16/2016	\$5.00 Cash	\$5.00

**Schedule C7 - Qualifying contributions**

	Date	Amount	Cycle To Date
<b>Name:</b> Rizo, Andrea <b>Address:</b>	02/16/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Sandoval, Lina <b>Address:</b>	02/16/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Sandoval, Martin <b>Address:</b>	02/16/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Sandoval, Revi <b>Address:</b>	02/16/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Estrella, Paula N <b>Address:</b>	02/17/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Hopkins, Richard <b>Address:</b>	02/17/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Manuel, Bonnie <b>Address:</b>	02/17/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Moreno, Jamie <b>Address:</b>	02/17/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Moreno, Lorraine <b>Address:</b>	02/17/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Moreno, Rosanne <b>Address:</b>	02/17/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Moreno, Rudy V <b>Address:</b>	02/17/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Ortega, Raymond Jr <b>Address:</b>	02/17/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Ortiz, Shiane <b>Address:</b>	02/17/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Osequeda, Alvina <b>Address:</b>	02/17/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Osequeda, Gualdalupe <b>Address:</b>	02/17/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Osequeda, Isidro <b>Address:</b>	02/17/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Osequeda, Mary <b>Address:</b>	02/17/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Pilone, Delberta <b>Address:</b>	02/17/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Pilone, Sharee <b>Address:</b>	02/17/2016	\$5.00 Cash	\$5.00

**Schedule C7 - Qualifying contributions**

	Date	Amount	Cycle To Date
<b>Name:</b> Ramirez, Eileen <b>Address:</b>	02/17/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Ramirez, Irene <b>Address:</b>	02/17/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Salsman, Rick <b>Address:</b>	02/17/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Turner, Kristin <b>Address:</b>	02/17/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Allaman, Kristopher Lee <b>Address:</b>	02/18/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Cipriano, Arlinda <b>Address:</b>	02/18/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Cipriano, Linda <b>Address:</b>	02/18/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Burbage, Gloria <b>Address:</b>	02/19/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Burbage, Manning Edward <b>Address:</b>	02/19/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Gonzalez, Maria <b>Address:</b>	02/19/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Mendoza, Clarence <b>Address:</b>	02/19/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Mendoza, Maria <b>Address:</b>	02/19/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Ramirez, Fernando <b>Address:</b>	02/19/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Riggs, Christopher S <b>Address:</b>	02/19/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Riggs, Patricia <b>Address:</b>	02/19/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Sandoval, Bonnie <b>Address:</b>	02/19/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Vasquez, Gilbert V <b>Address:</b>	02/19/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Garcia, Irma Y <b>Address:</b>	02/21/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Gomez, Maria <b>Address:</b>	02/21/2016	\$5.00 Cash	\$5.00

**Schedule C7 - Qualifying contributions**

	Date	Amount	Cycle To Date
<b>Name:</b> Miller, Daniel <b>Address:</b>	02/21/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Ramos, Maritza <b>Address:</b>	02/22/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Aguirre, Theresa <b>Address:</b>	02/25/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Flores, Roger M <b>Address:</b>	02/25/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Baker, Lorri <b>Address:</b>	02/26/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Burkhardt, Lori <b>Address:</b>	02/26/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Coronado, Graciela Y <b>Address:</b>	02/26/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Gray, Andrea R <b>Address:</b>	02/26/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Leon, Ana <b>Address:</b>	02/26/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Ochoa, Jose <b>Address:</b>	02/26/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Ochoa, Ruth C <b>Address:</b>	02/26/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Quintero, Magda V <b>Address:</b>	02/26/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Rodriguez, Maria S <b>Address:</b>	02/26/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Sessums, Vivien <b>Address:</b>	02/26/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Turner, Yovana <b>Address:</b>	02/26/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Villegas, Petronilo <b>Address:</b>	02/26/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Villegas, Sylvia <b>Address:</b>	02/26/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Stout, Edward A <b>Address:</b>	02/28/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Stout, Zachary A <b>Address:</b>	02/28/2016	\$5.00 Cash	\$5.00

**Schedule C7 - Qualifying contributions**

	Date	Amount	Cycle To Date
<b>Name:</b> Halcomb, Jennifer <b>Address:</b>	02/29/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Lopez, Lizbet A <b>Address:</b>	02/29/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Marquez, Robert <b>Address:</b>	02/29/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Navarro, Hector <b>Address:</b>	02/29/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Navarro, Viviana <b>Address:</b>	02/29/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Rodriguez Villegas, Benito <b>Address:</b>	02/29/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Stout, Rhonda M <b>Address:</b>	02/29/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Barcenas, Nanci <b>Address:</b>	03/01/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Artea, Sylvia <b>Address:</b>	03/02/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Cleto, Araceli <b>Address:</b>	03/02/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Gonzalez, Maria E <b>Address:</b>	03/02/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Lopez, Darlene C <b>Address:</b>	03/02/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Lopez, Jesus F <b>Address:</b>	03/02/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Lopez, Maria <b>Address:</b>	03/02/2016	\$5.00 Cash	\$10.00
<b>Name:</b> Nieto, Ambrocio <b>Address:</b>	03/02/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Perez, Felipe <b>Address:</b>	03/02/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Perry, Peggy <b>Address:</b>	03/02/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Ramirez, Adrian <b>Address:</b>	03/02/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Rubalcava, Jesus <b>Address:</b>	03/02/2016	\$5.00 Cash	\$5.00

**Schedule C7 - Qualifying contributions**

	Date	Amount	Cycle To Date
<b>Name:</b> Vasquez, Robert <b>Address:</b>	03/02/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Araujo, Adrian <b>Address:</b>	03/03/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Araujo, Manuel <b>Address:</b>	03/03/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Hacker, Jaclyn <b>Address:</b>	03/03/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Manuel, Gloria J <b>Address:</b>	03/05/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Nevarez, Pedro F <b>Address:</b>	03/12/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Contreras, Ruby D <b>Address:</b>	03/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Cervantes, Irma <b>Address:</b>	03/23/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Constantino, Refugio <b>Address:</b>	03/23/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Narramore, Shelly <b>Address:</b>	03/29/2016	\$5.00 Cash	\$5.00
<b>Name:</b> romero, maria <b>Address:</b>	03/31/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Sowers, Lynn E <b>Address:</b>	04/01/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Garcia, Irma <b>Address:</b>	04/03/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Gonzalez, Ignacio <b>Address:</b>	04/05/2016	\$5.00 Cash	\$5.00
<b>Name:</b> VILLEGAS, SUMMER DONTAE <b>Address:</b>	04/05/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Ramirez, Leticia <b>Address:</b>	04/16/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Baldenegro, Jesus <b>Address:</b>	04/19/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Baldenegro, Rosantina <b>Address:</b>	04/19/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Garcia, Marcia <b>Address:</b>	04/26/2016	\$5.00 Cash	\$5.00

**Schedule C7 - Qualifying contributions**

	Date	Amount	Cycle To Date
<b>Name:</b> Gonzalez, Joshua <b>Address:</b>	04/26/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Carlos, Isaac <b>Address:</b>	04/27/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Celaya, Lillian V <b>Address:</b>	04/27/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Cipriano, Dennis <b>Address:</b>	04/27/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Cipriano, Linda S <b>Address:</b>	04/27/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Coletta, Elizabeth <b>Address:</b>	04/27/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Gonzalez Neblina, Melanie <b>Address:</b>	04/27/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Leon, Miguel <b>Address:</b>	04/27/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Manuel, Randall <b>Address:</b>	04/27/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Miranda, Clarissa <b>Address:</b>	04/27/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Neblina, Bessie <b>Address:</b>	04/27/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Neblina, Cyrus P <b>Address:</b>	04/27/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Osequeda, Sadina <b>Address:</b>	04/27/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Ramirez, Leo <b>Address:</b>	04/27/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Randall, Charlotte <b>Address:</b>	04/27/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Reyna Gomez, Kathleen M <b>Address:</b>	04/27/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Sizemore, Donna S <b>Address:</b>	04/27/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Sizemore, Tim L <b>Address:</b>	04/27/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Valenzuela, Nina N <b>Address:</b>	04/27/2016	\$5.00 Cash	\$5.00

**Schedule C7 - Qualifying contributions**

	Date	Amount	Cycle To Date
<b>Name:</b> Venegas, Frances E <b>Address:</b>	04/27/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Birchfield, Darcy <b>Address:</b>	04/28/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Dominguez, Kitty <b>Address:</b>	04/28/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Kreeger, Clyde <b>Address:</b>	04/28/2016	\$5.00 Cash	\$5.00
<b>Name:</b> McAnelly, Ruby <b>Address:</b>	04/28/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Ortiz, Juanaysa AB <b>Address:</b>	04/28/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Perez, Imelda <b>Address:</b>	04/28/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Garcia, Ethel <b>Address:</b>	04/29/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Gonzalez, Evangelina <b>Address:</b>	04/29/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Marquez, Luis <b>Address:</b>	04/29/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Sanchez, Miguel <b>Address:</b>	04/29/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Williams, Walter John <b>Address:</b>	04/29/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Getzwiler, Joe <b>Address:</b>	04/30/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Getzwiler, Theresa <b>Address:</b>	04/30/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Rodriguez, Enrique E <b>Address:</b>	05/01/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Ballesteros, Linda P <b>Address:</b>	05/02/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Birchfield, David <b>Address:</b>	05/02/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Cadavas, Isaac <b>Address:</b>	05/02/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Celaya, Daniel <b>Address:</b>	05/02/2016	\$5.00 Cash	\$5.00



**Schedule C7 - Qualifying contributions**

	Date	Amount	Cycle To Date
<b>Name:</b> Laborin, Leticia <b>Address:</b>	05/02/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Miranda, Breanna D <b>Address:</b>	05/02/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Miranda, Josie <b>Address:</b>	05/02/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Montana, Jana <b>Address:</b>	05/02/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Osequeda, Theresa <b>Address:</b>	05/02/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Preston, Daniel III <b>Address:</b>	05/02/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Smith, Vernon J <b>Address:</b>	05/02/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Wurzaof, Betty L <b>Address:</b>	05/02/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Anahill, Pamela <b>Address:</b>	05/04/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Guerrero, Lorenia <b>Address:</b>	05/04/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Lewis, Loretta <b>Address:</b>	05/04/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Manuel, Diana F <b>Address:</b>	05/04/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Wakeham, Jomarie <b>Address:</b>	05/04/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Manuel, Grace <b>Address:</b>	05/05/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Morgan, Monica K <b>Address:</b>	05/05/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Hernandez, Serena <b>Address:</b>	05/06/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Espinoza Ruiz, Ray <b>Address:</b>	05/07/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Fernandez, Linsey <b>Address:</b>	05/07/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Maxey, JoAnn <b>Address:</b>	05/07/2016	\$5.00 Cash	\$5.00

**Schedule C7 - Qualifying contributions**

	Date	Amount	Cycle To Date
<b>Name:</b> Mendoza, Melissa <b>Address:</b>	05/07/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Turner, Joshua <b>Address:</b>	05/07/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Gills, Betty <b>Address:</b>	05/08/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Birchfield, Yolanda <b>Address:</b>	05/09/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Rodriguez, Sofia <b>Address:</b>	05/09/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Taylor, Stephanie <b>Address:</b>	05/09/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Baldrige, Lynelle <b>Address:</b>	05/10/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Esquivel, Fidel <b>Address:</b>	05/10/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Fernandez, Fernando Jr <b>Address:</b>	05/10/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Fuentes, Brenda <b>Address:</b>	05/10/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Henry, Dianne G <b>Address:</b>	05/10/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Henry, Ron <b>Address:</b>	05/10/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Hipp, Marshall <b>Address:</b>	05/10/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Lopez, Annabelle M <b>Address:</b>	05/10/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Lopez, Dusty Ray <b>Address:</b>	05/10/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Papworth, Jennifer <b>Address:</b>	05/10/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Rios, James <b>Address:</b>	05/10/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Rios, Valerie J <b>Address:</b>	05/10/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Sikes, Tommy Lee <b>Address:</b>	05/10/2016	\$5.00 Cash	\$5.00

**Schedule C7 - Qualifying contributions**

	Date	Amount	Cycle To Date
<b>Name:</b> Tavernaro, Lois M <b>Address:</b>	05/10/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Turner, James <b>Address:</b>	05/10/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Turner, Lewis C <b>Address:</b>	05/10/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Espinoza, Delilah <b>Address:</b>	05/11/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Farmer, Molli <b>Address:</b>	05/11/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Mendez, Loretta L <b>Address:</b>	05/11/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Pablo, Anna <b>Address:</b>	05/11/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Rodriguez, Guillermo <b>Address:</b>	05/11/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Gonzalez, Beatriz <b>Address:</b>	05/12/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Hipp, Diana <b>Address:</b>	05/12/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Hoffman, Herman Jr <b>Address:</b>	05/12/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Navarro, Maritza I <b>Address:</b>	05/12/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Young, Victoria E <b>Address:</b>	05/12/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Aldama, Emmanuel <b>Address:</b>	05/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Alvarez, Miguel <b>Address:</b>	05/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Campa, Joaquin A <b>Address:</b>	05/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Curiel, Ramses <b>Address:</b>	05/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Galvan, Aurelio <b>Address:</b>	05/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Hernandez, Kimberly Shanell <b>Address:</b>	05/13/2016	\$5.00 Cash	\$5.00

**Schedule C7 - Qualifying contributions**

	Date	Amount	Cycle To Date
<b>Name:</b> Ibarra, Jose <b>Address:</b>	05/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Ramirez, Alejandro <b>Address:</b>	05/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> SANTANA, MARCO <b>Address:</b>	05/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Turner, James Jr <b>Address:</b>	05/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Velasco, Clarissa <b>Address:</b>	05/13/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Basaldua, Dora <b>Address:</b>	05/14/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Garcia, Abby <b>Address:</b>	05/14/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Garduno, Hector <b>Address:</b>	05/14/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Miller, Damian <b>Address:</b>	05/14/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Ortiz, Tara <b>Address:</b>	05/14/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Ruiz, Cecilia E <b>Address:</b>	05/14/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Serratos, Sabrina <b>Address:</b>	05/14/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Turner, Beverly <b>Address:</b>	05/14/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Turner, John <b>Address:</b>	05/14/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Turner, Stephany <b>Address:</b>	05/14/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Villegas, Alfred <b>Address:</b>	05/14/2016	\$5.00 Cash	\$5.00
<b>Name:</b> Walls, Leah Ruth <b>Address:</b>	05/14/2016	\$5.00 Cash	\$5.00
Total of Clean Elections Qualifying Contributions		\$1,415.00	
Total of Refunds Given		\$0.00	
Net Total of Qualifying Contributions		\$1,415.00	

**Schedule E1 - Operating expenses**

		<b>Date</b>	<b>Amount</b>	<b>Cycle To Date</b>
<b>Name:</b>	Pride Travel Center	01/11/2016	\$19.10	\$19.10
<b>Address:</b>	5240 S Sunland Gin Rd, Eloy, AZ 85131		Cash	
<b>Category:</b>	Travel - Fuel			
<b>Name:</b>	Frys Food & Drug	01/25/2016	\$51.12	\$51.12
<b>Address:</b>	11203 S Interstate 8 Frontage Rd, Yuma, AZ 85367		Cash	
<b>Category:</b>	Travel - Fuel			
<b>Memo:</b>	51.12			
<b>Name:</b>	Shindigz	01/25/2016	\$104.94	\$104.94
<b>Address:</b>	One Party Place, South Whitley, IN 46787		Cash	
<b>Category:</b>	Event Expenses - Decorations/supplies			
<b>Memo:</b>	Parade/Float Supplies			
<b>Name:</b>	Sam's Club	01/29/2016	\$23.26	\$43.26
<b>Address:</b>	1459 N Dysart Rd, Avondale, AZ 85323		Cash	
<b>Category:</b>	Event Expenses - Other			
<b>Memo:</b>	Candy for parade			
<b>Name:</b>	Chevron/Shay Oil Company	02/08/2016	\$10.00	\$10.00
<b>Address:</b>	51 E 10th St, Yuma, AZ 85364		Cash	
<b>Category:</b>	Travel - Fuel			
<b>Name:</b>	One N Ten	02/08/2016	\$200.00	\$200.00
<b>Address:</b>	2700 N 3rd St, Ste 2011, Phoenix, AZ 85004		Cash	
<b>Category:</b>	Event Expenses - Other			
<b>Memo:</b>	Campaign Event Sponsor			
<b>Name:</b>	Southern Advertising & Sign Service	02/12/2016	\$200.00	\$200.00
<b>Address:</b>	90 W 28th St, Chattanooga, TN 37408		Cash	
<b>Category:</b>	Communications - Production cost			
<b>Memo:</b>	Graphic Design Work			
<b>Name:</b>	Little Italy Pizza	02/16/2016	\$45.00	\$45.00
<b>Address:</b>	502 E Pima, Gila Bend, AZ 85337		Cash	
<b>Category:</b>	Travel - Meals			
<b>Memo:</b>	Meals for canvassers			
<b>Name:</b>	VISTAPRINT	02/16/2016	\$35.79	\$35.79
<b>Address:</b>	100 Hayden Ave, , Lexington, MA 02421		Cash	
<b>Category:</b>	Communications - Other			
<b>Memo:</b>	Business Cards			
<b>Name:</b>	BK Carne Asada & Hot Dogs	02/17/2016	\$39.99	\$39.99
<b>Address:</b>	5118 S 12th Ave, Tucson, AZ 85706		Cash	
<b>Category:</b>	Travel - Meals			
<b>Memo:</b>	Meals for canvassers			

**Schedule E1 - Operating expenses**

		Date	Amount	Cycle To Date
<b>Name:</b>	Queensboro Shirts Co	02/29/2016	\$80.35	\$80.35
<b>Address:</b>	1400 Marstellar St, Wilmington, NC 28401		Cash	
<b>Category:</b>	Communications - Other			
<b>Memo:</b>	Polo Shirts			
<b>Name:</b>	Ventura, Ariana	02/29/2016	\$70.00	\$330.00
<b>Address:</b>	3046 W Pierce St, Phoenix, AZ 85009		Cash	
<b>Category:</b>	Miscellaneous - Petitions			
<b>Memo:</b>	Petition Circulators			
<b>Name:</b>	Ventura, Maria Guadalupe	02/29/2016	\$70.00	\$415.00
<b>Address:</b>	3046 W Pierce St, Phoenix, AZ 85009		Cash	
<b>Category:</b>	Miscellaneous - Petitions			
<b>Memo:</b>	Petition Circulators			
<b>Name:</b>	Direct Checks Unlimited	03/02/2016	\$31.90	\$31.90
<b>Address:</b>	PO Box 19000, Colorado Springs, CO 80935		Cash	
<b>Category:</b>	Miscellaneous - Other			
<b>Memo:</b>	Campaign Checkbooks			
<b>Name:</b>	Krispy Kreme	03/15/2016	\$9.78	\$9.78
<b>Address:</b>	1495 N Dysart Rd, Avondale, AZ 85323		Cash	
<b>Category:</b>	Travel - Meals			
<b>Memo:</b>	Canvassers breakfast			
<b>Name:</b>	Ventura, Maria Guadalupe	03/17/2016	\$65.00	\$415.00
<b>Address:</b>	3046 W Pierce St, Phoenix, AZ 85009		Cash	
<b>Category:</b>	Miscellaneous - Petitions			
<b>Memo:</b>	Petition Circulators			
<b>Name:</b>	YUMA CHEVRON	03/30/2016	\$12.93	\$12.93
<b>Address:</b>	100 S 4th Ave, , Yuma, AZ 85364		Cash	
<b>Category:</b>	Travel - Fuel			
<b>Name:</b>	Delgado, Wenceslao Delgado	03/31/2016	\$160.00	\$160.00
<b>Address:</b>	8619 W Papago St, Tolleson, AZ 85353		Cash	
<b>Category:</b>	Miscellaneous - Petitions			
<b>Memo:</b>	Petition Circulators			
<b>Name:</b>	Ventura, Ariana	04/01/2016	\$160.00	\$330.00
<b>Address:</b>	3046 W Pierce St, Phoenix, AZ 85009		Cash	
<b>Category:</b>	Miscellaneous - Petitions			
<b>Memo:</b>	Petitions/Canvass			
<b>Name:</b>	Yuma Democratic Party	04/06/2016	\$100.00	\$100.00
<b>Address:</b>	290 S 1st Ave, Ste 1, Yuma, AZ 85364		Cash	
<b>Category:</b>	Event Expenses - Other			
<b>Memo:</b>	Table fee for Yuma Co Fair			

**Schedule E1 - Operating expenses**

	Date	Amount	Cycle To Date
<b>Name:</b> Ventura, Ariana	04/13/2016	\$100.00	\$330.00
<b>Address:</b> 3046 W Pierce St, Phoenix, AZ 85009		Cash	
<b>Category:</b> Miscellaneous - Petitions			
<b>Memo:</b> Petition Circulators			
<b>Name:</b> Amezcua, Abraham	04/15/2016	\$100.00	\$100.00
<b>Address:</b> 810 W Margaret St., Gila Bend, AZ 85337		Cash	
<b>Category:</b> Miscellaneous - Petitions			
<b>Memo:</b> Petition Circulators			
<b>Name:</b> Amezcua, Valerie	04/15/2016	\$100.00	\$100.00
<b>Address:</b> 810 W Margaret St, Gila Bend, AZ 85337		Cash	
<b>Category:</b> Miscellaneous - Petitions			
<b>Memo:</b> Petition Circulators			
<b>Name:</b> Ventura, Maria Guadalupe	04/18/2016	\$100.00	\$415.00
<b>Address:</b> 3046 W Pierce St, Phoenix, AZ 85009		Cash	
<b>Category:</b> Miscellaneous - Other			
<b>Memo:</b> Canvass			
<b>Name:</b> Ventura, Maria Guadalupe	05/11/2016	\$180.00	\$415.00
<b>Address:</b> 3046 W Pierce St, Phoenix, AZ 85009		Cash	
<b>Category:</b> Miscellaneous - Petitions			
<b>Memo:</b> Petitions/Canvass			
<b>Name:</b> Sam's Club	05/23/2016	\$20.00	\$43.26
<b>Address:</b> 1459 N Dysart Rd, Avondale, AZ 85323		Cash	
<b>Category:</b> Travel - Fuel			
Total of Operating Expenses		\$2,089.16	
Total of Refunds, Rebates, and Credits Received		\$0.00	
Net Total of Operating Expenses		\$2,089.16	

**Schedule D1 - Committee Debt**

Item	Date	Amount
<b>Outstanding Debt Balance at Beginning of Period</b>	12/22/2015	\$7.76
Original Amount of Debt: \$7.76 Original Transaction Date: 12/22/2015		
<b>Debt Balance at End of Reporting Period</b>		\$7.76
<b>Outstanding Debt Balance at Beginning of Period</b>	12/08/2015	\$13.17
Original Amount of Debt: \$13.17 Original Transaction Date: 12/08/2015		
<b>Debt Balance at End of Reporting Period</b>		\$13.17
<b>Outstanding Debt Balance at Beginning of Period</b>	12/11/2015	\$49.00
Original Amount of Debt: \$49.00 Original Transaction Date: 12/11/2015		
<b>Debt Balance at End of Reporting Period</b>		\$49.00
Total of Outstanding Debt Before Adjustments		\$69.93
Total Credits Against Outstanding Bills		\$0.00
Total Payments On Outstanding Bills		\$0.00
Total of Outstanding Debt After Adjustments		\$69.93





# EXHIBIT F



# Campaign Finance Report

Rubalcava for House  
Committee #: 201600368

Treasurer: Nevarez, Rosa  
PO Box 863, Gila Bend, AZ 85337  
Phone: (602) 295-2102  
Email: [jesusarubalcava@gmail.com](mailto:jesusarubalcava@gmail.com)  
Candidate Name: Rubalcava, Jesus A  
Office Sought: State Representative - District 4

**NO ACTIVITY THIS PERIOD**

## Amended 2016 Qualifying Period Recap Report

Election Cycle: 2015-2016  
Date Filed: August 29, 2016  
Reporting Period: August 19, 2016-August 23, 2016

### Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$2,747.56
Total Cash Receipts this Reporting Period:	\$0.00
Total Cash Disbursements this Reporting Period:	\$0.00
Cash Balance at End of Reporting Period:	\$2,747.56

Report ID: 163939

## Summary of Activity

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	\$0.00	\$0.00	\$0.00	\$177.00
Individual Contributions	C2	\$0.00	\$0.00	\$0.00	\$525.00
Contributions from Political Committees	C3	\$0.00	\$0.00	\$0.00	\$0.00
Business Contributions	C4	\$0.00	\$0.00	\$0.00	\$0.00
Small Contributions	C5	\$0.00	\$0.00	\$0.00	\$60.00
CCEC Funding and Matching	C6	\$0.00	\$0.00	\$0.00	\$16,044.00
Qualifying Contributions	C7	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made to this Committee	L1	\$0.00	\$0.00	\$0.00	\$0.00
Other Receipts, including Interest and Dividends	R1	\$0.00	\$0.00	\$0.00	\$0.00
Transfers from Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Cash Surplus from Previous Committee	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Income</b>		\$0.00	\$0.00	\$0.00	\$16,806.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$0.00	\$0.00	\$0.00	\$4,497.09
Independent Expenditures	E2	\$0.00	\$0.00	\$0.00	\$0.00
Contributions to Other Committees	E3	\$0.00	\$0.00	\$0.00	\$0.00
Other Expenses	E4	\$0.00	\$0.00	\$0.00	\$9,631.28
Transfers to Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made by This Committee	L2	\$0.00	\$0.00	\$0.00	\$0.00
Expenditure of In-Kind Contributions	C8	\$0.00	\$0.00	\$0.00	\$0.00
Disposal of Surplus Cash	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Expenditures</b>		\$0.00	\$0.00	\$0.00	\$14,128.37
Bill Payments for Previous Expenditures	D1	\$0.00		\$0.00	\$0.00
<b>Total Cash Disbursed</b>		\$0.00			

Schedule D1 - Committee Debt

Item	Date	Amount
Outstanding Debt Balance at Beginning of Period	12/22/2015	\$7.76
Original Amount of Debt: \$7.76 Original Transaction Date: 12/22/2015		
Debt Balance at End of Reporting Period		\$7.76
Outstanding Debt Balance at Beginning of Period	12/08/2015	\$13.17
Original Amount of Debt: \$13.17 Original Transaction Date: 12/08/2015		
Debt Balance at End of Reporting Period		\$13.17
Outstanding Debt Balance at Beginning of Period	12/11/2015	\$49.00
Original Amount of Debt: \$49.00 Original Transaction Date: 12/11/2015		
Debt Balance at End of Reporting Period		\$49.00
Total of Outstanding Debt Before Adjustments		\$69.93
Total Credits Against Outstanding Bills		\$0.00
Total Payments On Outstanding Bills		\$0.00
Total of Outstanding Debt After Adjustments		\$69.93



# EXHIBIT G

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THE STATE OF ARIZONA

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CITIZENS CLEAN ELECTIONS COMMISSION

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REPORTER'S TRANSCRIPT OF PROCEEDINGS

11

12

13

14

Phoenix, Arizona

15

May 18, 2017

16

9:31 a.m.

17

18

19

20

21

COASH & COASH, INC.

22

Court Reporting, Video & Videoconferencing

23

1802 N. 7th Street, Phoenix, AZ 85006

602-258-1440 staff@coashandcoash.com

24

By: Colette E. Ross, CR

25

Certified Reporter

Certificate No. 50658

**Coash & Coash, Inc.**

**602-258-1440**

**www.coashandcoash.com**



10:10:08-10:11:33 Page 30

1 know, that I have been working with the audit firm since  
2 the primary audit with Jill Foley. And we have had plenty  
3 of communication back and forth.  
4 I did have a chance to review the final audit.  
5 I didn't know whether I would be able to address the  
6 Commission so I went ahead and wrote up a brief statement  
7 of summary of what happened. As I mentioned in that  
8 statement, there is -- I am not disputing the outcome of  
9 the audit. And I do acknowledge and I am taking  
10 responsibility that there was poor accounting and  
11 practices during this campaign cycle. And there is, you  
12 know, reasons that I explained in my response there as to  
13 why one thing led to the next.  
14 And so, you know, basically I wanted to make  
15 myself available for you, you know, should you have any  
16 questions.  
17 I do understand now. I am learning the process  
18 as we go along as well. I had never gone through anything  
19 like this. And so I, you know, I just want to make myself  
20 available should you have any questions, understanding now  
21 that this is basically an approval of acknowledgment that  
22 the audit has been completed. I thought there would be  
23 other action taking place today.  
24 CHAIRMAN TITLA: Any questions, Commissioners?  
25 COMMISSIONER CHAN: Mr. Chairman.

10:11:45-10:12:31 Page 31

1 CHAIRMAN TITLA: Commissioner Chan.  
2 COMMISSIONER CHAN: If Representative Rubalcava  
3 doesn't dispute the audit, and the other Commissioners  
4 don't have any questions, I would be comfortable, you  
5 know, moving to accept the audit as it has been presented  
6 to us today.  
7 CHAIRMAN TITLA: Okay. There is a motion by  
8 Commissioner Chan to accept the audit. Is there a second?  
9 COMMISSIONER KIMBLE: I second it.  
10 CHAIRMAN TITLA: Second by Commissioner Kimble.  
11 All in favor say aye.  
12 (A chorus of ayes.)  
13 CHAIRMAN TITLA: Opposed.  
14 (No response.)  
15 CHAIRMAN TITLA: Abstained.  
16 (No response.)  
17 CHAIRMAN TITLA: Okay. The audit is accepted.  
18 MR. COLLINS: And, Mr. Rubalcava, we will be in  
19 touch with you with a final copy of this and any other  
20 correspondence from us here in the next bit.  
21 REPRESENTATIVE RUBALCAVA: Okay.  
22 MR. COLLINS: So you are free to go.  
23 REPRESENTATIVE RUBALCAVA: I appreciate it.  
24 Thank you, Chairman. Thank you, Commissioners.  
25 CHAIRMAN TITLA: Okay, thank you, Representative

10:12:44-10:13:54 Page 32

1 Rubalcava.  
2 Okay. We will go to the next item, discussion  
3 of possible action on a five-year review report submitted  
4 to Governor's Regulatory Review Council and related  
5 matters.  
6 Director Collins.  
7 MR. COLLINS: Yes, Mr. Chairman. And I think  
8 this can be brief. This is really just we are asking you  
9 to approve the draft letter and draft report.  
10 As you recall, at the, I don't know, two or  
11 three, two GRRC meetings ago, I guess, the council  
12 accepted in part and returned in part our five-year  
13 report. This addresses the provisions that were returned  
14 and also provides a cover letter explaining how we  
15 believe -- you know, GRRC's counsel, Chris Klemmich, has  
16 suggested that there is a substantial compliance standard  
17 that might be applied. So we made an effort there in the  
18 cover letter to articulate why putting aside our, you  
19 know, reserving our procedural and substantive objections  
20 to the actions that the council has taken, that  
21 nevertheless the Commission has substantially complied  
22 with what the council has asked for.  
23 So we are simply asking that you, well, we are  
24 asking you to approve the letter and the report to be  
25 submitted after this meeting, probably tomorrow. If --

10:14:12-10:14:55 Page 33

1 you know, either way we are going to submit something. It  
2 would be better to have you approve it, but if you don't  
3 approve it, this is what we are submitting.  
4 CHAIRMAN TITLA: Commissioners, any questions?  
5 MR. COLLINS: Unless, well, unless you object,  
6 unless you object. I mean absent an objection, this is  
7 what we plan to submit, I guess would be a better way of  
8 putting that.  
9 CHAIRMAN TITLA: Okay. Any questions for the  
10 director?  
11 COMMISSIONER PATON: No questions.  
12 CHAIRMAN TITLA: Okay. He is asking us to  
13 approve the letter as submitted in our documentation.  
14 MR. COLLINS: That's correct. That's correct.  
15 That's correct, Chairman Titla.  
16 COMMISSIONER KIMBLE: Mr. Chairman.  
17 CHAIRMAN TITLA: Commissioner Kimble.  
18 COMMISSIONER KIMBLE: I move we approve the  
19 response to the Governor's Regulatory Review Council.  
20 COMMISSIONER PATON: Okay.  
21 CHAIRMAN TITLA: Okay. There is a motion by  
22 Commissioner Kimble to approve the letter and report as  
23 submitted in our documentation by the Director Collins.  
24 Is there a second?  
25 COMMISSIONER CHAN: I will second that,

# EXHIBIT H

Doug Ducey  
Governor

Thomas M. Collins  
Executive Director



Mitchell C. Laird  
Chair

Thomas J. Koester  
Steve M. Titla  
Damien R. Meyer  
Mark S. Kimble  
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)

MEMORANDUM

To: Paula Thomas, Executive Officer  
Thru: Thomas M. Collins, Executive Director *TK*  
From: Sara A. Larsen, Financial Affairs & Compliance Officer  
Date: August 26, 2016  
Subject: Disbursement of 2016 *General* *sat* Primary Election Funds

In accordance with A.A.C. R2-20-106, the Commission has determined that the candidate referenced below is not contested in the primary election and is advancing to the general election. Therefore, the candidate is qualified to receive general election funding in the amount of \$24,066.00. ✓

Candidate Name: Jesus A. Rubalcava ✓  
Office Sought: State Representative, Legislative District 4  
Vendor Number: 26006848070 ✓

I certify that this expenditure/transaction is for a valid public purpose and is consistent with all applicable statutes, laws, appropriations, grants, and contracts. I also certify that sufficient appropriation and monies are available for this expenditure/transaction, and that I am authorized to distribute these monies.

*General  
Funding*

Signature: *[Signature]* Date: *8/29/16*  
19000 6891

X *[Signature]*

Funding Received By

*8/31/16*  
Date

WARRANT NO.

217860966

AGY: ECA

AGENCY CONTACT: PAULA THOMAS

602-364-3477

INVOICE NO.	INVOICE DT.	INVOICE DESCRIPTION	DOCUMENT/LINE NO.	INVOICE AMT.	DISCOUNT AMT.	NET AMT.
		2018 GENERAL ELECTION	GAX, ECA, 2EC17066 / 1	\$24,066.00	\$0.00	\$24,066.00

IF REMITTANCE ADVICE ABOVE IS BLANK, SEE [HTTP://WWW.VENPAY.GAO.AZDOA.GOV/](http://WWW.VENPAY.GAO.AZDOA.GOV/) FOR FURTHER DETAILS.



EVER WONDER WHERE YOUR PAYMENT FROM THE STATE IS? OR, WHICH STATE AGENCY PAID YOU THROUGH DIRECT DEPOSIT/ACH? VISIT OUR VENDOR PAYMENT WEBSITE, [HTTP://WWW.VENPAY.GAO.AZDOA.GOV/](http://www.venpay.gao.azdoa.gov/).

**VENDOR NAME:** Jesus Armando Rubalcava

**ISSUE DATE:**

**WARRANT AMOUNT:**

**VENDOR ID:** VC0000032595

08/29/2016

\$24,066.00

FOLD OR SEPARATE AT COLORED LINE BELOW

STATE OF ARIZONA

**NOT GOOD AFTER  
VOID DATE SHOWN**

91-113

1221

DATE ISSUED
MO-DAY-YR
08/29/2016

VOID AFTER
MO-DAY-YR
02/25/2017

BANK  
21

WARRANT NO.  
7860966

DEPARTMENT  
ECA

**DOCUMENT ID**  
170000100663

---

PAY THIS AMOUNT

\$24,066.00

\*\*\*\*\*TWENTY FOUR THOUSAND SIXTY SIX AND 00/100 DOLLARS\*\*\*\*\*

PAY TO THE ORDER OF

Jesus Armando Rubalcava  
PO Box 863  
Gila Bend AZ 85337



Gary C Brown  
DEPARTMENT OF ADMINISTRATION

*Douglas A. Duany*  
COUNTERSIGNED GOVERNOR

PAYABLE THRU STATE SERVICING BANK OF STATE TREASURER OF ARIZONA

⑈7860966⑈ 1:1221011331: 000000000021⑈

# EXHIBIT I

## Sara Larsen

---

**From:** Thomas Collins  
**Sent:** Thursday, September 01, 2016 2:57 PM  
**To:** jesusarubalcava@gmail.com  
**Cc:** Sara Larsen; Karlson, Kara (Kara.Karlson@azag.gov)  
**Subject:** Letter Regarding Excess Funds Distributed by CEC  
**Attachments:** Rubalcava Return Of Funds Letter.pdf

Mr. Rubalcava,

Please find the attached letter indicating that an excess amount of funding was made available to you for your general election campaign.

Please review the letter and feel free to contact us with questions. We are also delivering the letter by overnight mail.

Sincerely,

Tom Collins  
Executive Director  
Arizona Citizens Clean Elections Commission  
602-364-3477

**Doug Ducey**  
Governor

**Thomas M. Collins**  
Executive Director



**Mitchell C. Laird**  
Chair

**Steve M. Titla**  
**Damien R. Meyer**  
**Mark S. Kimble**  
**Galen D. Paton**  
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)

---

Jesus Rubalcava  
806 W Margaret St.  
Gila Bend AZ 85337  
[jesusrubalcava@gmail.com](mailto:jesusrubalcava@gmail.com)

**Via Overnight Delivery and E-Mail**

Dear Mr. Rubalcava:

I am writing to follow up on the Commission's phone call this week related to whether you are opposed in your general election campaign. At this time, because the Commission cannot determine that there is a candidate that has qualified for the ballot pursuant to A.R.S. §§ 16-301, -341, or -343. *See* A.R.S. §§ 16-951(D), -961(F)(1), (2). Because of this the amount you received is in excess of the amount to which you are entitled under the Act. *See* Ariz. Admin. Code R2-20-704(B)(1). Accordingly, please return \$22,651 in a check payable to the Clean Elections Fund as soon as possible but no later than 30 days from September 1, 2016. Please contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Collins", written in a cursive style.

Thomas M. Collins  
Executive Director  
Arizona Citizens Clean Elections Commission

cc: Kara Karlson, Assistant Attorney General, Arizona Attorney General's Office (E-Mail only)  
Sara Larsen, Financial Affairs & Compliance Officer, CCEC (E-Mail only)

## Sara Larsen

---

**From:** Thomas Collins  
**Sent:** Thursday, September 01, 2016 3:16 PM  
**To:** Jesus Rubalcava  
**Cc:** Sara Larsen  
**Subject:** RE: Letter Regarding Excess Funds Distributed by CEC

Mr. Rubalcava,  
Thank you for your prompt reply.  
You have thirty days *from today*, September 1. So it is not due today.  
Thank you,  
Tom

---

**From:** Jesus Rubalcava [<mailto:jesusarubalcava@gmail.com>]  
**Sent:** Thursday, September 01, 2016 3:11 PM  
**To:** Thomas Collins  
**Subject:** Re: Letter Regarding Excess Funds Distributed by CEC

Thank you Mr. Collins for clarifying. I have a meeting this evening and do not have my campaign checkbook with me. The letter states I need to submit a check no later than today. I can't make it in to CEC today. Please advise.

Jesus Rubalcava

On Sep 1, 2016, at 2:56 PM, Thomas Collins <[Thomas.Collins@azcanelections.gov](mailto:Thomas.Collins@azcanelections.gov)> wrote:

Mr. Rubalcava,

Please find the attached letter indicating that an excess amount of funding was made available to you for your general election campaign.

Please review the letter and feel free to contact us with questions. We are also delivering the letter by overnight mail.

Sincerely,

Tom Collins  
Executive Director  
Arizona Citizens Clean Elections Commission  
602-364-3477

<Rubalcava Return Of Funds Letter.pdf>



# EXHIBIT J

## Sara Larsen

---

**From:** Jill Foley <jfoley@f-cpc.com>  
**Sent:** Tuesday, October 18, 2016 4:14 PM  
**To:** Jesus Rubalcava  
**Cc:** Sara Larsen  
**Subject:** Primary Recap Report Balance  
  
**Importance:** High

Dear Mr. Rubalcava,

I noted that your Campaign's Primary Recap Report had an ending cash balance of \$7,046.72. Generally we expect to see the Recap Reports have \$0 balances, or if there are remaining balances, the amount remaining is paid back to the Citizens Clean Elections Commission, because this is unused Primary Election funding. I did not see that you balance amount was paid back to the Commission in your Post-Primary report.

Can you please provide some insight on this?

Thank you,

*Jill*

Jill T. Foley, CPA  
Fester & Chapman P.C.  
4001 N. 3<sup>rd</sup> Street, Suite 275  
Phoenix, AZ 85012  
602-264-3077, ext. 215 (phone)  
602-265-6241 (Fax)  
[jfoley@f-cpc.com](mailto:jfoley@f-cpc.com)

This communication and any accompanying documents are confidential and privileged. They are intended for the sole use of the addressee. If you receive this transmission in error, you are advised that any disclosure, copying, distribution, or the taking of any action in reliance upon this communication is strictly prohibited. Moreover, any such disclosure shall not compromise or waive the attorney-client, accountant-client, or other privileges as to this communication or otherwise. If you have received this communication in error, please contact me at the above email address. Thank you.

Fester & Chapman.

# EXHIBIT K



# Campaign Finance Report

Rubalcava for House  
Committee #: 201600368

Treasurer: Nevarez, Rosa  
PO Box 863, Gila Bend, AZ 85337  
Phone: (602) 295-2102  
Email: [jesusarubalcava@gmail.com](mailto:jesusarubalcava@gmail.com)  
Candidate Name: Rubalcava, Jesus A  
Office Sought: State Representative - District 4

## 2016 Primary Recap Report

Election Cycle: 2015-2016  
Date Filed: September 4, 2016  
Reporting Period: August 24, 2016-August 30, 2016

## Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$9,796.72
Total Cash Receipts this Reporting Period:	\$0.00
Total Cash Disbursements this Reporting Period:	\$2,750.00
Cash Balance at End of Reporting Period:	\$7,046.72

Report ID: 159043

## Summary of Activity

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	\$0.00	\$0.00	\$0.00	\$100.00
Individual Contributions	C2	\$0.00	\$0.00	\$0.00	\$525.00
Contributions from Political Committees	C3	\$0.00	\$0.00	\$0.00	\$0.00
Business Contributions	C4	\$0.00	\$0.00	\$0.00	\$0.00
Small Contributions	C5	\$0.00	\$0.00	\$0.00	\$60.00
CCEC Funding and Matching	C6	\$0.00	\$0.00	\$0.00	\$16,044.00
Qualifying Contributions	C7	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made to this Committee	L1	\$0.00	\$0.00	\$0.00	\$0.00
Other Receipts, including Interest and Dividends	R1	\$0.00	\$0.00	\$0.00	\$0.00
Transfers from Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Cash Surplus from Previous Committee	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Income</b>		\$0.00	\$0.00	\$0.00	\$16,729.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$0.00	\$0.00	\$0.00	\$0.00
Independent Expenditures	E2	\$0.00	\$0.00	\$0.00	\$0.00
Contributions to Other Committees	E3	\$0.00	\$0.00	\$0.00	\$0.00
Other Expenses	E4	\$2,750.00	\$0.00	\$2,750.00	\$9,682.28
Transfers to Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made by This Committee	L2	\$0.00	\$0.00	\$0.00	\$0.00
Expenditure of In-Kind Contributions	C8	\$0.00	\$0.00	\$0.00	\$0.00
Disposal of Surplus Cash	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Expenditures</b>		\$2,750.00	\$0.00	\$2,750.00	\$9,682.28
Bill Payments for Previous Expenditures	D1	\$0.00		\$0.00	\$0.00
<b>Total Cash Disbursed</b>		\$2,750.00			

**Schedule E4 - Other expenses**

		<b>Date</b>	<b>Amount</b>	<b>Cycle To Date</b>
<b>Name:</b>	Amezcuca, Abraham	08/30/2016	\$200.00	\$200.00
<b>Address:</b>	810 W Margaret St., Gila Bend, AZ 85337		Cash	
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Amezcuca, Edgar	08/30/2016	\$200.00	\$200.00
<b>Address:</b>	810 W Margaret St, Gila Bend, AZ 85337		Cash	
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Amezcuca, Erika	08/30/2016	\$200.00	\$200.00
<b>Address:</b>	810 W Margaret St, Gila Bend, AZ 85337		Cash	
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Amezcuca, Valerie	08/30/2016	\$200.00	\$200.00
<b>Address:</b>	810 W Margaret St, Gila Bend, AZ 85337		Cash	
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Gonzalez, Gloria	08/30/2016	\$250.00	\$450.00
<b>Address:</b>	406 W Preston St, Gila Bend , AZ 85337		Cash	
<b>Memo:</b>	Phone Bank/GOTV/Canvass			
<b>Name:</b>	Gonzalez, Jose R	08/30/2016	\$300.00	\$500.00
<b>Address:</b>	406 W Preston St., Gila Bend , AZ 85337		Cash	
<b>Occupation:</b>	Town of Gila Bend			
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Hector, Navarro	08/30/2016	\$300.00	\$300.00
<b>Address:</b>	314 E Fremont St, Gila Bend, AZ 85337		Cash	
<b>Occupation:</b>	Maricopa County Department of Transportation			
<b>Memo:</b>	Phone Bank/GOTV/Driver to Polls			
<b>Name:</b>	Miller, Damion	08/30/2016	\$250.00	\$450.00
<b>Address:</b>	2036 E Cristina St., San Luis, AZ 85349		Cash	
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Miller, Daniel	08/30/2016	\$250.00	\$250.00
<b>Address:</b>	311 East Freemont, Gila Bend, AZ 85337		Cash	
<b>Occupation:</b>	Area Manager, WAL-Mart Stores Inc.			
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Nevarez, Pedro	08/30/2016	\$300.00	\$300.00
<b>Address:</b>	315 E Fremont St, Gila Bend, AZ 85337		Cash	
<b>Occupation:</b>	Mechanic, Self Employed			
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Nevarez, Rosa	08/30/2016	\$300.00	\$500.00
<b>Address:</b>	38739 W Interstate 8, Gila Bend , AZ 85337		Cash	
<b>Occupation:</b>	Maintenace , Paloma ESD			
<b>Memo:</b>	Phone Bank/GOTV/Driver to Polls			

Covers 08/24/2016 to 08/30/2016

Total of Other Expenses	\$2,750.00	
Total of Refunds, Rebates, and Credits Received	\$0.00	
Net Total of Other Expenses	\$2,750.00	





# EXHIBIT L



# Campaign Finance Report

Rubalcava for House  
Committee #: 201600368

Treasurer: Nevarez, Rosa  
PO Box 863, Gila Bend, AZ 85337  
Phone: (602) 295-2102  
Email: [jesusarubalcava@gmail.com](mailto:jesusarubalcava@gmail.com)  
Candidate Name: Rubalcava, Jesus A  
Office Sought: State Representative - District 4

## Amended 2016 Primary Recap Report

Election Cycle: 2015-2016  
Date Filed: September 4, 2016  
Reporting Period: August 24, 2016-August 30, 2016

## Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$2,747.56
Total Cash Receipts this Reporting Period:	\$0.00
Total Cash Disbursements this Reporting Period:	\$2,750.00
Cash Balance at End of Reporting Period:	(\$2.44)

Report ID: 163938

## Summary of Activity

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	\$0.00	\$0.00	\$0.00	\$177.00
Individual Contributions	C2	\$0.00	\$0.00	\$0.00	\$525.00
Contributions from Political Committees	C3	\$0.00	\$0.00	\$0.00	\$0.00
Business Contributions	C4	\$0.00	\$0.00	\$0.00	\$0.00
Small Contributions	C5	\$0.00	\$0.00	\$0.00	\$60.00
CCEC Funding and Matching	C6	\$0.00	\$0.00	\$0.00	\$16,044.00
Qualifying Contributions	C7	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made to this Committee	L1	\$0.00	\$0.00	\$0.00	\$0.00
Other Receipts, including Interest and Dividends	R1	\$0.00	\$0.00	\$0.00	\$0.00
Transfers from Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Cash Surplus from Previous Committee	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Income</b>		\$0.00	\$0.00	\$0.00	\$16,806.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$0.00	\$0.00	\$0.00	\$4,497.09
Independent Expenditures	E2	\$0.00	\$0.00	\$0.00	\$0.00
Contributions to Other Committees	E3	\$0.00	\$0.00	\$0.00	\$0.00
Other Expenses	E4	\$2,750.00	\$0.00	\$2,750.00	\$12,381.28
Transfers to Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made by This Committee	L2	\$0.00	\$0.00	\$0.00	\$0.00
Expenditure of In-Kind Contributions	C8	\$0.00	\$0.00	\$0.00	\$0.00
Disposal of Surplus Cash	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Expenditures</b>		\$2,750.00	\$0.00	\$2,750.00	\$16,878.37
Bill Payments for Previous Expenditures	D1	\$0.00		\$0.00	\$0.00
<b>Total Cash Disbursed</b>		\$2,750.00			

**Schedule E4 - Other expenses**

		Date	Amount	Cycle To Date
<b>Name:</b>	Amezcuca, Abraham	08/30/2016	\$200.00	\$200.00
<b>Address:</b>	810 W Margaret St., Gila Bend, AZ 85337		Cash	
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Amezcuca, Edgar	08/30/2016	\$200.00	\$200.00
<b>Address:</b>	810 W Margaret St, Gila Bend, AZ 85337		Cash	
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Amezcuca, Erika	08/30/2016	\$200.00	\$200.00
<b>Address:</b>	810 W Margaret St, Gila Bend, AZ 85337		Cash	
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Amezcuca, Valerie	08/30/2016	\$200.00	\$200.00
<b>Address:</b>	810 W Margaret St, Gila Bend, AZ 85337		Cash	
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Gonzalez, Gloria	08/30/2016	\$250.00	\$450.00
<b>Address:</b>	406 W Preston St, Gila Bend , AZ 85337		Cash	
<b>Memo:</b>	Phone Bank/GOTV/Canvass			
<b>Name:</b>	Gonzalez, Jose R	08/30/2016	\$300.00	\$500.00
<b>Address:</b>	406 W Preston St., Gila Bend , AZ 85337		Cash	
<b>Occupation:</b>	Town of Gila Bend			
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Hector, Navarro	08/30/2016	\$300.00	\$300.00
<b>Address:</b>	314 E Fremont St, Gila Bend, AZ 85337		Cash	
<b>Occupation:</b>	Maricopa County Department of Transportation			
<b>Memo:</b>	Phone Bank/GOTV/Driver to Polls			
<b>Name:</b>	Miller, Damion	08/30/2016	\$250.00	\$450.00
<b>Address:</b>	2036 E Cristina St., San Luis, AZ 85349		Cash	
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Miller, Daniel	08/30/2016	\$250.00	\$250.00
<b>Address:</b>	311 East Freemont, Gila Bend, AZ 85337		Cash	
<b>Occupation:</b>	Area Manager, WAL-Mart Stores Inc.			
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Nevarez, Pedro	08/30/2016	\$300.00	\$300.00
<b>Address:</b>	315 E Fremont St, Gila Bend, AZ 85337		Cash	
<b>Occupation:</b>	Mechanic, Self Employed			
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Nevarez, Rosa	08/30/2016	\$300.00	\$500.00
<b>Address:</b>	38739 W Interstate 8, Gila Bend , AZ 85337		Cash	
<b>Occupation:</b>	Maintenace , Paloma ESD			
<b>Memo:</b>	Phone Bank/GOTV/Driver to Polls			

Total of Other Expenses	\$2,750.00	
Total of Refunds, Rebates, and Credits Received	\$0.00	
Net Total of Other Expenses	\$2,750.00	

**Schedule D1 - Committee Debt**

Item	Date	Amount
<b>Outstanding Debt Balance at Beginning of Period</b>	12/22/2015	\$7.76
Original Amount of Debt: \$7.76 Original Transaction Date: 12/22/2015		
<b>Debt Balance at End of Reporting Period</b>		\$7.76
<b>Outstanding Debt Balance at Beginning of Period</b>	12/08/2015	\$13.17
Original Amount of Debt: \$13.17 Original Transaction Date: 12/08/2015		
<b>Debt Balance at End of Reporting Period</b>		\$13.17
<b>Outstanding Debt Balance at Beginning of Period</b>	12/11/2015	\$49.00
Original Amount of Debt: \$49.00 Original Transaction Date: 12/11/2015		
<b>Debt Balance at End of Reporting Period</b>		\$49.00
Total of Outstanding Debt Before Adjustments		\$69.93
Total Credits Against Outstanding Bills		\$0.00
Total Payments On Outstanding Bills		\$0.00
Total of Outstanding Debt After Adjustments		\$69.93



## Thomas Collins

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**From:** Thomas Collins  
**Sent:** Friday, June 23, 2017 3:46 PM  
**To:** jesusarubalcava@gmail.com  
**Cc:** Sara Larsen  
**Subject:** Order of Compliance and Deadline for Compliance  
**Attachments:** exhibits to att 1.pdf; order of compl. lett. att. 1.pdf; order of compliance letter.pdf

Dear Representative Rubalcava,

Please find the attached documents regarding MUR 17-01, the matter under review regarding your campaign.

Please give these items your prompt attention as the deadline is July 10, 2017.

Additionally, as you know neither the Commission nor its staff may provide legal advice.

Sincerely,

Thomas M. Collins  
Executive Director  
Arizona Citizens Clean Elections Commission  
602-364-3477

Your message is ready to be sent with the following file or link attachments:

exhibits to att 1.pdf  
order of compl. lett. att. 1.pdf  
order of compliance letter.pdf

Note: To protect against computer viruses, e-mail programs may prevent sending or receiving certain types of file attachments. Check your e-mail security settings to determine how attachments are handled.



Doug Ducey  
Governor

Thomas M. Collins  
Executive Director



Steve M. Titla  
Chair

Damien R. Meyer  
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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**Brief of the Executive Director**  
**PROBABLE CAUSE RECOMMENDATION**  
**AND NOTICE OF POSSIBLE PENALTIES**

**To:** Commissioners  
**From:** Thomas M. Collins, Executive Director  
**Date:** November 3, 2014  
**Subject:** MUR 17-01 (Jesus Rubalcava)

I am writing in reference to the Citizens Clean Elections Commission's (the Commission) determination of reason to believe Jesus Rubalcava (Respondent) may have committed violations of the Citizens Clean Elections Act and Commission rules (collectively, the Act). I recommend that the Commission find probable cause that Respondent violated the Act.

**I. Factual and Procedural Background**

Respondent, a 2016 candidate for State Representative of Legislative District 4, was certified as a participating candidate on January 15, 2016 (**Exhibit A**). Upon applying for certification, Respondent signed under oath and under penalty of perjury that he was in compliance with A.R.S. § 16-941(A) and would continue to comply with such restrictions as required by the Act. Respondent was selected for a random primary election audit on September 15, 2016. Based on

findings from the random audit (**Exhibit B**), the Commission approved a comprehensive audit and review for Respondent and Respondent's candidate campaign committee on January 19, 2017. On April 28, 2017, the independent auditors, Fester & Chapman P.C., submitted the final comprehensive audit to the Commission (**Exhibit C**).

On May 23, 2017, the Executive Director served Respondent with an internal Complaint regarding the findings of the comprehensive audit and review (**Exhibit D**). The Complaint alleged Respondent may have violated the Clean Elections Act and Rules by: (1) accepting contributions other than individual contributions and \$5 qualifying contributions; (2) making expenditures in excess of the personal money contribution limit; (3) making expenditures in excess of the adjusted primary election spending limit; (4) making expenditures in excess of the adjusted general election spending limit; (5) failing to comply with A.R.S. §16-948 regarding campaign accounts; and (6) failing to comply with A.R.S. §16-953 regarding the return of unused monies to the Citizens Clean Elections Fund. The Complaint also noticed Respondent of potential reporting violations and related penalties.

On May 30, 2017, Respondent submitted a Response to the Complaint (**Exhibit E**). The Commission determined there was reasonable cause, and authorized an investigation on June 22, 2017, and Respondent was served with a

compliance order on June 23, 2017. (**Exhibit F**). Respondent did not come into compliance.

On August 22, 2017, the Commission unanimously voted to impose a repayment order on Respondent for the amount of Clean Elections Funding issued to him. (**Exhibit G**). To date Respondent has not complied with that Order.

Pursuant to the Commission's determination of reasonable cause and investigation authorization, Commission staff sought additional documents from Respondent. On September 14, 2017, Respondent responded to Commission staff's subpoena by providing a print-out from the Secretary of State's campaign finance reporting system which detailed all of his campaign finance report transactions and contained hand-written notes. Amid the pages of the print-out were 4 invoices for campaign services. Those invoices were added as transactions to Respondent's campaign finance reports after he was notified of being selected for the campaign finance audit.

Date	Vendor	Amount	Reported	Due to be Reported	Campaign Bank Acct. Transaction
1/25/2016	Shindiz	\$104.94	10/31/2016	6/30/2016	No
2/12/2016	Vistaprint	\$35.79	11/1/2016	6/30/2016	No
3/3/2016	Queensboro Shirt Co	\$80.35	11/1/2016	6/30/2016	No
6/22/2016	R Sky Photography	\$925.00	11/2/2016	8/26/2016	No
*6/28/2016	Factor Sales	\$6,073.91	11/2/2016	8/26/2016	Yes

With respect to these transactions, only \$3,374.91 of the Factor Sales, Inc.

expenditure was a reported timely on the 2016 Pre-Primary Report. The \$3,374.91

was paid for by a check drawn on the candidate's campaign bank account on June

30, 2016. The remaining amount of \$2,699 was reported on November 2, 2016 after Respondent was notified of the audit. The \$2,699 was paid for by a check drawn on the candidate's campaign bank account on June 24, 2016.

Respondent also provided his PayPal transaction history. However, the contributions listed on the transaction history do not match the candidate's campaign finance reports. A donation received on February 25, 2016 from Timothy Ogle in the amount of \$200 appears on the candidate's June 30<sup>th</sup> Report as being received from Kathe Ogle on February 25, 2016 in the amount of \$100. An additional four small contributions totaling \$73 are not reported. Finally, Respondent stated in an email to Staff that if there was a requested item that was not provided it was "because [I] was not able to locate it or because it doesn't exist. . . ." (Exhibit H).

## **II. Questions Presented and Brief Answers**

### **A.**

**Question:** Is there probable cause to believe that Respondent exceed early contribution limits established by to A.R.S. § 16-941(A)(1), which bars all contributions except \$5 qualifying contributions and limited early contributions?

**Answer:** Because audits of Respondent's campaign finance activities, Respondent's admissions, and Respondent's failure to keep required records demonstrate he exceeded the applicable limits by at least \$3,637.87 there is probable cause to believe Respondent violated A.R.S. § 16-941(A)(1).

### **Analysis:**

Pursuant to A.R.S. §16-941(A)(1), a participating candidate shall not accept any contributions, other than a limited number of five-dollar qualifying and early individual contributions. The auditors found that Respondent made transfers from a separate bank account to the campaign bank account totaling \$1,869.33 and made additional deposits, whose purpose cannot be determined, into the campaign bank account in the amount of \$3,945.54. Respondent's Amended June 30<sup>th</sup> Report details that Respondent collected \$1,415 in qualifying contributions (**Exhibit I**). Respondent's Amended Qualifying Period Recap Report details that Respondent received \$177 in personal and family contributions, \$525 in early individual contributions, and \$60 in small contributions (**Exhibit J**). The total combined amount of received contributions as reported by Respondent is \$2,177. Respondent deposited into his bank account a total of \$5,814.87 (not including Clean Elections Funding); this is \$3,637.87 more than the total combined qualifying contributions, individual contributions, small contributions, and personal and family contributions Respondent reported on his campaign finance reports.

In documents filed prior to the reasonable cause determination, Respondent stated he did accept contributions other than the \$5 qualifying contributions, but he received early contributions from individuals and referenced his campaign finance reports as an exhibit. However, the campaign finance reports referenced by

Respondent do not match the deposits made in the bank account. Moreover, Respondent admitted that he does not “disput[e] the outcome of the audit.” Clean Elections Commission Meeting, 5/18/2017, Tr. 30:8-11 (“I do acknowledge and I am taking responsibility that there was poor accounting and practices during this campaign cycle.”) (**Exhibit K**); *accord* Response at 1 (“Please acknowledge that I am not by any means challenging the results of the review, nor I am denying any wrong doing.”) Additionally, Respondent failed to provide sufficient documentation for the campaign activity in his campaign finance reports, pursuant to A.A.C. R2-20-703, from which the Commission can infer evidence supporting a violation.

Furthermore, A.R.S. §16-941(A)(2) provides a participating legislative candidate shall not make expenditures of more than a total of seven hundred and twenty dollars of the candidate’s personal monies. The auditors found that Respondent had made transfers from a separate bank account to the campaign bank account totaling \$1,869.33 and made additional deposits, whose purpose cannot be determined, into the campaign bank account in the amount of \$3,945.54. If Respondent only received \$2,000 from his qualifying contributions, early individual contributions, and small contributions combined, as reported on his campaign finance reports, then Respondent received \$3,814.87 in personal and family contributions. Respondent only reported receiving \$177 in personal and family contributions. In other words, the Respondent’s financial activity cannot be

reconciled with the applicable limits, further demonstrating probable cause to believe a violation occurred. Finally, even the limited documentation provided under subpoena shows further discrepancies and excess early contributions. However, giving Respondent the benefit of any doubt, I recommend the Commission find probable cause to believe the excess contributions to be \$3,637.87.

**Possible Penalty:**

Pursuant to A.R.S. § 16-942(A) “[t]he civil penalty for a violation of any contribution or expenditure limit in § 16-941 by . . . a participating candidate shall be ten times the amount by which the expenditure or contribution exceeded the applicable limit.”

The possible penalty for this violation is:

$$\$3,637.87 \times 10 = \$36,379.70$$

**B.**

**Question:** Is there probable cause to believe Respondent exceeded the spending limit for the general election period established by A.R.S. § 16-941(A)(3), which was \$1,415 for Respondent, who was unopposed in the general election.

**Answer:** Because an audit of Respondent’s campaign finance activities, his own admissions, and his failure to maintain proper records all support the conclusion that Respondent exceeded the applicable limit, there is probable cause to believe Respondent violated A.R.S. § 16-941(A)(4).

### **Analysis:**

The adjusted general election spending limit for Respondent, who was unopposed in the general election, was set by the number of \$5 qualifying contributions he submitted multiplied by \$5. A.R.S. § 16-953. Accordingly, the general election period limit for Respondent was \$1,415.

The auditors found that Respondent made a total of \$3,677.16 in expenditures from the campaign bank account during the general election period (August 31, 2016 through November 8, 2016). Consequently, Respondent made a total of \$2,262.16 in excess expenditures during the general election period.

In his responses during the reason to believe phase of this matter, Respondent states that he “did not exceed the amount of the general election spending limit.” He also states that he did not receive general election funding because he was unopposed and learned that he was unopposed in late September. However, Respondent did receive general funding on August 31, 2016 (**Exhibit L**) but it was determined that Respondent would be unopposed in the general election; therefore, the next day on September 1, 2016, Respondent was notified by the Executive Director, through e-mail and overnight delivery, that he would need to return \$22,651 in general election funding and he could only retain the amount of the \$5 qualifying contributions (\$1,415) he submitted to the Secretary of State’s Office (**Exhibit M**). Respondent acknowledged the notification the same day but did not return the general election funds until September 28, 2016.



Respondent also provided his campaign finance reports as evidence that he did not exceed the general election spending limit. However, the auditors found that Respondent's campaign finance reports do not accurately reflect the campaign finance activity in the Respondent's campaign bank account. Respondent does not "disput[e] the outcome of the audit." Clean Elections Commission Meeting, 5/18/2017, Tr. 30:8-11 ("I do acknowledge and I am taking responsibility that there was poor accounting and practices during this campaign cycle."); *accord* Response at 1 ("Please acknowledge that I am not by any means challenging the results of the review, nor I am denying any wrong doing."). The auditors found that \$2,829.61 in expenditures from the campaign bank account during the general election period were not reported on Respondent's campaign finance reports.

Indeed, the auditors requested supporting documentation for the expenditures but Respondent claimed to have been unable to "locate the box" containing the information, just as he did in response to the Commission staff's investigative efforts. Every Clean Elections candidate is required to maintain campaign financial records for three years. A.A.C. R2-20-703. The evidence provided by the audit, Respondent's own admission, and Respondent's failure to maintain proper records each support the conclusion there is probable cause to believe Respondent exceeded the applicable limit by \$2,829.61. The Executive Director thus urges the Commission to so conclude.

**Possible Penalty:**

Pursuant to A.R.S. § 16-942(A) “[t]he civil penalty for a violation of any contribution or expenditure limit in § 16-941 by . . . a participating candidate shall be ten times the amount by which the expenditure or contribution exceeded the applicable limit.”

The possible penalty for this violation is:

$$\$2,829.61 \times 10 = \$28,296.10$$

**C.**

**Question:** Is there probable cause to believe that Respondent failed to abide by the limitations imposed by A.R.S. § 16-941(A)(5) that limit participating candidates to the use of a single account for campaign activity for the payments for goods and services to the campaign and limit candidates spending in the primary and general period by requiring the return of unspent Clean Elections Funding. A.R.S. §§ 16-948(A), (C); -953(A), (B).

**Answer:** The audit results, Respondent’s admissions, and failure to keep proper records demonstrate that Respondent used at least two accounts for campaign activity and failed to return unused or improperly used funds to the Clean Elections Fund.

**Analysis:**

Section 16-941(A)(5) imposes additional limitations on expenditures by candidates. Specifically, participating candidates must use a single bank account and pay for campaign goods and services through that account. A.R.S. § 16-948. Similarly, A.R.S. § 16-953 provides an additional limitation necessary for the integrity of the Clean Elections Fund and the other sections of the Act by providing

for the return of Clean Elections Funds at the end of the primary and general election periods. This is a direct limitation on a candidate's use of funds.

On June 15, 2016, Respondent physically received his check for the primary election. Bank records show that \$16,044 was deposited into a personal bank account and \$13,280.22 was transferred from Respondent's personal bank account to a campaign bank account on June 17, 2016. The difference of \$2,763.78 was not transferred to the campaign account. The auditors noted transfers from a separate bank account to the campaign account equaling \$1,869.33 and other deposits with undeterminable purposes equating to \$3,945.54. The deposits cannot be verified due to Respondent's failure to provide supporting documentation. Respondent neglected to establish a petty cash account and provide detailed information on campaign finance reports. The auditors found ATM withdrawals totaling \$683.50 that Respondent failed to document on his campaign finance reports. The withdrawals cannot be verified due to the lack of supporting documentation.

Respondent has previously asserted that "according to the reports filed with the Arizona Secretary of State, there wasn't [sic] any unused monies that were not returned to the Citizens Clean Elections Commission." Moreover, he has claimed that because his personal bank account and campaign account were linked, he "began to use the filing report with the Secretary of State as [his] accounting and balance." However, Respondent amended his reports several months after the transactions had taken place so it is improbable that he was able to utilize the

Secretary of State's campaign finance reporting system to keep track of his campaign finance activity.

Respondent used the two bank accounts during the campaign periods in violation of 16-941(A)(5). Indeed, Respondent does not "disput[e] the outcome of the audit." Clean Elections Commission Meeting, 5/18/2017, Tr. 30:8-11 ("I do acknowledge and I am taking responsibility that there was poor accounting and practices during this campaign cycle."); *accord* Response at 1 ("Please acknowledge that I am not by any means challenging the results of the review, nor I am denying any wrong doing.").

Furthermore auditors found a transfer from the Respondent's campaign bank account to Respondent's personal bank account equaling \$604.42. Respondent made \$4,653.41 in non-campaign withdrawals from the campaign bank account. An additional \$3,635.41 was withdrawn and auditors were unable to provide a determinable purpose.

Participating candidates must return Clean Elections funding that was not used for direct campaign purposes, as required by A.R.S. § 16-953 and R2-20-704(B). On October 18, 2016, the auditors contacted Respondent regarding a high ending balance on the Primary Recap Report (**Exhibit N**). At that time Respondent should have returned \$7,046.72 in unspent primary election funding based on the timely filing of his Primary Recap Report (**Exhibit O**). On November 1, 2016, Respondent filed amendments to his campaign finance reports. The new ending

balance on the Amended Primary Recap Report was -\$2.44 (**Exhibit P**). The auditors found that Respondent made \$17,501.51 in expenditures from the campaign bank account during the primary election period. Since Respondent could have only potentially deposited \$18,221 into the campaign bank account during the primary period (based upon primary election funding, early contributions, \$5 qualifying contributions, small contributions and personal contributions), Respondent should have returned to the Clean Elections Fund at least \$710.49. This does not take into account the expenditures that were made for personal use and should have also been returned to the fund. As noted above, however, Respondent admits the results of the audit, and the Commission has established that it is entitled to a full refund. This also represents probable cause to believe that Respondent violated A.R.S. § 16-941(A)(5).

The amount of the violation is \$17,459.00.

**Possible Penalty:**

Pursuant to A.R.S. § 16-942(A) “[t]he civil penalty for a violation of any contribution or expenditure limit in § 16-941 by . . . a participating candidate shall be ten times the amount by which the expenditure or contribution exceeded the applicable limit.”

The possible penalty for this violation is:

$$\$17,459.00 \times 10 = \$174,590$$

**D.**

**Question:** Is there probable cause to believe that Respondent violated A.R.S. § 16-941(A)?

**Answer:** Based on the forgoing there is probable cause to believe Respondent violated A.R.S. § 16-941(A) multiple times.

**Analysis:**

Section 16-942(D) provides that

[a]ny participating candidate adjudged to have committed a knowing violation of section 16-941, subsection A . . . shall repay from the candidate's personal monies to the fund all monies expended from the candidate's campaign account and shall turn over the candidate's campaign account to the fund.

In this case, Respondent expend at least \$17,459 from campaign accounts based on the Commission's repayment order, the audits, Respondent's admissions, and his failure to keep proper records or maintain proper accounts. It is clear that Respondent knew his responsibilities when he applied and was approved as a clean elections candidates and that by his actions, whether the depositing of checks, failure to properly keep records or account of his activities he had "knowledge that the facts exist that bring the act or omission within the provisions of the statute. . . ." A.R.S. § 1-213(17)(a). "Knowingly . . . [d]oes not require any knowledge of the unlawfulness of the act or omission." Id. § 1-213(17)(b). Accordingly this additional penalty is applicable and there is probable cause to believe A.R.S. § 16-941(A) was violated.

**Possible Penalty:** \$17,459.00

**E.**

**Question:** Is there probable cause to believe Respondent failed to report certain expenditures and contributions required by the Clean Elections Act and Rules?

**Answer:** Because the audit findings, Respondent's admissions, and Respondent's failure to keep required records support the conclusion that certain expenditures and contributions went unreported, there is probable cause to believe there is a violation subject to penalty under the Act.

**Analysis:**

Pursuant to A.R.S. § 16-941, participating candidates shall comply with A.R.S. § 16-948 stating that candidates are required to report expenditures made directly from their campaign bank account, as required by A.R.S. § 16-948(C). Information to be provided on the campaign finance reports includes recipient's full name, address, nature of good and services, and compensation. A.A.C. R2-20-703 requires candidates to report all receipts and disbursements from the campaign account similarly. In addition, A.A.C. R2-20-115 contends that participating candidates maintain books and records of financial transactions in a single location, and such records are to be accessible upon request.

The auditors found that Respondent failed to report an aggregate of \$9,209.72 in expenditures and \$4,852.55 in deposits on his campaign finance reports. It could not be determined if an additional \$1,362.32 was reported because of insufficient records.

Respondent states that out of confusion he “began to use the filing report with the Secretary of State as [his] accounting and balance.” As required by A.A.C. R2-20-110, participating candidates’ campaign finance reports are to include *all receipts and disbursements for their current campaign account*. However, Respondent does not “disput[e] the outcome of the audit.” Clean Elections Commission Meeting, 5/18/2017, Tr. 30:8-11 (“I do acknowledge and I am taking responsibility that there was poor accounting and practices during this campaign cycle.”); *accord* Response at 1 (“Please acknowledge that I am not by any means challenging the results of the review, nor I am denying any wrong doing.”). The comprehensive audit revealed several expenditures were made and not reported. Respondent made reference to his campaign finance reports submitted to the Secretary of State as proof against allegations of excess spending, but information in reports is recorded by the candidate and numerous expenditures and deposits were never documented by Respondent. Based on the audit, Respondent’s admissions, and his failure to abide by his obligation to preserve documents related to expenditures and contributions there is probable cause to believe the amounts of \$9,209.72 in expenditures and \$4,852.55 in contributions remain unreported. These amounts are subject to penalty pursuant to A.R.S. 16-942(B).

**Possible Penalty:**

Because penalties under § 16-942 are capped at twice the unreported amount the possible penalty here is: \$28,124.54.



### **III. Conclusion**

For the forgoing reasons, I recommend that the Commission find probable cause that Respondent violated the Act on Items II A-E.

### **IV. Procedure**

If the Commission determines by an affirmative vote of at least three of its members that there is probable cause to believe that Respondent has violated the Act, the Commission shall authorize the Executive Director to so notify Respondent by an order that states the nature of the violation, and assesses civil penalties pursuant to A.R.S. § 16-957. A.A.C. R2-20-215(A) & -217.

Dated this 2nd day of November, 2017

By:   
Thomas M. Collins  
Executive Director

# EXHIBIT A

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0000349236

- ☐ Initial Application  
☐ Amended Application



**STATE OF ARIZONA  
 APPLICATION FOR CERTIFICATION  
 AS A PARTICIPATING CANDIDATE**

SECRETARY OF STATE

2016 JAN 14 PM 1:14

Pursuant to Arizona Revised Statutes §§16-947 and 948 and AAC R2-20-104 (D)

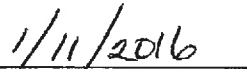
COMMITTEE ID NUMBER

**201600368**

NAME OF CANDIDATE <b>JESUS A RUBALCAVA</b>			DATE <b>01/11/2016</b>	
OFFICE SOUGHT <b>STATE REPRESENTATIVE - DISTRICT 4</b>	PARTY AFFILIATION <b>DEMOCRATIC</b>	ELECTION CYCLE <b>2016</b>		
CANDIDATE'S ADDRESS <b>806 W MARGARET ST PO BOX 863</b>		CITY <b>GILA BEND</b>	STATE <b>AZ</b>	ZIP <b>85337</b>
CANDIDATE'S TELEPHONE # <b>(602) 295-2102</b>	CANDIDATE'S FAX #	CANDIDATE'S EMAIL ADDRESS		
NAME OF POLITICAL COMMITTEE <b>RUBALCAVA FOR HOUSE</b>				
COMMITTEE ADDRESS <b>806 W MARGARET ST.</b>		CITY <b>GILA BEND</b>	STATE <b>AZ</b>	ZIP <b>85337</b>
COMMITTEE MAILING ADDRESS (if different from above) <b>PO BOX 863</b>		CITY <b>GILA BEND</b>	STATE <b>AZ</b>	ZIP <b>85337</b>
COMMITTEE TELEPHONE # <b>(602) 295-2102</b>	COMMITTEE FAX #	COMMITTEE EMAIL ADDRESS <b>JESUSARUBALCAVA@GMAIL.COM</b>		
NAME OF DESIGNATED INDIVIDUAL WITH AUTHORITY TO WITHDRAW FUNDS (IF APPLICABLE) (A.R.S. §16-948)				
DESIGNATED INDIVIDUAL'S ADDRESS		CITY	STATE	ZIP
DESIGNATED INDIVIDUAL'S TELEPHONE #	DESIGNATED INDIVIDUAL'S FAX #	DESIGNATED INDIVIDUAL'S EMAIL		
LIST THE NAME OF THE FINANCIAL INSTITUTION FROM WHICH THE CANDIDATE AND THE DESIGNATED INDIVIDUAL WILL CONDUCT ALL FINANCIAL ACTIVITY FOR THE CANDIDATE'S CAMPAIGN COMMITTEE (Do not list account numbers). (A.R.S. §16-948(A))				
NAME OF FINANCIAL INSTITUTION <b>WELLS FARGO BANK, N.A.</b>				

DESIGNATED CANDIDATE'S STATEMENT (if applicable) (A.R.S. §16-948(B)): I hereby  
 designate \_\_\_\_\_ as my duly authorized Designated Individual,  
 with the authority to withdraw funds and make expenditures from my campaign account on my behalf.

  
 Candidate's Signature

  
 Date

Committee ID: 201600368

Date: 01/11/2016

Form ID: 0000349236

Application for Certification -- Part II

**CANDIDATE AND DESIGNATED INDIVIDUAL'S STATEMENT (A.R.S. §16-947):**

I, the undersigned, upon my oath and under penalty of perjury, certify that the following statements are true and accurate to the best of my knowledge and belief:

1. I have complied with the restrictions of A.R.S. §16-941 (A) during the election cycle to date, which are as following:
  - a) Not accepted contributions other than early contributions as specified in A.R.S. §16-945;
  - b) Not made expenditures that exceed the candidate's personal money limit; and
  - c) Conducted all financial activity through a single campaign account.
2. I will continue to comply with the restrictions in paragraph 1 during the remainder of the election cycle and will:
  - a) Not make expenditures in the primary election period in excess of the adjusted primary election spending limit;
  - b) Not make expenditures in the general election period in excess of the adjusted general election spending limit; and
  - c) Return unused monies to the fund in accordance with A.R.S. §16-953.
3. I have filed all campaign finance reports required under Title 16, Chapter 6, Article I, during the election cycle to date, and the reports are complete and accurate.
4. I agree to use all Clean Election funding for direct campaign purposes only.
5. I will file, with this application, a campaign finance report showing all campaign activity to date in the current election cycle.
6. I will comply with all requirements of the Act and Commission rules.
7. I am subject to all enforcement actions by the Commission as authorized by the Act and Commission rules.
8. I have the burden of proving that expenditures made by or on behalf of the candidate were for direct campaign purposes.
9. I will keep and furnish to the Commission all documentation relating to expenditures, receipts, funding, books, records (including bank records for all accounts), and supporting documentation and other information that the Commission may request in accordance with Commission rules.
10. I will permit an audit and examination of all receipts and expenditures including those made by the candidate, the candidate's authorized committee, or any agent or person authorized to make expenditures on behalf of the candidate or committee. The candidate and the candidate's authorized committee shall also provide any material required in connection with an audit, investigation, or examination conducted by the Commission. The candidate and authorized committee shall facilitate the audit and examination and shall pay any amounts required to be repaid.
11. I will submit the name and mailing address of the person who is entitled to receive equalizing fund payments on behalf of the candidate and the name and address of the campaign depository designated by the candidate. Changes in the information required by this paragraph shall not be effective until submitted to the Commission in a letter signed by the candidate or the committee treasurer.
12. I will pay any civil penalties included in a conciliation agreement or otherwise imposed against the candidate.
13. I will file all campaign finance reports with the Secretary of State in an electronic format in a timely manner.

State of Arizona )  
County of Maricopa ) ss.

[Signature]  
Candidate's Signature

SUBSCRIBED AND SWORN TO before me this 11<sup>th</sup> day

of January 2016.

[Signature]  
Notary Public

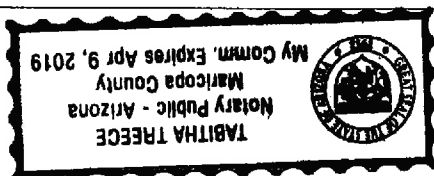
State of Arizona )  
County of \_\_\_\_\_ ) ss.

\_\_\_\_\_  
Designated Individual's Signature

SUBSCRIBED AND SWORN TO before me this \_\_\_\_\_ day

of \_\_\_\_\_ 20\_\_\_\_.

\_\_\_\_\_  
Notary Public



**Sara Larsen**

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**From:** No Reply <NoReply@azsos.gov>  
**Sent:** Friday, January 15, 2016 10:59 AM  
**To:** Rubalcava for House  
**Cc:** Jesus Rubalcava  
**Subject:** CCEC Application for Certification - Accepted

CCEC Application for Certification for candidate Rubalcava, Jesus A has been accepted on 01/15/2016 by the Citizens Clean Election Commission (Commission).

Pursuant to A.R.S. § 16-947, the Commission has approved your Application for Certification as a Participating Candidate for the 2016 election cycle. You are now considered a "participating candidate." You are required to comply with the Clean Elections Act and Commission rules. Participating candidates may solicit \$5 qualifying contributions during qualifying period only (August 1, 2015 – August 23, 2016).

All participating candidates are required to attend at least one training class within 60 days of being certified (or within 60 days of the beginning of the qualifying period if the candidate is certified before August 1, 2015). The class schedule may be found at [www.azcleelections.gov](http://www.azcleelections.gov).

In order for participating candidates to receive funding from the Commission, each candidate must be established as a vendor in the State accounting system. Please complete and mail an Arizona W-9 form to the address below. The Arizona W-9 form can be found at: <http://www.azcleelections.gov/docs/default-source/forms/azw-9.pdf?sfvrsn=0>.

If you have any questions, please contact me at 602.364.3477.

Sincerely,

Sara A. Larsen  
Financial Affairs & Compliance Officer  
Citizens Clean Elections Commission  
1616 W. Adams St., Suite 110  
Phoenix, Arizona 85007  
[sara.larsen@azcleelections.gov](mailto:sara.larsen@azcleelections.gov)  
602.364.3477

DO NOT REPLY TO THIS EMAIL

# EXHIBIT B

**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Jesus Rubalcava  
Participating Candidate for  
State Representative – District No. 4  
Primary Election 2016**

**Independent Accountants' Report on  
Applying Agreed-Upon Procedures**

Chairman and Members of the Commission  
Citizens Clean Elections Commission  
Phoenix, Arizona

We (the Contractor) have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Rubalcava for House (the Candidate) Campaign Finance Reports for both the Pre-Primary (June 1, 2016 to August 18, 2016) and the Post-Primary (August 19, 2016 to September 19, 2016) reporting periods were prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Pre-Primary and Post-Primary Campaign Finance Reports. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and the associated findings are as follows:

1. Preliminary Procedures

- a) Commission Staff will obtain a copy of the candidate's campaign finance report for the reporting period and provide the records to the Contractor.

**Finding**

We obtained both the Pre-Primary (June 1, 2016 to August 18, 2016) and Post-Primary (August 19, 2016 to September 19, 2016) Campaign Finance Reports from the Arizona Secretary of State's website.

- b) Perform a desk review of the receipts reported in the candidate's campaign finance report as follows:



- (i) Determine whether the candidate accepted contributions only from individuals.

**Finding**

The contributions received during the periods reviewed appeared to be only from individuals.

- (ii) Determine whether any contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the periods reviewed did not exceed the \$160 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the periods reviewed did not exceed the \$4,011 limit for a legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Early contributions received during the periods reviewed did not exceed the \$720 limit for a legislative candidate.

- c) Perform a desk review of the disbursements reported in the candidate's campaign finance report to identify any unusual items requiring follow-up during fieldwork.

**Finding**

We noted six disbursements to family members of the candidate, however the Campaign finance report did not indicate that the expenditures were made to family members. Per the Citizens Clean Elections Act & Rules Manual rule R2-20-701(C)(4), all payments made to family members or to enterprises owned in whole or part by the candidate or a family member shall be clearly itemized and indicated as such in all campaign finance reports.

In addition, there were three loans outstanding on the Post-Primary finance report that were made to the Campaign by the Candidate in December 2015, totaling \$69.93, that do not appear to have been repaid to the Candidate. In addition, supporting documentation for these loans was not maintained by the Campaign. Per the Citizens Clean Elections Act & Rule Manual rule R2-20-104(E), if the loan is to be repaid, the loans shall be repaid promptly upon receipt of Clean Elections funds if the participating candidate qualifies for Clean Elections funding. The Campaign received its Clean Elections funding on June 15, 2016.

It was further noted that the Campaign finance report had significantly fewer transactions than what was shown on the Campaign bank statements. Per discussion with the Candidate, the financial institution linked his personal bank account with the Campaign bank account, and therefore when he used his personal debit card, the Campaign bank account was debited. We noted approximately forty-one personal transactions consisting of out of state restaurant purchases, travel and other non-Campaign related items on the Campaign bank statement, totaling \$3,461.74; three ATM withdrawals, totaling \$243.50; five overdraft fees, totaling \$175.00; and three transfers from the Campaign bank account to the Candidate's personal bank account, totaling \$223.42. The Candidate indicated that he reimbursed the Campaign for these personal transactions, however deposits for these specific amounts was not provided. We noted eleven possible reimbursements to the Campaign on the bank statements, totaling \$2,270.19.

- d) Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

### **Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

## 2. Fieldwork Procedures

- a) Commission staff will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates chosen for a Primary Election Audit shall provide records from the Pre-Primary Election Report and the Post-Primary Election Report. Candidates chosen for a General Election Audit shall provide records from the Pre-General Election Report and the Post-General Election Report.

### **Finding**

Commission staff sent an initial notice of primary random audit selection to the Candidate and informed the Candidate that we would be contacting him. We then communicated to the Candidate in a written request, the purpose of the engagement, agreed-upon procedures to be performed, documentation needed and potential future requirements of the Candidate.

- b) Commission staff will provide the records to the Contractor upon receipt. The Contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

### **Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

### **Finding**

The Candidate provided written bookkeeping policies and procedures utilized by the campaign committee.

- (i) Review the names of the candidate's family members. Family members include parents, grandparents, spouse, children, siblings and a parent or spouse of any of those persons.

### **Finding**

We obtained and reviewed the names of the Candidate's family members.

- (ii) Review bank statements for each of the months in the reporting period and perform the following:
  - Select a sample of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance report.

### **Finding**

We selected five deposits and five withdrawals from the bank statements for the periods reviewed and determined that none appeared to be properly recorded in the Candidate's campaign finance reports.

The five withdrawals tested were personal purchases, made by the Candidate, totaling \$1,454.72. Per discussion with the Candidate, the financial institution linked his personal bank account with the Campaign bank account, and therefore when he used his personal debit card, the Campaign bank account was debited. He indicated that he reimbursed the Campaign for the personal purchases, however deposits for these specific amounts was not provided. He further indicated that the errors continued after he notified the financial institution.

The five deposits tested, per discussion with the Candidate, were reimbursements to the Campaign for personal purchases made in error by the financial institution, totaling \$1,717.99.

It was further noted that the Campaign finance report included the Primary Election Commission funding totaling \$16,044.00 on 6/15/16. The Campaign bank account did not include a corresponding deposit for this amount, however it did include a transfer from the Candidate's personal bank account for \$13,280.22, which represents a variance of \$2,763.78 of Commission monies that does not appear to have been deposited into the Campaign bank account. Per the Citizens Clean Elections Act & Rules Manual rule 16-948(A), a participating candidate shall conduct all financial activity through a single campaign account of the candidate's campaign committee.

- Perform a proof of receipts and disbursements for the reporting period.

### **Finding**

After performing proof of cash procedures, we calculated a Post-Primary ending cash balance of \$20,181.06, however the Amended Post-Primary campaign finance report reflected an ending balance of \$23,202.06, reflecting a variance of \$3,021.00, and indicating that the Campaign overspent by this amount. Per the Citizens Clean Elections Act & Rules Manual rule 16-941 (A)(3), a participating candidate: shall not make expenditures in the primary election period in excess of the adjusted primary election spending limit.

In addition, during this testwork it was noted that ten of the expenditure items in the Post-Primary campaign finance report, totaling \$2,214.50, had not cleared the bank as of September 30, 2016. Per discussion with the Candidate, he paid these vendors with cash, however no petty cash fund had been set up for the Campaign, and these expenditures were not reported as reimbursements to the Candidate on the Campaign finance report.

- d) Judgmentally select a sample of early contributions reported in the candidate's campaign finance report and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$50, which reflects the contributor's address, occupation and employer.

### **Finding**

We reviewed the supporting documentation for one early contribution (total population) reported in the Candidate's campaign finance report, and determined the name of the contributor for the contribution was included on the support. For individuals who contributed greater than \$50, we determined that the contributor's address, occupation and employer were also included on the support.

- (i) For other types of cash receipts reported in the candidate's campaign finance report, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's campaign finance reports during the periods reviewed.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's campaign finance reports during the periods reviewed.

- e) Judgmentally select a sample of cash expenditures reported in the candidate's campaign finance report and perform the following:
  - (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance report.

**Finding**

We reviewed five expenditures and agreed amounts to supporting invoices or other documentation and to the Candidate's finance report, with no exceptions noted.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance report.

**Finding**

We reviewed five expenditures and agreed the name, address and nature of goods or services provided to the information reported in the Candidate's Campaign finance report with no exceptions noted, however three of the expenditures tested were made were to family members of the Candidate and the Campaign finance report did not indicate that they were family members. Per the Citizens Clean Elections Act & Rules Manual rule R2-20-701(C)(4), all payments made to family members or to enterprises owned in whole or part by the candidate or a family member shall be clearly itemized and indicated as such in all campaign finance reports.

Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed five expenditures and agreed amounts to the campaign account bank statements with one exception. The Campaign finance report included a \$264.50 expenditure for newspaper advertising, however this amount was not present on the Campaign bank statement. Per discussion with the Candidate, he paid this vendor in cash, however no petty cash fund had been set up for the Campaign and this expenditure was not reported as a reimbursement to the Candidate on the Campaign finance report.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed five expenditures and agreed the name, address and nature of goods or services provided to the information reported in the Candidate's Campaign finance report with no exceptions noted.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

None of the expenditures we tested appeared to be for joint expenditures.

- f) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,420.

### **Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the periods reviewed, however per review of the Campaign bank statement, several ATM withdrawals were made and per discussion with the Candidate, multiple vendors were paid with cash.

- (i) If applicable, judgmentally select a sample of expenditures made from the Candidate's petty cash fund(s) and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$160 limit on petty cash expenditures.

### **Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the periods reviewed.

- g) Determine whether a legal defense fund has been established.

### **Finding**

Based on inquiry of the Candidate, the campaign did not establish a legal defense fund.

- (i) If a legal defense fund was established, how were these funds accounted for?

### **Finding**

Based on inquiry of the Candidate, the campaign did not establish a legal defense fund.

- h) Contact the Candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the Candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.



### **Finding**

We discussed our findings with the Candidate and the Candidate did not provide responses to our findings.

We were not engaged to and did not conduct an examination, the objective of which would be the expression of an opinion on the Pre-Primary and Post-Primary Campaign Finance Reports of Rubalcava for House. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the Citizens Clean Elections Commission, and is not intended to be and should not be used by anyone other than this specified party.

*Aster & Chapman P.C.*

December 13, 2016

# EXHIBIT C

**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Jesus Rubalcava  
Participating Candidate for  
State Representative – District No. 4  
2016 Election Cycle Finance Activity Comprehensive Review**

**Independent Accountants' Report on  
Applying Agreed-Upon Procedures**

Chairman and Members of the Commission  
Citizens Clean Elections Commission  
Phoenix, Arizona

We (the Contractor) have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Rubalcava for House (the Candidate), Campaign Finance Reports, Campaign bank account and corresponding documentation for expenditures and contributions for the 2016 election cycle (January 15, 2016 to January 31, 2017) were prepared or maintained in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign Finance Reports. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and the associated findings are as follows:

1. The Contractor shall review bank statements for each of the months in the election cycle and perform the following:
  - a) Select 100% of the deposits and withdrawals from the campaign bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance report.

### **Finding**

The Candidate provided the Campaign bank statements for all months of the election cycle, however the Candidate indicated that he was unable to identify or locate any documentation supporting the deposits and withdrawals from the Campaign bank statements. The attached Bank Statement Deposit Summary and Bank Statement Withdrawal Summary describe the deposits and withdrawals noted in the Campaign bank statements.

- b) Select 100% of cash disbursements and withdrawals from the campaign bank statement and perform the following:
  - (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance report.

### **Finding**

The Candidate indicated that he was unable to identify or locate any documentation supporting the withdrawals from the Campaign bank statements. The attached Bank Statement Withdrawal Summary describe the withdrawals noted in the Campaign bank statements.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance report.

### **Finding**

The Candidate indicated that he was unable to identify or locate any documentation supporting the withdrawals from the Campaign bank statements, therefore the name, address and nature of goods or services provided could not be agreed to the information reported in the Candidate's Campaign finance report. The attached Bank Statement Withdrawal Summary describe the withdrawals noted in the Campaign bank statements.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

The Candidate indicated that he was unable to identify or locate any documentation supporting the withdrawals from the Campaign bank statements, therefore expenditures made for a direct Campaign purpose could not be determined. The attached Bank Statement Withdrawal Summary describe the withdrawals noted in the Campaign bank statements.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

The Candidate indicated that he was unable to identify or locate any documentation supporting the withdrawals from the Campaign bank statements, therefore joint expenditures were unable to be identified. The attached Bank Statement Withdrawal Summary describe the withdrawals noted in the Campaign bank statements.

- c) Determine whether a legal defense has been established.

**Finding**

Based on inquiry of the Candidate, the Campaign did not establish a legal defense.

- (i) Has any Clean funding been used to pay for legal services?

**Finding**

Based on inquiry of the Candidate, the Campaign did not establish a legal defense.

- (ii) What is the cost or value of legal services being provided for the comprehensive audit and review of the finance activity?

**Finding**

Based on inquiry of the Candidate, the Campaign did not establish a legal defense.

- d) Contact the Candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this notification, the Contractor will advise the Candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We discussed our findings with the Candidate and the Candidate provided responses to our findings, which are included on pages 14-15 of this report.

We were not engaged to and did not conduct an examination, the objective of which would be the expression of an opinion on the comprehensive audit and review of the finance activity of Rubalcava for House. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the Citizens Clean Elections Commission, and is not intended to be and should not be used by anyone other than this specified party.

*Foster & Chapman P.C.*

April 28, 2017

### Bank Statement Deposit Summary

January 2016			
Date	Amount	Description	On Finance Report?
1/4/2016	\$ 200.00	ATM Cash Deposit	Undeterminable, significant number of contributions noted on report
1/4/2016	\$ 3.00	ATM Cash Deposit	No
1/4/2016	\$ 200.00	ATM Cash Deposit	Undeterminable, significant number of contributions noted on report
1/11/2016	\$ 2.00	Transfer from personal bank account	No
	<b>\$ 405.00</b>	<b>January Deposit Total:</b>	

January totals from above		Campaign Finance Report Totals	
\$ 2.00	Transfers from separate account	Included in Campaign Finance Report	\$ -
\$ 400.00	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ 5.00
\$ 3.00	Purpose not determinable	Undeterminable	\$ 400.00
\$ 405.00			\$ 405.00

February 2016			
Date	Amount	Description	On Finance Report?
		No deposit activity noted	

March 2016			
Date	Amount	Description	On Finance Report?
3/10/2016	\$ 25.00	ATM Check Deposit	Yes
3/31/2016	\$ 100.00	ATM Cash Deposit	Yes
3/31/2016	\$ 60.00	ATM Cash Deposit	Undeterminable, significant number of contributions noted on report
	<b>\$ 185.00</b>	<b>March Deposit Total:</b>	

March totals from above		Campaign Finance Report Totals	
\$ -	Transfers from separate account	Included in Campaign Finance Report	\$ 125.00
\$ 125.00	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ -
\$ 60.00	Purpose not determinable	Undeterminable	\$ 60.00
\$ 185.00			\$ 185.00

April 2016			
Date	Amount	Description	On Finance Report?
4/4/2016	\$ 70.00	ATM Cash Deposit	Undeterminable, significant number of contributions noted on report
4/15/2016	\$ 30.00	Transfer from personal account	No
4/18/2016	\$ 30.00	Transfer from personal account	No
	<b>\$ 130.00</b>	<b>April Deposit Total:</b>	

April totals from above		Campaign Finance Report Totals	
\$ 60.00	Transfers from separate account	Included in Campaign Finance Report	\$ -
\$ -	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ 60.00
\$ 70.00	Purpose not determinable	Undeterminable	\$ 70.00
\$ 130.00			\$ 130.00

May 2016			
Date	Amount	Description	On Finance Report?
5/6/2016	\$ 600.00	Transfer from personal account	No
5/11/2016	\$ 607.12	eDeposit IN Branch/Store	Undeterminable
5/11/2016	\$ 75.00	ATM Check Deposit	Yes
5/12/2016	\$ 500.00	Transfer from personal account	No
5/17/2016	\$ 100.00	ATM Cash Deposit	Undeterminable, significant number of contributions noted on report
5/23/2016	\$ 25.00	ATM Check Deposit	Undeterminable, significant number of contributions noted on report
5/31/2016	\$ 90.00	Transfer from personal account	No
	<b>\$ 1,997.12</b>	<b>May Deposit Total:</b>	

May totals from above		Campaign Finance Report Totals	
\$ 1,190.00	Transfers from separate account	Included in Campaign Finance Report	\$ 75.00
\$ 75.00	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ 1,190.00
\$ 732.12	Purpose not determinable	Undeterminable	\$ 732.12
\$ 1,997.12			\$ 1,997.12



June 2016			
Date	Amount	Description	On Finance Report?
6/2/2016	\$ 100.20	ATM Check Deposit	Undeterminable, significant number of contributions noted on report
6/2/2016	\$ 45.00	Transfer from personal account	No
6/9/2016	\$ 52.85	Transfer from personal account	No
6/13/2016	\$ 53.00	Transfer from personal account	No
6/17/2016	\$ 13,280.22	Transfer from personal account	This is presumed to be part of the Commission Primary Election funding. Total funding = \$16,044.00, difference of \$2,763.78.
	<b>\$ 13,531.27</b>	<b>June Deposit Total:</b>	

June totals from above		Campaign Finance Report Totals	
\$ 150.85	Transfers from separate account	Included in Campaign Finance Report	\$ 13,280.22
\$ 13,280.22	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ 150.85
\$ 100.20	Purpose not determinable	Undeterminable	\$ 100.20
\$ 13,531.27			\$ 13,531.27

July 2016			
Date	Amount	Description	On Finance Report?
No deposit activity noted			

August 2016			
Date	Amount	Description	On Finance Report?
8/4/2016	\$ 770.14	ATM Check Deposit	No
8/8/2016	\$ 77.00	eDeposit IN Branch/Store	Yes
8/9/2016	\$ 350.00	ATM Cash Deposit	No
8/29/2016	\$ 20.00	ATM Cash Deposit	No
8/29/2016	\$ 9.00	Transfer from personal account	No
8/30/2016	\$ 50.00	Transfer from personal account	No
	<b>\$ 1,276.14</b>	<b>August Deposit Total:</b>	

August totals from above		Campaign Finance Report Totals	
\$ 59.00	Transfers from separate account	Included in Campaign Finance Report	\$ 77.00
\$ 77.00	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ 1,199.14
\$ 1,140.14	Purpose not determinable	Undeterminable	\$ -
\$ 1,276.14			\$ 1,276.14

September 2016			
Date	Amount	Description	On Finance Report?
9/6/2016	\$ 24,066.00	eDeposit IN Branch/Store	Yes
9/6/2016	\$ 320.00	ATM Cash Deposit	No
9/19/2016	\$ 500.00	ATM Cash Deposit	No
	<b>\$ 24,886.00</b>	<b>September Deposit Total:</b>	

September totals from above		Campaign Finance Report Totals	
\$ -	Transfers from separate account	Included in Campaign Finance Report	\$ 24,066.00
\$ 24,066.00	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ 820.00
\$ 820.00	Purpose not determinable	Undeterminable	\$ -
\$ 24,886.00			\$ 24,886.00

October 2016			
Date	Amount	Description	On Finance Report?
10/3/2016	165.00	Transfer from personal account	No
10/5/2016	115.00	Transfer from personal account	No
10/12/2016	60.00	Transfer from personal account	No
10/24/2016	500.00	ATM Cash Deposit	No
10/24/2016	520.08	ATM Check Deposit	No
10/25/2016	33.00	Transfer from personal account	No
10/27/2016	34.48	Transfer from personal account	No
	<b>\$ 1,427.56</b>	<b>October Deposit Total:</b>	

October totals from above		Campaign Finance Report Totals	
\$ 407.48	Transfers from separate account	Included in Campaign Finance Report	\$ -
\$ -	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ 1,427.56
\$ 1,020.08	Purpose not determinable	Undeterminable	\$ -
\$ 1,427.56			\$ 1,427.56

November 2016			
Date	Amount	Description	On Finance Report?
No deposit activity noted			

December 2016			
Date	Amount	Description	On Finance Report?
No deposit activity noted			

Total Period Deposits		Campaign Finance Report Totals	
\$ 0.58	Beginning Bank Balance, 01/01/16	Beginning Bank Balance, 01/01/16	\$ 0.58
\$ 1,869.33	Transfers from separate account	Included in Campaign Finance Report	\$ 37,623.22
\$ 38,023.22	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ 4,852.55
\$ 3,945.54	Purpose not determinable	Undeterminable	\$ 1,362.32
\$ 43,838.67			\$ 43,838.67

## Bank Statement Withdrawal Summary

### January 2016

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
1/4/2016	\$ 100.00	ATM Withdrawal	Not determinable	n/a	No
1/4/2016	\$ 2.12	Family Dollar	Not determinable	n/a	No
1/4/2016	\$ 100.00	ATM Withdrawal	Not determinable	n/a	No
1/7/2016	\$ 100.00	ATM Withdrawal	Not determinable	n/a	No
1/11/2016	\$ 54.00	Transfer to personal account	No	n/a	No
1/11/2016	\$ 30.00	Western Union	No	n/a	No
1/11/2016	\$ 19.10	Pride Travel Center	Yes	Fuel	Yes
	<b>\$ 405.22</b>	<b>January Withdrawal Total</b>			

#### January totals from above

\$ 300.00	ATM Withdrawals
\$ 54.00	Transfers to personal account
\$ 30.00	Non-Campaign Withdrawals
\$ 19.10	Possible Campaign Withdrawals
\$ 2.12	Purpose not determinable
<b>\$ 405.22</b>	

#### Campaign Finance Report Totals

Included in Campaign Finance Report	\$ 386.12
Not included in Campaign Finance Report	\$ 19.10
	<b>\$ 405.22</b>

### February 2016

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
No bank statement activity noted					

### March 2016

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
3/17/2016	\$ 2.82	Quiktrip Tolleson AZ	Not determinable	n/a	No
3/18/2016	\$ 19.99	Western Union	No	n/a	No
3/18/2016	\$ 2.00	Swa Inflight Service	No	n/a	No
	<b>\$ 24.81</b>	<b>March Withdrawal Total</b>			

#### March totals from above

\$ -	ATM Withdrawals
\$ -	Transfers to personal account
\$ 21.99	Non-Campaign Withdrawals
\$ -	Possible Campaign Withdrawals
\$ 2.82	Purpose not determinable
<b>\$ 24.81</b>	

#### Campaign Finance Report Totals

Included in Campaign Finance Report	\$ -
Not included in Campaign Finance Report	\$ 24.81
	<b>\$ 24.81</b>

### April 2016

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
4/1/2016	\$ 10.25	Quiktrip Tolleson AZ	Not determinable	n/a	No
4/1/2016	\$ 60.00	ATM Withdrawal	No	n/a	No
4/4/2016	\$ 4.37	Burger King #9984 Buckeye AZ	Not determinable	n/a	No
4/4/2016	\$ 54.99	Western Union	No	n/a	No
4/6/2016	\$ 100.00	Check #101	Yes	Table fee for Yuma Co Fair	Yes
4/18/2016	\$ 10.01	Shell Service Station Gila Bend AZ	Not determinable	n/a	No
4/18/2016	\$ 27.99	Western Union	No	n/a	No
4/20/2016	\$ 4.82	Quiktrip Phoenix AZ	Not determinable	n/a	No
4/22/2016	\$ 8.00	Transfer to personal account	No	n/a	No
4/25/2016	\$ 5.41	Starbucks L3257 Los Angeles CA	No	n/a	No
	<b>\$ 285.84</b>	<b>April Withdrawal Total</b>			

#### April totals from above

\$ 60.00	ATM Withdrawals
\$ 8.00	Transfers to personal account
\$ 88.39	Non-Campaign Withdrawals
\$ 100.00	Possible Campaign Withdrawals
\$ 29.45	Purpose not determinable
<b>\$ 285.84</b>	

#### Campaign Finance Report Totals

Included in Campaign Finance Report	\$ 100.00
Not included in Campaign Finance Report	\$ 185.84
	<b>\$ 285.84</b>

**May 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
5/9/2016	\$ 319.00	Transfer to personal account	No	n/a	No
5/11/2016	\$ 80.00	ATM Withdrawal	No	n/a	No
5/12/2016	\$ 59.50	Sams Club	Not determinable	n/a	No
5/23/2016	\$ 20.00	Sams Club	Yes	Fuel	Yes
5/31/2016	\$ 95.69	Renaissance Hotel Phoenix AZ	Not determinable	n/a	No

**\$ 574.19 May Withdrawal Total**

**May totals from above**

\$ 80.00	ATM Withdrawals
\$ 319.00	Transfers to personal account
\$ -	Non-Campaign Withdrawals
\$ 20.00	Possible Campaign Withdrawals
\$ 155.19	Purpose not determinable
<b>\$ 574.19</b>	

**Campaign Finance Report Totals**

Included in Campaign Finance Report	\$ 20.00
Not included in Campaign Finance Report	\$ 554.19
	<b>\$ 574.19</b>

**June 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
6/1/2016	\$ 52.13	Reathrey Sekon Phoenix AZ	Not determinable	n/a	No
6/1/2016	\$ 24.65	Lin's Buffet Phoenix AZ	Not determinable	n/a	No
6/2/2016	\$ 80.00	ATM Withdrawal	No	n/a	No
6/6/2016	\$ 18.91	Popeye's #10632 Phoenix AZ	Not determinable	n/a	No
6/8/2016	\$ 1,415.00	Check #102	Yes	Submittal of \$5 qualifying contributions	Yes
6/9/2016	\$ 35.00	Overdraft fee	No	n/a	No
6/13/2016	\$ 12.52	Dial Cab CO. Washington DC	No	n/a	No
6/13/2016	\$ 53.00	Cobalt Washington DC	No	n/a	No
6/13/2016	\$ 197.70	Uber	No	n/a	No
6/14/2016	\$ 35.00	Overdraft fee	No	n/a	No
6/14/2016	\$ 35.00	Overdraft fee	No	n/a	No
6/21/2016	\$ 14.97	Cracker Barrel 1780 S Yuma AZ	Yes	Meal expense	Yes
6/21/2016	\$ 23.00	Sam's Club Phoenix AZ	Not determinable	n/a	No
6/22/2016	\$ 439.19	AT&T*Bill Payment	No	n/a	No
6/22/2016	\$ 10.86	Panda Express #153 Goodyear AZ	Not determinable	n/a	No
6/23/2016	\$ 23.50	Love S Country0000 Gila Bend AZ	Not determinable	n/a	No
6/23/2016	\$ 12.41	McDonald's F1373 Washington DC	No	n/a	No
6/24/2016	\$ 25.00	American Air001028 Fort Worth TX	No	n/a	No
6/24/2016	\$ 21.80	Phx Delux Burger N Phoenix AZ	Not determinable	n/a	No
6/24/2016	\$ 28.45	Taxicharge- Washin Washington DC	No	n/a	No
6/24/2016	\$ 10.58	Dial Cab CO. Washington DC	No	n/a	No
6/24/2016	\$ 46.00	El Paso Cafe Arlington VA	No	n/a	No
6/24/2016	\$ 2,699.00	Check #103	Yes	Campaign literature & signs	Yes
6/27/2016	\$ 200.00	Southwest Title Loan	No	n/a	No
6/27/2016	\$ 63.50	ATM Withdrawal	No	n/a	No
6/27/2016	\$ 2.50	ATM fee	No	n/a	No
6/27/2016	\$ 46.00	Cafe Paradiso Washington DC	No	n/a	No
6/27/2016	\$ 12.16	Uber	No	n/a	No
6/27/2016	\$ 12.88	Uber	No	n/a	No
6/27/2016	\$ 25.00	District Kitchen L Washington DC	No	n/a	No
6/27/2016	\$ 8.80	Filiberto's Mexica Buckeye AZ	Yes	Meal expense	Yes
6/28/2016	\$ 25.17	Omni Shoreham Washington DC	No	n/a	No
6/28/2016	\$ 25.01	American Tap Room Arlington VA	No	n/a	No
6/28/2016	\$ 55.00	Sky Harbor Parking Phoenix AZ	No	n/a	No
6/28/2016	\$ 149.64	Omni Shoreham Washington DC	No	n/a	No
6/28/2016	\$ 29.00	Circle K 00225 Gila Bend AZ	Not determinable	n/a	No
6/29/2016	\$ 800.00	Check #104	Yes	VAN	Yes
6/30/2016	\$ 200.00	Check #107	Yes	Canvass	Yes
6/30/2016	\$ 104.96	Lowe's	Yes	Pounder/Wire	Yes
6/30/2016	\$ 30.43	Lowe's	Yes	Pounder	Yes
6/30/2016	\$ 3,374.91	Check #106	Yes	Signs/Lit/Paper	Yes

**\$ 10,478.63 June Withdrawal Total**

June totals from above	
\$ 143.50	ATM Withdrawals
\$ -	Transfers to personal account
\$ 1,483.21	Non-Campaign Withdrawals
\$ 8,648.07	Possible Campaign Withdrawals
\$ 203.85	Purpose not determinable
<b>\$ 10,478.63</b>	

Campaign Finance Report Totals	
Included in Campaign Finance Report	\$ 8,648.07
Not included in Campaign Finance Report	\$ 1,830.56
	<b>\$ 10,478.63</b>

#### July 2016

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
7/1/2016	\$ 100.00	Check #108	Not determinable	n/a	No
7/1/2016	\$ 150.00	Check #111	Not determinable	n/a	No
7/5/2016	\$ 7.01	The Home Depot 402 Yuma AZ	Not determinable	n/a	No
7/5/2016	\$ 255.85	Check #105	Yes	Rebar	Yes
7/6/2016	\$ 300.00	Cashed Check #116	Yes	Canvass	Yes
7/7/2016	\$ 29.00	Shell Service Station Gila Bend AZ	Not determinable	n/a	No
7/7/2016	\$ 138.42	Transfer to personal account	No	n/a	No
7/7/2016	\$ 29.41	Lin's Buffet Phoenix AZ	Not determinable	n/a	No
7/7/2016	\$ 100.00	ATM Withdrawal	No	n/a	No
7/7/2016	\$ 200.00	Check #114	Not determinable	n/a	No
7/7/2016	\$ 200.00	Check #112	Not determinable	n/a	No
7/8/2016	\$ 281.72	Frys Food 2626 83Rd Av Phoenix AZ	Not determinable	n/a	No
7/11/2016	\$ 30.88	Marisco's MI Lindo Phoenix AZ	Not determinable	n/a	No
7/11/2016	\$ 23.00	Sam's Club Avondale AZ	Not determinable	n/a	No
7/12/2016	\$ 26.00	Sam's Club Phoenix AZ	Not determinable	n/a	No
7/13/2016	\$ 110.00	Main Event/Mty Air CA	No	n/a	No
7/13/2016	\$ 30.00	Cracker Barrel 1780 S Yuma AZ	Not determinable	n/a	No
7/14/2016	\$ 186.96	Southwest	No	n/a	No
7/14/2016	\$ 15.00	Southwest	No	n/a	No
7/14/2016	\$ 5.47	Taco Bell #23212 Buckeye AZ	Not determinable	n/a	No
7/14/2016	\$ 15.00	Southwest	No	n/a	No
7/14/2016	\$ 24.00	Arco #42258 Ampm Yuma AZ	Yes	Fuel	Yes
7/14/2016	\$ 130.00	Cashed Check #120	Yes	Canvass	Yes
7/14/2016	\$ 852.86	Check #118	Yes	Lawn signs	Yes
7/14/2016	\$ 200.00	Check #115	Yes	Canvass	Yes
7/15/2016	\$ 49.40	Michaels Stores Inc206 Goodyear AZ	Not determinable	n/a	No
7/18/2016	\$ 40.88	Hooters Yuma Yuma AZ	Not determinable	n/a	No
7/18/2016	\$ 24.99	Western Union	No	n/a	No
7/18/2016	\$ 430.87	Hilton Advance Pur Memphis TN	No	n/a	No
7/18/2016	\$ 18.95	Uber	No	n/a	No
7/18/2016	\$ 18.81	Uber	No	n/a	No
7/18/2016	\$ 15.00	Chevron 0307165 Alpine CA	No	n/a	No
7/18/2016	\$ 22.00	Frys Food & Drug 11203 Yuma AZ	Not determinable	n/a	No
7/19/2016	\$ 54.00	Hilton Garden Inn San Diego CA	No	n/a	No
7/19/2016	\$ 86.00	Coaster Saloon San Diego CA	No	n/a	No
7/19/2016	\$ 14.99	Smartfinal499 Phoenix AZ	Not determinable	n/a	No
7/19/2016	\$ 23.50	Circle K 03397 Buckeye AZ	Yes	Fuel	Yes
7/19/2016	\$ 35.00	Transfer to personal account	No	n/a	No
7/19/2016	\$ 190.00	Check #119	Yes	Tradeshelper, Salt River Project	Yes
7/20/2016	\$ 8.20	Sheraton Phoenix P Phoenix AZ	Not determinable	n/a	No
7/20/2016	\$ 29.11	Uber	No	n/a	No
7/21/2016	\$ 35.00	Overdraft Fee	No	n/a	No
7/21/2016	\$ 22.00	Barrio Cafe T43003 Phoenix AZ	Not determinable	n/a	No
7/22/2016	\$ 35.00	Overdraft Fee	No	n/a	No
<b>\$ 4,594.28</b>	<b>July Withdrawal Total</b>				

July totals from above	
\$ 100.00	ATM Withdrawals
\$ 173.42	Transfers to personal account
\$ 1,074.69	Non-Campaign Withdrawals
\$ 1,976.21	Possible Campaign Withdrawals
\$ 1,269.96	Purpose not determinable
<b>\$ 4,594.28</b>	

Campaign Finance Report Totals	
Included in Campaign Finance Report	\$ 1,976.21
Not included in Campaign Finance Report	\$ 2,618.07
	<b>\$ 4,594.28</b>

**August 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
8/5/2016	\$ 50.00	Transfer to personal account	No	n/a	No
8/5/2016	\$ 16.50	Sam's Club Avondale AZ	Not determinable	n/a	No
8/8/2016	\$ 57.87	Wal-Mart Super Center Phoenix AZ	Not determinable	n/a	No
8/8/2016	\$ 20.00	Circle K 03397 Buckeye AZ	Not determinable	n/a	No
8/8/2016	\$ 10.93	Little Caesars #32 Buckeye AZ	Not determinable	n/a	No
8/8/2016	\$ 48.57	Target T- 1515 N Litch Goodyear AZ	Not determinable	n/a	No
8/9/2016	\$ 150.00	Venmo 855-812-4430 NY	Not determinable	n/a	No
8/9/2016	\$ 378.84	AT&T*Bill Payment	No	n/a	No
8/17/2016	\$ 200.00	Check	Not determinable	n/a	No
8/22/2016	\$ 13.00	Charlie's Phoenix Phoenix AZ	Not determinable	n/a	No
8/24/2016	\$ 20.00	Loves Cntry St Gila Bend AZ	Not determinable	n/a	No
8/29/2016	\$ 44.54	American Air	No	n/a	No
8/29/2016	\$ 25.00	LA Tasca (King Str Alexandria VA	No	n/a	No
8/29/2016	\$ 18.19	Uber	No	n/a	No
8/30/2016	\$ 12.10	Georgetown Market Arlington VA	No	n/a	No
8/30/2016	\$ 27.00	Sky Harbor Parking Phoenix AZ	No	n/a	No
8/30/2016	\$ 55.00	Pullanos Pizza Glendale AZ	Not determinable	n/a	No

**\$ 1,147.54 August Withdrawal Total**

August totals from above	
\$ -	ATM Withdrawals
\$ 50.00	Transfers to personal account
\$ 505.67	Non-Campaign Withdrawals
\$ -	Possible Campaign Withdrawals
\$ 591.87	Purpose not determinable
<b>\$ 1,147.54</b>	

Campaign Finance Report Totals	
Included in Campaign Finance Report	\$ -
Not included in Campaign Finance Report	\$ 1,147.54
	<b>\$ 1,147.54</b>

**September 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
9/7/2016	\$ 300.00	Check #192	Yes	Canvass	Yes
9/7/2016	\$ 300.00	Check #191	Yes	Canvass	Yes
9/8/2016	\$ 10.00	Quiktrip Phoenix AZ	Not determinable	n/a	No
9/12/2016	\$ 28.00	Charlie's Phoenix	Not determinable	n/a	No
9/13/2016	\$ 48.54	Pullanos Pizza Glendale AZ	Not determinable	n/a	No
9/13/2016	\$ 197.10	Tm *Sia	No	n/a	No
9/15/2016	\$ 250.00	Check #198	Not determinable	n/a	No
9/15/2016	\$ 300.00	Check #197	Not determinable	n/a	No
9/19/2016	\$ 11.20	American Air	No	n/a	No
9/19/2016	\$ 75.00	American Air	No	n/a	No
9/19/2016	\$ 36.33	Birrieria Obregon Phoenix AZ	Not determinable	n/a	No
9/19/2016	\$ 142.37	My Ticket Tracker	No	n/a	No
9/20/2016	\$ 21.00	Arco #42533 Ampm Phoenix AZ	Not determinable	n/a	No
9/23/2016	\$ 56.00	Mariscos Altata Phoenix AZ	Not determinable	n/a	No
9/23/2016	\$ 306.50	Centurylink/Speedp	No	n/a	No
9/26/2016	\$ 127.21	Fairfield Inn & Su Phoenix AZ	No	n/a	No
9/26/2016	\$ 8.28	Federicos Buckeye AZ	Not determinable	n/a	No
9/26/2016	\$ 27.00	Circle K 00225 Gila Bend AZ	Not determinable	n/a	No
9/29/2016	\$ 35.00	Arizona List Tucson AZ	Not determinable	n/a	No
9/29/2016	\$ 247.55	4Imprint	Yes	Table runner	Yes

**\$ 2,527.08 September Withdrawal Total**

September totals from above	
\$ -	ATM Withdrawals
\$ -	Transfers to personal account
\$ 859.38	Non-Campaign Withdrawals
\$ 847.55	Possible Campaign Withdrawals
\$ 820.15	Purpose not determinable
<b>\$ 2,527.08</b>	

Campaign Finance Report Totals	
Included in Campaign Finance Report	\$ 847.55
Not included in Campaign Finance Report	\$ 1,679.53
	<b>\$ 2,527.08</b>

**October 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
10/11/2016	60.00	Under Review Sport Surprise AZ	Not determinable	n/a	No
10/18/2016	520.08	Marriott San Jose San Jose CA	No	n/a	No
10/19/2016	200.00	Check	Not determinable	n/a	No
10/19/2016	300.00	Check	Not determinable	n/a	No
10/21/2016	35.00	NSF Return Item Fee	No	n/a	No
10/24/2016	22,651.00	Check	Yes	Return of CCEC funds	Yes
10/25/2016	35.00	Overdraft Fee	No	n/a	No
<b>\$ 23,801.08 October Withdrawal Total</b>					

<b>October totals from above</b>		
\$ -	ATM Withdrawals	
\$ -	Transfers to personal account	
\$ 590.08	Non-Campaign Withdrawals	
\$ 22,651.00	Possible Campaign Withdrawals	
\$ 560.00	Purpose not determinable	
<b>\$ 23,801.08</b>		

<b>Campaign Finance Report Totals</b>		
Included in Campaign Finance Report	\$	22,651.00
Not included in Campaign Finance Report	\$	1,150.08
	<b>\$</b>	<b>23,801.08</b>

**November 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
No withdrawal activity noted					

**December 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
No withdrawal activity noted					

<b>Total Election Cycle Withdrawals</b>		
\$ 683.50	ATM Withdrawals	
\$ 604.42	Transfers to personal account	
\$ 4,653.41	Non-Campaign Withdrawals	
\$ 34,261.93	Possible Campaign Withdrawals	
\$ 3,635.41	Purpose not determinable	
<b>\$ 43,838.67</b>		

<b>Campaign Finance Report Totals</b>		
Included in Campaign Finance Report	\$	34,628.95
Not included in Campaign Finance Report	\$	9,209.72
	<b>\$</b>	<b>43,838.67</b>

April 28, 2017

To: Chairman and Members of the Commission  
Citizens Clean Elections Commission

From: Jesus Rubalcava, Participating Candidate  
for State Representative – District No. 4

Re: 2016 Election Cycle Finance Activity Comprehensive Review

Dear Chairman and Members,

I would like to start off by thanking you for the opportunity to participate as a participating candidate in the 2016 Election Cycle. Please acknowledge that I am not by any means challenging the results of the review, nor am I denying any wrong doing. More so, this is acknowledgement that my campaign finances were not effectively run and that my lesson has been learned. Moving forward, should I be given the opportunity, I now know what to do and what not to do. This letter is to explain and clarify some questions you may have in regards to the issues and concerns brought before you.

It is important to know that this was my first time running for such position. I had never had to file full campaign accounts and never had to form a committee for the purpose of running for office. Many things I did not know. For example, I did not know that I needed to set up a petty cash account. I did not know where or how to disclose family members that worked for my campaign. I did not know that I needed to hire legal counsel. I did call the Citizens Clean Elections Commission office twice to ask for 1) what or how much to pay individuals working for the campaign and 2) where to obtain a mileage reimbursement form. I did not receive a concrete answer for either questions, rather was told to attend the CCEC Orientation again. Again, this is not justification or an excuse.

The biggest issue with my campaign was that I used my bank account that linked with my campaign account. For example, I would deposit a check into what I thought was one account and it would end up



in another. Another example, I would use my campaign debit card for a transaction and it would withdraw from my personal account. Because this was so confusing to me, I began to use the filing report with the Secretary of State as my accounting and balance.

I was not able to provide additional documentation other than my bank statements for the following reason. I am a Special Education teacher in the Buckeye Elementary School District. When going through my initial audit, I had all of my campaign documents in my classroom. Over holiday break, I was moved into different classrooms 2 times. During this time, many of my personal belongings and documents were misplaced. I still have not been able to relocate them.

I ask the commission to please consider the reasoning for such flaws in this campaign finance. I accept the report on findings as a way to acknowledge and learn from what was done incorrectly and how to do things the correct way. I am willing to accept the consequences of my wrongdoing and ask that the commission allow me to take corrective actions in order to comply; whether this be repaying back any unaccounted monies and fees set forth by the commission.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'JR' followed by a stylized flourish.

Jesus A Rubalcava

# EXHIBIT D

Doug Ducey  
Governor

Thomas M. Collins  
Executive Director



Steve M. Titla  
Chair

Damlen R. Meyer  
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)

**NOTICE OF COMPLAINT AND OPPORTUNITY TO RESPOND**  
**Via Federal Express and E-mail**

May 23, 2017

The Honorable Jesus Rubalcalva  
Arizona House of Representatives  
1700 W. Washington  
Phoenix, AZ 85007

806 W. Margaret St.  
Gila Bend, AZ 85337

**RE: CCEC MUR #17-01**

Dear Representative Rubalcalva:

This letter serves as an internal complaint against you by the Executive Director of the Arizona Citizens Clean Elections Commission.

**Complaint**

Recently, the Arizona Citizens Clean Elections Commission accepted an audit of your campaign finances from the 2016 election. This comprehensive review, which followed a random audit related to the primary period, raised a number of issues related to the financing of your campaign as a participating candidate under the Citizens Clean Elections Act. Indeed, the audit provides substantial evidence that you may have violated a number of provisions of the Clean Elections Act and Rules.

According to the audit, you are unable to locate any documentation supporting your withdrawals from the campaign bank account, nor the identities or any contact information relating to goods and services purchases reported on your campaign finance reports, documentation of direct campaign expenditures or joint expenditures. The two audit reviews also confirm that you maintained more than one bank account that was used for campaign purposes throughout the campaign. Additionally, the reviews show that at no time did you deposit the entirety of your primary clean funding into your campaign bank account, that more than the primary and general limits applicable to you passed through the campaign bank account, and that bank account records and your campaign finance reports do not match. Among other things, the auditors were unable to reconcile deposits with claimed contributions noted on your campaign finance reports.

These allegations raise numerous potential violations. Participating candidates:

1. Shall not accept any contributions, other than a limited number of five-dollar qualifying contributions as specified in section 16-946 and early contributions as specified in section 16-945, except in the emergency situation specified in section 16-954, subsection F.
2. Shall not make expenditures of more than a total of five hundred dollars of the candidate's personal monies for a candidate for the legislature or more than one thousand dollars for a candidate for statewide office.
3. Shall not make expenditures in the primary election period in excess of the adjusted primary election spending limit.
4. Shall not make expenditures in the general election period in excess of the adjusted general election spending limit.
5. Shall comply with section 16-948 regarding campaign accounts and section 16-953 regarding returning unused monies to the citizens clean elections fund described in this article.

A.R.S. § 16-941(A). The audits provide evidence none of these requirements were complied with.

For example, A.R.S. § 16-953 (A) and (B) provide that “[a]t the end of the [primary or general] election period, a participating candidate. . . shall return to the fund all monies in the candidate's campaign account above an amount sufficient to pay any unpaid bills for expenditures made during the . . . election period and for goods or services directed to the . . . election.” In the absence of evidence that monies provided from the Clean Elections Commission were used for campaign expenditures, any unaccounted dollars became due to the fund under A.R.S. §§ 16-941 and 953.

Likewise, A.R.S. § 16-948 provides that a participating candidate “shall conduct *all financial activity* through a single campaign account of the candidate's campaign committee. A participating candidate shall not make any deposits into the campaign account other than those permitted under section 16-945 or 16-946.” (Emphasis added). Here, the audit reports are replete with indications you used more than one bank account and made multiple deposits from undetermined sources. This provides substantial evidence of ongoing violations on A.R.S. 16-941(A)(5) throughout the campaign, as well as 941(A)(1) and (A)(2).

Additionally, the auditors were unable to determine if direct campaign expenditures, joint expenditures, or other expenditures and contributions were made or accepted and properly reported. *See* Ariz. Admin. Code §§ R2-20-104, 109, 110, 111, 702, 703, 704 (2016).

Penalties for violating the Citizens Clean Elections Act and Rules include fines, repayment, and other penalties, including, in certain cases, removal from office. *See* A.R.S. §16-942(A)-(D); Ariz. Admin. Code §§ R2-20-222, -704.

### Opportunity for Response

Commission rules require notification to be given to the Respondent of a Complaint. Ariz. Admin. Code § R2-20-204(A). Additionally, the rules provide that you be advised of compliance procedures. Those procedures are set forth in Article 2 of the Commission's Rules (Arizona Administrative Code Sections R2-20-201 to R2-20-228) as well as the Clean Elections

Act (specifically Arizona Revised Statutes §§ 16-940 to 16-961), which are available on the Commission website at [www.azcleelections.gov](http://www.azcleelections.gov).

The Commission's rules provide that a Respondent "be afforded an opportunity to demonstrate that no action should be taken on the basis of a complaint by submitting, *within five days from receipt of a written copy of the complaint*, a letter or memorandum setting forth reasons why the Commission should take no action." Ariz. Admin. Code R2-20-205(A). Your response must be notarized, or the Commission will not consider it. Ariz. Admin. Code R2-20-205(C). Generally, a failure to respond to a complaint within five days may be viewed as an admission to the allegations. *Id.*

Commission rules require that you be given this notice and Complaint. The issuance of this notice and Complaint do not constitute a finding related to the Complaint. A finding, if any, may be made only after the Commission has reviewed the matter. Additionally, I would recommend you seek legal counsel, as the Commission and its staff cannot provide legal advice to you.

Please contact us if you have any questions at (602) 364-3477 or by e-mail at [ccec@azcleelections.gov](mailto:ccec@azcleelections.gov).

Sincerely,



Thomas M. Collins  
Executive Director  
Arizona Citizens Clean Elections Commission

Enclosure: Approved Audit Report

cc: Sara Larsen, Financial Affairs & Compliance Officer (email only)



**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Jesus Rubalcava  
Participating Candidate for  
State Representative – District No. 4  
Primary Election 2016**

**Independent Accountants' Report on  
Applying Agreed-Upon Procedures**

Chairman and Members of the Commission  
Citizens Clean Elections Commission  
Phoenix, Arizona

We (the Contractor) have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Rubalcava for House (the Candidate) Campaign Finance Reports for both the Pre-Primary (June 1, 2016 to August 18, 2016) and the Post-Primary (August 19, 2016 to September 19, 2016) reporting periods were prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Pre-Primary and Post-Primary Campaign Finance Reports. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and the associated findings are as follows:

1. Preliminary Procedures

- a) Commission Staff will obtain a copy of the candidate's campaign finance report for the reporting period and provide the records to the Contractor.

**Finding**

We obtained both the Pre-Primary (June 1, 2016 to August 18, 2016) and Post-Primary (August 19, 2016 to September 19, 2016) Campaign Finance Reports from the Arizona Secretary of State's website.

- b) Perform a desk review of the receipts reported in the candidate's campaign finance report as follows:



- (i) Determine whether the candidate accepted contributions only from individuals.

**Finding**

The contributions received during the periods reviewed appeared to be only from individuals.

- (ii) Determine whether any contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the periods reviewed did not exceed the \$160 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the periods reviewed did not exceed the \$4,011 limit for a legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Early contributions received during the periods reviewed did not exceed the \$720 limit for a legislative candidate.

- c) Perform a desk review of the disbursements reported in the candidate's campaign finance report to identify any unusual items requiring follow-up during fieldwork.

**Finding**

We noted six disbursements to family members of the candidate, however the Campaign finance report did not indicate that the expenditures were made to family members. Per the Citizens Clean Elections Act & Rules Manual rule R2-20-701(C)(4), all payments made to family members or to enterprises owned in whole or part by the candidate or a family member shall be clearly itemized and indicated as such in all campaign finance reports.

In addition, there were three loans outstanding on the Post-Primary finance report that were made to the Campaign by the Candidate in December 2015, totaling \$69.93, that do not appear to have been repaid to the Candidate. In addition, supporting documentation for these loans was not maintained by the Campaign. Per the Citizens Clean Elections Act & Rule Manual rule R2-20-104(E), if the loan is to be repaid, the loans shall be repaid promptly upon receipt of Clean Elections funds if the participating candidate qualifies for Clean Elections funding. The Campaign received its Clean Elections funding on June 15, 2016.

It was further noted that the Campaign finance report had significantly fewer transactions than what was shown on the Campaign bank statements. Per discussion with the Candidate, the financial institution linked his personal bank account with the Campaign bank account, and therefore when he used his personal debit card, the Campaign bank account was debited. We noted approximately forty-one personal transactions consisting of out of state restaurant purchases, travel and other non-Campaign related items on the Campaign bank statement, totaling \$3,461.74; three ATM withdrawals, totaling \$243.50; five overdraft fees, totaling \$175.00; and three transfers from the Campaign bank account to the Candidate's personal bank account, totaling \$223.42. The Candidate indicated that he reimbursed the Campaign for these personal transactions, however deposits for these specific amounts was not provided. We noted eleven possible reimbursements to the Campaign on the bank statements, totaling \$2,270.19.

- d) Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

#### **Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

## 2. Fieldwork Procedures

- a) Commission staff will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates chosen for a Primary Election Audit shall provide records from the Pre-Primary Election Report and the Post-Primary Election Report. Candidates chosen for a General Election Audit shall provide records from the Pre-General Election Report and the Post-General Election Report.

### **Finding**

Commission staff sent an initial notice of primary random audit selection to the Candidate and informed the Candidate that we would be contacting him. We then communicated to the Candidate in a written request, the purpose of the engagement, agreed-upon procedures to be performed, documentation needed and potential future requirements of the Candidate.

- b) Commission staff will provide the records to the Contractor upon receipt. The Contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

### **Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

### **Finding**

The Candidate provided written bookkeeping policies and procedures utilized by the campaign committee.

- (i) Review the names of the candidate's family members. Family members include parents, grandparents, spouse, children, siblings and a parent or spouse of any of those persons.

### **Finding**

We obtained and reviewed the names of the Candidate's family members.

- (ii) Review bank statements for each of the months in the reporting period and perform the following:
  - Select a sample of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance report.

### **Finding**

We selected five deposits and five withdrawals from the bank statements for the periods reviewed and determined that none appeared to be properly recorded in the Candidate's campaign finance reports.

The five withdrawals tested were personal purchases, made by the Candidate, totaling \$1,454.72. Per discussion with the Candidate, the financial institution linked his personal bank account with the Campaign bank account, and therefore when he used his personal debit card, the Campaign bank account was debited. He indicated that he reimbursed the Campaign for the personal purchases, however deposits for these specific amounts was not provided. He further indicated that the errors continued after he notified the financial institution.

The five deposits tested, per discussion with the Candidate, were reimbursements to the Campaign for personal purchases made in error by the financial institution, totaling \$1,717.99.

It was further noted that the Campaign finance report included the Primary Election Commission funding totaling \$16,044.00 on 6/15/16. The Campaign bank account did not include a corresponding deposit for this amount, however it did include a transfer from the Candidate's personal bank account for \$13,280.22, which represents a variance of \$2,763.78 of Commission monies that does not appear to have been deposited into the Campaign bank account. Per the Citizens Clean Elections Act & Rules Manual rule 16-948(A), a participating candidate shall conduct all financial activity through a single campaign account of the candidate's campaign committee.

- Perform a proof of receipts and disbursements for the reporting period.

#### Finding

After performing proof of cash procedures, we calculated a Post-Primary ending cash balance of \$20,181.06, however the Amended Post-Primary campaign finance report reflected an ending balance of \$23,202.06, reflecting a variance of \$3,021.00, and indicating that the Campaign overspent by this amount. Per the Citizens Clean Elections Act & Rules Manual rule 16-941 (A)(3), a participating candidate: shall not make expenditures in the primary election period in excess of the adjusted primary election spending limit.

In addition, during this testwork it was noted that ten of the expenditure items in the Post-Primary campaign finance report, totaling \$2,214.50, had not cleared the bank as of September 30, 2016. Per discussion with the Candidate, he paid these vendors with cash, however no petty cash fund had been set up for the Campaign, and these expenditures were not reported as reimbursements to the Candidate on the Campaign finance report.

- d) Judgmentally select a sample of early contributions reported in the candidate's campaign finance report and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$50, which reflects the contributor's address, occupation and employer.

#### Finding

We reviewed the supporting documentation for one early contribution (total population) reported in the Candidate's campaign finance report, and determined the name of the contributor for the contribution was included on the support. For individuals who contributed greater than \$50, we determined that the contributor's address, occupation and employer were also included on the support.

- (i) For other types of cash receipts reported in the candidate's campaign finance report, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's campaign finance reports during the periods reviewed.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's campaign finance reports during the periods reviewed.

- e) Judgmentally select a sample of cash expenditures reported in the candidate's campaign finance report and perform the following:
  - (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance report.

**Finding**

We reviewed five expenditures and agreed amounts to supporting invoices or other documentation and to the Candidate's finance report, with no exceptions noted.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance report.

**Finding**

We reviewed five expenditures and agreed the name, address and nature of goods or services provided to the information reported in the Candidate's Campaign finance report with no exceptions noted, however three of the expenditures tested were made were to family members of the Candidate and the Campaign finance report did not indicate that they were family members. Per the Citizens Clean Elections Act & Rules Manual rule R2-20-701(C)(4), all payments made to family members or to enterprises owned in whole or part by the candidate or a family member shall be clearly itemized and indicated as such in all campaign finance reports.

Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed five expenditures and agreed amounts to the campaign account bank statements with one exception. The Campaign finance report included a \$264.50 expenditure for newspaper advertising, however this amount was not present on the Campaign bank statement. Per discussion with the Candidate, he paid this vendor in cash, however no petty cash fund had been set up for the Campaign and this expenditure was not reported as a reimbursement to the Candidate on the Campaign finance report.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed five expenditures and agreed the name, address and nature of goods or services provided to the information reported in the Candidate's Campaign finance report with no exceptions noted.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

None of the expenditures we tested appeared to be for joint expenditures.

- f) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,420.

### **Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the periods reviewed, however per review of the Campaign bank statement, several ATM withdrawals were made and per discussion with the Candidate, multiple vendors were paid with cash.

- (i) If applicable, judgmentally select a sample of expenditures made from the Candidate's petty cash fund(s) and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$160 limit on petty cash expenditures.

### **Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the periods reviewed.

- g) Determine whether a legal defense fund has been established.

### **Finding**

Based on inquiry of the Candidate, the campaign did not establish a legal defense fund.

- (i) If a legal defense fund was established, how were these funds accounted for?

### **Finding**

Based on inquiry of the Candidate, the campaign did not establish a legal defense fund.

- h) Contact the Candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the Candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.



**Finding**

We discussed our findings with the Candidate and the Candidate did not provide responses to our findings.

We were not engaged to and did not conduct an examination, the objective of which would be the expression of an opinion on the Pre-Primary and Post-Primary Campaign Finance Reports of Rubalcava for House. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the Citizens Clean Elections Commission, and is not intended to be and should not be used by anyone other than this specified party.

*Foster & Chapman P.C.*

December 13, 2016

## EXHIBIT B

**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Jesus Rubalcava  
Participating Candidate for  
State Representative – District No. 4  
2016 Election Cycle Finance Activity Comprehensive Review**

**Independent Accountants' Report on  
Applying Agreed-Upon Procedures**

Chairman and Members of the Commission  
Citizens Clean Elections Commission  
Phoenix, Arizona

We (the Contractor) have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Rubalcava for House (the Candidate), Campaign Finance Reports, Campaign bank account and corresponding documentation for expenditures and contributions for the 2016 election cycle (January 15, 2016 to January 31, 2017) were prepared or maintained in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign Finance Reports. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and the associated findings are as follows:

1. The Contractor shall review bank statements for each of the months in the election cycle and perform the following:
  - a) Select 100% of the deposits and withdrawals from the campaign bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance report.

### **Finding**

The Candidate provided the Campaign bank statements for all months of the election cycle, however the Candidate indicated that he was unable to identify or locate any documentation supporting the deposits and withdrawals from the Campaign bank statements. The attached Bank Statement Deposit Summary and Bank Statement Withdrawal Summary describe the deposits and withdrawals noted in the Campaign bank statements.

- b) Select 100% of cash disbursements and withdrawals from the campaign bank statement and perform the following:
  - (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance report.

### **Finding**

The Candidate indicated that he was unable to identify or locate any documentation supporting the withdrawals from the Campaign bank statements. The attached Bank Statement Withdrawal Summary describe the withdrawals noted in the Campaign bank statements.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance report.

### **Finding**

The Candidate indicated that he was unable to identify or locate any documentation supporting the withdrawals from the Campaign bank statements, therefore the name, address and nature of goods or services provided could not be agreed to the information reported in the Candidate's Campaign finance report. The attached Bank Statement Withdrawal Summary describe the withdrawals noted in the Campaign bank statements.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

The Candidate indicated that he was unable to identify or locate any documentation supporting the withdrawals from the Campaign bank statements, therefore expenditures made for a direct Campaign purpose could not be determined. The attached Bank Statement Withdrawal Summary describe the withdrawals noted in the Campaign bank statements.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

The Candidate indicated that he was unable to identify or locate any documentation supporting the withdrawals from the Campaign bank statements, therefore joint expenditures were unable to be identified. The attached Bank Statement Withdrawal Summary describe the withdrawals noted in the Campaign bank statements.

- c) Determine whether a legal defense has been established.

**Finding**

Based on inquiry of the Candidate, the Campaign did not establish a legal defense.

- (i) Has any Clean funding been used to pay for legal services?

**Finding**

Based on inquiry of the Candidate, the Campaign did not establish a legal defense.

- (ii) What is the cost or value of legal services being provided for the comprehensive audit and review of the finance activity?

**Finding**

Based on inquiry of the Candidate, the Campaign did not establish a legal defense.

- d) Contact the Candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this notification, the Contractor will advise the Candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We discussed our findings with the Candidate and the Candidate provided responses to our findings, which are included on pages 14-15 of this report.

We were not engaged to and did not conduct an examination, the objective of which would be the expression of an opinion on the comprehensive audit and review of the finance activity of Rubalcava for House. Accordingly, we do not express such an opinion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

This report is intended solely for the information and use of the Citizens Clean Elections Commission, and is not intended to be and should not be used by anyone other than this specified party.

*Foster & Chapman P.C.*

April 28, 2017

### Bank Statement Deposit Summary

#### January 2016

Date	Amount	Description	On Finance Report?
1/4/2016	\$ 200.00	ATM Cash Deposit	Undeterminable, significant number of contributions noted on report
1/4/2016	\$ 3.00	ATM Cash Deposit	No
1/4/2016	\$ 200.00	ATM Cash Deposit	Undeterminable, significant number of contributions noted on report
1/11/2016	\$ 2.00	Transfer from personal bank account	No
	<u>\$ 405.00</u>	January Deposit Total:	

January totals from above		Campaign Finance Report Totals	
\$ 2.00	Transfers from separate account	Included in Campaign Finance Report	\$ -
\$ 400.00	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ 5.00
\$ 3.00	Purpose not determinable	Undeterminable	\$ 400.00
\$ 405.00			<u>\$ 405.00</u>

#### February 2016

Date	Amount	Description	On Finance Report?
		No deposit activity noted	

#### March 2016

Date	Amount	Description	On Finance Report?
3/10/2016	\$ 25.00	ATM Check Deposit	Yes
3/31/2016	\$ 100.00	ATM Cash Deposit	Yes
3/31/2016	\$ 60.00	ATM Cash Deposit	Undeterminable, significant number of contributions noted on report
	<u>\$ 185.00</u>	March Deposit Total:	

March totals from above		Campaign Finance Report Totals	
\$ -	Transfers from separate account	Included in Campaign Finance Report	\$ 125.00
\$ 125.00	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ -
\$ 60.00	Purpose not determinable	Undeterminable	\$ 60.00
\$ 185.00			<u>\$ 185.00</u>

#### April 2016

Date	Amount	Description	On Finance Report?
4/4/2016	\$ 70.00	ATM Cash Deposit	Undeterminable, significant number of contributions noted on report
4/15/2016	\$ 30.00	Transfer from personal account	No
4/18/2016	\$ 30.00	Transfer from personal account	No
	<u>\$ 130.00</u>	April Deposit Total:	

April totals from above		Campaign Finance Report Totals	
\$ 60.00	Transfers from separate account	Included in Campaign Finance Report	\$ -
\$ -	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ 60.00
\$ 70.00	Purpose not determinable	Undeterminable	\$ 70.00
\$ 130.00			<u>\$ 130.00</u>

#### May 2016

Date	Amount	Description	On Finance Report?
5/6/2016	\$ 600.00	Transfer from personal account	No
5/11/2016	\$ 607.12	eDeposit IN Branch/Store	Undeterminable
5/11/2016	\$ 75.00	ATM Check Deposit	Yes
5/12/2016	\$ 500.00	Transfer from personal account	No
5/17/2016	\$ 100.00	ATM Cash Deposit	Undeterminable, significant number of contributions noted on report
5/23/2016	\$ 25.00	ATM Check Deposit	Undeterminable, significant number of contributions noted on report
5/31/2016	\$ 90.00	Transfer from personal account	No
	<u>\$ 1,997.12</u>	May Deposit Total:	

May totals from above		Campaign Finance Report Totals	
\$ 1,190.00	Transfers from separate account	Included in Campaign Finance Report	\$ 75.00
\$ 75.00	Possible Campaign Deposits	Not included in Campaign Finance Report	\$ 1,190.00
\$ 732.12	Purpose not determinable	Undeterminable	\$ 732.12
\$ 1,997.12			<u>\$ 1,997.12</u>



### June 2016

Date	Amount	Description	On Finance Report?
6/2/2016	\$ 100.20	ATM Check Deposit	Undeterminable, significant number of contributions noted on report
6/2/2016	\$ 45.00	Transfer from personal account	No
6/9/2016	\$ 52.85	Transfer from personal account	No
6/13/2016	\$ 53.00	Transfer from personal account	No
6/17/2016	\$ 13,280.22	Transfer from personal account	This is presumed to be part of the Commission Primary Election funding. Total funding = \$16,044.00, difference of \$2,763.78.
	<u>\$ 13,531.27</u>	<b>June Deposit Total:</b>	

June totals from above		
\$ 150.85	Transfers from separate account	
\$ 13,280.22	Possible Campaign Deposits	
\$ 100.20	Purpose not determinable	
<u>\$ 13,531.27</u>		

Campaign Finance Report Totals		
Included in Campaign Finance Report	\$	13,280.22
Not included in Campaign Finance Report	\$	150.85
Undeterminable	\$	100.20
	<u>\$</u>	<u>13,531.27</u>

### July 2016

Date	Amount	Description	On Finance Report?
No deposit activity noted			

### August 2016

Date	Amount	Description	On Finance Report?
8/4/2016	\$ 770.14	ATM Check Deposit	No
8/8/2016	\$ 77.00	eDeposit IN Branch/Store	Yes
8/9/2016	\$ 350.00	ATM Cash Deposit	No
8/29/2016	\$ 20.00	ATM Cash Deposit	No
8/29/2016	\$ 9.00	Transfer from personal account	No
8/30/2016	\$ 50.00	Transfer from personal account	No
	<u>\$ 1,276.14</u>	<b>August Deposit Total:</b>	

August totals from above		
\$ 59.00	Transfers from separate account	
\$ 77.00	Possible Campaign Deposits	
\$ 1,140.14	Purpose not determinable	
<u>\$ 1,276.14</u>		

Campaign Finance Report Totals		
Included in Campaign Finance Report	\$	77.00
Not included in Campaign Finance Report	\$	1,199.14
Undeterminable	\$	-
	<u>\$</u>	<u>1,276.14</u>

### September 2016

Date	Amount	Description	On Finance Report?
9/6/2016	\$ 24,066.00	eDeposit IN Branch/Store	Yes
9/6/2016	\$ 320.00	ATM Cash Deposit	No
9/19/2016	\$ 500.00	ATM Cash Deposit	No
	<u>\$ 24,886.00</u>	<b>September Deposit Total:</b>	

September totals from above		
\$ -	Transfers from separate account	
\$ 24,066.00	Possible Campaign Deposits	
\$ 820.00	Purpose not determinable	
<u>\$ 24,886.00</u>		

Campaign Finance Report Totals		
Included in Campaign Finance Report	\$	24,066.00
Not included in Campaign Finance Report	\$	820.00
Undeterminable	\$	-
	<u>\$</u>	<u>24,886.00</u>

### October 2016

Date	Amount	Description	On Finance Report?
10/3/2016	165.00	Transfer from personal account	No
10/5/2016	115.00	Transfer from personal account	No
10/12/2016	60.00	Transfer from personal account	No
10/24/2016	500.00	ATM Cash Deposit	No
10/24/2016	520.08	ATM Check Deposit	No
10/25/2016	33.00	Transfer from personal account	No
10/27/2016	34.48	Transfer from personal account	No
	<u>\$ 1,427.56</u>	<b>October Deposit Total:</b>	

October totals from above		
\$ 407.48	Transfers from separate account	
\$ -	Possible Campaign Deposits	
\$ 1,020.08	Purpose not determinable	
<u>\$ 1,427.56</u>		

Campaign Finance Report Totals		
Included in Campaign Finance Report	\$	-
Not included in Campaign Finance Report	\$	1,427.56
Undeterminable	\$	-
	<u>\$</u>	<u>1,427.56</u>

November 2016			
Date	Amount	Description	On Finance Report?
No deposit activity noted			

December 2016			
Date	Amount	Description	On Finance Report?
No deposit activity noted			

Total Period Deposits		Campaign Finance Report Totals	
\$	0.58	Beginning Bank Balance, 01/01/16	\$ 0.58
\$	1,869.33	Transfers from separate account	Included in Campaign Finance Report \$ 37,623.22
\$	38,023.22	Possible Campaign Deposits	Not included in Campaign Finance Report \$ 4,852.55
\$	3,945.54	Purpose not determinable	Undeterminable \$ 1,362.32
\$	43,838.67		\$ 43,838.67

# **Bank Statement Withdrawal Summary**

**January 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
1/4/2016	\$ 100.00	ATM Withdrawal	Not determinable	n/a	No
1/4/2016	\$ 2.12	Family Dollar	Not determinable	n/a	No
1/4/2016	\$ 100.00	ATM Withdrawal	Not determinable	n/a	No
1/7/2016	\$ 100.00	ATM Withdrawal	Not determinable	n/a	No
1/11/2016	\$ 54.00	Transfer to personal account	No	n/a	No
1/11/2016	\$ 30.00	Western Union	No	n/a	No
1/11/2016	\$ 19.10	Pride Travel Center	Yes	Fuel	Yes
<b>\$ 405.22 January Withdrawal Total</b>					

<b>January totals from above</b>	
\$ 300.00	ATM Withdrawals
\$ 54.00	Transfers to personal account
\$ 30.00	Non-Campaign Withdrawals
\$ 19.10	Possible Campaign Withdrawals
\$ 2.12	Purpose not determinable
<b>\$ 405.22</b>	

<b>Campaign Finance Report Totals</b>	
Included in Campaign Finance Report	\$ 386.12
Not included in Campaign Finance Report	\$ 19.10
	<b>\$ 405.22</b>

**February 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
No bank statement activity noted					

**March 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
3/17/2016	\$ 2.82	Quiktrip Tolleson AZ	Not determinable	n/a	No
3/18/2016	\$ 19.99	Western Union	No	n/a	No
3/18/2016	\$ 2.00	Swa Inflight Service	No	n/a	No
<b>\$ 24.81 March Withdrawal Total</b>					

<b>March totals from above</b>	
\$ -	ATM Withdrawals
\$ -	Transfers to personal account
\$ 21.99	Non-Campaign Withdrawals
\$ -	Possible Campaign Withdrawals
\$ 2.82	Purpose not determinable
<b>\$ 24.81</b>	

<b>Campaign Finance Report Totals</b>	
Included in Campaign Finance Report	\$ -
Not included in Campaign Finance Report	\$ 24.81
	<b>\$ 24.81</b>

**April 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
4/1/2016	\$ 10.25	Quiktrip Tolleson AZ	Not determinable	n/a	No
4/1/2016	\$ 60.00	ATM Withdrawal	No	n/a	No
4/4/2016	\$ 4.37	Burger King #9984 Buckeye AZ	Not determinable	n/a	No
4/4/2016	\$ 54.99	Western Union	No	n/a	No
4/6/2016	\$ 100.00	Check #101	Yes	Table fee for Yuma Co Fair	Yes
4/18/2016	\$ 10.01	Shell Service Station Gila Bend AZ	Not determinable	n/a	No
4/18/2016	\$ 27.99	Western Union	No	n/a	No
4/20/2016	\$ 4.82	Quiktrip Phoenix AZ	Not determinable	n/a	No
4/22/2016	\$ 8.00	Transfer to personal account	No	n/a	No
4/25/2016	\$ 5.41	Starbucks L3257 Los Angeles CA	No	n/a	No
<b>\$ 285.84 April Withdrawal Total</b>					

<b>April totals from above</b>	
\$ 60.00	ATM Withdrawals
\$ 8.00	Transfers to personal account
\$ 88.39	Non-Campaign Withdrawals
\$ 100.00	Possible Campaign Withdrawals
\$ 29.45	Purpose not determinable
<b>\$ 285.84</b>	

<b>Campaign Finance Report Totals</b>	
Included in Campaign Finance Report	\$ 100.00
Not included in Campaign Finance Report	\$ 185.84
	<b>\$ 285.84</b>

**May 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
5/9/2016	\$ 319.00	Transfer to personal account	No	n/a	No
5/11/2016	\$ 80.00	ATM Withdrawal	No	n/a	No
5/12/2016	\$ 59.50	Sams Club	Not determinable	n/a	No
5/23/2016	\$ 20.00	Sams Club	Yes	Fuel	Yes
5/31/2016	\$ 95.69	Renaissance Hotel Phoenix AZ	Not determinable	n/a	No
	<b>\$ 574.19</b>	<b>May Withdrawal Total</b>			

<b>May totals from above</b>		
\$ 80.00	ATM Withdrawals	
\$ 319.00	Transfers to personal account	
\$ -	Non-Campaign Withdrawals	
\$ 20.00	Possible Campaign Withdrawals	
\$ 155.19	Purpose not determinable	
<b>\$ 574.19</b>		

<b>Campaign Finance Report Totals</b>		
Included in Campaign Finance Report	\$	20.00
Not included in Campaign Finance Report	\$	554.19
	<b>\$</b>	<b>574.19</b>

**June 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
6/1/2016	\$ 52.13	Reathrey Sekon Phoenix AZ	Not determinable	n/a	No
6/1/2016	\$ 24.65	Lin's Buffet Phoenix AZ	Not determinable	n/a	No
6/2/2016	\$ 80.00	ATM Withdrawal	No	n/a	No
6/6/2016	\$ 18.91	Popeye's #10632 Phoenix AZ	Not determinable	n/a	No
				Submittal of \$5 qualifying contributions	
6/8/2016	\$ 1,415.00	Check #102	Yes		Yes
6/9/2016	\$ 35.00	Overdraft fee	No	n/a	No
6/13/2016	\$ 12.52	Dial Cab CO. Washington DC	No	n/a	No
6/13/2016	\$ 53.00	Cobalt Washington DC	No	n/a	No
6/13/2016	\$ 197.70	Uber	No	n/a	No
6/14/2016	\$ 35.00	Overdraft fee	No	n/a	No
6/14/2016	\$ 35.00	Overdraft fee	No	n/a	No
6/21/2016	\$ 14.97	Cracker Barrel 1780 S Yuma AZ	Yes	Meal expense	Yes
6/21/2016	\$ 23.00	Sam's Club Phoenix AZ	Not determinable	n/a	No
6/22/2016	\$ 439.19	AT&T*Bill Payment	No	n/a	No
6/22/2016	\$ 10.86	Panda Express #153 Goodyear AZ	Not determinable	n/a	No
6/23/2016	\$ 23.50	Love S Country0000 Gila Bend AZ	Not determinable	n/a	No
6/23/2016	\$ 12.41	McDonald's F1373 Washington DC	No	n/a	No
6/24/2016	\$ 25.00	American Air001028 Fort Worth TX	No	n/a	No
6/24/2016	\$ 21.80	Phx Delux Burger N Phoenix AZ	Not determinable	n/a	No
6/24/2016	\$ 28.45	Taxicharge- Washin Washington DC	No	n/a	No
6/24/2016	\$ 10.58	Dial Cab CO. Washington DC	No	n/a	No
6/24/2016	\$ 46.00	El Paso Cafe Arlington VA	No	n/a	No
6/24/2016	\$ 2,699.00	Check #103	Yes	Campaign literature & signs	Yes
6/27/2016	\$ 200.00	Southwest Title Loan	No	n/a	No
6/27/2016	\$ 63.50	ATM Withdrawal	No	n/a	No
6/27/2016	\$ 2.50	ATM fee	No	n/a	No
6/27/2016	\$ 46.00	Cafe Paradiso Washington DC	No	n/a	No
6/27/2016	\$ 12.16	Uber	No	n/a	No
6/27/2016	\$ 12.88	Uber	No	n/a	No
6/27/2016	\$ 25.00	District Kitchen L Washington DC	No	n/a	No
6/27/2016	\$ 8.80	Filiberto's Mexica Buckeye AZ	Yes	Meal expense	Yes
6/28/2016	\$ 25.17	Omni Shoreham Washington DC	No	n/a	No
6/28/2016	\$ 25.01	American Tap Room Arlington VA	No	n/a	No
6/28/2016	\$ 55.00	Sky Harbor Parking Phoenix AZ	No	n/a	No
6/28/2016	\$ 149.64	Omni Shoreham Washington DC	No	n/a	No
6/28/2016	\$ 29.00	Circle K 00225 Gila Bend AZ	Not determinable	n/a	No
6/29/2016	\$ 800.00	Check #104	Yes	VAN	Yes
6/30/2016	\$ 200.00	Check #107	Yes	Canvass	Yes
6/30/2016	\$ 104.96	Lowe's	Yes	Pounder/Wire	Yes
6/30/2016	\$ 30.43	Lowe's	Yes	Pounder	Yes
6/30/2016	\$ 3,374.91	Check #106	Yes	Signs/Lit/Paper	Yes
	<b>\$ 10,478.63</b>	<b>June Withdrawal Total</b>			

June totals from above		
\$ 143.50	ATM Withdrawals	
\$ -	Transfers to personal account	
\$ 1,483.21	Non-Campaign Withdrawals	
\$ 8,648.07	Possible Campaign Withdrawals	
\$ 203.85	Purpose not determinable	
\$ 10,478.63		

Campaign Finance Report Totals		
Included in Campaign Finance Report	\$	8,648.07
Not included in Campaign Finance Report	\$	1,830.56
	\$	10,478.63

#### July 2016

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
7/1/2016	\$ 100.00	Check #108	Not determinable	n/a	No
7/1/2016	\$ 150.00	Check #111	Not determinable	n/a	No
7/5/2016	\$ 7.01	The Home Depot 402 Yuma AZ	Not determinable	n/a	No
7/5/2016	\$ 255.85	Check #105	Yes	Rebar	Yes
7/6/2016	\$ 300.00	Cashed Check #116	Yes	Canvass	Yes
7/7/2016	\$ 29.00	Shell Service Station Gila Bend AZ	Not determinable	n/a	No
7/7/2016	\$ 138.42	Transfer to personal account	No	n/a	No
7/7/2016	\$ 29.41	Lin's Buffet Phoenix AZ	Not determinable	n/a	No
7/7/2016	\$ 100.00	ATM Withdrawal	No	n/a	No
7/7/2016	\$ 200.00	Check #114	Not determinable	n/a	No
7/7/2016	\$ 200.00	Check #112	Not determinable	n/a	No
7/8/2016	\$ 281.72	Frys Food 2626 83Rd Av Phoenix AZ	Not determinable	n/a	No
7/11/2016	\$ 30.88	Marisco's MI Lindo Phoenix AZ	Not determinable	n/a	No
7/11/2016	\$ 23.00	Sam's Club Avondale AZ	Not determinable	n/a	No
7/12/2016	\$ 26.00	Sam's Club Phoenix AZ	Not determinable	n/a	No
7/13/2016	\$ 110.00	Main Event/Mty Air CA	No	n/a	No
7/13/2016	\$ 30.00	Cracker Barrel 1780 S Yuma AZ	Not determinable	n/a	No
7/14/2016	\$ 186.96	Southwest	No	n/a	No
7/14/2016	\$ 15.00	Southwest	No	n/a	No
7/14/2016	\$ 5.47	Taco Bell #23212 Buckeye AZ	Not determinable	n/a	No
7/14/2016	\$ 15.00	Southwest	No	n/a	No
7/14/2016	\$ 24.00	Arco #42258 Ampm Yuma AZ	Yes	Fuel	Yes
7/14/2016	\$ 130.00	Cashed Check #120	Yes	Canvass	Yes
7/14/2016	\$ 852.86	Check #118	Yes	Lawn signs	Yes
7/14/2016	\$ 200.00	Check #115	Yes	Canvass	Yes
7/15/2016	\$ 49.40	Michaels Stores Inc206 Goodyear AZ	Not determinable	n/a	No
7/18/2016	\$ 40.88	Hooters Yuma Yuma AZ	Not determinable	n/a	No
7/18/2016	\$ 24.99	Western Union	No	n/a	No
7/18/2016	\$ 430.87	Hilton Advance Pur Memphis TN	No	n/a	No
7/18/2016	\$ 18.95	Uber	No	n/a	No
7/18/2016	\$ 18.81	Uber	No	n/a	No
7/18/2016	\$ 15.00	Chevron 0307165 Alpine CA	No	n/a	No
7/18/2016	\$ 22.00	Frys Food & Drug 11203 Yuma AZ	Not determinable	n/a	No
7/19/2016	\$ 54.00	Hilton Garden Inn San Diego CA	No	n/a	No
7/19/2016	\$ 86.00	Coaster Saloon San Diego CA	No	n/a	No
7/19/2016	\$ 14.99	Smartfinal499 Phoenix AZ	Not determinable	n/a	No
7/19/2016	\$ 23.50	Circle K 03397 Buckeye AZ	Yes	Fuel	Yes
7/19/2016	\$ 35.00	Transfer to personal account	No	n/a	No
7/19/2016	\$ 190.00	Check #119	Yes	Tradeshelper, Salt River Project	Yes
7/20/2016	\$ 8.20	Sheraton Phoenix P Phoenix AZ	Not determinable	n/a	No
7/20/2016	\$ 29.11	Uber	No	n/a	No
7/21/2016	\$ 35.00	Overdraft Fee	No	n/a	No
7/21/2016	\$ 22.00	Barrio Cafe T43003 Phoenix AZ	Not determinable	n/a	No
7/22/2016	\$ 35.00	Overdraft Fee	No	n/a	No
\$ 4,594.28		July Withdrawal Total			

July totals from above		
\$ 100.00	ATM Withdrawals	
\$ 173.42	Transfers to personal account	
\$ 1,074.69	Non-Campaign Withdrawals	
\$ 1,976.21	Possible Campaign Withdrawals	
\$ 1,269.96	Purpose not determinable	
\$ 4,594.28		

Campaign Finance Report Totals		
Included in Campaign Finance Report	\$	1,976.21
Not included in Campaign Finance Report	\$	2,618.07
	\$	4,594.28

**August 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
8/5/2016	\$ 50.00	Transfer to personal account	No	n/a	No
8/5/2016	\$ 16.50	Sam's Club Avondale AZ	Not determinable	n/a	No
8/8/2016	\$ 57.87	Wal-Mart Super Center Phoenix AZ	Not determinable	n/a	No
8/8/2016	\$ 20.00	Circle K 03397 Buckeye AZ	Not determinable	n/a	No
8/8/2016	\$ 10.93	Little Caesars #32 Buckeye AZ	Not determinable	n/a	No
8/8/2016	\$ 48.57	Target T- 1515 N Litch Goodyear AZ	Not determinable	n/a	No
8/9/2016	\$ 150.00	Venmo 855-812-4430 NY	Not determinable	n/a	No
8/9/2016	\$ 378.84	AT&T*Bill Payment	No	n/a	No
8/17/2016	\$ 200.00	Check	Not determinable	n/a	No
8/22/2016	\$ 13.00	Charlie's Phoenix Phoenix AZ	Not determinable	n/a	No
8/24/2016	\$ 20.00	Loves Cntry St Gila Bend AZ	Not determinable	n/a	No
8/29/2016	\$ 44.54	American Air	No	n/a	No
8/29/2016	\$ 25.00	LA Tasca (King Str Alexandria VA	No	n/a	No
8/29/2016	\$ 18.19	Uber	No	n/a	No
8/30/2016	\$ 12.10	Georgetown Market Arlington VA	No	n/a	No
8/30/2016	\$ 27.00	Sky Harbor Parking Phoenix AZ	No	n/a	No
8/30/2016	\$ 55.00	Pullanos Pizza Glendale AZ	Not determinable	n/a	No
<b>\$ 1,147.54 August Withdrawal Total</b>					

<b>August totals from above</b>	
\$ -	ATM Withdrawals
\$ 50.00	Transfers to personal account
\$ 505.67	Non-Campaign Withdrawals
\$ -	Possible Campaign Withdrawals
\$ 591.87	Purpose not determinable
<b>\$ 1,147.54</b>	

<b>Campaign Finance Report Totals</b>	
Included in Campaign Finance Report	\$ -
Not included in Campaign Finance Report	\$ 1,147.54
	<b>\$ 1,147.54</b>

**September 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
9/7/2016	\$ 300.00	Check #192	Yes	Canvass	Yes
9/7/2016	\$ 300.00	Check #191	Yes	Canvass	Yes
9/8/2016	\$ 10.00	Quiktrip Phoenix AZ	Not determinable	n/a	No
9/12/2016	\$ 28.00	Charlie's Phoenix	Not determinable	n/a	No
9/13/2016	\$ 48.54	Pullanos Pizza Glendale AZ	Not determinable	n/a	No
9/13/2016	\$ 197.10	Tm *Sia	No	n/a	No
9/15/2016	\$ 250.00	Check #198	Not determinable	n/a	No
9/15/2016	\$ 300.00	Check #197	Not determinable	n/a	No
9/19/2016	\$ 11.20	American Air	No	n/a	No
9/19/2016	\$ 75.00	American Air	No	n/a	No
9/19/2016	\$ 36.33	Birrieria Obregon Phoenix AZ	Not determinable	n/a	No
9/19/2016	\$ 142.37	My Ticket Tracker	No	n/a	No
9/20/2016	\$ 21.00	Arco #42533 Ampm Phoenix AZ	Not determinable	n/a	No
9/23/2016	\$ 56.00	Mariscos Altata Phoenix AZ	Not determinable	n/a	No
9/23/2016	\$ 306.50	Centurylink/Speedp	No	n/a	No
9/26/2016	\$ 127.21	Fairfield Inn & Su Phoenix AZ	No	n/a	No
9/26/2016	\$ 8.28	Federicos Buckeye AZ	Not determinable	n/a	No
9/26/2016	\$ 27.00	Circle K 00225 Gila Bend AZ	Not determinable	n/a	No
9/29/2016	\$ 35.00	Arizona List Tucson AZ	Not determinable	n/a	No
9/29/2016	\$ 247.55	4Imprint	Yes	Table runner	Yes
<b>\$ 2,527.08 September Withdrawal Total</b>					

<b>September totals from above</b>	
\$ -	ATM Withdrawals
\$ -	Transfers to personal account
\$ 859.38	Non-Campaign Withdrawals
\$ 847.55	Possible Campaign Withdrawals
\$ 820.15	Purpose not determinable
<b>\$ 2,527.08</b>	

<b>Campaign Finance Report Totals</b>	
Included in Campaign Finance Report	\$ 847.55
Not included in Campaign Finance Report	\$ 1,679.53
	<b>\$ 2,527.08</b>

**October 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
10/11/2016	60.00	Under Review Sport Surprise AZ	Not determinable	n/a	No
10/18/2016	520.08	Marriott San Jose San Jose CA	No	n/a	No
10/19/2016	200.00	Check	Not determinable	n/a	No
10/19/2016	300.00	Check	Not determinable	n/a	No
10/21/2016	35.00	NSF Return Item Fee	No	n/a	No
10/24/2016	22,651.00	Check	Yes	Return of CCEC funds	Yes
10/25/2016	35.00	Overdraft Fee	No	n/a	No
<b>\$ 23,801.08</b>		<b>October Withdrawal Total</b>			

October totals from above	
\$ -	ATM Withdrawals
\$ -	Transfers to personal account
\$ 590.08	Non-Campaign Withdrawals
\$ 22,651.00	Possible Campaign Withdrawals
\$ 560.00	Purpose not determinable
<b>\$ 23,801.08</b>	

Campaign Finance Report Totals	
Included in Campaign Finance Report	\$ 22,651.00
Not included in Campaign Finance Report	\$ 1,150.08
	<b>\$ 23,801.08</b>

**November 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
No withdrawal activity noted					

**December 2016**

Date	Amount	Vendor or Check #	Possible Campaign Purpose	Purpose	On Finance Report?
No withdrawal activity noted					

Total Election Cycle Withdrawals	
\$ 683.50	ATM Withdrawals
\$ 604.42	Transfers to personal account
\$ 4,653.41	Non-Campaign Withdrawals
\$ 34,261.93	Possible Campaign Withdrawals
\$ 3,635.41	Purpose not determinable
<b>\$ 43,838.67</b>	

Campaign Finance Report Totals	
Included in Campaign Finance Report	\$ 34,628.95
Not included in Campaign Finance Report	\$ 9,209.72
	<b>\$ 43,838.67</b>

April 28, 2017

To: Chairman and Members of the Commission  
Citizens Clean Elections Commission

From: Jesus Rubalcava, Participating Candidate  
for State Representative – District No. 4

Re: 2016 Election Cycle Finance Activity Comprehensive Review

Dear Chairman and Members,

I would like to start off by thanking you for the opportunity to participate as a participating candidate in the 2016 Election Cycle. Please acknowledge that I am not by any means challenging the results of the review, nor am I denying any wrong doing. More so, this is acknowledgement that my campaign finances were not effectively run and that my lesson has been learned. Moving forward, should I be given the opportunity, I now know what to do and what not to do. This letter is to explain and clarify some questions you may have in regards to the issues and concerns brought before you.

It is important to know that this was my first time running for such position. I had never had to file full campaign accounts and never had to form a committee for the purpose of running for office. Many things I did not know. For example, I did not know that I needed to set up a petty cash account. I did not know where or how to disclose family members that worked for my campaign. I did not know that I needed to hire legal counsel. I did call the Citizens Clean Elections Commission office twice to ask for 1) what or how much to pay individuals working for the campaign and 2) where to obtain a mileage reimbursement form. I did not receive a concrete answer for either questions, rather was told to attend the CCEC Orientation again. Again, this is not justification or an excuse.

The biggest issue with my campaign was that I used my bank account that linked with my campaign account. For example, I would deposit a check into what I thought was one account and it would end up



in another. Another example, I would use my campaign debit card for a transaction and it would withdraw from my personal account. Because this was so confusing to me, I began to use the filing report with the Secretary of State as my accounting and balance.

I was not able to provide additional documentation other than my bank statements for the following reason. I am a Special Education teacher in the Buckeye Elementary School District. When going through my initial audit, I had all of my campaign documents in my classroom. Over holiday break, I was moved into different classrooms 2 times. During this time, many of my personal belongings and documents were misplaced. I still have not been able to relocate them.

I ask the commission to please consider the reasoning for such flaws in this campaign finance. I accept the report on findings as a way to acknowledge and learn from what was done incorrectly and how to do things the correct way. I am willing to accept the consequences of my wrongdoing and ask that the commission allow me to take corrective actions in order to comply; whether this be repaying back any unaccounted monies and fees set forth by the commission.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read 'JR' followed by a stylized surname.

Jesus A Rubalcava



# EXHIBIT E

May 30, 2017

To: Tom Collins  
Citizens Clean Elections Commission

From: Jesus Rubalcava  
2016 Participating Candidate

RE: Notice of Complaint/Opportunity to Respond

Dear Executive Director Collins & Commission Members:

Thank you for the opportunity to respond to this complaint. Please acknowledge that I am not by any means challenging the results of the review, nor am I denying any wrong doing. More so, this is acknowledgement that my campaign finances were not effectively run and that my lesson has been learned. Moving forward, should I be given the opportunity, I now know what to do and what not to do. This memo is to explain and/or clarify the complaints brought forth.

**Complaint #1.**

I did accept contributions other than the \$5 contributions because it was my understanding that a candidate was allowed to receive early contributions with a limit on the amount a candidate could receive. According to the Citizens Clean Elections Commission and as posted on their website "individuals may contribute up to a maximum of \$160". The following Exhibit A. demonstrates the amounts received and the individuals who contributed.

**Exhibit A.**

Schedule C2 - Individual contributions Covers period 11/25/2014 to 11/8/2016			
Name / Address	Date	Amount	Cycle To Date
Wilson, Sandi 22943 W Durango St, Buckeye, AZ 85326 Manager, Palo Verde Elementary School District 49	12/08/2015	\$5.00	\$5.00
Bacon, Julia 8098 E Theresa Dr, Scottsdale, AZ 85255 Homemaker, Self	02/22/2016	\$100.00	\$100.00
Navarrete, Otoniel PO Box 18611, Phoenix, AZ 85005 Retired, None	02/25/2016	\$100.00	\$100.00
Ogle, Kathe 20418 N 98th Pl, Scottsdale, AZ 85255 homemaker, Homemaker	02/25/2016	\$100.00	\$100.00
Alvarado, M L 3834 W Ocotillo Rd, Phoenix, AZ 85019 Retired, Retired	03/04/2016	\$25.00	\$25.00

**Complaint #2.**

I did contribute \$177.00 of my personal money to the campaign. According to the Citizens Clean Elections Commission and website, it states that " Candidates may contribute his or her personal funds up to a maximum amount of \$740 for candidates for the legislature and \$1,460 for candidates running for a statewide office." Please see Exhibit B.

**Exhibit B.**

Schedule C1 - Personal and family contributions Covers period 11/25/2014 to 11/8/2016

Name / Address	Date	Amount	Cycle To Date
Rubalcava, Jesus A 806 W Margaret St, Gila Bend, AZ 85337 Educator, Palo Verde ESD	12/04/2015	\$100.00	\$177.00
Rubalcava, Jesus A 806 W Margaret St, Gila Bend, AZ 85337 Educator, Palo Verde ESD	08/08/2016	\$77.00	\$177.00

**Complaint #3.**

According to the campaign finance reports submitted to the Secretary of State, I did not exceed the amount of the adjusted primary election spending limit. A copy of the finance reports filed with the Arizona Secretary of State are available for your review: Exhibit C, Exhibit D, Exhibit E, Exhibit G, and Exhibit H.

**Complaint #4.**

According to the campaign finance reports submitted to the Secretary of State, I did not exceed the amount of the adjusted general election spending limit. I did not receive funding for the general election because I was unopposed and learned I was unopposed until late September. The only expenditures were made were for payments made to individuals helping take down

signs after the election or those individuals working on the campaign in the case that I would have General Election opposition. A copy of the finance reports filed with the Arizona Secretary of State are available for your review: Exhibit C, Exhibit D, Exhibit E, Exhibit G, and Exhibit H.

**Complaint #5.**

According to the reports filed with the Arizona Secretary of State, there wasn't any unused monies that were not returned to the Citizens Clean Elections Commission. If I am mistaken, I ask that I be allowed to make the necessary arrangements to pay back whatever amount the commission feels is owed.

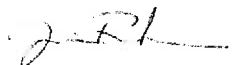
Executive Director Collins and Commission, please know that this was my first time running for such position. I had never had to file full campaign accounts and never had to form a committee for the purpose of running for office. Many things I did not know. For example, I did not know that I needed to set up a petty cash account. I did not know where or how to disclose family members that worked for my campaign. I did not know that I needed to hire legal counsel.

The biggest issue with my campaign was that I used my bank account that linked with my campaign account. For example, I would deposit a check into what I thought was one account and it would end up in another. Another example, I would use my campaign debit card for a transaction and it would withdraw from my personal account. Because this was so confusing to me, I began to use the filing report with the Secretary of State as my accounting and balance.

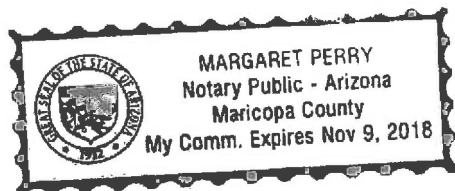
I ask the commission to please consider the reasoning for such flaws in this campaign finance. I accept the report on findings as a way to acknowledge and learn from what was done incorrectly and how to do things the correct way. I am willing to accept the consequences of my wrongdoing and ask that the commission allow me to take corrective actions in order to comply; whether this be repaying back any unaccounted monies and fees set forth by the commission.

Thank you for your time and consideration.

Sincerely,

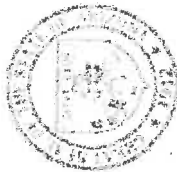


Jesus A Rubalcava



*Margaret Perry*  
Commission expires Nov 9, 2018

# State of Arizona



## Campaign Finance Report

Rubalcava for House  
Committee #: 201600368

Treasurer: Nevarez, Rosa  
PO Box 863, Gila Bend, AZ 85337  
Phone: (602) 295-2102  
Email: [jesusarubalcava@gmail.com](mailto:jesusarubalcava@gmail.com)  
Candidate Name: Rubalcava, Jesus A  
Office Sought: State Representative - District 4

### Amended 2016 Interim Report

Election Cycle: 2016-2016  
Date Filed: May 12, 2016  
Reporting Period: January 1, 2016-January 11, 2016

### Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$127.00
Total Cash Receipts this Reporting Period:	\$10.00
Total Cash Disbursements this Reporting Period:	\$19.10
Cash Balance at End of Reporting Period:	\$117.90

Report ID: 163897



**Summary of Activity**

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	\$0.00		\$0.00	\$100.00
Individual Contributions	C2	\$0.00		\$0.00	\$5.00
Contributions from Political Committees	C3	\$0.00		\$0.00	\$0.00
Business Contributions	C4	\$0.00		\$0.00	\$0.00
Small Contributions	C5	\$0.00		\$0.00	\$60.00
CCEC Funding and Matching	C6	\$0.00		\$0.00	\$0.00
Qualifying Contributions	C7	\$10.00		\$10.00	\$10.00
Loans Made to this Committee	L1	\$0.00		\$0.00	\$0.00
Other Receipts, Including Interest and Dividends	R1	\$0.00		\$0.00	\$0.00
Transfers from Other Committees	T1	\$0.00		\$0.00	\$0.00
Cash Surplus from Previous Committee	S1	\$0.00		\$0.00	\$0.00
<b>Total Income</b>		\$10.00		\$10.00	\$175.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$19.10		\$19.10	\$127.03
Independent Expenditures	E2	\$0.00		\$0.00	\$0.00
Contributions to Other Committees	E3	\$0.00		\$0.00	\$0.00
Other Expenses	E4	\$0.00		\$0.00	\$0.00
Transfers to Other Committees	T1	\$0.00		\$0.00	\$0.00
Loans Made by This Committee	L2	\$0.00		\$0.00	\$0.00
Expenditure of In-Kind Contributions	C8	\$0.00		\$0.00	\$0.00
Disposal of Surplus Cash	S1	\$0.00		\$0.00	\$0.00
<b>Total Expenditures</b>		\$19.10		\$19.10	\$127.03
Bill Payments for Previous Expenditures	D1	\$0.00		\$0.00	\$0.00
<b>Total Cash Disbursed</b>		\$19.10		\$0.00	\$0.00

**Amended Interim Report**  
**Covers 01/01/2016 to 01/11/2016**

**Amended Interim Report**  
**Covers 01/01/2016 to 01/11/2016**

# State of Arizona



## Campaign Finance Report

Rubalcava for House  
Committee #: 201600368

Treasurer: Nevarez, Rosa  
PO Box 863, Gila Bend, AZ 85337  
Phone: (602) 295-2102  
Email: Jesusarubalcava@gmail.com  
Candidate Name: Rubalcava, Jesus A  
Office Sought: State Representative - District 4

### Amended 2016 Primary Recap Report

Election Cycle: 2015-2016  
Date Filed: September 4, 2016  
Reporting Period: August 24, 2016-August 30, 2016

#### Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$2,747.56
Total Cash Receipts this Reporting Period:	\$0.00
Total Cash Disbursements this Reporting Period:	\$2,750.00
Cash Balance at End of Reporting Period:	(\$2.44)

Report ID: 163938

## Summary of Activity

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	\$0.00	\$0.00	\$0.00	\$177.00
Individual Contributions	C2	\$0.00	\$0.00	\$0.00	\$525.00
Contributions from Political Committees	C3	\$0.00	\$0.00	\$0.00	\$0.00
Business Contributions	C4	\$0.00	\$0.00	\$0.00	\$0.00
Small Contributions	C5	\$0.00	\$0.00	\$0.00	\$60.00
CCEC Funding and Matching	C6	\$0.00	\$0.00	\$0.00	\$16,044.00
Qualifying Contributions	C7	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made to this Committee	L1	\$0.00	\$0.00	\$0.00	\$0.00
Other Receipts, including Interest and Dividends	R1	\$0.00	\$0.00	\$0.00	\$0.00
Transfers from Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Cash Surplus from Previous Committee	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Income</b>		\$0.00	\$0.00	\$0.00	\$16,806.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$0.00	\$0.00	\$0.00	\$4,497.09
Independent Expenditures	E2	\$0.00	\$0.00	\$0.00	\$0.00
Contributions to Other Committees	E3	\$0.00	\$0.00	\$0.00	\$0.00
Other Expenses	E4	\$2,750.00	\$0.00	\$2,750.00	\$12,381.28
Transfers to Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made by This Committee	L2	\$0.00	\$0.00	\$0.00	\$0.00
Expenditure of In-Kind Contributions	C8	\$0.00	\$0.00	\$0.00	\$0.00
Disposal of Surplus Cash	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Expenditures</b>		\$2,750.00	\$0.00	\$2,750.00	\$16,878.37
Bill Payments for Previous Expenditures	D1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Cash Disbursed</b>		\$2,750.00	\$0.00	\$2,750.00	\$0.00

# State of Arizona



## Campaign Finance Report

Rubalcava for House  
Committee #: 201600368

Treasurer: Nevarez, Rosa  
PO Box 863, Gila Bend, AZ 85337  
Phone: (602) 295-2102  
Email: [jesusarubalcava@gmail.com](mailto:jesusarubalcava@gmail.com)  
Candidate Name: Rubalcava, Jesus A  
Office Sought: State Representative - District 4

### Amended 2016 June 30th Report

Election Cycle: 2015-2016  
Date Filed: November 1, 2016  
Reporting Period: January 1, 2016-May 31, 2016

### Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$127.00
Total Cash Receipts this Reporting Period:	\$1,935.00
Total Cash Disbursements this Reporting Period:	\$2,089.16
Cash Balance at End of Reporting Period:	(\$27.16)

Report ID: 163894

## Summary of Activity

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	\$0.00	\$0.00	\$0.00	\$100.00
Individual Contributions	C2	\$520.00	\$0.00	\$520.00	\$525.00
Contributions from Political Committees	C3	\$0.00	\$0.00	\$0.00	\$0.00
Business Contributions	C4	\$0.00	\$0.00	\$0.00	\$0.00
Small Contributions	C5	\$0.00	\$0.00	\$0.00	\$50.00
CCEC Funding and Matching	C6	\$0.00	\$0.00	\$0.00	\$0.00
Qualifying Contributions	C7	\$1,415.00	\$0.00	\$1,415.00	\$1,415.00
Loans Made to this Committee	L1	\$0.00	\$0.00	\$0.00	\$0.00
Other Receipts, Including Interest and Dividends	R1	\$0.00	\$0.00	\$0.00	\$0.00
Transfers from Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Cash Surplus from Previous Committee	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Income</b>		<b>\$1,935.00</b>	<b>\$0.00</b>	<b>\$1,935.00</b>	<b>\$2,100.00</b>

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$2,089.16	\$0.00	\$2,089.16	\$2,197.09
Independent Expenditures	E2	\$0.00	\$0.00	\$0.00	\$0.00
Contributions to Other Committees	E3	\$0.00	\$0.00	\$0.00	\$0.00
Other Expenses	E4	\$0.00	\$0.00	\$0.00	\$0.00
Transfers to Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made by This Committee	L2	\$0.00	\$0.00	\$0.00	\$0.00
Expenditure of In-Kind Contributions	C8	\$0.00	\$0.00	\$0.00	\$0.00
Disposal of Surplus Cash	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Expenditures</b>		<b>\$2,089.16</b>	<b>\$0.00</b>	<b>\$2,089.16</b>	<b>\$2,197.09</b>
Bill Payments for Previous Expenditures	D1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Cash Disbursed</b>		<b>\$2,089.16</b>	<b>\$0.00</b>	<b>\$2,089.16</b>	<b>\$2,197.09</b>

# State of Arizona



## Campaign Finance Report

Rubalcava for House  
Committee #: 201600368

Treasurer: Nevarez, Rosa  
PO Box 863, Gila Bend, AZ 85337  
Phone: (602) 295-2102  
Email: [jesusarubalcava@gmail.com](mailto:jesusarubalcava@gmail.com)  
Candidate Name: Rubalcava, Jesus A  
Office Sought: State Representative - District 4

### Amended 2016 Post-Primary Election Report

Election Cycle: 2015-2016  
Date Filed: November 1, 2016  
Reporting Period: August 19, 2016-September 19, 2016

#### Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$2,747.56
Total Cash Receipts this Reporting Period:	\$24,066.00
Total Cash Disbursements this Reporting Period:	\$3,614.50
Cash Balance at End of Reporting Period:	\$23,199.06

Report ID: 163937

## Summary of Activity

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	\$0.00	\$0.00	\$0.00	\$177.00
Individual Contributions	C2	\$0.00	\$0.00	\$0.00	\$525.00
Contributions from Political Committees	C3	\$0.00	\$0.00	\$0.00	\$0.00
Business Contributions	C4	\$0.00	\$0.00	\$0.00	\$0.00
Small Contributions	C5	\$0.00	\$0.00	\$0.00	\$50.00
CCEC Funding and Matching	C6	\$24,066.00	\$0.00	\$24,066.00	\$40,110.00
Qualifying Contributions	C7	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made to this Committee	L1	\$0.00	\$0.00	\$0.00	\$0.00
Other Receipts, Including Interest and Dividends	R1	\$0.00	\$0.00	\$0.00	\$0.00
Transfers from Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Cash Surplus from Previous Committee	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Income</b>		\$24,066.00	\$0.00	\$24,066.00	\$40,872.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$0.00	\$0.00	\$0.00	\$4,497.09
Independent Expenditures	E2	\$0.00	\$0.00	\$0.00	\$0.00
Contributions to Other Committees	E3	\$0.00	\$0.00	\$0.00	\$0.00
Other Expenses	E4	\$3,614.50	\$0.00	\$3,614.50	\$13,245.78
Transfers to Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made by This Committee	L2	\$0.00	\$0.00	\$0.00	\$0.00
Expenditure of In-Kind Contributions	C8	\$0.00	\$0.00	\$0.00	\$0.00
Disposal of Surplus Cash	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Expenditures</b>		\$3,614.50	\$0.00	\$3,614.50	\$17,742.87
Bill Payments for Previous Expenditures	D1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Cash Disbursed</b>		\$3,614.50	\$0.00	\$3,614.50	\$0.00



**Schedule C6 - Clean Elections funding and matching**

<b>Name:</b>	Citizens Clean Election Commission	<b>Date</b>	09/06/2016	<b>Amount</b>		<b>Cycle To Date</b>	\$40,110.00
<b>Address:</b>	1616 W Adams, Suite 110, Phoenix, AZ 85007			\$24,066.00	Cash		
<b>Trans. Type:</b>	CCEC Funding Received						
Total of Funding Received from Clean Elections				\$24,066.00			
Total of Funds Returned to Clean Elections				\$0.00			
Net Total of Funding from Clean Elections				\$24,066.00			

# State of Arizona



## Campaign Finance Report

Rubalcava for House  
Committee #: 201600368

Treasurer: Nevarez, Rosa  
PO Box 863, Gila Bend, AZ 85337  
Phone: (602) 295-2102  
Email: [jesusarubalcava@gmail.com](mailto:jesusarubalcava@gmail.com)  
Candidate Name: Rubalcava, Jesus A  
Office Sought: State Representative - District 4

### Amended 2016 Pre-Primary Election Report

Election Cycle: 2015-2016  
Date Filed: November 2, 2016  
Reporting Period: June 1, 2016-August 18, 2016

#### Summary of Finances

Cash Balance at Beginning of Reporting Period:	(\$27.16)
Total Cash Receipts this Reporting Period:	\$14,706.00
Total Cash Disbursements this Reporting Period:	\$11,931.28
Cash Balance at End of Reporting Period:	\$2,747.56

Report ID: 163936

## Summary of Activity

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	\$77.00	\$0.00	\$77.00	\$177.00
Individual Contributions	C2	\$0.00	\$0.00	\$0.00	\$525.00
Contributions from Political Committees	C3	\$0.00	\$0.00	\$0.00	\$0.00
Business Contributions	C4	\$0.00	\$0.00	\$0.00	\$0.00
Small Contributions	C5	\$0.00	\$0.00	\$0.00	\$60.00
CCEC Funding and Matching	C6	\$16,044.00	\$0.00	\$16,044.00	\$16,044.00
Qualifying Contributions	C7	(\$1,415.00)	\$0.00	(\$1,415.00)	\$0.00
Loans Made to this Committee	L1	\$0.00	\$0.00	\$0.00	\$0.00
Other Receipts, Including Interest and Dividends	R1	\$0.00	\$0.00	\$0.00	\$0.00
Transfers from Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Cash Surplus from Previous Committee	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Income</b>		<b>\$14,706.00</b>	<b>\$0.00</b>	<b>\$14,706.00</b>	<b>\$16,806.00</b>

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$2,300.00	\$0.00	\$2,300.00	\$4,497.09
Independent Expenditures	E2	\$0.00	\$0.00	\$0.00	\$0.00
Contributions to Other Committees	E3	\$0.00	\$0.00	\$0.00	\$0.00
Other Expenses	E4	\$9,631.28	\$0.00	\$9,631.28	\$9,631.28
Transfers to Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made by This Committee	L2	\$0.00	\$0.00	\$0.00	\$0.00
Expenditure of In-Kind Contributions	C8	\$0.00	\$0.00	\$0.00	\$0.00
Disposal of Surplus Cash	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Expenditures</b>		<b>\$11,931.28</b>	<b>\$0.00</b>	<b>\$11,931.28</b>	<b>\$14,128.37</b>
Bill Payments for Previous Expenditures	D1	\$0.00			\$0.00
<b>Total Cash Disbursed</b>		<b>\$11,931.28</b>	<b>\$0.00</b>	<b>\$11,931.28</b>	<b>\$14,128.37</b>

# EXHIBIT F

Doug Ducey  
Governor

Thomas M. Collins  
Executive Director



Steve M. Titla  
Chair

Damien R. Meyer  
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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June 23, 2017

Via E-Mail and Overnight Mail

The Honorable Jesus Rubalcava  
Arizona House of Representatives  
1700 W. Washington  
Phoenix, AZ 85007

806 W. Margaret Street  
Gila Bend, AZ 85337

**Re: Order of Compliance and Deadline to Comply**

Dear Representative Rubalcava:

This letter serves to inform you that the Arizona Citizens Clean Elections commission has determined that there is reason to believe you have committed violations of the Clean Elections Act and Rules.

Pursuant to the Commission's June 22 vote, you are ordered to comply with the Commission's determination (Attachment 1). You are ordered to comply within 14 days. Ariz. Admin Code R2-20-208. During this period, you "may provide any explanation to the Commission, comply with the order, or enter into a public administrative settlement with the Commission." *Id.* Failure to comply can lead to serious consequences, including loss of office, fines and repayment obligations. In order to account for the time to deliver these materials by overnight mail, **the deadline to comply with this order is July 10, 2017.**

As you have been previously informed, neither the Commission nor its staff may provide legal assistance to you, although you should give serious consideration to engaging an attorney.

Sincerely,

A handwritten signature in black ink, appearing to read "Tom Collins", is written over a horizontal line.

Thomas M. Collins  
Executive Director

Attachment

**STATE OF ARIZONA**  
**CITIZENS CLEAN ELECTIONS COMMISSION**  
MUR: No. 17-01 JESUS RUBALCAVA  
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**

Jesus Rubalcava ("Respondent"), a 2016 participating candidate for State Representative of Legislative District 4, was selected for a random primary election audit on September 15, 2016. Based on findings from the random audit (**Exhibit A**), the Commission approved a comprehensive audit and review for Respondent and Respondent's candidate campaign committee on January 19, 2017. On April 28, 2017, the independent auditors, Fester & Chapman P.C., submitted the final comprehensive audit to the Commission (**Exhibit B**).

On May 23, 2017, the Executive Director served Respondent with an internal Complaint regarding the findings of the comprehensive audit and review (**Exhibit C**). The Complaint alleges Respondent may have violated the Clean Elections Act and Rules by: (1) accepting contributions other than individual contributions and \$5 qualifying contributions; (2) making expenditures in excess of the personal money contribution limit; (3) making expenditures in excess of the adjusted primary election spending limit; (4) making expenditures in excess of the adjusted general election spending limit; (5) failing to comply with A.R.S. §16-948 regarding campaign accounts; and (6) failing to comply with A.R.S. §16-953 regarding the return of unused monies to the Citizens Clean Elections Fund. The Complaint also noticed Respondent of potential reporting violations and related penalties.

On May 30, 2017, Respondent submitted a Response to the Complaint (**Exhibit D**).

Because of the audit and Respondent's related admissions noted below, it is clear that numerous violations may have occurred. The failure to document transactions properly, coupled with the usage of funds and dual bank accounts noted in the audits, gives rise to potentially serious violations. An investigation will determine whether there is probable cause to believe a violation has occurred, as well as the scope of the violation.

**II. Alleged Violations**

**A. Exceeding early contribution limit**

Pursuant to A.R.S. §16-941(A)(1), a participating candidate shall not accept any contributions, other than a limited number of five-dollar qualifying and early individual contributions.

The auditors found that Respondent made transfers from a separate bank account to the campaign bank account totaling \$1,869.33 and made additional deposits, whose purpose cannot be determined, into the campaign bank account in the amount of \$3,945.54. Respondent's Amended June 30<sup>th</sup> Report details that Respondent collected \$1,415 in qualifying contributions (**Exhibit E**). Respondent's Amended Qualifying Period Recap Report details that Respondent received \$177 in personal and family contributions, \$525 in early individual contributions, and \$60 in small contributions (**Exhibit F**). The total combined amount of received contributions as reported by Respondent is \$2,177. Respondent deposited into his bank account a total of \$5,814.87 (not including Clean Elections Funding); this is \$3,637.87 more than the total combined qualifying contributions, individual contributions, small contributions, and personal and family contributions Respondent reported on his campaign finance reports.

In his Response, Respondent states he did accept contributions other than the \$5 qualifying contributions, but he received early contributions from individuals and referenced his campaign finance reports as an exhibit. However, the campaign finance reports referenced by Respondent do not match the deposits made in the bank account. Moreover, Respondent does not "disput[e] the outcome of the audit." Clean Elections Commission Meeting, 5/18/2017, Tr. 30:8-11 ("I do acknowledge and I am taking responsibility that there was poor accounting and practices during this campaign cycle.") (**Exhibit G**); *accord* Response at 1 ("Please acknowledge that I am not by any means challenging the results of the review, nor I am denying any wrong doing."). Additionally, Respondent failed to provide sufficient documentation for all campaign activity in his campaign finance reports, pursuant to R2-20-104. As such, the auditors and Commission staff are unable to determine if contributions comply with the limits. A.R.S. § 16-941(A)(1) ("[A] participating candidate. . . [s]hall not accept any contributions, other than a limited number of five-dollar qualifying contributions as specified in section 16-946 and early contributions as specified in section 16-945, except in the emergency situation specified in section 16-954, subsection F.").

For the reasons set forth above, I recommend the Commission find reason to believe a violation may have occurred.

#### **B. Exceeding the limit for expenditures paid with personal monies**

Pursuant to A.R.S. §16-941(A)(2), a participating legislative candidate shall not make expenditures of more than a total of seven hundred and twenty dollars of the candidate's personal monies.

The auditors found that Respondent had made transfers from a separate bank account to the campaign bank account totaling \$1,869.33 and made additional deposits, whose purpose cannot be determined, into the campaign bank account in the amount of \$3,945.54. If Respondent only received \$2,000 from his qualifying contributions, early individual contributions, and small contributions combined, as reported on his campaign finance reports, then Respondent received \$3,814.87 in personal and family contributions. Respondent only reported receiving \$177 in personal and family contributions.

In his Response, Respondent states he contributed \$177 of his personal money to his campaign. However, Respondent failed to provide sufficient documentation for all campaign activity, as required by R2-20-104. Again, Respondent does not “disput[e] the outcome of the audit.” Clean Elections Commission Meeting, 5/18/2017, Tr. 30:8-11 (“I do acknowledge and I am taking responsibility that there was poor accounting and practices during this campaign cycle.”); *accord* Response at 1 (“Please acknowledge that I am not by any means challenging the results of the review, nor I am denying any wrong doing.”). As such, the auditors and Commission staff are unable to determine if use of personal monies is within the limits. A.R.S. § 16-941(A)(2)(“[A] participating candidate. . . shall not make expenditures of more than a total of five hundred dollars of the candidate's personal monies for a candidate for the legislature or more than one thousand dollars for a candidate for statewide office.”).

For the reasons set forth above, I recommend the Commission find reason to believe a violation may have occurred.

### **C. Exceeding general election spending limit**

Pursuant to A.R.S. §§16-941(A)(3) and -941(A)(4), a participating candidate shall not make expenditures exceeding the adjusted primary spending limit (\$16,044) and adjusted general spending limit (\$1,415).

The auditors found that Respondent made a total of \$3,677.16 in expenditures from the campaign bank account during the general election period (August 31, 2016 through November 8, 2016). Respondent's adjusted general election spending limit was \$1,415 since Respondent was not contested in the general election. Respondent made a total of \$2,262.16 in excess expenditures during the general election period.

In his Response, Respondent states that he “did not exceed the amount of the general election spending limit.” He also states that he did not receive general election funding because he was unopposed and learned that he was unopposed in late September. However, Respondent did receive general funding on August 31, 2016 (**Exhibit H**) but it was determined that Respondent would be unopposed in the general election; therefore, the next day on September 1, 2016, Respondent was notified by the Executive Director, through e-mail and overnight delivery, that he would need to return \$22,651 in general election funding and he could only retain the amount of the \$5 qualifying contributions (\$1,415) he submitted to the Secretary of State's Office (**Exhibit I**). Respondent acknowledged the notification the same day but did not return the general election funds until September 28, 2016.

Respondent also provides his campaign finance reports as evidence that he did not exceed the general election spending limit. However, the auditors found that Respondent's campaign finance reports do not accurately reflect the campaign finance activity in the Respondent's campaign bank account. Respondent does not “disput[e] the outcome of the audit.” Clean Elections Commission Meeting, 5/18/2017, Tr. 30:8-11 (“I do acknowledge and I am taking responsibility that there was poor accounting and practices during this campaign cycle.”); *accord* Response at 1 (“Please acknowledge that I am not by any means challenging the results of the review, nor I am denying any wrong doing.”). The auditors found that \$2,829.61 in expenditures



from the campaign bank account during the general election period were not reported on Respondent's campaign finance reports.

The auditors requested supporting documentation for the expenditures but Respondent claimed to have been unable to "locate the box" containing the information. Every Clean Elections candidate has the burden of proving expenditures are made for direct campaign purposes, pursuant to A.A.C. R2-20-104(C). We are unable to determine whether expenditures were for direct campaign purposes and in compliance with the adjusted general spending limit. A.R.S. § 16-941(A)(4)("[A] participating candidate . . . [s]hall not make expenditures in the general election period in excess of the adjusted general election spending limit.").

For the reasons set forth above, I recommend the Commission find reason to believe a violation may have occurred.

**D. Failure to return unused monies to the Commission after the primary and general elections and exceeding the primary election spending limit.**

Pursuant to A.R.S. § 16-941(A)(5), participating candidates must comply with A.R.S. §16-953 stating that at the end of the primary and general elections participating candidates must return monies in the campaign account to the Commission.

The auditors found a transfer from the Respondent's campaign bank account to Respondent's personal account equaling \$604.42. Respondent made \$4,653.41 in non-campaign withdrawals from the campaign bank account. An additional \$3,635.41 was withdrawn and auditors were unable to provide a determinable purpose. Participating candidates must return Clean Elections funding that was not used for direct campaign purposes, as required by R2-20-704(B).

On October 18, 2016, the auditors contacted Respondent regarding a high ending balance on the Primary Recap Report (**Exhibit J**). At that time Respondent should have returned \$7,046.72 in unspent primary election funding based on the timely filing of his Primary Recap Report (**Exhibit K**). On November 1, 2016, Respondent filed amendments to his campaign finance reports. The new ending balance on the Amended Primary Recap Report was -\$2.44 (**Exhibit L**).

The auditors found that Respondent made \$17,501.51 in expenditures from the campaign bank account during the primary election period. Since Respondent could have only potentially deposited \$18,221 into the campaign bank account during the primary period (based upon primary election funding, early contributions, \$5 qualifying contributions, small contributions and personal contributions), Respondent should have returned to the Clean Elections Fund at least \$710.49. This does not take into account the expenditures that were made for personal use and should have also been returned to the fund. Moreover, absent evidence to support the expenditures during the primary, Respondent may have exceeded the primary spending limit he took on himself.

Respondent states that “according to the reports filed with the Arizona Secretary of State, there wasn’t [sic] any unused monies that were not returned to the Citizens Clean Elections Commission.” And that because his personal bank account and campaign account were linked, he “began to use the filing report with the Secretary of State as [his] accounting and balance.” However, Respondent amended his reports several months after the transactions had taken place so it is improbable that he was able to utilize the Secretary of State’s campaign finance reporting system to keep track of his campaign finance activity. Confirming this, Respondent does not “disput[e] the outcome of the audit.” Clean Elections Commission Meeting, 5/18/2017, Tr. 30:8-11 (“I do acknowledge and I am taking responsibility that there was poor accounting and practices during this campaign cycle.”); *accord* Response at 1 (“Please acknowledge that I am not by any means challenging the results of the review, nor I am denying any wrong doing.”).

For the reasons set forth above, I recommend the Commission find reason to believe a violation may have occurred. A.R.S. § 16-941(A)(3) (“[A] [participating candidate. . . [s]hall not make expenditures in the primary election period in excess of the adjusted primary election spending limit.”); § 16-941(A)(5)([A] participating candidate. . . [s]hall comply with section . . . section 16-953 regarding returning unused monies to the citizens clean elections fund described in this article.”).

#### **E. Failure to conduct campaign activity through a single bank account**

Pursuant to A.R.S. § 16-941(A)(5), participating candidates must comply with A.R.S. § 16-948 stating that all financial campaign activity must be conducted through a single campaign account and a participating candidate shall not make any deposits into the campaign bank account other than early and qualifying contributions. A.R.S. § 16-948(C) and R2-20-114(A) require candidates who establish a petty cash account to adhere to an aggregate limit of \$1,420 and each expenditure may not exceed \$160. Participating candidates utilizing petty cash accounts must include additional, detailed information on their campaign finance reports, as required by A.A.C. R2-20-115.

On June 15, 2016, Respondent physically received his check for the primary election. Bank records show that \$16,044 was deposited into a personal bank account and \$13,280.22 was transferred from Respondent’s personal bank account to a campaign bank account on June 17, 2016. The difference of \$2,763.78 was not transferred to the campaign account. The auditors noted transfers from a separate bank account to the campaign account equaling \$1,869.33 and other deposits with undeterminable purposes equating to \$3,945.54. The deposits cannot be verified due to Respondent’s failure to provide supporting documentation.

Respondent neglected to establish a petty cash account and provide detailed information on campaign finance reports. The auditors found ATM withdrawals totaling \$683.50 that Respondent failed to document on his campaign finance reports. The withdrawals cannot be verified due to the lack of supporting documentation. Respondent does not “disput[e] the outcome of the audit.” Clean Elections Commission Meeting, 5/18/2017, Tr. 30:8-11 (“I do acknowledge and I am taking responsibility that there was poor accounting and practices during this campaign cycle.”); *accord* Response at 1 (“Please acknowledge that I am not by any means challenging the results of the review, nor I am denying any wrong doing.”).

For the reasons set forth above, I recommend the Commission find reason to believe a violation may have occurred. A.R.S. § 16-941(A)(5) ([A] participating candidate . . . [s]hall comply with section 16-948 regarding campaign accounts. . . .”).

#### **F. Failure to report expenditures and receipts**

Pursuant to A.R.S. § 16-941, participating candidates shall comply with A.R.S. § 16-948 stating that candidates are required to report expenditures made directly from their campaign bank account, as required by A.R.S. § 16-948(C). Information to be provided on the campaign finance reports includes recipient’s full name, address, nature of good and services, and compensation. A.A.C. R2-20-703 requires candidates to report all receipts and disbursements from the campaign account similarly. In addition, A.A.C. R2-20-115 contends that participating candidates maintain books and records of financial transactions in a single location, and such records be accessible upon request.

The auditors found that Respondent failed to report an aggregate of \$9,209.72 in expenditures and \$4,852.55 in deposits on his campaign finance reports. It could not be determined if an additional \$1,362.32 was reported because of insufficient records.

Respondent states that out of confusion he “began to use the filing report with the Secretary of State as [his] accounting and balance.” As required by A.A.C. R2-20-110, participating candidates’ campaign finance reports are to include all receipts and disbursements for their current campaign account. However, Respondent does not “disput[e] the outcome of the audit.” Clean Elections Commission Meeting, 5/18/2017, Tr. 30:8-11 (“I do acknowledge and I am taking responsibility that there was poor accounting and practices during this campaign cycle.”); *accord* Response at 1 (“Please acknowledge that I am not by any means challenging the results of the review, nor I am denying any wrong doing.”). The comprehensive audit revealed several expenditures were made and not reported. Respondent made reference to his campaign finance reports submitted to the Secretary of State as proof against allegations of excess spending, but information in reports is recorded by the candidate and numerous expenditures and deposits were never documented by Respondent.

For the reasons set forth above, I recommend the Commission find reason to believe a violation may have occurred. A.R.S. § 16-942(B); Ariz. Admin. Code R2-20-109 (2016).

#### **G. Failure to utilize Clean Elections funding for direct campaign expenditures**

Pursuant to A.R.S. §16-941, participating candidates shall comply with A.R.S. §16-948 stating that Clean Elections funding must be utilized only for direct campaign expenditures. Additionally, A.A.C. R2-20-702(C) prohibits participating candidates from using funds within the candidate’s campaign account for personal use.

Auditors noted that Respondent transferred \$604.42 from his campaign bank account to Respondent’s personal account. Respondent made \$4,653.41 in non-campaign withdrawals from the campaign bank account. An additional \$3,635.41 was withdrawn and auditors were unable to provide a determinable purpose. Non-campaign withdrawals are exemplified by, but not limited

to, Respondent's expenditures for: airline fees, hotel fees in the states of Tennessee, California, and the District of Columbia, and AT&T bill payments.

However, Respondent failed to provide sufficient documentation for all campaign activity including possible direct campaign expenditures, as required by R2-20-104. . Respondent does not "disput[e] the outcome of the audit." Clean Elections Commission Meeting, 5/18/2017, Tr. 30:8-11 ("I do acknowledge and I am taking responsibility that there was poor accounting and practices during this campaign cycle."); *accord* Response at 1 ("Please acknowledge that I am not by any means challenging the results of the review, nor I am denying any wrong doing."). As such, the auditors and Commission staff are unable to determine if any of the expenditures were for direct campaign purposes as required by A.R.S. §§16-941 and -948, A.A.C. R2-20-104 and R2-20-702(C) .

For the reasons set forth above, I recommend the Commission find reason to believe a violation may have occurred. *See* A.R.S. § 16-941(A).

### **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 further audits. I request that the Commission authorize such subpoenas now to allow the investigation to proceed in due course.

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), including removal from office. A.A.C. R2-20-217. The Commission may order the repayment of funds expended in violation of A.A.C. R2-20-702. A.A.C. R2-20-704(B).

Dated this 19<sup>th</sup> day of June, 2017  
Thomas M. Collins, Executive Director

# EXHIBIT G

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STATE OF ARIZONA  
CITIZENS CLEAN ELECTIONS COMMISSION

In the Matter of:

Jesus Rubalcava, Respondent

MUR No. 17-01

**Repayment Order**

Pursuant to its authority under ARS § 16-956(A)(7) "to ensure that money from the fund is placed in candidate campaign accounts or otherwise spent as specified in this article and not otherwise," and Ariz. Admin. Code §§ R2-20-702, R2-20-703 and R2-20-704, the Citizens Clean Elections Commission (the "Commission"), hereby orders Jesus Rubalcava ("Respondent"), a participating candidate for Legislature in 2016, to repay the amount of \$17,459. This order is effective upon approval of the Commission and is based on the following legal and factual reasons:

- A. Respondent received \$17,459 for his campaign in 2016, including \$16,044 for the primary election and an additional \$1,415 for the general election.
- B. Respondent was subject to a random audit that found he could not provide documentation for the transactions selected for audit. Exhibit 1, Random Audit Report.
- C. The Commission ordered a Comprehensive Audit and Review of all of Respondent's campaign finance activities in the 2016 election.
- D. Respondent provided no documentation of direct campaign expenditures to the auditors during the Comprehensive Audit and Review for the 2016 election. Exhibit 2, Comprehensive Audit and Review of 2016 Election Campaign Finances.

1 E. Respondent stated that "I accept the report on findings as a way to acknowledge and  
2 learn from what was done incorrectly and how to do things the correct way. I am willing  
3 to accept the consequences of my wrongdoing and ask that the commission allow me  
4 to take corrective actions in order to comply; whether this be repaying back any  
5 unaccounted monies and fees set forth by the commission." *Id.* Additionally,  
6 Respondent told the Commission he did not "disput[e] the outcome of the audit." Clean  
7 Elections Commission Meeting, 5/18/2017, Tr.30:8-11 ("I do acknowledge and I am  
8 taking responsibility that there was poor accounting and practices during this campaign  
9 cycle.").

10 F. The Commission found reason to believe a violation of §§ R2-20-702 and R2-20-703  
11 may have occurred. Exhibit 3.

12 G. An Order of Compliance was served on Respondent, June 23, 2017. He has taken no  
13 action in response.

14 H. Candidates bear the burden of showing that expenditures of Clean Elections Funding  
15 are for direct campaign purposes. Ariz. Admin. Code §§ R2-20-702, R2-20-703.

16 I. Respondent agreed to these conditions in his sworn application for certification. Exhibit  
17 4.

18 J. Respondent has not met his burden because he has failed to provide to documentation  
19 and because he admitted he will provide repayment as ordered.

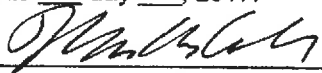
20 WHEREFORE, the Commission enters the following orders in addition to any other action regarding  
21 this matter:

- 22 1. The Commission has jurisdiction over Respondent pursuant to A.R.S. § 16-956(A)(7)  
23 and the Arizona Administrative Code.
- 24 2. The Commission orders Respondent to repay \$17,459 within thirty (30) days or the  
25 date of this order.  
26

3. All payments shall be made from Respondent's personal funds by check or money order payable to the Citizens Clean Elections Fund and delivered to the Citizens Clean Elections Commission, 1616 West Adams, Suite 110, Phoenix, Arizona, 85007.
4. Interest shall accrue and becomes immediately payable on any amount that remains unpaid thirty days after the date of this Order. Interest shall accrue at the statutory rate of ten percent (10%) pursuant to A.R.S. § 44-1201(A).
5. This Order constitutes a fine, penalty, or forfeiture payable to and for the benefit of a governmental unit, and not compensation for actual pecuniary loss; and pursuant to 11 USC § 523 such obligations are not subject to discharge in bankruptcy.
6. In the event legal action is necessary to enforce collection hereunder, Respondent shall additionally pay all costs and expenses of collection, including without limitation, reasonable attorneys' fees in an amount equal to thirty-five percent (35%) of monies recovered.
7. In the event that any paragraph or provision of this Order shall be ruled unenforceable, all other provisions hereof shall be unaffected thereby.
8. This Order does not prevent the Commission from seeking additional penalties and repayments from Respondent.
9. This Order does not affect or impair any investigatory activities undertaken by the Commission staff pursuant to prior Commission authorizations in this matter.
10. No delay, omission or failure by the Commission to exercise any right or power hereunder shall be construed to be a waiver or consent of any breach of any of the terms of this Order by the Respondent.
11. The Commission authorizes the Executive Director to sign this order making it effective upon the Executive Director's signature.
12. If Respondent disputes the Commission repayment determination, he may request an administrative appeal of the determination in accordance with A.R.S. § 41-1092, et. seq., Ariz. Admin. Code § R2-20-704(C)(2).



Dated this 22 day of August, 2017.

By:   
Thomas M. Collins, Executive Director  
Citizens Clean Elections Commission

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# EXHIBIT H

## Thomas Collins

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**From:** Thomas Collins  
**Sent:** Wednesday, November 01, 2017 6:37 PM  
**To:** Thomas Collins  
**Subject:** FW: Subpoena time extension offer (time sensitive)  
**Attachments:** Rubalcava Income Expense 1.pdf; Rubalcava Income Expense 2.pdf; Rubalcava Income Expense 3.pdf; Rubalcava PayPal.PDF; Rubalcava ASBA Travel Claim 1.pdf; Rubalcava ASBA Travel Claim 2.pdf; NSBA Travel Claim 1.pdf; NSBA Travel Claim 2.pdf; NSBA Travel Claim 3.pdf; NSBA Travel Claim 4.pdf

**From:** Jesus Rubalcava [<mailto:jesusarubalcava@gmail.com>]  
**Sent:** Thursday, September 14, 2017 12:32 PM  
**To:** Thomas Collins  
**Subject:** Re: Subpoena time extension offer (time sensitive)

Please find the attachments for the following items. If there isn't anything for the item, it's because i was not able to locate it or because it doesn't exist (such as reimbursements for Gila Bend USD).

On Fri, Sep 1, 2017 at 12:07 PM, Thomas Collins <[Thomas.Collins@azcleanelections.gov](mailto:Thomas.Collins@azcleanelections.gov)> wrote:  
Mr. Rubalcava:

Pursuant to Ariz. Admin. Code R2-20-213(C), I am offering you a two (2) week extension from the deadline set in the subpoena to respond to the subpoena that has been issued to you.

That would extend the time to 4 pm on September 14, 2017.

This offer does not relieve you of your obligations and you remain subject to the subpoena.

If you accept this extension please notify me in writing by replying to this email no later than 5PM Tuesday, September 5, 2017. If you do not accept by that time, the offer to extend time will expire.

Sincerely,  
Tom Collins  
Executive Director  
Arizona Citizens Clean Elections Commission  
[602-364-3477](tel:602-364-3477)  
[thomas.collins@azcleanelections.gov](mailto:thomas.collins@azcleanelections.gov)

# EXHIBIT I

# State of Arizona



## Campaign Finance Report

Rubalcava for House  
Committee #: 201600368

Treasurer: Nevarez, Rosa  
PO Box 863, Gila Bend, AZ 85337  
Phone: (602) 295-2102  
Email: [jesusarubalcava@gmail.com](mailto:jesusarubalcava@gmail.com)  
Candidate Name: Rubalcava, Jesus A  
Office Sought: State Representative - District 4

### Amended 2016 June 30th Report

Election Cycle: 2015-2016  
Date Filed: November 1, 2016  
Reporting Period: January 1, 2016-May 31, 2016

### Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$127.00
Total Cash Receipts this Reporting Period:	\$1,935.00
Total Cash Disbursements this Reporting Period:	\$2,089.16
Cash Balance at End of Reporting Period:	(\$27.16)

Report ID: 163894

## Summary of Activity

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	\$0.00	\$0.00	\$0.00	\$100.00
Individual Contributions	C2	\$520.00		\$520.00	\$525.00
Contributions from Political Committees	C3	\$0.00		\$0.00	\$0.00
Business Contributions	C4	\$0.00		\$0.00	\$0.00
Small Contributions	C5	\$0.00		\$0.00	\$60.00
CCEC Funding and Matching	C6	\$0.00		\$0.00	\$0.00
Qualifying Contributions	C7	\$1,415.00		\$1,415.00	\$1,415.00
Loans Made to this Committee	L1	\$0.00		\$0.00	\$0.00
Other Receipts, including Interest and Dividends	R1	\$0.00		\$0.00	\$0.00
Transfers from Other Committees	T1	\$0.00		\$0.00	\$0.00
Cash Surplus from Previous Committee	S1	\$0.00		\$0.00	\$0.00
<b>Total Income</b>		\$1,935.00	\$0.00	\$1,935.00	\$2,100.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$2,089.16	\$0.00	\$2,089.16	\$2,197.09
Independent Expenditures	E2	\$0.00		\$0.00	\$0.00
Contributions to Other Committees	E3	\$0.00		\$0.00	\$0.00
Other Expenses	E4	\$0.00		\$0.00	\$0.00
Transfers to Other Committees	T1	\$0.00		\$0.00	\$0.00
Loans Made by This Committee	L2	\$0.00		\$0.00	\$0.00
Expenditure of In-Kind Contributions	C8	\$0.00		\$0.00	\$0.00
Disposal of Surplus Cash	S1	\$0.00		\$0.00	\$0.00
<b>Total Expenditures</b>		\$2,089.16	\$0.00	\$2,089.16	\$2,197.09
Bill Payments for Previous Expenditures	D1	\$0.00		\$0.00	\$0.00
<b>Total Cash Disbursed</b>		\$2,089.16		\$2,089.16	\$0.00

**Schedule C2 - Individual contributions**

			Date	Amount	Cycle To Date
<b>Name:</b>	Bacon, Julia		02/22/2016	\$100.00 Cash	\$100.00
<b>Address:</b>	8098 E Theresa Dr, Scottsdale, AZ 85255				
<b>Occupation:</b>	Homemaker, Self				
<b>Memo:</b>	PayPal				
<b>Name:</b>	Navarrete, Otoniel		02/25/2016	\$100.00 Cash	\$100.00
<b>Address:</b>	PO Box 18611, Phoenix, AZ 85005				
<b>Occupation:</b>	Retired, None				
<b>Memo:</b>	PayPal				
<b>Name:</b>	Ogle, Kathe		02/25/2016	\$100.00 Cash	\$100.00
<b>Address:</b>	20418 N 98th Pl, Scottsdale, AZ 85255				
<b>Occupation:</b>	homemaker, Homemaker				
<b>Name:</b>	Alvarado, M L		03/04/2016	\$25.00 Cash	\$25.00
<b>Address:</b>	3834 W Ocotillo Rd, Phoenix, AZ 85019				
<b>Occupation:</b>	Retired, Retired				
<b>Name:</b>	Lucero, Joanna		03/17/2016	\$20.00 Cash	\$20.00
<b>Address:</b>	2301 N 40th Dr, Phoenix, AZ 85009				
<b>Occupation:</b>	Office Manager, Non-Profit				
<b>Name:</b>	Knecht, Kathy		03/20/2016	\$100.00 Cash	\$100.00
<b>Address:</b>	6727 W Corrine Dr, Peoria, AZ 85381				
<b>Occupation:</b>	student, studen				
<b>Name:</b>	Otondo, Lisa		05/11/2016	\$75.00 Cash	\$75.00
<b>Address:</b>	1037 S 8th Ave, Yuma, AZ 85364				
<b>Occupation:</b>	State Rep, State of AZ				
Total of Individual Contributions				\$520.00	
Total of Refunds Given				\$0.00	
Net Total of Individual Contributions				\$520.00	

**Schedule C7 - Qualifying contributions**

Name: Address:		Date	Amount	Cycle To Date
Sanchez, Teresa		01/01/2016	\$5.00 Cash	\$5.00
Gonzalez, Armida		01/04/2016	\$5.00 Cash	\$5.00
Fusco, Anthony D Jr.		01/12/2016	\$5.00 Cash	\$5.00
Harris, Louis W		01/12/2016	\$5.00 Cash	\$5.00
Peten, Geraldine		01/12/2016	\$5.00 Cash	\$5.00
Peters, Karen		01/12/2016	\$5.00 Cash	\$5.00
Stromberg, Ingrid S		01/12/2016	\$5.00 Cash	\$5.00
Weston Salsman, Mary		01/12/2016	\$5.00 Cash	\$5.00
Taylor, Patrick		01/13/2016	\$5.00 Cash	\$5.00
Nelson, Daniel		01/14/2016	\$5.00 Cash	\$5.00
Nelson, Theresa		01/14/2016	\$5.00 Cash	\$5.00
Orozco, Brandon		01/18/2016	\$5.00 Cash	\$5.00
Orozco, Jennifer		01/18/2016	\$5.00 Cash	\$5.00
Orozco, Kaylen		01/18/2016	\$5.00 Cash	\$5.00
Jennings, Edward Jr		01/29/2016	\$5.00 Cash	\$5.00
Jennings, Edward Sr		01/29/2016	\$5.00 Cash	\$5.00
Muse, LaGina		01/29/2016	\$5.00 Cash	\$5.00
Trexler, Marilyn		01/29/2016	\$5.00 Cash	\$5.00
Marquez, Ana L		01/30/2016	\$5.00 Cash	\$5.00



**Schedule C7 - Qualifying contributions**

Name: Address:	Date	Amount	Cycle To Date
Amezcu, Abraham	02/01/2016	\$5.00 Cash	\$5.00
Name: Address:			
Amezcu, Edgar R	02/01/2016	\$5.00 Cash	\$5.00
Name: Address:			
Amezcu, Erika	02/01/2016	\$5.00 Cash	\$5.00
Name: Address:			
Bhakta, Natvarbhai M	02/01/2016	\$5.00 Cash	\$5.00
Name: Address:			
Birchfield, Glen	02/01/2016	\$5.00 Cash	\$5.00
Name: Address:			
Davis, Gina	02/01/2016	\$5.00 Cash	\$5.00
Name: Address:			
Davis, Laura	02/01/2016	\$5.00 Cash	\$5.00
Name: Address:			
Ortiz, Ruvi	02/01/2016	\$5.00 Cash	\$5.00
Name: Address:			
Poqui, Luz A	02/01/2016	\$5.00 Cash	\$5.00
Name: Address:			
Rodriguez, Manuela	02/01/2016	\$5.00 Cash	\$5.00
Name: Address:			
Smith, Elizabeth	02/01/2016	\$5.00 Cash	\$5.00
Name: Address:			
Conner, Marcia M	02/03/2016	\$5.00 Cash	\$5.00
Name: Address:			
Stanberry, Jody	02/03/2016	\$5.00 Cash	\$5.00
Name: Address:			
Carpenter, Earl	02/08/2016	\$5.00 Cash	\$5.00
Name: Address:			
Carpenter, Shirley	02/08/2016	\$5.00 Cash	\$5.00
Name: Address:			
Birchfield, Dayle G	02/09/2016	\$5.00 Cash	\$5.00
Name: Address:			
Nevarez, Pedro B	02/09/2016	\$5.00 Cash	\$5.00
Name: Address:			
Nevarez, Rosa I	02/09/2016	\$5.00 Cash	\$5.00
Name: Address:			
Raygoza, Gladis G	02/09/2016	\$5.00 Cash	\$5.00
Name: Address:			

**Schedule C7 - Qualifying contributions**

Name: Address:		Date	Amount	Cycle To Date
Sly, Agustina		02/10/2016	\$5.00 Cash	\$5.00
Stanberry, Justin		02/10/2016	\$5.00 Cash	\$5.00
Cavanaugh, Kelly		02/11/2016	\$5.00 Cash	\$5.00
Neal, James E		02/11/2016	\$5.00 Cash	\$5.00
Neal, Janie		02/11/2016	\$5.00 Cash	\$5.00
Amezcuca, Valerie		02/13/2016	\$5.00 Cash	\$5.00
Carpenter, Joanne		02/13/2016	\$5.00 Cash	\$5.00
Carpenter, Joshua		02/13/2016	\$5.00 Cash	\$5.00
Figueroa, Jose		02/13/2016	\$5.00 Cash	\$5.00
Gonzalez, Jose R		02/13/2016	\$5.00 Cash	\$5.00
Hecht, Christina		02/13/2016	\$5.00 Cash	\$5.00
Hipp, Mike		02/13/2016	\$5.00 Cash	\$5.00
Knutson, Elizabeth		02/13/2016	\$5.00 Cash	\$5.00
Lopez, Maria		02/13/2016	\$5.00 Cash	\$10.00
Loter, Tammy		02/13/2016	\$5.00 Cash	\$5.00
Osequeda, Cynthia		02/13/2016	\$5.00 Cash	\$5.00
Ruiz Melendrez, Fabiola		02/13/2016	\$5.00 Cash	\$5.00
Sanchez, Ericka		02/13/2016	\$5.00 Cash	\$5.00
Sanchez, Melissa		02/13/2016	\$5.00 Cash	\$5.00

**Schedule C7 - Qualifying contributions**

Name: Address:		Date	Amount	Cycle To Date
Taylor, Wanda M		02/13/2016	\$5.00 Cash	\$5.00
Villegas, Felipe		02/13/2016	\$5.00 Cash	\$5.00
Villegas, Josefina		02/13/2016	\$5.00 Cash	\$5.00
Villegas, Victor		02/13/2016	\$5.00 Cash	\$5.00
Dupree, Mattie L		02/15/2016	\$5.00 Cash	\$5.00
Lanford, Terry		02/15/2016	\$5.00 Cash	\$5.00
Basaldua, Rudy		02/16/2016	\$5.00 Cash	\$5.00
Celaya, Angelo		02/16/2016	\$5.00 Cash	\$5.00
Cipriano, Willalee		02/16/2016	\$5.00 Cash	\$5.00
Dempsey, Diane		02/16/2016	\$5.00 Cash	\$5.00
Dempsey, Terry		02/16/2016	\$5.00 Cash	\$5.00
Diaz, Augustine		02/16/2016	\$5.00 Cash	\$5.00
Laborin, Albert		02/16/2016	\$5.00 Cash	\$5.00
Manuel, Mary		02/16/2016	\$5.00 Cash	\$5.00
Mattia, Wilbert		02/16/2016	\$5.00 Cash	\$5.00
Miguel, Claret		02/16/2016	\$5.00 Cash	\$5.00
Ortega, Ida		02/16/2016	\$5.00 Cash	\$5.00
Ortiz, Edith		02/16/2016	\$5.00 Cash	\$5.00
Osequeda, Ramona		02/16/2016	\$5.00 Cash	\$5.00

**Schedule C7 - Qualifying contributions**

Name: Address:		Date	Amount	Cycle To Date
Rizo, Andrea		02/16/2016	\$5.00 Cash	\$5.00
Sandoval, Lina		02/16/2016	\$5.00 Cash	\$5.00
Sandoval, Martin		02/16/2016	\$5.00 Cash	\$5.00
Sandoval, Revi		02/16/2016	\$5.00 Cash	\$5.00
Estrella, Paula N		02/17/2016	\$5.00 Cash	\$5.00
Hopkins, Richard		02/17/2016	\$5.00 Cash	\$5.00
Manuel, Bonnie		02/17/2016	\$5.00 Cash	\$5.00
Moreno, Jamie		02/17/2016	\$5.00 Cash	\$5.00
Moreno, Lorraine		02/17/2016	\$5.00 Cash	\$5.00
Moreno, Rosanne		02/17/2016	\$5.00 Cash	\$5.00
Moreno, Rudy V		02/17/2016	\$5.00 Cash	\$5.00
Ortega, Raymond Jr		02/17/2016	\$5.00 Cash	\$5.00
Ortiz, Shiane		02/17/2016	\$5.00 Cash	\$5.00
Osequeda, Alvina		02/17/2016	\$5.00 Cash	\$5.00
Osequeda, Guadalupe		02/17/2016	\$5.00 Cash	\$5.00
Osequeda, Isidro		02/17/2016	\$5.00 Cash	\$5.00
Osequeda, Mary		02/17/2016	\$5.00 Cash	\$5.00
Pilone, Delberta		02/17/2016	\$5.00 Cash	\$5.00
Pilone, Sharee		02/17/2016	\$5.00 Cash	\$5.00

**Schedule C7 - Qualifying contributions**

Name: Address:		Date	Amount	Cycle To Date
Ramirez, Eileen		02/17/2016	\$5.00 Cash	\$5.00
Name: Address:				
Ramirez, Irene		02/17/2016	\$5.00 Cash	\$5.00
Name: Address:				
Salsman, Rick		02/17/2016	\$5.00 Cash	\$5.00
Name: Address:				
Turner, Kristin		02/17/2016	\$5.00 Cash	\$5.00
Name: Address:				
Allaman, Kristopher Lee		02/18/2016	\$5.00 Cash	\$5.00
Name: Address:				
Cipriano, Arlinda		02/18/2016	\$5.00 Cash	\$5.00
Name: Address:				
Cipriano, Linda		02/18/2016	\$5.00 Cash	\$5.00
Name: Address:				
Burbage, Gloria		02/19/2016	\$5.00 Cash	\$5.00
Name: Address:				
Burbage, Manning Edward		02/19/2016	\$5.00 Cash	\$5.00
Name: Address:				
Gonzalez, Maria		02/19/2016	\$5.00 Cash	\$5.00
Name: Address:				
Mendoza, Clarence		02/19/2016	\$5.00 Cash	\$5.00
Name: Address:				
Mendoza, Maria		02/19/2016	\$5.00 Cash	\$5.00
Name: Address:				
Ramirez, Fernando		02/19/2016	\$5.00 Cash	\$5.00
Name: Address:				
Riggs, Christopher S		02/19/2016	\$5.00 Cash	\$5.00
Name: Address:				
Riggs, Patricia		02/19/2016	\$5.00 Cash	\$5.00
Name: Address:				
Sandoval, Bonnie		02/19/2016	\$5.00 Cash	\$5.00
Name: Address:				
Vasquez, Gilbert V		02/19/2016	\$5.00 Cash	\$5.00
Name: Address:				
Garcia, Irma Y		02/21/2016	\$5.00 Cash	\$5.00
Name: Address:				
Gomez, Maria		02/21/2016	\$5.00 Cash	\$5.00
Name: Address:				

**Schedule C7 - Qualifying contributions**

Name: Address:		Date	Amount	Cycle To Date
Miller, Daniel		02/21/2016	\$5.00 Cash	\$5.00
Name: Address:				
Ramos, Maritza		02/22/2016	\$5.00 Cash	\$5.00
Name: Address:				
Aguirre, Theresa		02/25/2016	\$5.00 Cash	\$5.00
Name: Address:				
Flores, Roger M		02/25/2016	\$5.00 Cash	\$5.00
Name: Address:				
Baker, Lori		02/26/2016	\$5.00 Cash	\$5.00
Name: Address:				
Burkhardt, Lori		02/26/2016	\$5.00 Cash	\$5.00
Name: Address:				
Coronado, Graciela Y		02/26/2016	\$5.00 Cash	\$5.00
Name: Address:				
Gray, Andrea R		02/26/2016	\$5.00 Cash	\$5.00
Name: Address:				
Leon, Ana		02/26/2016	\$5.00 Cash	\$5.00
Name: Address:				
Ochoa, Jose		02/26/2016	\$5.00 Cash	\$5.00
Name: Address:				
Ochoa, Ruth C		02/26/2016	\$5.00 Cash	\$5.00
Name: Address:				
Quintero, Magda V		02/26/2016	\$5.00 Cash	\$5.00
Name: Address:				
Rodriguez, Maria S		02/26/2016	\$5.00 Cash	\$5.00
Name: Address:				
Sessums, Vivien		02/26/2016	\$5.00 Cash	\$5.00
Name: Address:				
Turner, Yovana		02/26/2016	\$5.00 Cash	\$5.00
Name: Address:				
Villegas, Petronilo		02/26/2016	\$5.00 Cash	\$5.00
Name: Address:				
Villegas, Sylvia		02/26/2016	\$5.00 Cash	\$5.00
Name: Address:				
Stout, Edward A		02/28/2016	\$5.00 Cash	\$5.00
Name: Address:				
Stout, Zachary A		02/28/2016	\$5.00 Cash	\$5.00
Name: Address:				

**Schedule C7 - Qualifying contributions**

Name: Address:		Date	Amount	Cycle To Date
Halcomb, Jennifer		02/29/2016	\$5.00 Cash	\$5.00
Lopez, Lizbet A		02/29/2016	\$5.00 Cash	\$5.00
Marquez, Robert		02/29/2016	\$5.00 Cash	\$5.00
Navarro, Hector		02/29/2016	\$5.00 Cash	\$5.00
Navarro, Viviana		02/29/2016	\$5.00 Cash	\$5.00
Rodriguez Villegas, Benito		02/29/2016	\$5.00 Cash	\$5.00
Stout, Rhonda M		02/29/2016	\$5.00 Cash	\$5.00
Barcenas, Nanci		03/01/2016	\$5.00 Cash	\$5.00
Artea, Sylvia		03/02/2016	\$5.00 Cash	\$5.00
Cleto, Araceli		03/02/2016	\$5.00 Cash	\$5.00
Gonzalez, Maria E		03/02/2016	\$5.00 Cash	\$5.00
Lopez, Darlene C		03/02/2016	\$5.00 Cash	\$5.00
Lopez, Jesus F		03/02/2016	\$5.00 Cash	\$5.00
Lopez, Maria		03/02/2016	\$5.00 Cash	\$10.00
Nieto, Ambrocio		03/02/2016	\$5.00 Cash	\$5.00
Perez, Felipe		03/02/2016	\$5.00 Cash	\$5.00
Perry, Peggy		03/02/2016	\$5.00 Cash	\$5.00
Ramirez, Adrian		03/02/2016	\$5.00 Cash	\$5.00
Rubalcava, Jesus		03/02/2016	\$5.00 Cash	\$5.00

**Schedule C7 - Qualifying contributions**

Name: Address:	Date	Amount	Cycle To Date
Vasquez, Robert	03/02/2016	\$5.00 Cash	\$5.00
Araujo, Adrian	03/03/2016	\$5.00 Cash	\$5.00
Araujo, Manuel	03/03/2016	\$5.00 Cash	\$5.00
Hacker, Jaclyn	03/03/2016	\$5.00 Cash	\$5.00
Manuel, Gloria J	03/05/2016	\$5.00 Cash	\$5.00
Nevarez, Pedro F	03/12/2016	\$5.00 Cash	\$5.00
Contreras, Ruby D	03/13/2016	\$5.00 Cash	\$5.00
Cervantes, Irma	03/23/2016	\$5.00 Cash	\$5.00
Constantino, Refugio	03/23/2016	\$5.00 Cash	\$5.00
Narramore, Shelly	03/29/2016	\$5.00 Cash	\$5.00
romero, maria	03/31/2016	\$5.00 Cash	\$5.00
Sowers, Lynn E	04/01/2016	\$5.00 Cash	\$5.00
Garcia, Irma	04/03/2016	\$5.00 Cash	\$5.00
Gonzalez, Ignacio	04/05/2016	\$5.00 Cash	\$5.00
VILLEGAS, SUMMER DONTAE	04/05/2016	\$5.00 Cash	\$5.00
Ramirez, Leticia	04/16/2016	\$5.00 Cash	\$5.00
Baldenegro, Jesus	04/19/2016	\$5.00 Cash	\$5.00
Baldenegro, Rosantina	04/19/2016	\$5.00 Cash	\$5.00
Garcia, Marcia	04/26/2016	\$5.00 Cash	\$5.00



**Schedule C7 - Qualifying contributions**

Name: Address:	Date	Amount	Cycle To Date
Gonzalez, Joshua	04/26/2016	\$5.00 Cash	\$5.00
Carlos, Isaac	04/27/2016	\$5.00 Cash	\$5.00
Celaya, Lillian V	04/27/2016	\$5.00 Cash	\$5.00
Cipriano, Dennis	04/27/2016	\$5.00 Cash	\$5.00
Cipriano, Linda S	04/27/2016	\$5.00 Cash	\$5.00
Coletta, Elizabeth	04/27/2016	\$5.00 Cash	\$5.00
Gonzalez Neblina, Melanie	04/27/2016	\$5.00 Cash	\$5.00
Leon, Miguel	04/27/2016	\$5.00 Cash	\$5.00
Manuel, Randall	04/27/2016	\$5.00 Cash	\$5.00
Miranda, Clarissa	04/27/2016	\$5.00 Cash	\$5.00
Nebina, Bessie	04/27/2016	\$5.00 Cash	\$5.00
Nebina, Cyrus P	04/27/2016	\$5.00 Cash	\$5.00
Osequeda, Sadina	04/27/2016	\$5.00 Cash	\$5.00
Ramirez, Leo	04/27/2016	\$5.00 Cash	\$5.00
Randall, Charlotte	04/27/2016	\$5.00 Cash	\$5.00
Reyna Gomez, Kathleen M	04/27/2016	\$5.00 Cash	\$5.00
Sizemore, Donna S	04/27/2016	\$5.00 Cash	\$5.00
Sizemore, Tim L	04/27/2016	\$5.00 Cash	\$5.00
Valenzuela, Nina N	04/27/2016	\$5.00 Cash	\$5.00

**Schedule C7 - Qualifying contributions**

Name: Address:	Date	Amount	Cycle To Date
Venegas, Frances E	04/27/2016	\$5.00 Cash	\$5.00
Birchfield, Darcy	04/28/2016	\$5.00 Cash	\$5.00
Dominguez, Kitty	04/28/2016	\$5.00 Cash	\$5.00
Kreeger, Clyde	04/28/2016	\$5.00 Cash	\$5.00
McAnelly, Ruby	04/28/2016	\$5.00 Cash	\$5.00
Ortiz, Juanayssa AB	04/28/2016	\$5.00 Cash	\$5.00
Perez, Imelda	04/28/2016	\$5.00 Cash	\$5.00
Garcia, Ethel	04/29/2016	\$5.00 Cash	\$5.00
Gonzalez, Evangelina	04/29/2016	\$5.00 Cash	\$5.00
Marquez, Luis	04/29/2016	\$5.00 Cash	\$5.00
Sanchez, Miguel	04/29/2016	\$5.00 Cash	\$5.00
Williams, Walter John	04/29/2016	\$5.00 Cash	\$5.00
Getzwiler, Joe	04/30/2016	\$5.00 Cash	\$5.00
Getzwiler, Theresa	04/30/2016	\$5.00 Cash	\$5.00
Rodriguez, Enrique E	05/01/2016	\$5.00 Cash	\$5.00
Ballesteros, Linda P	05/02/2016	\$5.00 Cash	\$5.00
Birchfield, David	05/02/2016	\$5.00 Cash	\$5.00
Cadavas, Isaac	05/02/2016	\$5.00 Cash	\$5.00
Celaya, Daniel	05/02/2016	\$5.00 Cash	\$5.00

**Schedule C7 - Qualifying contributions**

Name: Address:	Date	Amount	Cycle To Date
Laborin, Leticia	05/02/2016	\$5.00 Cash	\$5.00
Miranda, Breanna D	05/02/2016	\$5.00 Cash	\$5.00
Miranda, Josie	05/02/2016	\$5.00 Cash	\$5.00
Montana, Jana	05/02/2016	\$5.00 Cash	\$5.00
Osequeda, Theresa	05/02/2016	\$5.00 Cash	\$5.00
Preston, Daniel III	05/02/2016	\$5.00 Cash	\$5.00
Smith, Vernon J	05/02/2016	\$5.00 Cash	\$5.00
Wurzaof, Betty L	05/02/2016	\$5.00 Cash	\$5.00
Anahill, Pamela	05/04/2016	\$5.00 Cash	\$5.00
Guerrero, Lorenia	05/04/2016	\$5.00 Cash	\$5.00
Lewis, Loretta	05/04/2016	\$5.00 Cash	\$5.00
Manuel, Diana F	05/04/2016	\$5.00 Cash	\$5.00
Wakeham, Jomarie	05/04/2016	\$5.00 Cash	\$5.00
Manuel, Grace	05/05/2016	\$5.00 Cash	\$5.00
Morgan, Monica K	05/05/2016	\$5.00 Cash	\$5.00
Hernandez, Serena	05/06/2016	\$5.00 Cash	\$5.00
Espinoza Ruiz, Ray	05/07/2016	\$5.00 Cash	\$5.00
Fernandez, Linsey	05/07/2016	\$5.00 Cash	\$5.00
Maxey, JoAnn	05/07/2016	\$5.00 Cash	\$5.00

**Schedule C7 - Qualifying contributions**

Name: Address:		Date	Amount	Cycle To Date
Mendoza, Melissa		05/07/2016	\$5.00 Cash	\$5.00
Turner, Joshua		05/07/2016	\$5.00 Cash	\$5.00
Gills, Betty		05/08/2016	\$5.00 Cash	\$5.00
Birchfield, Yolanda		05/09/2016	\$5.00 Cash	\$5.00
Rodriguez, Sofia		05/09/2016	\$5.00 Cash	\$5.00
Taylor, Stephanie		05/09/2016	\$5.00 Cash	\$5.00
Baldridge, Lynelle		05/10/2016	\$5.00 Cash	\$5.00
Esquivel, Fidel		05/10/2016	\$5.00 Cash	\$5.00
Fernandez, Fernando Jr		05/10/2016	\$5.00 Cash	\$5.00
Fuentes, Brenda		05/10/2016	\$5.00 Cash	\$5.00
Henry, Dianne G		05/10/2016	\$5.00 Cash	\$5.00
Henry, Ron		05/10/2016	\$5.00 Cash	\$5.00
Hipp, Marshall		05/10/2016	\$5.00 Cash	\$5.00
Lopez, Annabelle M		05/10/2016	\$5.00 Cash	\$5.00
Lopez, Dusty Ray		05/10/2016	\$5.00 Cash	\$5.00
Papworth, Jennifer		05/10/2016	\$5.00 Cash	\$5.00
Rios, James		05/10/2016	\$5.00 Cash	\$5.00
Rios, Valerie J		05/10/2016	\$5.00 Cash	\$5.00
Sikes, Tommy Lee		05/10/2016	\$5.00 Cash	\$5.00

**Schedule C7 - Qualifying contributions**

		Date	Amount	Cycle To Date
Name:	Tavernaro, Lois M	05/10/2016	\$5.00 Cash	\$5.00
Address:				
Name:	Turner, James	05/10/2016	\$5.00 Cash	\$5.00
Address:				
Name:	Turner, Lewis C	05/10/2016	\$5.00 Cash	\$5.00
Address:				
Name:	Espinoza, Delilah	05/11/2016	\$5.00 Cash	\$5.00
Address:				
Name:	Farmer, Mollie	05/11/2016	\$5.00 Cash	\$5.00
Address:				
Name:	Mendez, Loretta L	05/11/2016	\$5.00 Cash	\$5.00
Address:				
Name:	Pablo, Anna	05/11/2016	\$5.00 Cash	\$5.00
Address:				
Name:	Rodriguez, Guillermo	05/11/2016	\$5.00 Cash	\$5.00
Address:				
Name:	Gonzalez, Beatriz	05/12/2016	\$5.00 Cash	\$5.00
Address:				
Name:	Hipp, Diana	05/12/2016	\$5.00 Cash	\$5.00
Address:				
Name:	Hoffman, Herman Jr	05/12/2016	\$5.00 Cash	\$5.00
Address:				
Name:	Navarro, Maritza I	05/12/2016	\$5.00 Cash	\$5.00
Address:				
Name:	Young, Victoria E	05/12/2016	\$5.00 Cash	\$5.00
Address:				
Name:	Aldama, Emmanuel	05/13/2016	\$5.00 Cash	\$5.00
Address:				
Name:	Alvarez, Miguel	05/13/2016	\$5.00 Cash	\$5.00
Address:				
Name:	Campa, Joaquin A	05/13/2016	\$5.00 Cash	\$5.00
Address:				
Name:	Cunel, Ramses	05/13/2016	\$5.00 Cash	\$5.00
Address:				
Name:	Galvan, Aurelio	05/13/2016	\$5.00 Cash	\$5.00
Address:				
Name:	Hernandez, Kimberly Shanell	05/13/2016	\$5.00 Cash	\$5.00
Address:				

**Schedule C7 - Qualifying contributions**

Name: Address:	Date	Amount	Cycle To Date
Ibarra, Jose	05/13/2016	\$5.00 Cash	\$5.00
Name: Address:			
Ramirez, Alejandro	05/13/2016	\$5.00 Cash	\$5.00
Name: Address:			
SANTANA, MARCO	05/13/2016	\$5.00 Cash	\$5.00
Name: Address:			
Turner, James Jr	05/13/2016	\$5.00 Cash	\$5.00
Name: Address:			
Velasco, Clarissa	05/13/2016	\$5.00 Cash	\$5.00
Name: Address:			
Basaldua, Dora	05/14/2016	\$5.00 Cash	\$5.00
Name: Address:			
Garcia, Abby	05/14/2016	\$5.00 Cash	\$5.00
Name: Address:			
Garduno, Hector	05/14/2016	\$5.00 Cash	\$5.00
Name: Address:			
Miller, Damian	05/14/2016	\$5.00 Cash	\$5.00
Name: Address:			
Ortiz, Tara	05/14/2016	\$5.00 Cash	\$5.00
Name: Address:			
Ruiz, Cecilia E	05/14/2016	\$5.00 Cash	\$5.00
Name: Address:			
Serratos, Sabrina	05/14/2016	\$5.00 Cash	\$5.00
Name: Address:			
Turner, Beverly	05/14/2016	\$5.00 Cash	\$5.00
Name: Address:			
Turner, John	05/14/2016	\$5.00 Cash	\$5.00
Name: Address:			
Turner, Stephany	05/14/2016	\$5.00 Cash	\$5.00
Name: Address:			
Villegas, Alfred	05/14/2016	\$5.00 Cash	\$5.00
Name: Address:			
Walls, Leah Ruth	05/14/2016	\$5.00 Cash	\$5.00
Name: Address:			
Total of Clean Elections Qualifying Contributions		\$1,415.00	
Total of Refunds Given		\$0.00	
Net Total of Qualifying Contributions		\$1,415.00	

**Schedule E1 - Operating expenses**

		Date	Amount	Cycle To Date
<b>Name:</b>	Pride Travel Center	01/11/2016	\$19.10 Cash	\$19.10
<b>Address:</b>	5240 S Sunland Gin Rd, Eloy, AZ 85131			
<b>Category:</b>	Travel - Fuel			
<b>Name:</b>	Frys Food & Drug	01/25/2016	\$51.12 Cash	\$51.12
<b>Address:</b>	11203 S Interstate 8 Frontage Rd, Yuma, AZ 85367			
<b>Category:</b>	Travel - Fuel			
<b>Memo:</b>	51.12			
<b>Name:</b>	Shindigz	01/25/2016	\$104.94 Cash	\$104.94
<b>Address:</b>	One Party Place, South Whitley, IN 46787			
<b>Category:</b>	Event Expenses - Decorations/supplies			
<b>Memo:</b>	Parade/Float Supplies			
<b>Name:</b>	Sam's Club	01/29/2016	\$23.26 Cash	\$43.26
<b>Address:</b>	1459 N Dysart Rd, Avondale, AZ 85323			
<b>Category:</b>	Event Expenses - Other			
<b>Memo:</b>	Candy for parade			
<b>Name:</b>	Chevron/Shay Oil Company	02/08/2016	\$10.00 Cash	\$10.00
<b>Address:</b>	51 E 10th St, Yuma, AZ 85364			
<b>Category:</b>	Travel - Fuel			
<b>Name:</b>	One N Ten	02/08/2016	\$200.00 Cash	\$200.00
<b>Address:</b>	2700 N 3rd St, Ste 2011, Phoenix, AZ 85004			
<b>Category:</b>	Event Expenses - Other			
<b>Memo:</b>	Campaign Event Sponsor			
<b>Name:</b>	Southern Advertising & Sign Service	02/12/2016	\$200.00 Cash	\$200.00
<b>Address:</b>	90 W 28th St, Chattanooga, TN 37408			
<b>Category:</b>	Communications - Production cost			
<b>Memo:</b>	Graphic Design Work			
<b>Name:</b>	Little Italy Pizza	02/16/2016	\$45.00 Cash	\$45.00
<b>Address:</b>	502 E Pima, Gila Bend, AZ 85337			
<b>Category:</b>	Travel - Meals			
<b>Memo:</b>	Meals for canvassers			
<b>Name:</b>	VISTAPRINT	02/16/2016	\$35.79 Cash	\$35.79
<b>Address:</b>	100 Hayden Ave., Lexington, MA 02421			
<b>Category:</b>	Communications - Other			
<b>Memo:</b>	Business Cards			
<b>Name:</b>	BK Carne Asada & Hot Dogs	02/17/2016	\$39.99 Cash	\$39.99
<b>Address:</b>	5118 S 12th Ave, Tucson, AZ 85706			
<b>Category:</b>	Travel - Meals			
<b>Memo:</b>	Meals for canvassers			

**Schedule E1 - Operating expenses**

			Date	Amount	Cycle To Date
<b>Name:</b>	Queensboro Shirts Co		02/29/2016	\$80.35 Cash	\$80.35
<b>Address:</b>	1400 Marstellar St, Wilmington, NC 28401				
<b>Category:</b>	Communications - Other				
<b>Memo:</b>	Polo Shirts				
<b>Name:</b>	Ventura, Ariana		02/29/2016	\$70.00 Cash	\$330.00
<b>Address:</b>	3046 W Pierce St, Phoenix, AZ 85009				
<b>Category:</b>	Miscellaneous - Petitions				
<b>Memo:</b>	Petition Circulators				
<b>Name:</b>	Ventura, Maria Guadalupe		02/29/2016	\$70.00 Cash	\$415.00
<b>Address:</b>	3046 W Pierce St, Phoenix, AZ 85009				
<b>Category:</b>	Miscellaneous - Petitions				
<b>Memo:</b>	Petition Circulators				
<b>Name:</b>	Direct Checks Unlimited		03/02/2016	\$31.90 Cash	\$31.90
<b>Address:</b>	PO Box 19000, Colorado Springs, CO 80935				
<b>Category:</b>	Miscellaneous - Other				
<b>Memo:</b>	Campaign Checkbooks				
<b>Name:</b>	Krispy Kreme		03/15/2016	\$9.78 Cash	\$9.78
<b>Address:</b>	1495 N Dysart Rd, Avondale, AZ 85323				
<b>Category:</b>	Travel - Meals				
<b>Memo:</b>	Canvassers breakfast				
<b>Name:</b>	Ventura, Maria Guadalupe		03/17/2016	\$65.00 Cash	\$415.00
<b>Address:</b>	3046 W Pierce St, Phoenix, AZ 85009				
<b>Category:</b>	Miscellaneous - Petitions				
<b>Memo:</b>	Petition Circulators				
<b>Name:</b>	YUMA CHEVRON		03/30/2016	\$12.93 Cash	\$12.93
<b>Address:</b>	100 S 4th Ave, Yuma, AZ 85364				
<b>Category:</b>	Travel - Fuel				
<b>Name:</b>	Delgado, Wenceslao Delgado		03/31/2016	\$160.00 Cash	\$160.00
<b>Address:</b>	8619 W Papago St, Tolleson, AZ 85353				
<b>Category:</b>	Miscellaneous - Petitions				
<b>Memo:</b>	Petition Circulators				
<b>Name:</b>	Ventura, Ariana		04/01/2016	\$160.00 Cash	\$330.00
<b>Address:</b>	3046 W Pierce St, Phoenix, AZ 85009				
<b>Category:</b>	Miscellaneous - Petitions				
<b>Memo:</b>	Petitions/Canvass				
<b>Name:</b>	Yuma Democratic Party		04/06/2016	\$100.00 Cash	\$100.00
<b>Address:</b>	290 S 1st Ave, Ste 1, Yuma, AZ 85364				
<b>Category:</b>	Event Expenses - Other				
<b>Memo:</b>	Table fee for Yuma Co Fair				



**Schedule E1 - Operating expenses**

		Date	Amount	Cycle To Date
<b>Name:</b>	Ventura, Ariana	04/13/2016	\$100.00 Cash	\$330.00
<b>Address:</b>	3046 W Pierce St, Phoenix, AZ 85009			
<b>Category:</b>	Miscellaneous - Petitions			
<b>Memo:</b>	Petition Circulators			
<b>Name:</b>	Amezcu, Abraham	04/15/2016	\$100.00 Cash	\$100.00
<b>Address:</b>	810 W Margaret St., Gila Bend, AZ 85337			
<b>Category:</b>	Miscellaneous - Petitions			
<b>Memo:</b>	Petition Circulators			
<b>Name:</b>	Amezcu, Valerie	04/15/2016	\$100.00 Cash	\$100.00
<b>Address:</b>	810 W Margaret St, Gila Bend, AZ 85337			
<b>Category:</b>	Miscellaneous - Petitions			
<b>Memo:</b>	Petition Circulators			
<b>Name:</b>	Ventura, Maria Guadalupe	04/18/2016	\$100.00 Cash	\$415.00
<b>Address:</b>	3046 W Pierce St, Phoenix, AZ 85009			
<b>Category:</b>	Miscellaneous - Other			
<b>Memo:</b>	Canvass			
<b>Name:</b>	Ventura, Maria Guadalupe	05/11/2016	\$180.00 Cash	\$415.00
<b>Address:</b>	3046 W Pierce St, Phoenix, AZ 85009			
<b>Category:</b>	Miscellaneous - Petitions			
<b>Memo:</b>	Petitions/Canvass			
<b>Name:</b>	Sam's Club	05/23/2016	\$20.00 Cash	\$43.26
<b>Address:</b>	1459 N Dysart Rd, Avondale, AZ 85323			
<b>Category:</b>	Travel - Fuel			
Total of Operating Expenses			\$2,089.16	
Total of Refunds, Rebates, and Credits Received			\$0.00	
Net Total of Operating Expenses			\$2,089.16	

**Schedule D1 - Committee Debt**

Item	Date	Amount
<b>Outstanding Debt Balance at Beginning of Period</b>	12/22/2015	\$7.76
Original Amount of Debt: \$7.76		
Original Transaction Date: 12/22/2015		
<b>Debt Balance at End of Reporting Period</b>		\$7.76
<b>Outstanding Debt Balance at Beginning of Period</b>	12/08/2015	\$13.17
Original Amount of Debt: \$13.17		
Original Transaction Date: 12/08/2015		
<b>Debt Balance at End of Reporting Period</b>		\$13.17
<b>Outstanding Debt Balance at Beginning of Period</b>	12/11/2015	\$49.00
Original Amount of Debt: \$49.00		
Original Transaction Date: 12/11/2015		
<b>Debt Balance at End of Reporting Period</b>		\$49.00
Total of Outstanding Debt Before Adjustments		\$69.93
Total Credits Against Outstanding Bills		\$0.00
Total Payments On Outstanding Bills		\$0.00
Total of Outstanding Debt After Adjustments		\$69.93



# EXHIBIT J



## Campaign Finance Report

Treasurer: Nevarez, Rosa  
PO Box 863, Gila Bend, AZ 85337  
Phone: (602) 295-2102  
Email: [jesusarubalcava@gmail.com](mailto:jesusarubalcava@gmail.com)  
Candidate Name: Rubalcava, Jesus A  
Office Sought: State Representative - District 4

Rubalcava for House  
Committee #: 201600368

### NO ACTIVITY THIS PERIOD

### Amended 2016 Qualifying Period Recap Report

Election Cycle: 2015-2016  
Date Filed: August 29, 2016  
Reporting Period: August 19, 2016-August 23, 2016

### Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$2,747.56
Total Cash Receipts this Reporting Period:	\$0.00
Total Cash Disbursements this Reporting Period:	\$0.00
Cash Balance at End of Reporting Period:	\$2,747.56

Report ID: 163939

## Summary of Activity

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	\$0.00	\$0.00	\$0.00	\$177.00
Individual Contributions	C2	\$0.00	\$0.00	\$0.00	\$525.00
Contributions from Political Committees	C3	\$0.00	\$0.00	\$0.00	\$0.00
Business Contributions	C4	\$0.00	\$0.00	\$0.00	\$0.00
Small Contributions	C5	\$0.00	\$0.00	\$0.00	\$60.00
CCEC Funding and Matching	C6	\$0.00	\$0.00	\$0.00	\$16,044.00
Qualifying Contributions	C7	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made to this Committee	L1	\$0.00	\$0.00	\$0.00	\$0.00
Other Receipts, including Interest and Dividends	R1	\$0.00	\$0.00	\$0.00	\$0.00
Transfers from Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Cash Surplus from Previous Committee	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Income</b>		\$0.00	\$0.00	\$0.00	\$16,806.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$0.00	\$0.00	\$0.00	\$4,497.09
Independent Expenditures	E2	\$0.00	\$0.00	\$0.00	\$0.00
Contributions to Other Committees	E3	\$0.00	\$0.00	\$0.00	\$0.00
Other Expenses	E4	\$0.00	\$0.00	\$0.00	\$9,631.28
Transfers to Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made by This Committee	L2	\$0.00	\$0.00	\$0.00	\$0.00
Expenditure of In-Kind Contributions	C8	\$0.00	\$0.00	\$0.00	\$0.00
Disposal of Surplus Cash	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Expenditures</b>		\$0.00	\$0.00	\$0.00	\$14,128.37
Bill Payments for Previous Expenditures	D1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Cash Disbursed</b>		\$0.00	\$0.00	\$0.00	\$0.00

# Schedule D1 - Committee Debt

Item	Date	Amount
<b>Outstanding Debt Balance at Beginning of Period</b>	12/22/2015	\$7.76
Original Amount of Debt: \$7.76		
Original Transaction Date: 12/22/2015		
<b>Debt Balance at End of Reporting Period</b>		\$7.76
<b>Outstanding Debt Balance at Beginning of Period</b>	12/08/2015	\$13.17
Original Amount of Debt: \$13.17		
Original Transaction Date: 12/08/2015		
<b>Debt Balance at End of Reporting Period</b>		\$13.17
<b>Outstanding Debt Balance at Beginning of Period</b>	12/11/2015	\$49.00
Original Amount of Debt: \$49.00		
Original Transaction Date: 12/11/2015		
<b>Debt Balance at End of Reporting Period</b>		\$49.00
Total of Outstanding Debt Before Adjustments		\$69.93
Total Credits Against Outstanding Bills		\$0.00
Total Payments On Outstanding Bills		\$0.00
Total of Outstanding Debt After Adjustments		\$69.93





# EXHIBIT K

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THE STATE OF ARIZONA

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CITIZENS CLEAN ELECTIONS COMMISSION

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REPORTER'S TRANSCRIPT OF PROCEEDINGS

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14

Phoenix, Arizona

15

May 18, 2017

16

9:31 a.m.

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20

21

COASH & COASH, INC.

Court Reporting, Video & Videoconferencing

22

1802 N. 7th Street, Phoenix, AZ 85006

23

602-258-1440 staff@coashandcoash.com

24

By: Colette E. Ross, CR

25

Certified Reporter

Certificate No. 50658

Coash & Coash, Inc.

602-258-1440

www.coashandcoash.com

10:10:08-10:11:33 Page 30	10:12:44-10:13:54 Page 32
<p>1 know, that I have been working with the audit firm since</p> <p>2 the primary audit with Jill Foley. And we have had plenty</p> <p>3 of communication back and forth.</p> <p>4 I did have a chance to review the final audit.</p> <p>5 I didn't know whether I would be able to address the</p> <p>6 Commission so I went ahead and wrote up a brief statement</p> <p>7 of summary of what happened. As I mentioned in that</p> <p>8 statement, there is -- <u>I am not disputing the outcome of</u></p> <p>9 <u>the audit. And I do acknowledge and I am taking</u></p> <p>10 <u>responsibility that there was poor accounting and</u></p> <p>11 <u>practices during this campaign cycle.</u> And there is, you</p> <p>12 know, reasons that I explained in my response there as to</p> <p>13 why one thing led to the next.</p> <p>14 And so, you know, basically I wanted to make</p> <p>15 myself available for you, you know, should you have any</p> <p>16 questions.</p> <p>17 I do understand now. I am learning the process</p> <p>18 as we go along as well. I had never gone through anything</p> <p>19 like this. And so I, you know, I just want to make myself</p> <p>20 available should you have any questions, understanding now</p> <p>21 that this is basically an approval of acknowledgment that</p> <p>22 the audit has been completed. I thought there would be</p> <p>23 other action taking place today.</p> <p>24 CHAIRMAN TITLA: Any questions, Commissioners?</p> <p>25 COMMISSIONER CHAN: Mr. Chairman.</p>	<p>1 Rubalcava.</p> <p>2 Okay. We will go to the next item, discussion</p> <p>3 of possible action on a five-year review report submitted</p> <p>4 to Governor's Regulatory Review Council and related</p> <p>5 matters.</p> <p>6 Director Collins.</p> <p>7 MR. COLLINS: Yes, Mr. Chairman. And I think</p> <p>8 this can be brief. This is really just we are asking you</p> <p>9 to approve the draft letter and draft report.</p> <p>10 As you recall, at the, I don't know, two or</p> <p>11 three, two GRRC meetings ago, I guess, the council</p> <p>12 accepted in part and returned in part our five-year</p> <p>13 report. This addresses the provisions that were returned</p> <p>14 and also provides a cover letter explaining how we</p> <p>15 believe -- you know, GRRC's counsel, Chris Klemmich, has</p> <p>16 suggested that there is a substantial compliance standard</p> <p>17 that might be applied. So we made an effort there in the</p> <p>18 cover letter to articulate why putting aside our, you</p> <p>19 know, reserving our procedural and substantive objections</p> <p>20 to the actions that the council has taken, that</p> <p>21 nevertheless the Commission has substantially complied</p> <p>22 with what the council has asked for.</p> <p>23 So we are simply asking that you, well, we are</p> <p>24 asking you to approve the letter and the report to be</p> <p>25 submitted after this meeting, probably tomorrow. If --</p>
10:11:45-10:12:31 Page 31	10:14:12-10:14:55 Page 33
<p>1 CHAIRMAN TITLA: Commissioner Chan.</p> <p>2 COMMISSIONER CHAN: If Representative Rubalcava</p> <p>3 doesn't dispute the audit, and the other Commissioners</p> <p>4 don't have any questions, I would be comfortable, you</p> <p>5 know, moving to accept the audit as it has been presented</p> <p>6 to us today.</p> <p>7 CHAIRMAN TITLA: Okay. There is a motion by</p> <p>8 Commissioner Chan to accept the audit. Is there a second?</p> <p>9 COMMISSIONER KIMBLE: I second it.</p> <p>10 CHAIRMAN TITLA: Second by Commissioner Kimble.</p> <p>11 All in favor say aye.</p> <p>12 (A chorus of ayes.)</p> <p>13 CHAIRMAN TITLA: Opposed.</p> <p>14 (No response.)</p> <p>15 CHAIRMAN TITLA: Abstained.</p> <p>16 (No response.)</p> <p>17 CHAIRMAN TITLA: Okay. The audit is accepted.</p> <p>18 MR. COLLINS: And, Mr. Rubalcava, we will be in</p> <p>19 touch with you with a final copy of this and any other</p> <p>20 correspondence from us here in the next bit.</p> <p>21 REPRESENTATIVE RUBALCAVA: Okay.</p> <p>22 MR. COLLINS: So you are free to go.</p> <p>23 REPRESENTATIVE RUBALCAVA: I appreciate it.</p> <p>24 Thank you, Chairman. Thank you, Commissioners.</p> <p>25 CHAIRMAN TITLA: Okay, thank you, Representative</p>	<p>1 you know, either way we are going to submit something. It</p> <p>2 would be better to have you approve it, but if you don't</p> <p>3 approve it, this is what we are submitting.</p> <p>4 CHAIRMAN TITLA: Commissioners, any questions?</p> <p>5 MR. COLLINS: Unless, well, unless you object,</p> <p>6 unless you object. I mean absent an objection, this is</p> <p>7 what we plan to submit, I guess would be a better way of</p> <p>8 putting that.</p> <p>9 CHAIRMAN TITLA: Okay. Any questions for the</p> <p>10 director?</p> <p>11 COMMISSIONER PATON: No questions.</p> <p>12 CHAIRMAN TITLA: Okay. He is asking us to</p> <p>13 approve the letter as submitted in our documentation.</p> <p>14 MR. COLLINS: That's correct. That's correct.</p> <p>15 That's correct, Chairman Titla.</p> <p>16 COMMISSIONER KIMBLE: Mr. Chairman.</p> <p>17 CHAIRMAN TITLA: Commissioner Kimble.</p> <p>18 COMMISSIONER KIMBLE: I move we approve the</p> <p>19 response to the Governor's Regulatory Review Council.</p> <p>20 COMMISSIONER PATON: Okay.</p> <p>21 CHAIRMAN TITLA: Okay. There is a motion by</p> <p>22 Commissioner Kimble to approve the letter and report as</p> <p>23 submitted in our documentation by the Director Collins.</p> <p>24 Is there a second?</p> <p>25 COMMISSIONER CHAN: I will second that,</p>

# EXHIBIT L

Doug Ducey  
Governor

Thomas M. Collins  
Executive Director



Mitchell C. Laird  
Chair

Thomas J. Koester  
Steve M. Titla  
Damien R. Meyer  
Mark S. Kimble  
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)

MEMORANDUM

To: Paula Thomas, Executive Officer  
Thru: Thomas M. Collins, Executive Director *TK*  
From: Sara A. Larsen, Financial Affairs & Compliance Officer  
Date: August 26, 2016  
Subject: Disbursement of 2016 *General* Primary Election Funds *sat*

In accordance with A.A.C. R2-20-106, the Commission has determined that the candidate referenced below is not contested in the primary election and is advancing to the general election. Therefore, the candidate is qualified to receive general election funding in the amount of \$24,066.00. ✓

Candidate Name: Jesus A. Rubalcava ✓  
Office Sought: State Representative, Legislative District 4  
Vendor Number: 26006848070 ✓

I certify that this expenditure/transaction is for a valid public purpose and is consistent with all applicable statutes, laws, appropriations, grants, and contracts. I also certify that sufficient appropriation and monies are available for this expenditure/transaction, and that I am authorized to distribute these monies.

*General  
Funding*

Signature: *[Signature]* Date: *8/29/16*  
*1900 6891*

X *[Signature]*

Funding Received By

*8/31/16*  
Date

## STATE OF ARIZONA REMITTANCE ADVICE

WARRANT NO.  
217860966

AGY: ECA

AGENCY CONTACT: PAULA THOMAS

602-364-3477

INVOICE NO.	INVOICE DT.	INVOICE DESCRIPTION	DOCUMENT/LINE NO.	INVOICE AMT.	DISCOUNT AMT.	NET AMT.
		2016 GENERAL ELECTION	GAX, ECA, 2EC17066 / 1	\$24,066.00	\$0.00	\$24,066.00

IF REMITTANCE ADVICE ABOVE IS BLANK, SEE [HTTP://WWW.VENPAY.GAO.AZDOA.GOV/](http://WWW.VENPAY.GAO.AZDOA.GOV/) FOR FURTHER DETAILS.EVER WONDER WHERE YOUR PAYMENT FROM THE STATE IS? OR, WHICH  
STATE AGENCY PAID YOU THROUGH DIRECT DEPOSIT/ACH? VISIT OUR  
VENDOR PAYMENT WEBSITE, [HTTP://WWW.VENPAY.GAO.AZDOA.GOV/](http://WWW.VENPAY.GAO.AZDOA.GOV/).

VENDOR NAME: Jesus Armando Rubalcava

ISSUE DATE:

WARRANT AMOUNT:

VENDOR ID: VC0000032595

08/29/2016

\$24,066.00

FOLD OR SEPARATE AT COLORED LINE BELOW

STATE OF ARIZONA

NOT GOOD AFTER  
VOID DATE SHOWN91-113  
1221

DATE ISSUED
MO-DAY-YR
08/29/2016

VOID AFTER
MO-DAY-YR
02/25/2017

DEPARTMENT

DOCUMENT ID

ECA

170000100663

BANK  
21WARRANT NO.  
7860966

PAY THIS AMOUNT

\$24,066.00

\*\*\*\*\*TWENTY FOUR THOUSAND SIXTY SIX AND 00/100 DOLLARS\*\*\*\*\*

PAY TO THE ORDER OF

Jesus Armando Rubalcava  
PO Box 863  
Gila Bend AZ 85337Ray C. Brown  
DEPARTMENT OF ADMINISTRATIONDouglas A. Duany  
COUNTERSIGNED GOVERNOR

PAYABLE THRU STATE SERVICING BANK OF STATE TREASURER OF ARIZONA

⑈ 7860966 ⑈ ⑆ 122101133 ⑆ 0000000000 21 ⑈

# EXHIBIT M

**Sara Larsen**

---

**From:** Thomas Collins  
**Sent:** Thursday, September 01, 2016 2:57 PM  
**To:** [jesusarubalcava@gmail.com](mailto:jesusarubalcava@gmail.com)  
**Cc:** Sara Larsen; Karlson, Kara ([Kara.Karlson@azag.gov](mailto:Kara.Karlson@azag.gov))  
**Subject:** Letter Regarding Excess Funds Distributed by CEC  
**Attachments:** Rubalcava Return Of Funds Letter.pdf

Mr. Rubalcava,

Please find the attached letter indicating that an excess amount of funding was made available to you for your general election campaign.

Please review the letter and feel free to contact us with questions. We are also delivering the letter by overnight mail.

Sincerely,

Tom Collins  
Executive Director  
Arizona Citizens Clean Elections Commission  
602-364-3477



Doug Ducey  
Governor

Thomas M. Collins  
Executive Director



Mitchell C. Laird  
Chair

Steve M. Titla  
Damien R. Meyer  
Mark S. Kimble  
Galen D. Paton  
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)

---

Jesus Rubalcava  
806 W Margaret St.  
Gila Bend AZ 85337  
[jesusrubalcava@gmail.com](mailto:jesusrubalcava@gmail.com)

**Via Overnight Delivery and E-Mail**

Dear Mr. Rubalcava:

I am writing to follow up on the Commission's phone call this week related to whether you are opposed in your general election campaign. At this time, because the Commission cannot determine that there is a candidate that has qualified for the ballot pursuant to A.R.S. §§ 16-301, -341, or -343. *See* A.R.S. §§ 16-951(D), -961(F)(1), (2). Because of this the amount you received is in excess of the amount to which you are entitled under the Act. *See* Ariz. Admin. Code R2-20-704(B)(1). Accordingly, please return \$22,651 in a check payable to the Clean Elections Fund as soon as possible but no later than 30 days from September 1, 2016. Please contact me with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Thomas M. Collins".

Thomas M. Collins  
Executive Director  
Arizona Citizens Clean Elections Commission

cc: Kara Karlson, Assistant Attorney General, Arizona Attorney General's Office (E-Mail only)  
Sara Larsen, Financial Affairs & Compliance Officer, CCEC (E-Mail only)

## Sara Larsen

---

**From:** Thomas Collins  
**Sent:** Thursday, September 01, 2016 3:16 PM  
**To:** Jesus Rubalcava  
**Cc:** Sara Larsen  
**Subject:** RE: Letter Regarding Excess Funds Distributed by CEC

Mr. Rubalcava,  
Thank you for your prompt reply.  
You have thirty days *from today*, September 1. So it is not due today.  
Thank you,  
Tom

---

**From:** Jesus Rubalcava [<mailto:jesusarubalcava@gmail.com>]  
**Sent:** Thursday, September 01, 2016 3:11 PM  
**To:** Thomas Collins  
**Subject:** Re: Letter Regarding Excess Funds Distributed by CEC

Thank you Mr. Collins for clarifying. I have a meeting this evening and do not have my campaign checkbook with me. The letter states I need to submit a check no later than today. I can't make it in to CEC today. Please advise.

Jesus Rubalcava

On Sep 1, 2016, at 2:56 PM, Thomas Collins <[Thomas.Collins@azcleaselections.gov](mailto:Thomas.Collins@azcleaselections.gov)> wrote:

Mr. Rubalcava,

Please find the attached letter indicating that an excess amount of funding was made available to you for your general election campaign.  
Please review the letter and feel free to contact us with questions. We are also delivering the letter by overnight mail.

Sincerely,

Tom Collins  
Executive Director  
Arizona Citizens Clean Elections Commission  
602-364-3477

<Rubalcava Return Of Funds Letter.pdf>

# EXHIBIT N

## Sara Larsen

---

**From:** Jill Foley <jfoley@f-cpc.com>  
**Sent:** Tuesday, October 18, 2016 4:14 PM  
**To:** Jesus Rubalcava  
**Cc:** Sara Larsen  
**Subject:** Primary Recap Report Balance

**Importance:** High

Dear Mr. Rubalcava,

I noted that your Campaign's Primary Recap Report had an ending cash balance of \$7,046.72. Generally we expect to see the Recap Reports have \$0 balances, or if there are remaining balances, the amount remaining is paid back to the Citizens Clean Elections Commission, because this is unused Primary Election funding. I did not see that you balance amount was paid back to the Commission in your Post-Primary report.

Can you please provide some insight on this?

Thank you,

*Jill*

Jill T. Foley, CPA  
Fester & Chapman P.C.  
4001 N. 3<sup>rd</sup> Street, Suite 275  
Phoenix, AZ 85012  
602-264-3077, ext. 215 (phone)  
602-265-6241 (Fax)  
[jfoley@f-cpc.com](mailto:jfoley@f-cpc.com)

This communication and any accompanying documents are confidential and privileged. They are intended for the sole use of the addressee. If you receive this transmission in error, you are advised that any disclosure, copying, distribution, or the taking of any action in reliance upon this communication is strictly prohibited. Moreover, any such disclosure shall not compromise or waive the attorney-client, accountant-client, or other privileges as to this communication or otherwise. If you have received this communication in error, please contact me at the above email address. Thank you.

Fester & Chapman.

# EXHIBIT O



## Campaign Finance Report

Rubalcava for House  
Committee #: 201600368

Treasurer: Nevarez, Rosa  
PO Box 863, Gila Bend, AZ 85337  
Phone: (602) 295-2102  
Email: [jesusarubalcava@gmail.com](mailto:jesusarubalcava@gmail.com)  
Candidate Name: Rubalcava, Jesus A  
Office Sought: State Representative - District 4

### 2016 Primary Recap Report

Election Cycle: 2015-2016  
Date Filed: September 4, 2016  
Reporting Period: August 24, 2016-August 30, 2016

### Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$9,796.72
Total Cash Receipts this Reporting Period:	\$0.00
Total Cash Disbursements this Reporting Period:	\$2,750.00
Cash Balance at End of Reporting Period:	\$7,046.72

Report ID: 159043

## Summary of Activity

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	\$0.00	\$0.00	\$0.00	\$100.00
Individual Contributions	C2	\$0.00	\$0.00	\$0.00	\$525.00
Contributions from Political Committees	C3	\$0.00	\$0.00	\$0.00	\$0.00
Business Contributions	C4	\$0.00	\$0.00	\$0.00	\$0.00
Small Contributions	C5	\$0.00	\$0.00	\$0.00	\$60.00
CCEC Funding and Matching	C6	\$0.00	\$0.00	\$0.00	\$16,044.00
Qualifying Contributions	C7	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made to this Committee	L1	\$0.00	\$0.00	\$0.00	\$0.00
Other Receipts, including Interest and Dividends	R1	\$0.00	\$0.00	\$0.00	\$0.00
Transfers from Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Cash Surplus from Previous Committee	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Income</b>		\$0.00	\$0.00	\$0.00	\$16,729.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$0.00	\$0.00	\$0.00	\$0.00
Independent Expenditures	E2	\$0.00	\$0.00	\$0.00	\$0.00
Contributions to Other Committees	E3	\$0.00	\$0.00	\$0.00	\$0.00
Other Expenses	E4	\$2,750.00	\$0.00	\$2,750.00	\$9,682.28
Transfers to Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made by This Committee	L2	\$0.00	\$0.00	\$0.00	\$0.00
Expenditure of In-Kind Contributions	C8	\$0.00	\$0.00	\$0.00	\$0.00
Disposal of Surplus Cash	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Expenditures</b>		\$2,750.00	\$0.00	\$2,750.00	\$9,682.28
Bill Payments for Previous Expenditures	D1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Cash Disbursed</b>		\$2,750.00	\$0.00	\$2,750.00	\$0.00

**Schedule E4 - Other expenses**

		Date	Amount	Cycle To Date
<b>Name:</b>	Amezcu, Abraham	08/30/2016	\$200.00	\$200.00
<b>Address:</b>	810 W Margaret St, Gila Bend, AZ 85337		Cash	
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Amezcu, Edgar	08/30/2016	\$200.00	\$200.00
<b>Address:</b>	810 W Margaret St, Gila Bend, AZ 85337		Cash	
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Amezcu, Erika	08/30/2016	\$200.00	\$200.00
<b>Address:</b>	810 W Margaret St, Gila Bend, AZ 85337		Cash	
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Amezcu, Valerie	08/30/2016	\$200.00	\$200.00
<b>Address:</b>	810 W Margaret St, Gila Bend, AZ 85337		Cash	
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Gonzalez, Gloria	08/30/2016	\$250.00	\$450.00
<b>Address:</b>	406 W Preston St, Gila Bend, AZ 85337		Cash	
<b>Memo:</b>	Phone Bank/GOTV/Canvass			
<b>Name:</b>	Gonzalez, Jose R	08/30/2016	\$300.00	\$500.00
<b>Address:</b>	406 W Preston St, Gila Bend, AZ 85337		Cash	
<b>Occupation:</b>	Town of Gila Bend			
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Hector, Navarro	08/30/2016	\$300.00	\$300.00
<b>Address:</b>	314 E Fremont St, Gila Bend, AZ 85337		Cash	
<b>Occupation:</b>	Maricopa County Department of Transportation			
<b>Memo:</b>	Phone Bank/GOTV/Driver to Polls			
<b>Name:</b>	Miller, Damion	08/30/2016	\$250.00	\$450.00
<b>Address:</b>	2036 E Cristina St., San Luis, AZ 85349		Cash	
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Miller, Daniel	08/30/2016	\$250.00	\$250.00
<b>Address:</b>	311 East Freemont, Gila Bend, AZ 85337		Cash	
<b>Occupation:</b>	Area Manager, WAL-Mart Stores Inc.			
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Navarez, Pedro	08/30/2016	\$300.00	\$300.00
<b>Address:</b>	315 E Fremont St, Gila Bend, AZ 85337		Cash	
<b>Occupation:</b>	Mechanic, Self Employed			
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Navarez, Rosa	08/30/2016	\$300.00	\$500.00
<b>Address:</b>	38739 W Interstate 8, Gila Bend, AZ 85337		Cash	
<b>Occupation:</b>	Maintenance, Paloma ESD			
<b>Memo:</b>	Phone Bank/GOTV/Driver to Polls			



Covers 08/24/2016 to 08/30/2016	
Total of Other Expenses	\$2,750.00
Total of Refunds, Rebates, and Credits Received	\$0.00
Net Total of Other Expenses	\$2,750.00



# EXHIBIT P



## Campaign Finance Report

Treasurer: Nevarez, Rosa  
PO Box 863, Gila Bend, AZ 85337  
Phone: (602) 295-2102  
Email: [jesusarubalcava@gmail.com](mailto:jesusarubalcava@gmail.com)  
Candidate Name: Rubalcava, Jesus A  
Office Sought: State Representative - District 4

Rubalcava for House  
Committee #: 201600368

### Amended 2016 Primary Recap Report

Election Cycle: 2015-2016  
Date Filed: September 4, 2016  
Reporting Period: August 24, 2016-August 30, 2016

#### Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$2,747.56
Total Cash Receipts this Reporting Period:	\$0.00
Total Cash Disbursements this Reporting Period:	\$2,750.00
Cash Balance at End of Reporting Period:	(\$2.44)

Report ID: 163938

## Summary of Activity

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	\$0.00	\$0.00	\$0.00	\$177.00
Individual Contributions	C2	\$0.00	\$0.00	\$0.00	\$525.00
Contributions from Political Committees	C3	\$0.00	\$0.00	\$0.00	\$0.00
Business Contributions	C4	\$0.00	\$0.00	\$0.00	\$0.00
Small Contributions	C5	\$0.00	\$0.00	\$0.00	\$60.00
CCEC Funding and Matching	C6	\$0.00	\$0.00	\$0.00	\$16,044.00
Qualifying Contributions	C7	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made to this Committee	L1	\$0.00	\$0.00	\$0.00	\$0.00
Other Receipts, including Interest and Dividends	R1	\$0.00	\$0.00	\$0.00	\$0.00
Transfers from Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Cash Surplus from Previous Committee	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Income</b>		\$0.00	\$0.00	\$0.00	\$16,806.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$0.00	\$0.00	\$0.00	\$4,497.09
Independent Expenditures	E2	\$0.00	\$0.00	\$0.00	\$0.00
Contributions to Other Committees	E3	\$0.00	\$0.00	\$0.00	\$0.00
Other Expenses	E4	\$2,750.00	\$0.00	\$2,750.00	\$12,381.28
Transfers to Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made by This Committee	L2	\$0.00	\$0.00	\$0.00	\$0.00
Expenditure of In-Kind Contributions	C8	\$0.00	\$0.00	\$0.00	\$0.00
Disposal of Surplus Cash	S1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Expenditures</b>		\$2,750.00	\$0.00	\$2,750.00	\$16,878.37
Bill Payments for Previous Expenditures	D1	\$0.00	\$0.00	\$0.00	\$0.00
<b>Total Cash Disbursed</b>		\$2,750.00	\$0.00	\$2,750.00	\$16,878.37

**Schedule E4 - Other expenses**

		Date	Amount	Cycle To Date
<b>Name:</b>	Amezua, Abraham	08/30/2016	\$200.00	\$200.00
<b>Address:</b>	810 W Margaret St., Gila Bend, AZ 85337		Cash	
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Amezua, Edgar	08/30/2016	\$200.00	\$200.00
<b>Address:</b>	810 W Margaret St, Gila Bend, AZ 85337		Cash	
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Amezua, Erika	08/30/2016	\$200.00	\$200.00
<b>Address:</b>	810 W Margaret St, Gila Bend, AZ 85337		Cash	
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Amezua, Valerie	08/30/2016	\$200.00	\$200.00
<b>Address:</b>	810 W Margaret St, Gila Bend, AZ 85337		Cash	
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Gonzalez, Gloria	08/30/2016	\$250.00	\$450.00
<b>Address:</b>	406 W Preston St, Gila Bend , AZ 85337		Cash	
<b>Memo:</b>	Phone Bank/GOTV/Canvass			
<b>Name:</b>	Gonzalez, Jose R	08/30/2016	\$300.00	\$500.00
<b>Address:</b>	406 W Preston St., Gila Bend , AZ 85337		Cash	
<b>Occupation:</b>	Town of Gila Bend			
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Hector, Navarro	08/30/2016	\$300.00	\$300.00
<b>Address:</b>	314 E Fremont St, Gila Bend, AZ 85337		Cash	
<b>Occupation:</b>	Maricopa County Department of Transportation			
<b>Memo:</b>	Phone Bank/GOTV/Driver to Polls			
<b>Name:</b>	Miller, Damion	08/30/2016	\$250.00	\$450.00
<b>Address:</b>	2036 E Cristina St., San Luis, AZ 85349		Cash	
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Miller, Daniel	08/30/2016	\$250.00	\$250.00
<b>Address:</b>	311 East Freemont, Gila Bend, AZ 85337		Cash	
<b>Occupation:</b>	Area Manager, WAL-Mart Stores Inc.			
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Nevarez, Pedro	08/30/2016	\$300.00	\$300.00
<b>Address:</b>	315 E Fremont St, Gila Bend, AZ 85337		Cash	
<b>Occupation:</b>	Mechanic, Self Employed			
<b>Memo:</b>	Phone Bank/GOTV			
<b>Name:</b>	Nevarez, Rosa	08/30/2016	\$300.00	\$500.00
<b>Address:</b>	38739 W Interstate 8, Gila Bend , AZ 85337		Cash	
<b>Occupation:</b>	Maintenance , Paloma ESD			
<b>Memo:</b>	Phone Bank/GOTV/Driver to Polls			

Amended Primary Recap Report	
Covers 08/24/2016 to 08/30/2016	
Total of Other Expenses	\$2,750.00
Total of Refunds, Rebates, and Credits Received	\$0.00
Net Total of Other Expenses	\$2,750.00

**Schedule D1 - Committee Debt**

Item	Date	Amount
<b>Outstanding Debt Balance at Beginning of Period</b>	12/22/2015	\$7.76
Original Amount of Debt: \$7.76		
Original Transaction Date: 12/22/2015		
<b>Debt Balance at End of Reporting Period</b>		\$7.76
<b>Outstanding Debt Balance at Beginning of Period</b>	12/08/2015	\$13.17
Original Amount of Debt: \$13.17		
Original Transaction Date: 12/08/2015		
<b>Debt Balance at End of Reporting Period</b>		\$13.17
<b>Outstanding Debt Balance at Beginning of Period</b>	12/11/2015	\$49.00
Original Amount of Debt: \$49.00		
Original Transaction Date: 12/11/2015		
<b>Debt Balance at End of Reporting Period</b>		\$49.00
Total of Outstanding Debt Before Adjustments		\$69.93
Total Credits Against Outstanding Bills		\$0.00
Total Payments On Outstanding Bills		\$0.00
Total of Outstanding Debt After Adjustments		\$69.93





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**STATE OF ARIZONA**

**CITIZENS CLEAN ELECTIONS COMMISSION**

In the Matter of:

Case No.: 17-01

**Jesus Rubacalva, RESPONDENT**

**ORDER AND NOTICE OF APPEALABLE  
AGENCY ACTION**

The Citizens Clean Elections Commission ("Commission") shall enforce the provisions of the Citizens Clean Elections Act ("Act"). Pursuant to those duties, the Commission hereby issues this Order and Notice of Appealable Agency Action.

**FINDINGS OF FACT AND CONCLUSIONS OF LAW**

Jesus Rubacalva, a 2016 candidate for State Representative of Legislative District 4, was certified as a participating candidate on January 15, 2016. Upon applying for certification, Respondent signed under oath and under penalty of perjury that he was in compliance with A.R.S. § 16-941(A) and would continue to comply with such restrictions as required by the Act. Respondent was selected for a random primary election audit on September 15, 2016. Based on findings from the random audit, the Commission approved a comprehensive audit and review for Respondent and Respondent's candidate campaign committee on January 19, 2017. On April 28, 2017, the independent auditors, Fester & Chapman P.C., submitted the final comprehensive audit to the Commission.

On May 23, 2017, the Executive Director served Respondent with a Complaint regarding the findings of the comprehensive audit and review. The Complaint alleged Respondent may have violated the Clean Elections Act and Rules by: (1) accepting contributions other than individual contributions and \$5 qualifying contributions; (2) making expenditures in excess of the personal money contribution limit; (3) making expenditures in excess of the adjusted primary election spending limit; (4) making expenditures in excess of the adjusted general election spending limit; (5) failing to comply with A.R.S. § 16-948 regarding

1 campaign accounts; and (6) failing to comply with A.R.S. § 16-953 regarding the return of unused monies  
2 to the Citizens Clean Elections Fund. The Complaint also noticed Respondent of potential reporting  
3 violations and related penalties.

4 On May 30, 2017, Respondent submitted a Response to the Complaint. The Commission  
5 determined there was reason to believe a violation occurred and authorized an investigation on June 22,  
6 2017. Respondent was served with a compliance order on June 23, 2017. Respondent did not come into  
7 compliance.

8 On August 22, 2017, the Commission unanimously voted to impose a repayment order on  
9 Respondent for the amount of Clean Elections Funding issued to him. To date Respondent has not  
10 complied with that Order.

11 **Count I. A.R.S. § 16-941(A)(1).**

12 Pursuant to A.R.S. § 16-941(A)(1), a participating candidate shall not accept any contributions,  
13 other than a limited number of five-dollar qualifying and early individual contributions. The auditors found  
14 that Respondent made transfers from a separate bank account to the campaign bank account totaling  
15 \$1,869.33 and made additional deposits, the purpose of which cannot be determined, into the campaign  
16 bank account in the amount of \$3,945.54. Respondent's Amended June 30th Report details that  
17 Respondent collected \$1,415 in qualifying contributions. Respondent's Amended Qualifying Period Recap  
18 Report details that Respondent received \$177 in personal and family contributions, \$525 in early  
19 individual contributions, and \$60 in small contributions. The total combined amount of received  
20 contributions as reported by Respondent is \$2,177. Respondent deposited into his bank account a total of  
21 \$5,814.87 (not including Clean Elections Funding); this is \$3,637.87 more than the total combined  
22 qualifying contributions, individual contributions, small contributions, and personal and family contributions  
23 Respondent reported on his campaign finance reports.

24 In documents filed prior to the reasonable cause determination, Respondent stated he did accept  
25 contributions other than the \$5 qualifying contributions, but he received early contributions from  
individuals and referenced his campaign finance reports as an exhibit. However, the campaign finance

1 reports referenced by Respondent do not match the deposits made in the bank account. Moreover,  
2 Respondent admitted that he does not "disput[e] the outcome of the audit." Clean Elections Commission  
3 Meeting, May 18, 2017, Tr. 30:8-11 ("I do acknowledge and I am taking responsibility that there was poor  
4 accounting and practices during this campaign cycle."); accord Response to Comprehensive Audit and  
5 Review, Apr. 28, 2017 at 1 ("Please acknowledge that I am not by any means challenging the results of  
6 the review, nor am I denying any wrong doing."). Additionally, Respondent failed to provide sufficient  
7 documentation for the campaign activity in his campaign finance reports, pursuant to A.A.C. R2-20-703,  
8 supporting the inference that a violation has occurred.

9 **Count II. A.R.S § 16-941(A)(3).**

10 The adjusted general election spending limit for Respondent, who was unopposed in the general  
11 election, was set by the number of \$5 qualifying contributions he submitted multiplied by \$5. A.R.S. § 16-  
12 953. Accordingly, the general election period limit for Respondent was \$1,415.

13 The auditors found that Respondent made a total of \$3,677.16 in expenditures from the campaign  
14 bank account during the general election period (August 31, 2016 through November 8, 2016).  
15 Consequently, Respondent made a total of \$2,262.16 in excess expenditures during the general election  
16 period.

17 In his responses during the reason to believe phase of this matter, Respondent states that he "did  
18 not exceed the amount of the general election spending limit." Respondent provided his campaign finance  
19 reports as evidence that he did not exceed the general election spending limit. However, the auditors  
20 found that Respondent's campaign finance reports do not accurately reflect the campaign finance activity  
21 in the Respondent's campaign bank account. Respondent does not "disput[e] the outcome of the audit."  
22 Clean Elections Commission Meeting, May 18, 2017, Tr. 30:8-11; accord Response to Comprehensive  
23 Audit and Review, Apr. 28, 2017 at 1 ("Please acknowledge that I am not by any means challenging the  
24 results of the review, nor am I denying any wrong doing."). The auditors found that \$2,829.61 in  
25 expenditures from the campaign bank account during the general election period were not reported on  
Respondent's campaign finance reports.

1 The auditors requested supporting documentation for the expenditures but Respondent claimed  
2 to have been unable to "locate the box" containing the information, just as he did in response to the  
3 Commission staff's investigative efforts. Every Clean Elections candidate is required to maintain  
4 campaign financial records for three years. A.A.C. R2-20-703. The evidence provided by the audit,  
5 Respondent's own admission, and Respondent's failure to maintain proper records each support the  
6 conclusion there is probable cause to believe Respondent exceeded the applicable limit.

7 **Count III. A.R.S. § 16-941(A)(5).**

8 Section 16-941(A)(5) imposes additional limitations on expenditures by candidates. To ensure  
9 compliance with these limits, participating candidates must use a single bank account and pay for  
10 campaign goods and services through that account. A.R.S. § 16-948. Participating candidates are also  
11 required to return unused monies to the Clean Elections Fund at the end of the primary and general  
12 election periods pursuant to A.R.S. § 16-953. This is a direct limitation on a candidate's use of funds.

13 On June 15, 2016, Respondent received a check from the Commission in the amount of  
14 \$<XXXX> for the primary election. Bank records show that \$16,044 was deposited into a personal bank  
15 account and \$13,280.22 was transferred from Respondent's personal bank account to a campaign bank  
16 account on June 17, 2016. The difference of \$2,763.78 was not transferred to the campaign account. The  
17 auditors noted transfers from a separate bank account to the campaign account equaling \$1,869.33 and  
18 other deposits with an unknown purpose totaling \$3,945.54. The origination and purpose of these  
19 deposits cannot be verified because Respondent failed to provide supporting documentation. Respondent  
20 neglected to establish a petty cash account and provide detailed information on campaign finance  
21 reports. The auditors found ATM withdrawals totaling \$683.50 that Respondent failed to document on his  
22 campaign finance reports. The purpose of the ATM withdrawals cannot be verified due to the lack of  
23 supporting documentation.

24 Respondent has previously asserted that "according to the reports filed with the Arizona  
25 Secretary of State, there wasn't [sic] any unused monies that were not returned to the Citizens Clean  
Elections Commission." Response to Executive Director's Complaint, May 10, 2017 at 3.. Moreover, he

1 has claimed that because his personal bank account and campaign account were linked, he "began to  
2 use the filing report with the Secretary of State as [his] accounting and balance." *Id.* However, that is not  
3 the purpose of campaign finance reports. Furthermore, Respondent amended his reports several months  
4 after the transactions had taken place so it is improbable that he was using the Secretary of State's  
5 campaign finance reporting system to keep track of his campaign finance activity.

6 Respondent used the two bank accounts during the campaign periods in violation of A.R.S. § 16-  
7 941(A)(5). Indeed, Respondent does not "disput[e] the outcome of the audit." Clean Elections  
8 Commission Meeting, May 18, 2017, Tr. 30:8-11 ("I do acknowledge and I am taking responsibility that  
9 there was poor accounting and practices during this campaign cycle."); accord Response at 1 ("Please  
10 acknowledge that I am not by any means challenging the results of the review, nor I am denying any  
11 wrong doing.").

12 Furthermore auditors found a transfer from the Respondent's campaign bank account to Respondent's  
13 personal bank account equaling \$604.42. Respondent made \$4,653.41 in non-campaign withdrawals  
14 from the campaign bank account. An additional \$3,635.41 was withdrawn and auditors were unable to  
15 determine if those funds were used for an appropriate campaign expense.

16 Participating candidates must return Clean Elections funding that was not used for direct  
17 campaign purposes, as required by A.R.S. § 16-953 and R2-20-704(B). On October 18, 2016, the  
18 auditors contacted Respondent regarding a high ending balance on the Primary Recap Report. At that  
19 time Respondent should have returned \$7,046.72 in unspent primary election funding based on his  
20 Primary Recap Report. After Respondent was notified that he was required to return unused monies to  
21 the Commission, he filed amendments to his campaign finance reports. On November 1, 2016, the new  
22 ending balance on the Amended Primary Recap Report was \$2.44. The auditors found that Respondent  
23 made \$17,501.51 in expenditures from the campaign bank account during the primary election period.  
24 Since Respondent could have only potentially deposited \$18,221 into the campaign bank account during  
25 the primary period (based upon primary election funding, early contributions, \$5 qualifying contributions,  
small contributions and personal contributions), Respondent should have returned to the Clean Elections

1 Fund at least \$710.49. This does not take into account the expenditures that were made for personal use  
2 and should have also been returned to the fund. As noted above, Respondent admits to the results of the  
3 audit and the Commission has established that it is entitled to a full refund. This also represents probable  
4 cause to believe that Respondent violated A.R.S. § 16-941(A)(5).

#### 5 **Count IV. Reporting Violations.**

6 Pursuant to A.R.S. § 16-941, participating candidates are required to report expenditures made  
7 directly from their campaign bank account, as required by A.R.S. § 16-948(C). Information to be provided  
8 on the campaign finance reports includes recipient's full name, address, nature of good and services, and  
9 compensation. A.A.C. R2-20-703 requires candidates to report all this information for any other deposit or  
10 disbursements from the campaign account. In addition, A.A.C. R2-20-115 requires that participating  
11 candidates maintain books and records of financial transactions in a single location, and that such  
12 records are to be accessible upon request.

13 The auditors found that Respondent failed to report an aggregate of \$9,209.72 in expenditures  
14 and \$4,852.55 in deposits on his campaign finance reports. It could not be determined if an additional  
15 \$1,362.32 was reported because of insufficient records.

16 Respondent states that out of confusion he "began to use the filing report with the Secretary of  
17 State as [his] accounting and balance." Response to Executive Director's Complaint, May 30, 2017, at 3.  
18 As required by A.A.C. R2-20-110, participating candidates' campaign finance reports are to include all  
19 receipts and disbursements for their current campaign account. However, the comprehensive audit  
20 revealed several expenditures were made and not reported. Respondent made reference to his campaign  
21 finance reports submitted to the Secretary of State as proof against allegations of excess spending, but  
22 information in the reports is recorded by the candidate (rather than a record provided by a disinterested  
23 third party, such as a receipt for services rendered), and numerous expenditures and deposits were never  
24 documented by Respondent. Based on the audit, Respondent's admissions, and his failure to abide by  
25 his obligation to preserve documents related to expenditures and contributions there is probable cause to

1 believe the amounts of \$9,209.72 in expenditures and \$4,852.55 in contributions remain unreported.  
2 These amounts are subject to penalty pursuant to A.R.S. § 16-942(B).

### 3 **FAILURE TO COMPLY**

4 After the June 22, 2017 Commission finding that there was reason to believe Respondent had  
5 violated requirements of the Act, the expiration of fourteen days, and service of an order requiring  
6 compliance, which occurred on June 23, 2017, Respondent failed to comply. Accordingly, the  
7 Commission has made a public finding that the Respondent violated the Act and issues this Order  
8 assessing a civil penalty in accordance with A.R.S. § 16-942 and R2-20-109(F)(3).

### 9 **PENALTIES**

10 Following a hearing on November 16, 2017, the Commission imposed a substantially mitigated  
11 penalty of \$53,277.

### 12 **ORDER**

13 WHEREFORE, the Citizens Clean Elections Commission hereby imposes a civil penalty of  
14 \$53,277 upon Respondent. This civil penalty will be satisfied upon receipt of payment to the Citizens  
Clean Elections Commission, 1616 W. Adams, Ste. 110, Phoenix, Arizona 85007.

15 The Respondent may request an administrative hearing to contest this Order by submitting a  
16 written request for a hearing within 30 days of receipt of this Order. The written request for a hearing shall  
17 be sent to the Citizens Clean Elections Commission, 1616 W. Adams, Ste. 110, Phoenix, Arizona 85007.

18 If the Respondent requests a hearing, he or she may request an informal settlement conference  
19 pursuant to A.R.S. § 41-1092.06.

20 Individuals with a disability may request reasonable accommodation by contacting the Citizens  
21 Clean Elections Commission, 1616 W. Adams, Ste. 110, Phoenix, Arizona 85007, Telephone: (602) 364-  
22 3477; and during a hearing by contacting the Office of Administrative Hearings, 1400 West Washington,  
23 Suite 101, Phoenix, Arizona 85007, Telephone: (602) 542-9826. Requests should be made as early as  
24 possible to allow time to arrange the accommodation.  
25



Dated this 22d day of November, 2017.

By: 

Thomas M. Collins, Executive Director