

STATE OF ARIZONA
CITIZENS CLEAN ELECTIONS COMMISSION

In the Matter of:

Save Our AZ Solar Committee, Respondent

MUR No. 16-002

CONCILIATION AGREEMENT

Pursuant to ARS § 16-957(A), the Citizens Clean Elections Commission (the "Commission"), Save our Solar (Respondent) enter this Conciliation Agreement (the "Conciliation Agreement") in the manner described below:

- A. On October 27, 2016, the Commission adopted the Statement of Reasons (the "Statement of Reasons"), a copy of which is attached hereto and incorporated herein by reference, setting forth the recommendation of the Executive Director that there is reason to believe Respondent may have committed a violation of the Citizens Clean Elections Act and Commission rules (collectively, the "Act").
- B. Any person making independent expenditures must abide by the Clean Elections Act and Rules and the Commission has authority to enforce the Act and Rules pursuant to A.R.S. § 16-956(A)(7), including penalties that apply for failure to file reports.
- C. On August 29, 2016, the Commission received a Complaint regarding Respondent's failure to file a report required by A.R.S. § 16-941, -958. After receiving the Complaint the Commission Staff reviewed the Respondent's Campaign Finance Reports. Those reports indicated other independent expenditures that the Commission maintains should have been reported pursuant to the Act. ("Supplemental Complaint") The

1 additional late reports are identified in Schedule 1 of this Conciliation and incorporated
2 herein by reference.

3 D. In response to the Complaint and the Supplemental Complaint, Respondent has filed
4 several reports, identified in Schedule 1.

5 E. This Conciliation Agreement concludes the Commission's enforcement proceeding
6 respecting the Complaint and additional reports that Respondent should have timely
7 filed as outlined in the Statement of Reasons and Schedule 1.

8 WHEREFORE, the Commission enters the following orders in lieu of any other action regarding this
9 matter:

- 10 1. Respondent acknowledges that pursuant to A.R.S. §§ 16-941(D) and -958 any person
11 who makes an independent expenditure above a threshold set forth in the Clean
12 Elections Act must file reports required by the person and that under A.R.S. § 16-
13 942(B) the statutory penalty for any reporting violation on behalf of a candidate is up to
14 \$880 per day up to twice the value of the unreported amount. Respondent
15 acknowledges these statutes and penalties apply to it.
- 16 2. Respondent acknowledges and supports the authority of the Commission to require the
17 filing of independent expenditure reports as required by the Act. Prior to the filing of the
18 Complaint on September 2, 2016, Respondent, to the best of its knowledge, was not
19 notified by its attorneys that it would be required to file independent expenditure reports
20 with the Commission or their reasons for not telling Respondent about the requirement.
21 Indeed, until October 26, 2016, Respondent was unaware that the Commission's
22 Executive Director had sent an email on June 3, 2016 to Arizona election law attorneys,
23 including Respondent's attorneys, informing them of the requirement to file expenditure
24 reports directly with the Commission. If Respondent had been fully informed by its
25 attorneys of the CCEC June 3, 2016 email and the requirement to file with the
26 Commission, Respondent would have readily complied with both the SOS filing
requirements and those of the Commission. Once Respondent learned of the

1 Complaint against Respondent, and of the requirement to file with the Commission, it
2 began the process of filing all the required independent expenditure reports with the
3 Commission from the primary, including reports that were subsequently identified by
4 the Executive Director of the Commission as not having been filed. Additionally,
5 Respondent timely filed all required reports prospectively with the Commission for the
6 general election. All the information contained in the independent expenditure reports
7 that were filed with the Commission for the primary election had previously been filed
8 with the Secretary of State. Respondent admits that the Secretary of State's Campaign
9 Finance Reporting System provides a link to the Commission's report and that incorrect
10 instructions on the Secretary of State's Campaign Finance Reporting System do not
11 relieve Respondent of its obligation to consult the Commission.

- 12 3. Respondent supports full and timely transparency in reporting independent
13 expenditures to the Commission.
- 14 4. Respondent agrees to settle this matter for \$15,000, in addition to the other provisions
15 herein. This amount represents a mitigated fine based, in part, on the timely filing of
16 the Respondent's pre-primary campaign finance report and the filing of missing
17 independent expenditure reports as noted in the Statement of Reasons.
- 18 5. To satisfy the debt amount acknowledged above, Respondent shall pay to the
19 Commission \$15,000 by November 18, 2016.
- 20 6. Respondent agrees to continue to file timely, accurate reports required by the Act as
21 identified by A.R.S. §§ 16-941 and -958 and Commission rules for the remainder to the
22 election cycle, as well as any other campaign finance reports related to independent
23 expenditures.
- 24 7. All payments shall be made by check or money order payable to the Citizens Clean
25 Elections Fund and delivered to the Citizens Clean Elections Commission, 1616 West
26 Adams, Suite 110, Phoenix, Arizona, 85007.

- 1 8. The Commission shall not commence any legal action against Respondent to collect
2 the claims so long as they are not in default.
- 3 9. Respondent shall be in default of this Agreement upon the occurrence of any of the
4 following:
- 5 a. Respondent fails to make any payment required hereunder within five (5) working
6 days following the date due;
- 7 b. Respondent files a petition under the bankruptcy laws or any creditor of the
8 Respondent files any petition under said laws against the Respondent;
- 9 c. Any creditor of Respondent commences a foreclosure action to foreclose (by suit
10 or trustee sale) on real property of the Respondent or commences garnishment,
11 attachment, levy or execution against the Respondent's property; or;
- 12 d. Respondent provides false information to the Commission.
- 13 e. Respondent fails to abide by any provision of this agreement.
- 14 10. In the event of default hereunder, at the option of the Commission, all unpaid amounts
15 hereunder shall be immediately due and payable and the Commission may pursue
16 additional penalties mitigated by this agreement as identified in Schedule 1. In
17 addition, interest shall accrue on the unpaid balance from the date that the payments
18 become due and payable. Interest shall accrue at the statutory rate of ten percent
19 (10%) pursuant to A.R.S. § 44-1201(A).
- 20 11. Nothing contained in this Agreement shall be construed to prevent any state agency
21 which issues licenses for any profession from requiring that the debt in issue be paid in
22 full before said agency will issue Respondent a new license.
- 23 12. The Commission may waive any condition of default without waiving any other
24 condition of default and without waiving its rights to full, timely future performance of
25 the conditions waived.
- 26 13. 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.

14. Respondent acknowledges that all obligations payable pursuant to this Agreement constitute a fine, penalty, or forfeiture payable to and for the benefit of a governmental unit, and not compensation for actual pecuniary loss; and that pursuant to 11 USC § 523 such obligations are not subject to discharge in bankruptcy.

15. This Agreement shall be construed under the laws of the State of Arizona.

16. In the event that any paragraph or provision hereof shall be ruled unenforceable, all other provisions hereof shall be unaffected thereby.

17. This Agreement shall constitute the entire agreement between the parties regarding the subject matter. This Agreement shall not be modified or amended except in a writing signed by all parties hereto.

18. This Agreement shall not be subject to assignment.

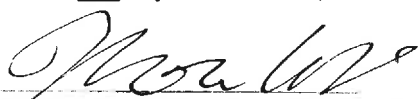
19. No delay, omission or failure by the Commission to exercise any right or power hereunder shall be construed to be a waiver or consent of any breach of any of the terms of this Agreement by the Respondent.

20. Respondent has obtained independent legal advice in connection with the execution of this Agreement or have freely chosen not to do so. Any rule construing this Agreement against the drafter is inapplicable and is waived.

21. This Agreement shall be void unless executed by the Respondent and delivered to the Commission not later than November 18, 2016.

22. All proceedings commenced by the Commission in this matter will be terminated and the matter closed upon receipt of the final payment of the civil penalty and compliance with the other terms set forth in this Agreement.

Dated this 18th day of November, 2016.

By: 
Thomas M. Collins, Executive Director
Citizens Clean Elections Commission

By: 
Kris Mayes, Respondent

Schedule 1

Date of IE	Est. Expenditure based on full AZ-SOS CF report or complaint	Expenditure amount Reported by SOS-AZ	CE Report Date	Date Filed	Potential fine
8/2/2016	131,766.00 50,000.00	Same	8/9/2016	10/20/2016	\$63,360
8/10/2016	\$96,748.80 \$5,984.88 \$175,000.00	Same	8/16/2016	10/20/2016	\$57,200
8/12/2016	\$96,934.56	Same	8/16/2016	10/20/2016	\$57,200
8/18/2016	\$111,187.80	Same	8/19/2016	10/20/2016	\$54,560
8/26/2016		\$14,937.96	8/27/2016	10/20/2016	\$29,875.92
8/23/2016	\$32,441		8/24/2016	9/22/2016	\$25,520
9/8/2016		\$4,502.46	9/13/2016	10/20/2016	\$9,004.92
Total					\$296,720.84

STATE OF ARIZONA
CITIZENS CLEAN ELECTIONS COMMISSION
MUR: No. 16-001 NOEL CAMPBELL AND DAVID STRINGER
STATEMENT OF REASONS BY EXECUTIVE DIRECTOR

On behalf of the Citizens Clean Elections Commission (“Commission”), the Executive Director hereby provides the Statement of Reasons showing there is no reason to believe that violations of the Citizens Clean elections Act and/or the Commission rules (collectively, the “Act”) may have occurred.

I. Procedural Background

On August 22, 2016, Larry Gray (“Complainant”) filed a complaint (“Complaint”) against Noel Campbell and David Stringer (“Respondents”) alleging the Respondents violated Arizona’s campaign finance laws (**Exhibit A**). Respondent Campbell is a participating candidate for the House of Representatives in legislative district 1. Respondent Stringer is a traditional candidate for House of Representatives in legislative district 1. On September 7, 2016, Respondents submitted separate Responses to the Complaint (**Exhibit B**). Respondent Stinger filed a supplemental response on September 8, 2016 (**Exhibit C**). Complainant electronically submitted supplemental information that was neither notarized nor sworn to, on September 16, 2016 (**Exhibit D**).

II. Alleged Violations

A. Accepting a prohibited campaign contribution

A.R.S. § 16-901(5) defines a contribution as “any gift, subscription, loan, advance or deposit of money or anything of value made for the purpose of influencing an election.” An in-kind contribution is a contribution of a good or service or anything of value and not a monetary contribution. *Id.* § 16-901(15). A.R.S. §§ 16-941(A) and -945(A) prohibit participating candidates from accepting early contributions from any entity other than an individual. Upon

applying for certification as a participating candidate, the candidate certifies, under oath, that “the candidate will comply with the requirements of § 16-941, subsection A during the remainder of the election cycle and, specifically, will not accept private contributions” A.R.S. § 16-947(B)(3).

Complainant alleges during the primary election period Respondent Stringer paid for, printed, and distributed campaign mailers advocating for the election of two clearly identified candidates, Respondent Campbell and Respondent Stringer (**Exhibit E**), and since both candidates share a political consultant, the mailer cannot be considered an independent expenditure. Complainant also notes that the mailers his household received separately from Respondent Campbell and Respondent Stringer were sent using the same pre-sorted postage permit number. Complainant alleges the same mail house was used to distribute both mailers. Complainant argues the mail piece expressly advocates for the election of Noel Campbell as defined by A.R.S. §16-901.01.¹ Complainant also argues that if the expenditure is a not an independent expenditure and that it is in fact a coordinated expenditure because Respondents shared a vendor, the expenditure would then be an in-kind contribution to Respondent Campbell and would violate A.R.S. §§ 16-941(A) and -945(A).

In his response, Respondent Campbell does not address the allegation of receiving an in-kind contribution from Respondent Stringer’s campaign. However, he does state, he has “...nothing to do with Mr. Stringer’s Frist Amendment right to advertise...” and he cannot respond to those particular allegations in the Complaint.

Respondent Stringer’s Response addresses the in-kind contribution allegation. He argues he did not use his campaign funds to elect Respondent Campbell because “Mr. Campbell is a popular incumbent who ran for re-election...He did not need [Respondent Stringer’s] help. Nor

¹ Pursuant to A.R.S. §16-901.01(1) “expressly advocates” means words that in context can have no reasonable meaning other than to advocate the election or defeat of one or more clearly identified candidates.

did he ask for it.” Respondent Stringer also states he was attempting to let voters know that there were two open seats and they had “two votes to cast.” He states, he “wanted to associate [himself] with Mr. Campbell’s popularity and the good will voters have toward him...” Respondent Stringer argues that there is a clear difference between drawing attention to ideological similarities of candidates and expressly advocating for another candidate’s election. Respondent Stringer believes he was merely encouraging voter to support himself in the election because he was a “like minded” candidate to incumbent, Noel Campbell. He also argues that, within the confines of the law, he has a First Amendment right to “campaign for office, promote [his] beliefs and political attributes and pursue a strategy...” for the best chance of victory. Respondent Stringer states that he mentioned Respondent Campbell’s name on the mailer for the “...clear purpose of enlisting support...” for himself in the Primary Election. He also states he designed the mailer to deliver the message that he was “...the most reliably conservative candidate in the race” by contrasting his record to the third Republican candidate in the race, Chip Davis.

Although Complainant alleges that the mailer fails to meet the definition of “independent expenditure” because it was coordinated due to a shared consultant, the definition of “independent expenditure” also specifically excludes expenditures made by a candidate’s campaign committee (A.R.S. §16-901(14)). The mailer indicates that it was paid for by Conservatives for Stringer, Respondent Stringer’s candidate campaign committee. Respondent Stringer’s Pre-Primary Election Report filed on August 26, 2016, identifies several expenditures for “postcards” and “mailings” during the reporting period. The mailer expenditure was made a candidate’s campaign committee and is therefore not an independent expenditure.

Complainant argues the mailer expenditure is an in-kind contribution to Respondent Campbell because it expressly advocates for his election and it cannot be considered an

independent expenditure due to coordination (A.R.S. §16-917(C)). However, there is no evidence of coordination even though the Respondent's share a campaign consultant and mailing house. The mailer can have alternative reasonable meanings than to advocate for the election of Respondent Campbell, which are to either advocate for the election of Respondent Stringer or advocate for the defeat of candidate Chip Davis. The alternative reasonable meanings defeat the allegation that the expenditure was coordinated solely to advocate for the election of Respondent Campbell.

B. Failure to report campaign expenditures

A.R.S. § 16-942(B) provides penalties for violation of “any reporting requirement” imposed by Title 16, Chapter 6. In addition, participating candidates must identify the full name and street address of the person and the nature of the goods and services and compensation for which payment was made. A.R.S. § 16-948(C). A.A.C. R2-20-109(B)(5) states, “for the purposes of the Act and Commission rules, a candidate or campaign shall be deemed to have made an expenditure as of the date upon which the candidate or campaign promises, agrees, contracts or otherwise incurs an obligation to pay for goods or services.”

1. The January 5, 2016 Fundraiser

Complainant alleges Respondent Campbell failed to report expenditures for his part of a fundraising event held on January 5, 2016 for Legislative District 1 candidates.

In his response, Respondent Campbell argues that the January 5th fundraising reception was produced by a lobbyist without Respondent Campbell's direct involvement. He believes he was invited to attend the event in order “make contributors and voters think [he] was supporting Chip Davis” in the legislative race. He states he was invited to attend the event and agreed to do so as a neutral party in the legislative House race. He states he confirmed with candidate Karen Fann that he would not be accepting any contributions at the event. He believes a follow-up

invitation was sent indicating that he would not be soliciting contributions at the event.

Respondent Campbell says that he was included on the “paid for by” disclaimer because he believes it was “legally the safe and correct thing to do.” He states he is unaware of costs associated with the invitation, which was sent electronically via e-mail, and he does not know who paid for the event as he was invited to attend.

2. The January 17, 2016 Fundraiser

Complainant alleges Respondent Campbell failed to report expenditures for his part of a fundraising event held on January 17, 2016.

Respondent Campbell states that the January 17th fundraising reception was a “Meet n’ Greet” he agreed to attend with Respondent David Stringer. He states he agreed to attend as a “make-up” event since he had previously attended one for Chip Davis and he felt he was remaining neutral in the race. Respondent Campbell states he did not solicit contributions at the event.

Respondent Stringer states that the Meet n’ Greet was a joint event for himself and Respondent Campbell. He states that Respondent Campbell agreed to appear at the event although Respondent Campbell was neutral in the race. Respondent Stringer believes Respondent Campbell appeared at the event because Respondent Campbell has previously attended an event with their opponent Chip Davis where Respondent Stringer was not included. The cost of the event (\$299.00) was reported on Respondent Stringer’s June 30th Campaign Finance Report. **(Exhibit F)** He states that although the expectation was that both candidates would share the cost of the event, he believes that he most likely did not request a reimbursement from Respondent Campbell because the amount in question was relatively small and Respondent Campbell had not yet qualified for Clean Elections Funding.

Commission Rules R2-20-109(B)(4) and R2-20-703(C) requires candidates to report expenditures made in conjunction with other candidates and for each candidate to pay his or her proportionate share of the expenditure. Since Respondent Stringer considered the event a joint event with Respondent Campbell and had an expectation that each candidate would pay a share of the event cost, Respondent Stringer should have requested reimbursement from Respondent Campbell at the time the expenditure for the Meet n' Greet was made. At the time of the event, Respondent Campbell was not a participating candidate and could have received an in-kind contribution from Respondent Stringer for his share of the expenditure. Respondent Campbell received an in-kind contribution in the amount \$149.50, which is below the contribution limit of \$160.00. Upon applying for certification as a participating candidate, Respondent Campbell would have been required to reimburse Respondent Stringer's campaign committee for the in-kind contribution because participating candidates can receive contributions from individuals only (A.R.S. §16-945(A)).

3. The March 11, 2016 Fundraiser

Complainant alleges Respondent Campbell failed to report expenditures for his part of a fundraising event held on March 11, 2016.

Respondent Campbell states that he was invited to attend a Meet n' Greet by mutual supports of Respondent Stringer and himself. He states that his fundraiser was held by the supporters and they produced the invitation on their own to send their friends and neighbors. Respondent Campbell denied seeing the invitation prior to receiving the Complaint and his is unaware of any associated costs.

Respondent Stringer states the March 11th event in Prescott was not sponsored by his campaign and that he was invited to attend the event as a guest. He states that he did not approve the flyer attached to the Complaint and that he did not incur any costs associated with the flyer.

Respondent Stringer states that the cost of the event was reported as a loan on this campaign finance report. Respondent Stringer's June 30th Campaign Finance Report indicates two loans made on March 11, 2016: 1) John Lamerson for \$122.00; and 2) John R. Stevens for \$122.00.

(Exhibit F)

Respondent Stringer and Respondent Campbell should reported receiving in-kind contributions from John Lamerson and John R. Stevens proportionately, \$61 from each individual who paid for the meet and greet at the Jersey Lilly Saloon. The event does not meet the contribution exception as prescribed in A.R.S. §16-901(5)(iii). Respondent Campbell was a participating candidate at the time of the event and each in-kind contribution would have been within the individual contribution limit of \$160.00 and Respondent Campbell did not exceed the aggregate early individual contribution limit of \$4,011.00.

III. Analysis

A. Accepting a prohibited campaign contribution

Because the mailer had meaning other than to advocate for Campbell and because there is no evidence Campbell knew of it, the Complainant theory of contribution fails. A.R.S. §16-945(A) requires participating candidates to accept early contributions from individuals only and not to exceed the early contribution limit of \$160.00. Participating candidates may not accept contributions from political committees as set forth in A.A.C. R2-20-104(D). The facts outlined above demonstrate that there is no reason to believe that Respondent Campbell violated A.R.S. §§ 16 941(A) and -945(A) by accepting a prohibited in-kind contribution from Respondent Stringer. I do not recommend the Commission find reason to believe a violation may have occurred.

B. Failure to report campaign expenditures

1. The January 5, 2016 Fundraiser

The facts outlined above demonstrate that there is no reason to believe Respondents may have violated A.R.S. §§ 16-942(B), -948(C) and R2-20-109(B) by failing to report expenditures for a campaign fundraiser.

2. The January 17, 2016 Fundraiser

The facts outlined above demonstrate that there is no reason to believe Respondents may violated A.R.S. §§ 16-942(B), -948(C) and R2-20-109(B) by failing to report expenditures for a campaign fundraiser.

3. The March 11, 2016 Fundraiser

The facts outlined above demonstrate that there is no reason to believe Respondents may violated A.R.S. §§ 16-942(B), -948(C) and R2-20-109(B) by failing to report expenditures for a campaign fundraiser.

IV. Investigation After Reason to Believe Finding

If the Commission determines by an affirmative vote of at least three (3) of its members that it has reason to believe a respondent has violated a statute or rule over which the Commission has jurisdiction, the Commission shall notify such respondent of the Commission's finding setting forth: (i) the sections of the statute or rule alleged to have been violated; (ii) the alleged factual basis supporting the finding; and (iii) an order requiring compliance within fourteen (14) days. During that period, the Respondent may provide any explanation to the Commission, comply with the order, or enter into a public administrative settlement with the Commission. A.R.S. § 16-957(A) & A.A.C. R2-20-208(A).

After the Commission finds reason to believe that a violation of a statute or rule over which the Commission has jurisdiction has occurred, the Commission shall conduct an investigation. A.A.C. R2-20-209(A). The Commission may authorize the Executive Director to

subpoena all of the Respondent's records documenting disbursements, debts, or obligations to the present, and may authorize an audit.

Upon expiration of the fourteen (14) days, if the Commission finds that the alleged violator remains out of compliance, the Commission shall make a public finding to that effect and issue an order assessing a civil penalty in accordance with A.R.S. § 16-942, unless the Commission publishes findings of fact and conclusions of law expressing good cause for reducing or excusing the penalty. A.R.S. § 16-957(B).

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).

After fourteen (14) days and upon completion of the investigation, the Executive Director will recommend whether the Commission should find probable cause to believe that a violation of a statute or rule over which the Commission has jurisdiction has occurred. A.A.C. R2-20-214(A). Upon a finding of probable cause that the alleged violator remains out of compliance, by an affirmative vote of at least three (3) of its members, the Commission may issue of an order and assess civil penalties pursuant to A.R.S. § 16-957(B). A.A.C. R2-20-217.

Dated this 24th day of October, 2016.

By: s/Thomas M. Collins
Thomas M. Collins, Executive Director

EXHIBIT A

Larry D. Gray
2979 Southpark
Prescott, AZ 86305-6418

Thomas Collins
Executive Director
Arizona Clean Elections Commission

August 19, 2016

Dear Mr. Collins:

I write to inform you of an apparent campaign finance law violation by David Stringer and Noel Campbell candidates for the Arizona House of Representatives in Legislative District 1.

On January 5 and 17, 2016 there were two events identified as fundraising for LD 1 House candidates. Those two events indicate Mr. Campbell paid part of the event expenses, yet his Campaign Finance Report filed July 16, 2016, does not show any expenses for those dates, in fact the first noted expense is dated 2/13/2016. A third fundraiser dated March 11, 2016, by Mr. Campbell and Mr. Stringer does not note a "paid for by" on the flyer I have attached. Mr. Campbell does not show any expense for that date in his report. Please see the attachments included.

I do not have the recording of a similar radio ad, but I have attached an audio file of an automated phone call to my home by Mr. Stringer that states:

You've got two votes for state representative. Noel Campbell has done a great job and I'll be supporting him for one of those seats. I hope you'll vote for David Stringer for the second seat. If you want someone who has a proven conservative record, vote David Stringer and I'll work to protect our liberties, fight for our schools and families, and do everything I can to secure our borders and prohibit tax payer funded benefits going to those who are here illegally. Thanks for you time. This call is paid for by Conservatives for Stringer.

I have attached a mail piece that Mr. Stringer has distributed to voters in Legislative District 1. In this campaign piece, Mr. Stringer states:

[I]t seems like everyone I know is voting for Noel Campbell with their 1st vote for State Representative. Please use your 2nd vote to elect a real conservative who will work with him instead of against him. Like Noel, I oppose higher taxes and ObamaCare Expansion... Why elect a conservative and then a liberal to cancel his vote? The mailer notes: Paid for by Conservatives for Stringer.

I have attached a mail piece from Mr. Campbell that shows the permit number for presorted postage is the same number as Mr. Stringer's mailer indicating the same mail house was used for both mailers.

This campaign piece constitutes express advocacy in favor of Mr. Stinger, but also in favor of Noel Campbell. A.R.S. §16-901.01 states that "expressly advocates" is defined as:

"Conveying a communication containing a phrase such as "vote for," "elect," "reelect," "support," "endorse," "cast your ballot for," "(name of candidate) in (year)," "(name of candidate) for (office)," "vote against," "defeat," "reject" or a campaign slogan or words that in context can have no reasonable meaning other than to advocate the election or defeat of one or more clearly identified candidates."

Clearly this piece advocates the election of two clearly identified candidates—Mr. Stringer and Mr. Campbell.

Normally such a piece would be counted as an independent expenditure. See A.R.S. §16-901(15). And Mr. Stringer would be required to fill out campaign finance reports to this effect. However, under these circumstances, it appears that this is not a lawful independent expenditure because it is coordinated with the benefited candidate. This is because both Mr. Stringer and Mr. Campbell use a common political consultant.

A.R.S. §16-911(A)(1) states that an expenditure is coordinated if:

Any officer, member, employee or agent of the political committee making the expenditure is also an officer, member, employee or agent of the committee of the candidate whose election or whose opponent's defeat is being advocated by the expenditure or an agent of the candidate whose election or whose opponent's defeat is being advocated by the expenditure.

Similarly, the Federal Elections Commissions standards state that an expenditure is coordinated under the following circumstances, where the benefited candidate's committee and the committee making the expenditure use a "common vendor":

- (i) The person paying for the communication, or an agent of such person, contracts with or employs a commercial vendor, as defined in 11 CFR 116.1(c), to create, produce, or distribute the communication;
- (ii) That commercial vendor, including any owner, officer, or employee of the commercial vendor, has provided any of the following services to the candidate who is clearly identified in the communication, or the candidate's authorized committee, the candidate's opponent, the opponent's authorized committee, or a political party committee, during the previous 120 days:

- (A) Development of media strategy, including the selection or purchasing of advertising slots;
- (B) Selection of audiences;
- (C) Polling;
- (D) Fundraising;
- (E) Developing the content of a public communication;
- (F) Producing a public communication;
- (G) Identifying voters or developing voter lists, mailing lists, or donor lists;
- (H) Selecting personnel, contractors, or subcontractors; or
- (I) Consulting or otherwise providing political or media advice

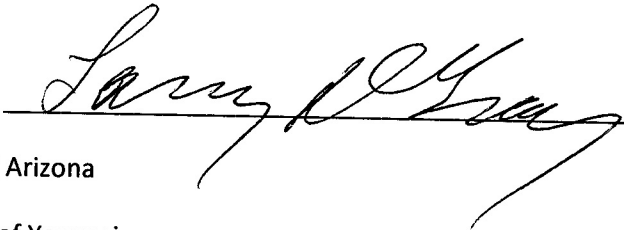
11 Code of Federal Regulations §109.21(d)(4)

If an expenditure is a coordinated expenditure, it is treated as an in-kind contribution to the benefited candidate. A.R.S. § 16-917(C). And that would result in a host of violations of the Citizens Clean Elections Act, because Mr. Stringer will have unlawfully contributed to a Clean Elections candidate. See A.R.S. §16-942 (mandating penalties of ten times the unlawfully contributed amount and disqualification of office under certain circumstances).

It is clear that the Commission must investigate this and take action. The integrity of the Clean Elections system must be preserved.

Thank you for reviewing this information. Larry Gray

I hereby certify under penalties of perjury, that the above are true and correct to the best of my knowledge.



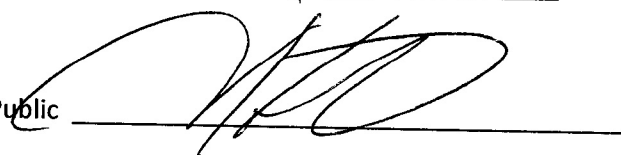
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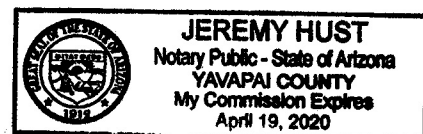
County of Yavapai

Subscribed and sworn or affirmed and acknowledged before me this **19th** day of **August, 2016**.

Commission Expiration date April 19, 2020

Notary Public





Making a Difference



I believe no matter what we do, we should make a difference doing it. Whether fighting for our nation in Vietnam or flying the AH-1G Cobra for drug interdiction along the Mexican border, I knew I had made a difference. I feel the same way about serving you in the Arizona Legislature. I've cut taxes, balanced the budget, fought against ObamaCare and Common Core, and I've passed bills to help the people I serve. I'm proud to have made a difference and ask you to return me for a second term so that I can continue to do so.

Noel

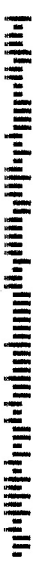
ENDORSED BY:

Arizona State Troopers
Arizona Fraternal Order of Police
Arizona Conference of Police & Sheriffs
National Rifle Association (NRA)
Professional Firefighters of Arizona
National Federation of Independent Businesses
Greater Phoenix Chamber of Commerce
Realtors of Arizona
See www.NoelCampbell.org for a full list...

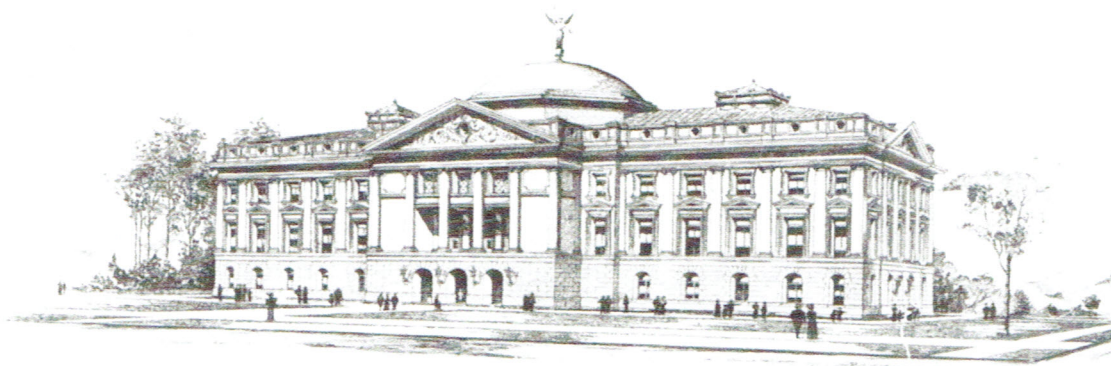
Paid for by Elect Noel Campbell P-001

Veteran Law Enforcement
NOEL CAMPBELL
Conservative for State House

PRESORTED STD
US POSTAGE
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THE GRAY FAMILY
2979 Southpark
Prescott AZ 86305-6418



Please Join us for a Fundraising Reception in Honor of...

REPRESENTATIVE KAREN FANN

Chairwoman, House Committee on Insurance

REPRESENTATIVE NOEL CAMPBELL

Vice-Chairman, House Committee on Federalism & States' Rights

And Introducing...

CHIP DAVIS

Candidate for House of Representatives, Legislative District 1

Tuesday, January 5th, 2016

4:30 PM to 6:30 PM

Alexi's Grill

3550 North Central Avenue

Phoenix, Arizona 85012

To Contribute Online to Elect Karen Fann, Please [Click Here](#)

To Contribute Online to Chip Davis for AZ, Please [Click Here](#)

**Please note that Representative Campbell will be running as a Clean Elections candidate, and will not be accepting contributions at this time.*

If you are unable to attend, please mail all contributions to:

Elect Karen Fann
5691 Hole in One Dr.
Prescott, AZ 86301

Chip Davis for AZ
3066 Mountain Lake Dr.
Prescott, AZ 86301

Paid for by Elect Karen Fann, Elect Noel Campbell, and Chip Davis for AZ



You Are Cordially Invited
to a Meet 'n' Greet with

Representative Noel Campbell
(running for re-election)

&

David Stringer
(running for the open House seat)

Come meet these two great conservatives and talk
about their positions, records, and campaigns!

Sunday, January 17th, 2016

2 pm - 5 pm

Prescott Country Club

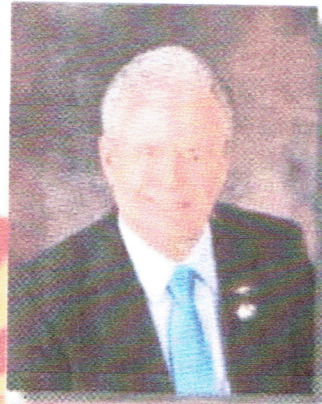
1030 N Prescott Country Club Blvd, Dewey, AZ 86327

Paid for by Elect Noel Campbell and Conservatives for Stringer

Come Meet Your LD1 Candidates

INCUMBANT LD #1
Representative

Noel Campbell



Prescott Businessman

David Stringer

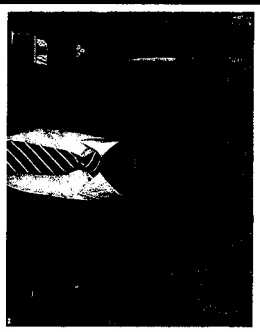
Friday, March 11

Jersey Lilly Saloon

116 S Montezuma St, Prescott

5 to 7 p.m.

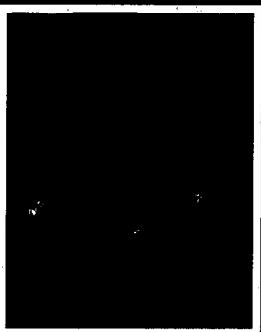
Join Us for a Raffle, Food, and Fun



Conservative David Stringer

Small Business Owner & Lifelong Conservative
Opposed the ObamaCare Medicaid Expansion
Led Efforts to Defeat Tax Increases
Opposes Higher Gas Taxes
Opposes Converting I-17 into a Toll Road

While Chip Davis was trying to raise your taxes to pay for bigger government, David Stringer was fighting to stop him. Now you get to choose who should represent you and who should set taxing and spending policies for the entire state of Arizona. We can't afford liberal Chip Davis. Vote Conservative David Stringer for State Representative.



Liberal Chip Davis

20-year Liberal Career Politician
Supported the ObamaCare Medicaid Expansion
A Long Record of Supporting Higher Taxes
Supports Higher Gas Taxes
Open to Converting I-17 into a Toll Road

While Republicans were trying to re-elect Conservative Republican Sylvia Allen to the State Senate, liberal Chip Davis was endorsing and campaigning for Tom O'Halleran to beat her. The same liberal Democrat Tom O'Halleran now running for Congress. If Davis thinks liberal Democrats should be in charge, why is he running as a Republican?

DAVID STRINGER

STATE HOUSE

VOTE STRINGER.COM

Paid for by Conservatives for Stringer

P-003

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0004971 000008 SCH 5-DIGIT 86302

THE GRAY FAMILY

2979 Southpark

Prescott AZ 86305-6418

"It seems like everyone I know is voting for Noel Campbell with their 1st vote for State Representative. Please use your 2nd vote to elect a real conservative who will work with him instead of against him. Like Noel, I oppose higher taxes and the ObamaCare Expansion, while my opponent has a long history of supporting higher taxes and the ObamaCare Expansion.

Why elect a conservative and then a liberal to cancel his vote?

Please vote for me in the Republican Primary. Thank you!"



Long-time Arizonan

Life-long Conservative

A Leader in the fight against higher taxes

EXHIBIT B

146 N. Mt. Vernon Ave.
Prescott, AZ 86301
September 2, 2016

'16 SEP 7 AM 11:05 CCEC

Sara A. Larsen
Financial Affairs & Compliance Officer
Citizens Clean Elections Commission
1616 W. Adams, Suite 110
Phoenix, AZ 85007

Dear Ms. Larsen,

Complaint MUR16-001, filed by Larry Gray, seems to be divided into two parts. The first has to do with Paid For Disclaimers and invite expenses, while the second has to do with David Stringer's campaign and some of his messaging to the LD-1 voters. As I read the complaint, I have nothing to do with Mr. Stringer's First Amendment right to advertise and so I cannot respond to those allegations. Therefore, I am limiting my response to the first part.

Mr. Gray's wife served in the Legislature for 16 years so he is well aware the Paid For Disclaimers which appear on printed materials relate only to the printed materials themselves. If I send out a fund raising invitation, then that invitation constitutes advocacy on my behalf, and I am required to include a disclaimer stating I paid for that invitation.

The three invites in question can each be addressed separately:

The January 5, 2016 "Fund Raising Reception" for Fann, Campbell, and Davis was produced by a lobbyist without my direct involvement, or frankly, my blessing. Ms. Fann and Mr. Davis wished to include me in their event so they could make contributors and voters think I was supporting Chip Davis' campaign when in fact I was neutral in that contest. I clearly stated as much, but the invitation was already sent by email to various lobbyists. At this point, it would have been a much bigger deal to send out a correction saying I wasn't going to be there. So I agreed to attend but reminded Ms. Fann I was running Clean Elections and would not be accepting any contributions. As I recall, a follow-up invite was sent out which clearly stated I was not accepting contributions. The lobbyist who sent out the invite included me on the Paid For Disclaimer which I believe is legally the safe and correct thing to do, but this was a PDF invitation which was emailed to invitees. I'm unaware of any actual real costs associated with the invitation, and as a result, I had nothing to report as related to its costs. As for the event itself, I don't know who paid for it; I showed up for a perfunctory period of time, accepted no money, and left.

The January 17, 2016 event was a "Meet n' Greet" for David Stringer and myself. I was invited to attend, sort of as a make-up event since I attended one for Chip Davis in Phoenix. So again, as the incumbent remaining neutral in this race, I accepted and attended. As with the first event, I raised no money there and the invitation was a PDF which I received via email. I believe it also had no actual cost associated with it.

The March 11, 2016, "Come Meet Your LD1 Candidates" event, which has no Paid For Disclaimers, is something I haven't seen before. Mutual supporters of David and me invited us to a Meet n' Greet. I suspect, based on the spelling errors and overall design, they produced this invitation on their own to send to their friends and neighbors. They likely don't know the rules on disclaimers, but I'm unaware

of any costs associated with it. In fairness, the lack of a disclaimer on a homemade invitation I've never seen before cannot possibly be an infraction on my part.

I'm always happy to made adjustments to my reports to keep in compliance. If there is anything you wish me to add to my reports, please let me know and I'll take care of it immediately. Let me know if there is anything else you need from me. Thank you.

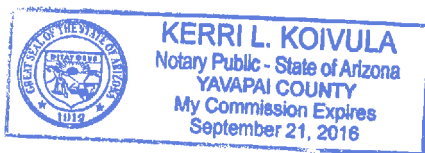
Sincerely,

Noel Campbell



STATE OF ARIZONA } ss.
COUNTY OF YAVAPAI }

This instrument was acknowledged before me this 2nd day of SEP, 20 16 by Noel Campbell.
In witness whereof I hereunto set my hand and official seal.
Kerri L. Koivula NOTARY PUBLIC



DAVID H STRINGER
1290 WHITE SPAR ROAD
PRESCOTT, ARIZONA 86303
928-848-1518

16 SEP 7 AM 10:33 CCEC

September 6, 2016

Ms. Sara A. Larsen
Financial Affairs & Compliance Officer
Citizens Clean Elections Commission
1616 W. Adams Street, Suite 110
Phoenix, Arizona 85007

RE: CCED MUR No. 16-001

Dear Ms. Larsen:

Your correspondence of August 22, 2016, was received shortly before the August 30th primary with a response date of August 29, 2016. I very much appreciate your consideration in extending the time to today's date. In response to the issues raised in the complaint, I would like to provide the following information:

1. The January 17th Meet 'n Greet at the Prescott Country Club was a joint event with Mr. Noel Campbell and myself. The flyer included the appropriate disclaimer. (Copy enclosed). This was not a fund raiser and to my knowledge no campaign contributions were sought or received. At the time of the event, I believe Mr. Campbell had announced an intention to run as a Clean Elections candidate but had not yet qualified. I believe he was officially neutral in the race at that time but agreed to appear with me because he had recently attended an event with my opponent that did not include me. The cost of the event was \$299 which was reported on my financial report. The expectation is that both candidates would share the cost of the event. But Mr. Campbell had not yet qualified as a Clean Elections candidate. I considered the amount in question relatively small. I'm not sure I ever asked for reimbursement. If this was not an appropriate gesture on my part, I will ask Mr. Campbell to reimburse my campaign his share of the cost and amend our report. Or, given the amount in question and if permitted to do so, I can make this a contribution to Mr. Campbell's seed money. I would note that this was the only event of this nature we did together. There was no intent to deceive the public, the Secretary of State or Clean Elections in the way my campaign reported this event.
2. With respect to the March 11, 2016, event at Jersey Lilly's in Prescott, this was not an event sponsored by my campaign. I attended as an invited guest. I did not prepare or approve the flyer and did not bear any of the costs. My understanding is that this was a

Meet 'n Greet and not a fund raiser. No funds were sought or received. The cost of the event was reported as a loan to my campaign by the parties involved.

3. The major part of the complaint is focused on whether or not I used my campaign funds to elect Noel Campbell. I did not. Mr. Campbell is a popular incumbent who ran for reelection. His first place finish was never in doubt. He did not need my help. Nor did he ask for it.

My campaign message was designed to do several things. First, because Mr. Campbell was an incumbent running for reelection, I needed to let voters know that there were two seats to fill and they had two votes to cast. I often ran into voters who indicated they liked me but intended to vote for Noel Campbell. I had to explain that our district had two representatives and they could vote for Mr. Campbell and still vote for me with their second vote. Second, I wanted to make sure voters knew that I was the most reliably conservative candidate in the race. I did this by detailing my record and contrasting it with the third candidate, Mr. Arlo "Chip" Davis. And third, I wanted to associate myself with Mr. Campbell's popularity and the good will voters have toward him by letting them know that I was running to work with him and not against him and that unlike my opponent, my vote would support his and not cancel him out.

This was sound strategy. In fact, it was the same strategy that Mr. Davis's supporters used when they attempted to include Mr. Campbell in their fundraising efforts on January 5th, and later sent out flyers falsely claiming that Mr. Davis and Noel Campbell were running as a team. (Copy enclosed). Mr. Davis and his supporters understood the value of associating themselves with a popular incumbent just as I did.

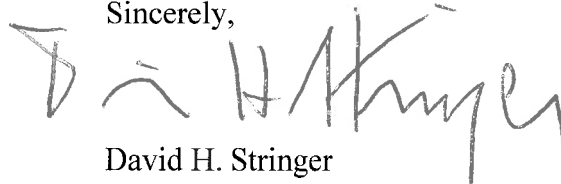
My consultant made it clear that it was appropriate to point out to voters that my conservative views were similar to Mr. Campbell's. But there is a clear distinction or bright line between being merely complimentary or drawing attention to our ideological similarity and direct advocacy for another candidate's election. We were careful not to cross that line. My statements were directed to asking voters to support me. When Mr. Campbell was mentioned, it was in passing and for the clear purpose of enlisting support for me. Voters were told that they did not have to choose between me and Noel Campbell because there was a second seat. We made our desired point that if voters wanted to elect like minded candidates they could vote for me.

I have a First Amendment right to campaign for office, promote my beliefs and political attributes and pursue a strategy that gives me the best chance of victory so long as I do not break the law. We went to a great deal of effort to ensure that we stayed on the right side of the law in advancing my campaign.

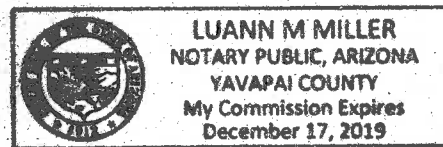
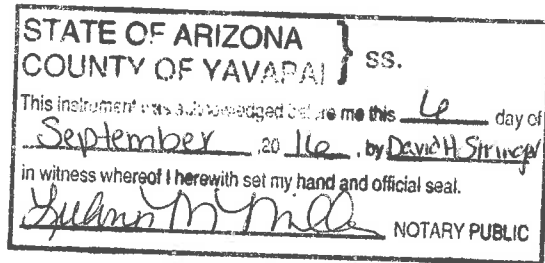
Please be assured of my full cooperation in resolving this matter. This is my first run for state office. I am not a legal expert in Clean Elections law, but I have made a diligent,

good faith effort to comply with all campaign rules and to make full disclosures. I am available to answer any follow up questions as is my consultant. We are prepared to explain and defend our choice of words and their clear intent and meaning. I should mention that I have prepared this response without consultation with an elections attorney. If you have further questions, I would ask for leave to supplement this response and reasonable time to consult with counsel. Please do not hesitate to contact me if anything further is needed.

Sincerely,



David H. Stringer





You Are Cordially Invited
to a Meet 'n' Greet with

Representative Noel Campbell

(running for re-election)

&

David Stringer

(running for the open House seat)

Come meet these two great conservatives and talk
about their positions, records, and campaigns!

Sunday, January 17th, 2016

2 pm - 5 pm

Prescott Country Club

1030 N Prescott Country Club Blvd, Dewey, AZ 86327

Paid for by Elect Noel Campbell and Conservatives for Stringer

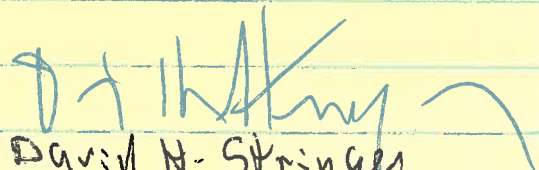
EXHIBIT C

Ms. Larson:

Sept 7, 2016
Re: CCEC MMR No. 16-001

The enclosed flyers were inadvertently omitted from my FEPER submission.

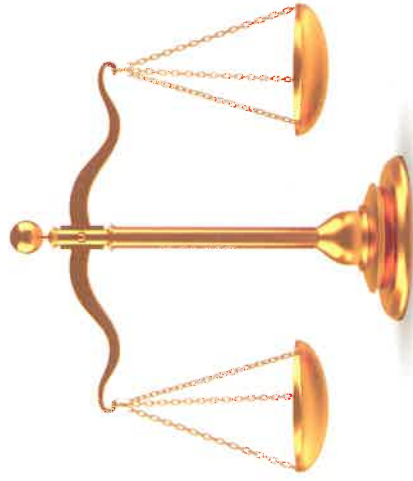
I am providing them as background to illustrate the strategy used by both sides of associating themselves with the popular incumbent, Noel Campbell. Mr. Campbell shared the cost of two mailers with me. He did not approve the use of his name and image on mailers supporting Mr. Davis and Ms. Fann. They had the effect of misleading voters about who he actually supported.


David H. Springer

AS YOUR LEGISLATORS, Noel Campbell & Chip Davis WILL VOTE TO BLOCK SPECIAL INTEREST TAX GRABS.

Campbell & Davis
WILL WORK TO ENSURE
BALANCED STATE BUDGETS!

YOUR PROPERTY TAXES
SHOULD GO TO IMPROVE
YOUR LOCAL SCHOOLS,



NOT TO SPECIAL INTERESTS!



Noel Campbell



Chip Davis

Paid for by: Responsible Leadership for AZ.
Not authorized by any candidate or candidate's
campaign committee. Major Funding by:
REALTORS® of AZ PAC (602) 248-7787

PRESORTED
STANDARD
U.S. POSTAGE PAID
PHOENIX, AZ
PERMIT NO. 3418



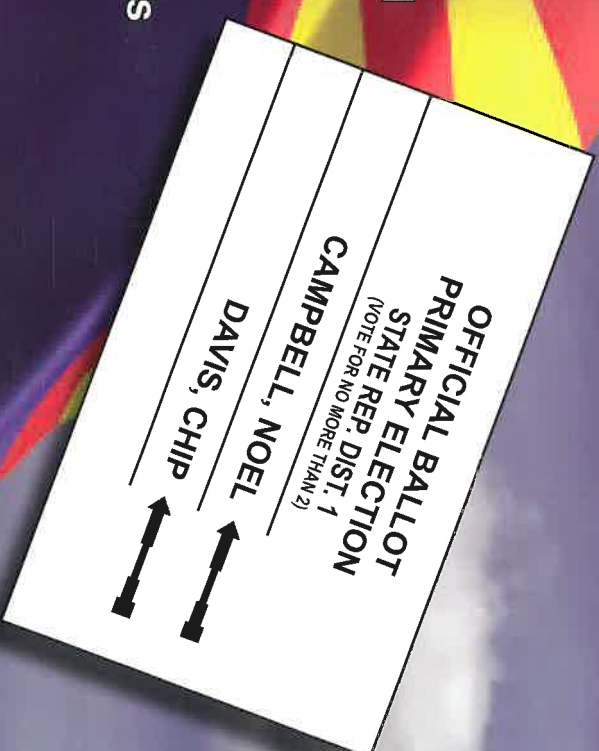
ELECT Noel Campbell & Chip Davis
OUR TAXPAYER CHAMPIONS

4272*****AUTO**SCH 5-DIGIT 86303
Frances Tate
231 S Marina St
Prescott AZ 86303-3942

ELECT Noel Campbell & Chip Davis!

Campbell & Davis Will Protect Our Values!

- Opposes Property Tax Increases
- Will Work To Reduce Regulatory Burdens On Businesses
- Supports Our Veterans And The Families Of Those Deployed
- High Quality Schools Controlled By Parents And Teachers
 - NOT STATE BUREAUCRATS!
- Create High Quality Jobs And A Well-Trained Workforce
- Believes That Building Roads And Improving Infrastructure Is Key To Arizona's Continued Economic Growth



Your Priorities Are Noel & Chip's Priorities!



Veteran Law Enforcement
NOEL CAMPBELL
Conservative for State House

STRINGER
STATE HOUSE
- CONSTITUTION
PRO - TAXPAYER
- FAMILY

Cast Your TWO Votes For Campbell & Stringer

NOELCAMPBELL.ORG

VOTESTRINGER.COM

Balanced Budgets & Lower Taxes

Border Security & No Amnesty

Protecting Our Constitutional Rights

Education Reform for Greater Results & Efficiency

Protecting Life & Traditional Values

Free Market Solutions to Health Care Issues

Ensuring our District gets the respect it deserves

Paid for by Elect Noel Campbell
and Conservatives for Stringer

P-002

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0004948 000009 SCH 5-DIGIT 86303

THE STRINGER FAMILY

231 S Marina St

Prescott AZ 86303-3942

Veteran Law Enforcement
NOEL CAMPBELL
Conservative for State House

CONSERVATIVE & EFFECTIVE VOICES

STRINGER
STATE HOUSE
PRO - TAXPAYER
CONSTITUTION
FAMILY



Our district only get two votes in the State House, which is why we need a team that works together to get the job done. We ask that you support us both so we can work together for commonsense conservative solutions. It makes no sense to elect one conservative and one liberal to cancel each other out. Please vote for the team of Campbell & Stringer for State House. Thank you!



20-YEAR ELECTED POLITICIAN CHIP DAVIS - LIBERAL VOTES - LIBERAL VALUES



Outside Special Interests are spending heavily to elect Chip Davis to our second House seat. They like Chip's big government, high-tax record, and they want him at the Capitol to vote "Yes" on their expensive bills. **Chip Davis even campaigned for liberal Tom O'Halleran (the Democrat candidate for Congress in CD1) to defeat a conservative Republican Senator.** Arizona can't afford Chip Davis' liberal votes or his commitment to liberal politicians.

We Support Your Legislative Team



Karen Fann for Senate



Noel Campbell for House



Chip Davis for House

They Share Your Values

**ENDORSED BY THE FOLLOWING
ORGANIZATIONS!**

- REALTORS® of AZ PAC
- Professional Fire Fighters of AZ
- AZ Chamber of Commerce and Industry
- AZ Nurses Association
- Greater Phoenix Chamber of Commerce

EXHIBIT D

Larry D. Gray
2979 Southpark
Prescott, AZ 86305-6418

Sara A. Larsen
Financial Affairs & Compliance Officer
Citizens Clean Elections Commission
1616 W. Adams St., Suite 110
Phoenix, Arizona 85007

August 19, 2016

Dear Ms. Larson:

Thank you for the updated information on the responses to my complaint.

I find both Mr. Campbell and Mr. Stringer's responses to be disingenuous and not addressing the actual campaign violations while providing information that appears to have the purpose of distracting the Commission away from the violations.

I have heard that Mr. Campbell was very upset about my complaint and contacted Representative Fann to request her assistance in providing a document/letter (?) regarding the January 5 event. I saw that Mr. Davis acknowledged an in-kind contribution from Representative Fann in his financial report for that event. I believe it is reasonable to believe Representative Fann provided that expense information to Mr. Davis and she would have provided the same information to Mr. Campbell. Maybe, Representative Fann should be contacted to determine if she supplied any document regarding this event to Mr. Campbell that he elected not to include in his response to the Commission. This failure would be similar to his failure to report in-kind expenditures on his campaign finance report.

Mr. Campbell seems to have the ability to also avoid providing detailed information on his reports to the Commission, like failing to acknowledge the lobbyist status for all but one seed money contribution as the acknowledgement would be in conflict with his statements to the Capitol Times, July 25, 2016, when he stated "turning around and taking money from lobbyists would have been easy, but hypocritical."

Mr. Campbell says in his response that "If I send out a fund raising invitation, then that invitation constitutes advocacy on my behalf," yet he seems to claim that because he did not accept any donations at the January 5 event, there was no advocacy with the many lobbyist that attended. That position is clearly in conflict with ARS 16-901.01.

Once again Mr. Campbell's excuse is that he raised no money and states "I believe it also had no actual cost associated with it." The idea that a "Meet and Greet" has no expenses whether in Phoenix or Prescott is not credible. As the treasurer for Senator Linda Gray for at least 5 clean

election campaigns, the Commission and I know full well there are expenses for meet and greet functions; especially at Alexi's Grill!

Mr. Campbell does not address the coordination of expenditures under ARS 16-911(A)(1). Perhaps Mr. Campbell does not wish to acknowledge or address this because as he told the Capitol Times "I have a measly \$24,000."

Mr. Stringer takes a similar position as Mr. Campbell regarding the March 11 event stating, "No funds were sought or received." That position is clearly in conflict with ARS 16-901.01.

Mr. Stringer's response to the violation of ARS 16-911(A)(1) coordination of expenditures appears ignore the statute while stating he has "a First Amendment right to campaign for office." Does Mr. Stringer believe that First Amendment right allows him and Mr. Campbell to avoid compliance with state law regarding campaign finance law?

Mr. Stringer's handwritten response dated 9-7-16 is confusing because the flyers he attached were in fact independent expenditures and were not coordinated with the candidates, nor did the political action committees' request permission of the candidates in the production of the flyers. Those flyers were in fact in compliance with ARS 16-911(A)(1).

Thank you for taking the time to review my comments. I look forward the results of your investigation.

Larry Gray

EXHIBIT E

“It seems like everyone I know is voting for Noel Campbell with their 1st vote for State Representative. Please use your 2nd vote to elect a real conservative who will work with him instead of against him. Like Noel, I oppose higher taxes and the ObamaCare Expansion, while my opponent has a long history of supporting higher taxes and the ObamaCare Expansion. Why elect a conservative and then a liberal to cancel his vote. Please vote for me in the Republican Primary. Thank you!”



**Long-time Arizonan
Life-long Conservative
A Leader in the fight against higher taxes**



Conservative David Stringer

Small Business Owner & Lifelong Conservative
Opposed the ObamaCare Medicaid Expansion
Led Efforts to Defeat Tax Increases
Opposes Higher Gas Taxes
Opposes Converting I-17 into a Toll Road

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Liberal Chip Davis

20-year Liberal Career Politician
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2979 Southpark
Prescott AZ 86305-6418

EXHIBIT F

State of Arizona



Campaign Finance Report

Conservatives for Stringer
Committee #: 201600370

Treasurer: STEVENS, JOHN R
PO Box 1913, Prescott, AZ 86302
Phone: (928) 443-0830
Email: john@aztaxpros.org
Candidate Name: Stringer, David H
Office Sought: State Representative - District 1

2016 June 30th Report

Election Cycle: 2015-2016
Date Filed: June 29, 2016
Reporting Period: January 1, 2016-May 31, 2016

Summary of Finances

Cash Balance at Beginning of Reporting Period:	\$48,778.30
Total Cash Receipts this Reporting Period:	\$39,249.49
Total Cash Disbursements this Reporting Period:	\$24,051.13
Cash Balance at End of Reporting Period:	\$63,976.66

Report ID: 148745

Summary of Activity

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	\$0.00	\$0.00	\$0.00	\$0.00
Individual Contributions	C2	\$0.00	\$0.00	\$0.00	\$0.00
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	\$0.00
CCEC Funding and Matching	C6	\$0.00	\$0.00	\$0.00	\$0.00
Qualifying Contributions	C7	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made to this Committee	L1	\$39,249.49	\$0.00	\$39,249.49	\$89,249.49
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
Total Income		\$39,249.49	\$0.00	\$39,249.49	\$89,249.49

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$24,051.13	\$0.00	\$24,051.13	\$25,272.83
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
Total Expenditures		\$24,051.13	\$0.00	\$24,051.13	\$25,272.83
Bill Payments for Previous Expenditures	D1	\$0.00		\$0.00	\$0.00
Total Cash Disbursed		\$24,051.13			

Schedule E1 - Operating expenses

		Date	Amount	Cycle To Date
Name:	Walter, Sharon J	01/01/2016	\$1,000.00	\$7,268.25
Address:	1970 Acacia Cir, Prescott, AZ 86301		Cash	
Occupation:	Clerical, Self			
Category:	Professional Services - Consultants			
Memo:	Jan Services			
Name:	Walter, Sharon J	01/11/2016	\$59.46	\$7,268.25
Address:	1970 Acacia Cir, Prescott, AZ 86301		Cash	
Occupation:	Clerical, Self			
Category:	Communications - Other			
Memo:	phone card reimb			
Name:	Sensmeier, Steven K	01/13/2016	\$520.00	\$520.00
Address:	7416 E Mingus Trl, Prescott Valley, AZ 86315		Cash	
Occupation:	Web Designer, Self			
Category:	Professional Services - Website/graphic design			
Name:	Randalls the Resturant	01/17/2016	\$299.00	\$299.00
Address:	1030 N Prescott CC Blvd, Prescott, AZ 86301		Cash	
Category:	Event Expenses - Food/refreshments			
Memo:	Meet 'n Greet PG&CC			
Name:	Walter, Sharon J	02/01/2016	\$1,000.00	\$7,268.25
Address:	1970 Acacia Cir, Prescott, AZ 86301		Cash	
Occupation:	Clerical, Self			
Category:	Professional Services - Consultants			
Memo:	Feb Services			
Name:	Walter, Sharon J	02/10/2016	\$95.09	\$7,268.25
Address:	1970 Acacia Cir, Prescott, AZ 86301		Cash	
Occupation:	Clerical, Self			
Category:	Communications - Other			
Memo:	ph card & supplies			
Name:	Ariz Republican Party	02/16/2016	\$250.00	\$250.00
Address:	3501 N 24th St, Phoenix, AZ 85016		Cash	
Category:	Communications - Mailings			
Name:	Grassroots Partners LLC	02/16/2016	\$1,350.63	\$11,358.00
Address:	2942 N 24th St, Ste 114-776, Phoenix, AZ 85016		Cash	
Category:	Communications - Flyers/handouts/door hangers			
Memo:	Inv #1613			
Name:	Pinmart Inc	02/17/2016	\$1,002.77	\$1,002.77
Address:	1842 S Elmhurst Rd, Mount Prospect, IL 60056		Cash	
Category:	Communications - Flyers/handouts/door hangers			

Schedule E1 - Operating expenses

		Date	Amount	Cycle To Date
Name:	Prescott Chamber of Commerce	02/18/2016	\$190.00	\$190.00
Address:	117 W Goodwin St, Prescott, AZ 86303		Cash	
Category:	Miscellaneous - Membership dues			
Memo:	Inv #7450			
Name:	Chino Valley Chamber of Commerce	02/23/2016	\$125.00	\$425.00
Address:	175 E Road 2 S, Chino Valley, AZ 86323		Cash	
Category:	Miscellaneous - Membership dues			
Name:	Prescott Vly Chamber of Commerce	02/23/2016	\$169.00	\$219.00
Address:	7120 Pav Way, Ste 102, Prescott Valley, AZ 86314		Cash	
Category:	Miscellaneous - Membership dues			
Name:	Walter, Sharon J	03/01/2016	\$1,000.00	\$7,268.25
Address:	1970 Acacia Cir, Prescott, AZ 86301		Cash	
Occupation:	Clerical, Self			
Category:	Professional Services - Consultants			
Name:	Grassroots Partners LLC	03/07/2016	\$275.00	\$11,358.00
Address:	2942 N 24th St, Ste 114-776, Phoenix, AZ 85016		Cash	
Category:	Professional Services - Consultants			
Name:	Grassroots Partners LLC	03/07/2016	\$199.61	\$11,358.00
Address:	2942 N 24th St, Ste 114-776, Phoenix, AZ 85016		Cash	
Category:	Communications - Flyers/handouts/door hangers			
Name:	Walter, Arthur Pete	03/07/2016	\$20.00	\$347.01
Address:	1970 Acacia Cir, Prescott, AZ 86301		Cash	
Occupation:	service tech, self-employed			
Category:	Miscellaneous - Petty cash			
Memo:	Reimb Yav County Records			
Name:	Walter, Arthur Pete	03/10/2016	\$32.75	\$347.01
Address:	1970 Acacia Cir, Prescott, AZ 86301		Cash	
Occupation:	service tech, self-employed			
Category:	Communications - Other			
Memo:	reimb phone card			
Name:	Walter, Sharon J	03/10/2016	\$67.00	\$7,268.25
Address:	1970 Acacia Cir, Prescott, AZ 86301		Cash	
Occupation:	Clerical, Self			
Category:	Communications - Other			
Memo:	campaign training			
Name:	Walter, Sharon J	03/10/2016	\$1,000.00	\$7,268.25
Address:	1970 Acacia Cir, Prescott, AZ 86301		Cash	
Occupation:	Clerical, Self			
Category:	Miscellaneous - Sign installation			

Schedule E1 - Operating expenses

		Date	Amount	Cycle To Date
Name:	Costco	03/11/2016	\$122.00	\$244.00
Address:	3911 N State Route 89, Prescott, AZ 86301		Cash	
Category:	Event Expenses - Food/refreshments			
Memo:	Fri 03/11/2016			
Name:	Costco	03/11/2016	\$122.00	\$244.00
Address:	3911 N State Route 89, Prescott, AZ 86301		Cash	
Category:	Event Expenses - Food/refreshments			
Memo:	03/11/2016			
Name:	Cave Creek Rodeo	03/14/2016	\$50.00	\$50.00
Address:	48529 N 24th Ln, New River, AZ 85087		Cash	
Category:	Event Expenses - Parade fees			
Name:	T Shirt Antics	03/16/2016	\$190.57	\$223.08
Address:	PO Box 730, Humboldt, AZ 86329		Cash	
Category:	Communications - Signs			
Name:	Lowe's	03/17/2016	\$101.49	\$396.33
Address:	2300 E SR 69, Prescott, AZ 86301		Cash	
Category:	Communications - Signs			
Memo:	truck signs supplies			
Name:	Lowe's	03/18/2016	\$178.71	\$396.33
Address:	2300 E SR 69, Prescott, AZ 86301		Cash	
Category:	Communications - Signs			
Memo:	truck signs supplies			
Name:	Sign King of Ariz LLC	03/18/2016	\$1,383.04	\$1,383.04
Address:	325 S Westwood, Ste 1, Mesa, AZ 85210		Cash	
Category:	Communications - Signs			
Name:	Blue Ridge Mkt	03/19/2016	\$23.52	\$23.52
Address:	210 S State Route 69, Dewey, AZ 86327		Cash	
Category:	Travel - Fuel			
Memo:	truck fuel			
Name:	Charity Publishing	03/24/2016	\$395.00	\$395.00
Address:	PO Box 806, Chino Valley, AZ 86323		Cash	
Category:	Communications - Other			
Memo:	place mat ad			
Name:	Fry's	03/24/2016	\$32.00	\$79.00
Address:	702 Miller Valley Rd, Prescott, AZ 86301		Cash	
Category:	Travel - Fuel			
Name:	T Shirt Antics	03/24/2016	\$32.51	\$223.08
Address:	PO Box 730, Humboldt, AZ 86329		Cash	
Category:	Communications - Other			
Memo:	5 t shirts			

Schedule E1 - Operating expenses

		Date	Amount	Cycle To Date
Name:	Fry's	03/28/2016	\$13.00	\$79.00
Address:	702 Miller Valley Rd, Prescott, AZ 86301		Cash	
Category:	Travel - Fuel			
Name:	Grassroots Partners LLC	03/28/2016	\$1,185.89	\$11,358.00
Address:	2942 N 24th St, Ste 114-776, Phoenix, AZ 85016		Cash	
Category:	Communications - Bumper stickers			
Name:	Grassroots Partners LLC	03/28/2016	\$275.00	\$11,358.00
Address:	2942 N 24th St, Ste 114-776, Phoenix, AZ 85016		Cash	
Category:	Professional Services - Consultants			
Name:	Staples	03/28/2016	\$37.89	\$37.89
Address:	186 E Sheldon St, Prescott, AZ 86301		Cash	
Category:	Communications - Signs			
Memo:	sign supplies			
Name:	thiNK4inc.com	03/28/2016	\$40.00	\$40.00
Address:	PO Box 2319, Prescott, AZ 86302		Cash	
Category:	Communications - Other			
Memo:	toner for printer			
Name:	Prescott Vly Chamber of Commerce	03/30/2016	\$50.00	\$219.00
Address:	7120 Pav Way, Ste 102, Prescott Valley, AZ 86314		Cash	
Category:	Event Expenses - Parade fees			
Memo:	Lions Club			
Name:	Walter, Sharon J	04/01/2016	\$1,000.00	\$7,268.25
Address:	1970 Acacia Cir, Prescott, AZ 86301		Cash	
Occupation:	Clerical, Self			
Category:	Professional Services - Consultants			
Name:	Grassroots Partners LLC	04/04/2016	\$7,214.72	\$11,358.00
Address:	2942 N 24th St, Ste 114-776, Phoenix, AZ 85016		Cash	
Category:	Communications - Radio			
Memo:	KYCA,KQNA,KDDL			
Name:	Grassroots Partners LLC	04/06/2016	\$275.00	\$11,358.00
Address:	2942 N 24th St, Ste 114-776, Phoenix, AZ 85016		Cash	
Category:	Professional Services - Consultants			
Name:	Walter, Arthur Pete	04/06/2016	\$48.75	\$347.01
Address:	1970 Acacia Cir, Prescott, AZ 86301		Cash	
Occupation:	service tech, self-employed			
Category:	Event Expenses - Decorations/supplies			
Memo:	exp reimb			

Schedule E1 - Operating expenses

		Date	Amount	Cycle To Date
Name:	Walter, Arthur Pete	04/07/2016	\$45.51	\$347.01
Address:	1970 Acacia Cir, Prescott, AZ 86301		Cash	
Occupation:	service tech, self-employed			
Category:	Communications - Signs			
Memo:	reimb sir speedy			
Name:	Lowe's	04/14/2016	\$116.13	\$396.33
Address:	2300 E SR 69, Prescott, AZ 86301		Cash	
Category:	Communications - Signs			
Memo:	truck signs			
Name:	Sheperd's Express	04/14/2016	\$35.00	\$77.00
Address:	620 S Montezuma St, Prescott, AZ 86303		Cash	
Category:	Travel - Fuel			
Name:	Walter, Arthur Pete	04/18/2016	\$25.00	\$347.01
Address:	1970 Acacia Cir, Prescott, AZ 86301		Cash	
Occupation:	service tech, self-employed			
Category:	Miscellaneous - Petty cash			
Memo:	reimb map/city			
Name:	Sam's Club	04/19/2016	\$16.06	\$16.06
Address:	5757 E SR 69, Prescott Valley, AZ 86314		Cash	
Category:	Travel - Fuel			
Name:	Fry's	04/20/2016	\$34.00	\$79.00
Address:	702 Miller Valley Rd, Prescott, AZ 86301		Cash	
Category:	Travel - Fuel			
Name:	Sheperd's Express	04/24/2016	\$29.00	\$77.00
Address:	620 S Montezuma St, Prescott, AZ 86303		Cash	
Category:	Travel - Fuel			
Name:	Flag's Galore & More	04/26/2016	\$67.32	\$67.32
Address:	1701 N Emerald Dr, Ste A, Prescott, AZ 86301		Cash	
Category:	Communications - Other			
Memo:	AZ Flag for float			
Name:	Sheperd's Express	04/26/2016	\$13.00	\$77.00
Address:	620 S Montezuma St, Prescott, AZ 86303		Cash	
Category:	Travel - Fuel			
Name:	True Value Hardware	04/27/2016	\$31.39	\$67.11
Address:	846 Miller Valley Rd, Prescott, AZ 86301		Cash	
Category:	Communications - Signs			
Memo:	truck signs supplies			

Schedule E1 - Operating expenses

		Date	Amount	Cycle To Date
Name:	Walter, Sharon J	05/01/2016	\$1,000.00	\$7,268.25
Address:	1970 Acacia Cir, Prescott, AZ 86301		Cash	
Occupation:	Clerical, Self			
Category:	Professional Services - Consultants			
Memo:	May services			
Name:	The Home Depot	05/05/2016	\$16.45	\$16.45
Address:	1941 E State Route 69, Prescott, AZ 86301		Cash	
Category:	Communications - Signs			
Memo:	truck sign supplies			
Name:	True Value Hardware	05/06/2016	\$35.72	\$67.11
Address:	846 Miller Valley Rd, Prescott, AZ 86301		Cash	
Category:	Communications - Signs			
Memo:	truck sign supplies			
Name:	Woody's	05/06/2016	\$29.00	\$29.00
Address:	501 Cooper Bank, Prescott, AZ 86301		Cash	
Category:	Travel - Fuel			
Name:	Chino Valley Chamber of Commerce	05/09/2016	\$300.00	\$425.00
Address:	175 E Road 2 S, Chino Valley, AZ 86323		Cash	
Category:	Event Expenses - Parade fees			
Name:	Grassroots Partners LLC	05/09/2016	\$275.00	\$11,358.00
Address:	2942 N 24th St, Ste 114-776, Phoenix, AZ 85016		Cash	
Category:	Professional Services - Consultants			
Memo:	Inv 1645			
Name:	Grassroots Partners LLC	05/09/2016	\$307.15	\$11,358.00
Address:	2942 N 24th St, Ste 114-776, Phoenix, AZ 85016		Cash	
Category:	Communications - Flyers/handouts/door hangers			
Memo:	Inv 1645			
Name:	Specialized Publishing	05/31/2016	\$249.00	\$249.00
Address:	2555 W Glenshandra Dr, Prescott, AZ 86305		Cash	
Category:	Communications - Advertising			
Memo:	Banner AD			
Total of Operating Expenses			\$24,051.13	
Total of Refunds, Rebates, and Credits Received			\$0.00	
Net Total of Operating Expenses			\$24,051.13	

Schedule L1 - Loans Made to This Committee

Item	Date	Amount
New Loan	02/16/2016	\$250.00
Stringer, David H		
Original Amount of Loan: \$250.00		
Original Date of Loan: 02/16/2016		
Loan Balance at End of Reporting Period		\$250.00
New Loan	02/17/2016	\$1,002.77
Stringer, David H		
Original Amount of Loan: \$1,002.77		
Original Date of Loan: 02/17/2016		
Loan Balance at End of Reporting Period		\$1,002.77
New Loan	03/18/2016	\$1,383.04
Stringer, David H		
Original Amount of Loan: \$1,383.04		
Original Date of Loan: 03/18/2016		
Loan Balance at End of Reporting Period		\$1,383.04
New Loan	03/17/2016	\$101.49
Stringer, David H		
Original Amount of Loan: \$101.49		
Original Date of Loan: 03/17/2016		
Loan Balance at End of Reporting Period		\$101.49
New Loan	03/18/2016	\$112.47
Stringer, David H		
Original Amount of Loan: \$112.47		
Original Date of Loan: 03/18/2016		
Loan Balance at End of Reporting Period		\$112.47
New Loan	03/19/2016	\$23.52
Stringer, David H		
Original Amount of Loan: \$23.52		
Original Date of Loan: 03/19/2016		
Loan Balance at End of Reporting Period		\$23.52
New Loan	03/24/2016	\$32.00
Stringer, David H		
Original Amount of Loan: \$32.00		
Original Date of Loan: 03/24/2016		
Loan Balance at End of Reporting Period		\$32.00
New Loan	03/28/2016	\$37.89
Stringer, David H		
Original Amount of Loan: \$37.89		
Original Date of Loan: 03/28/2016		

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Covers 01/01/2016 to 05/31/2016

Loan Balance at End of Reporting Period		\$37.89
New Loan	03/28/2016	\$40.00
Stringer, David H		
Original Amount of Loan: \$40.00		
Original Date of Loan: 03/28/2016		
Loan Balance at End of Reporting Period		\$40.00
New Loan	03/28/2016	\$13.00
Stringer, David H		
Original Amount of Loan: \$13.00		
Original Date of Loan: 03/28/2016		
Loan Balance at End of Reporting Period		\$13.00
New Loan	04/04/2016	\$29.00
Stringer, David H		
Original Amount of Loan: \$29.00		
Original Date of Loan: 04/04/2016		
Loan Balance at End of Reporting Period		\$29.00
New Loan	04/14/2016	\$116.13
Stringer, David H		
Original Amount of Loan: \$116.13		
Original Date of Loan: 04/14/2016		
Loan Balance at End of Reporting Period		\$116.13
New Loan	04/14/2016	\$35.00
Stringer, David H		
Original Amount of Loan: \$35.00		
Original Date of Loan: 04/14/2016		
Loan Balance at End of Reporting Period		\$35.00
New Loan	05/31/2016	\$35,000.00
Stringer, David H		
Original Amount of Loan: \$35,000.00		
Original Date of Loan: 05/31/2016		
Loan Balance at End of Reporting Period		\$35,000.00
New Loan	04/19/2016	\$16.06
Stringer, David H		
Original Amount of Loan: \$16.06		
Original Date of Loan: 04/19/2016		
Loan Balance at End of Reporting Period		\$16.06
New Loan	04/20/2016	\$34.00
Stringer, David H		
Original Amount of Loan: \$34.00		
Original Date of Loan: 04/20/2016		
Loan Balance at End of Reporting Period		\$34.00
New Loan	04/24/2016	\$29.00

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June 30th Report

Covers 01/01/2016 to 05/31/2016

Stringer, David H Original Amount of Loan: \$29.00 Original Date of Loan: 04/24/2016 Loan Balance at End of Reporting Period		\$29.00
New Loan Stringer, David H Original Amount of Loan: \$13.00 Original Date of Loan: 04/26/2016 Loan Balance at End of Reporting Period	04/26/2016	\$13.00
New Loan Stringer, David H Original Amount of Loan: \$31.39 Original Date of Loan: 04/27/2016 Loan Balance at End of Reporting Period	04/27/2016	\$31.39
New Loan Stringer, David H Original Amount of Loan: \$16.45 Original Date of Loan: 05/06/2016 Loan Balance at End of Reporting Period	05/06/2016	\$16.45
New Loan Stringer, David H Original Amount of Loan: \$35.72 Original Date of Loan: 05/06/2016 Loan Balance at End of Reporting Period	05/06/2016	\$35.72
New Loan Stringer, David H Original Amount of Loan: \$29.00 Original Date of Loan: 05/06/2016 Loan Balance at End of Reporting Period	05/06/2016	\$29.00
New Loan Stringer, David H Original Amount of Loan: \$67.32 Original Date of Loan: 04/26/2016 Loan Balance at End of Reporting Period	04/26/2016	\$67.32
New Loan Stringer, David H Original Amount of Loan: \$520.00 Original Date of Loan: 01/13/2016 Loan Balance at End of Reporting Period	01/13/2016	\$520.00
Outstanding Loan Balance at Beginning of Period Stringer, David H	12/07/2015	\$10,000.00

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June 30th Report

Covers 01/01/2016 to 05/31/2016

Original Amount of Loan: \$10,000.00		
Original Date of Loan: 12/07/2015		
Loan Balance at End of Reporting Period		\$10,000.00
Outstanding Loan Balance at Beginning of Period	12/28/2015	\$40,000.00
Stringer, David H		
Original Amount of Loan: \$40,000.00		
Original Date of Loan: 12/28/2015		
Loan Balance at End of Reporting Period		\$40,000.00
New Loan	04/26/2016	\$29.24
Stringer, David H		
Original Amount of Loan: \$29.24		
Original Date of Loan: 04/26/2016		
Loan Balance at End of Reporting Period		\$29.24
New Loan	05/08/2016	\$8.00
Stringer, David H		
Original Amount of Loan: \$8.00		
Original Date of Loan: 05/08/2016		
Loan Balance at End of Reporting Period		\$8.00
New Loan	03/11/2016	\$122.00
Lamerson, John		
Original Amount of Loan: \$122.00		
Original Date of Loan: 03/11/2016		
Loan Balance at End of Reporting Period		\$122.00
New Loan	03/11/2016	\$122.00
Stevens, John R		
Original Amount of Loan: \$122.00		
Original Date of Loan: 03/11/2016		
Loan Balance at End of Reporting Period		\$122.00
Total of Outstanding Loans Before Adjustments		\$89,249.49
Total Adjustments Against Outstanding Loans		\$0.00
Total of Outstanding Loans After Adjustments		\$89,249.49

