

Approved 1-19-17

STATE OF ARIZONA  
CITIZENS CLEAN ELECTIONS COMMISSION

 ORIGINAL

In the Matter of:  
House Victory PAC, Respondent

MUR No. 16-008

~~Proposed~~ CONCILIATION AGREEMENT

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

- A. House Victory PAC did not timely file certain reports required by the Commission related to spending on behalf certain candidates. See Exhibit A (Filings). The Commission finds that these failures demonstrate there is reason to believe Respondent may have committed a violation of the Citizens Clean Elections Act and Commission rules (collectively, the "Act").
- B. A.R.S. § 16-941(D) states that "any person who makes independent expenditures related to a particular office" in excess of certain amounts must report such expenditures to the Secretary of State. A.R.S. § 16-956(A)(7) provides that the Commission has authority to enforce the Act and Rules, to include the assessment of penalties that apply for failure to file reports.
- C. On November 2, 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

Conciliation Agreement - 1

ITEM VI <D>

1 reports indicated other independent expenditures that the Commission maintains  
2 should have been reported pursuant to the Act

3 D. In response to the Complaint and the Supplemental Complaint, Respondent has filed  
4 several reports under protest.

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.

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

10 1. The Commission has jurisdiction over persons subject to ARS 16-941(D) and 16-958,  
11 including political committees. Respondent disputes this jurisdiction, but avows that the  
12 Campaign Finance Reporting System did not prompt it to make any reports as called  
13 for in those statutes, and it had no knowledge of the Commission's efforts to provide  
14 alternative electronic means of filing.

15 2. Pursuant to A.R.S. §§ 16-941(D) and -958 any person who makes an independent  
16 expenditure above a threshold set forth in the Clean Elections Act must file reports  
17 required by the person and that under A.R.S. § 16-942(B) the statutory penalty for any  
18 reporting violation on behalf of a candidate is up to \$880 per day up to twice the value  
19 of the unreported amount. Respondent disputes that its expenditures were subject to  
20 the reporting requirements set forth in A.R.S. §§ 16-941(D) and -958 and disputes the  
21 Commission's authority under A.R.S. § 16-942(B) to assess any statutory penalty in  
22 connection with such expenditures.

23 3. Respondent agrees to settle this matter for \$2,500, in addition to the other provisions  
24 herein. This amount represents a mitigated fine based, in part, on the facts stated in  
25 paragraph 1.

26 4. To satisfy the debt amount acknowledged above, Respondent shall pay to the  
Commission \$2,500 by January 31st, 2017

- 1           5.     All payments shall be made by check or money order payable to the Citizens Clean  
2                 Elections Fund and delivered to the Citizens Clean Elections Commission, 1616 West  
3                 Adams, Suite 110, Phoenix, Arizona, 85007.
- 4           6.     The Commission shall not commence any legal action against Respondent to collect  
5                 the claims so long as they are not in default.
- 6           7.     Respondent shall be in default of this Agreement upon the occurrence of any of the  
7                 following:
- 8                 a.     Respondent fails to make any payment required hereunder within five (5) working  
9                         days following the date due;
- 10                 b.     Respondent files a petition under the bankruptcy laws or any creditor of the  
11                         Respondent files any petition under said laws against the Respondent;
- 12                 c.     Any creditor of Respondent commences a foreclosure action to foreclose (by suit  
13                         or trustee sale) on real property of the Respondent or commences garnishment,  
14                         attachment, levy or execution against the Respondent's property; or;
- 15                 d.     Respondent provides false information to the Commission.
- 16                 e.     Respondent fails to abide by any provision of this agreement.
- 17           8.     In the event of default hereunder, at the option of the Commission, all unpaid amounts  
18                 hereunder shall be immediately due and payable and the Commission may pursue  
19                 additional penalties mitigated by this agreement. In addition, interest shall accrue on  
20                 the unpaid balance from the date that the payments become due and payable. Interest  
21                 shall accrue at the statutory rate of ten percent (10%) pursuant to A.R.S. § 44-1201(A).
- 22           9.     Nothing contained in this Agreement shall be construed to prevent any state agency  
23                 which issues licenses for any profession from requiring that the debt in issue be paid in  
24                 full before said agency will issue Respondent a new license.
- 25           10.    The Commission may waive any condition of default without waiving any other  
26                 condition of default and without waiving its rights to full, timely future performance of  
                  the conditions waived.

- 1 11. In the event legal action is necessary to enforce collection hereunder, Respondent shall  
2 additionally pay all costs and expenses of collection, including without limitation,  
3 reasonable attorneys' fees in an amount equal to thirty-five percent (35%) of monies  
4 recovered.
- 5 12. Respondent acknowledges that all obligations payable pursuant to this Agreement  
6 constitute a fine, penalty, or forfeiture payable to and for the benefit of a governmental  
7 unit, and not compensation for actual pecuniary loss; and that pursuant to 11 USC §  
8 523 such obligations are not subject to discharge in bankruptcy.
- 9 13. This Agreement shall be construed under the laws of the State of Arizona.
- 10 14. In the event that any paragraph or provision hereof shall be ruled unenforceable, all  
11 other provisions hereof shall be unaffected thereby.
- 12 15. This Agreement shall constitute the entire agreement between the parties regarding the  
13 subject matter. This Agreement shall not be modified or amended except in a writing  
14 signed by all parties hereto.
- 15 16. This Agreement shall not be subject to assignment.
- 16 17. No delay, omission or failure by the Commission to exercise any right or power  
17 hereunder shall be construed to be a waiver or consent of any breach of any of the  
18 terms of this Agreement by the Respondent.
- 19 18. By entering into this Agreement, the Respondent does not waive any rights, claims,  
20 defenses or arguments in any subsequent proceeding before the Commission or any  
21 agency, court or other tribunal.
- 22 19. Respondent has obtained independent legal advice in connection with the execution of  
23 this Agreement or have freely chosen not to do so. Any rule construing this Agreement  
24 against the drafter is inapplicable and is waived.
- 25 20. This Agreement shall be void unless executed by the Respondent and delivered to the  
26 Commission not later than January 23, 2017.

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21. 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 \_\_\_ day \_\_\_, 2017.

By:  1-19-17  
Thomas M. Collins, Executive Director  
Citizens Clean Elections Commission

By: \_\_\_\_\_  
Respondent



**CITIZENS CLEAN ELECTIONS COMMISSION**  
**Independent Expenditure Report**

Pursuant to A.R.S. §§16-941(D), -956, -958, and A.A.C. R2-20-109(F)

<b>OFFICIAL USE ONLY</b>
<input type="checkbox"/> Received _____

Amended Report

Name: <b>House Victory PAC</b>			
Address: <b>16018 E. Twin Acres Drive</b>		City: <b>Gilbert</b>	State: <b>AZ</b>
Telephone Number: <b>(480) 389-8946</b>		Zip: <b>85298</b>	
Name of Authorized Agent: <b>Jeff Hill</b>		Fax Number:	
Telephone Number: <b>(480) 389-8946</b>		E-mail Address: <b>jhill548@aol.com</b>	
Authorized Agent Address (if different from above): <b>(see above)</b>		City:	State:
		Zip:	

Date of Expenditure* (i.e. 5/30/2016)	Amount of Expenditure (i.e. \$5,000.00)	Candidate Supported /Opposed	Support	Oppose
10/13/2016	\$2,666.67	Brophy-McGee	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10/17/2016	\$2,666.67	Schmuck	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10/17/2016	\$2,666.66	Norgaard	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10/17/2016	\$2,666.66	Syms	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10/17/2016	\$2,666.67	Robson	<input checked="" type="checkbox"/>	<input type="checkbox"/>

All persons, including corporations, limited liability companies, and labor organizations, are required to file independent expenditure reports under A.R.S. §§ 16-941(D); -958 & Ariz. Admin. Code R2-20-109(F). Please fill out, scan and return to the Arizona Citizens Clean Elections Commission, [ccec@azcleelections.gov](mailto:ccec@azcleelections.gov).

Forms received within 24 hours of the date of expenditure will be considered timely.

Failure to file the form and submit the information required subjects an entity that makes independent expenditures to penalties under the Clean Elections Act unless the entity receives an exemption from the Commission. Exemption forms are available at [www.azcleelections.gov](http://www.azcleelections.gov).

Please contact [ccec@azcleelections.gov](mailto:ccec@azcleelections.gov) or (602) 364-3477 with questions.

\*The independent expenditure date is the date when the literature or advertisement is distributed. The independent expenditure may be paid for at a later date as reported on committee campaign finance reports required by A.R.S. §16-915.

I, the undersigned, certify that the above statements are true and accurate to the best of my knowledge and belief:

  
 \_\_\_\_\_  
 Signature of Authorized Agent

House Victory PAC submits this report under protest and subject to its position that the Arizona Citizens Clean Elections Commission lacks jurisdiction over independent expenditure committees such as House Victory PAC, and has no authority under Arizona law to impose reporting, disclosure or other regulatory obligations on such entities. House Victory PAC fully reserves all rights, claims, defenses and arguments in any proceeding before the Arizona Citizens Clean Elections Commission in connection with this report or any other matter.

**ITEM VI <D> EXHIBIT A**



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Name of Authorized Agent:  
**Jeff Hill**

Telephone Number:  
**(480) 389-8946** E-mail Address:  
**jhill548@aol.com**

Authorized Agent Address (if different from above):  
**(see above)**

City: \_\_\_\_\_ State: \_\_\_\_\_ Zip: \_\_\_\_\_

Date of Expenditure* (i.e. 5/30/2016)	Amount of Expenditure (i.e. \$5,000.00)	Candidate Supported /Opposed	Support	Oppose
10/17/2016	\$2,666.67	M. Hamway	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10/28/2016	\$3,975.00	D. Cook	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10/28/2016	\$3,975.00	T. Shope	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10/28/2016	\$3,500.00	S. Kais	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10/28/2016	\$3,500.00	C. Ackerley	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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10/28/2016	\$13,000.00	D. Hernandez	<input type="checkbox"/>	<input checked="" type="checkbox"/>
10/31/2016	\$2,500.00	M. Syms	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10/31/2016	\$2,500.00	M. Hamway	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10/31/2016	\$2,500.00	B. Robson	<input checked="" type="checkbox"/>	<input type="checkbox"/>
10/31/2016	\$2,500.00	J. Norgaard	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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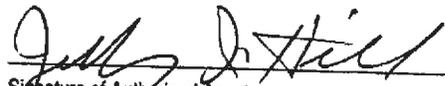
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Date of Expenditure* (i.e. 5/30/2016)	Amount of Expenditure (i.e. \$5,000.00)	Candidate Supported /Opposed	Support	Oppose
11/1/2016	\$2,300.00	C. Ackerley	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11/1/2016	\$2,300.00	D. Hernandez	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11/1/2016	\$2,300.00	R. Gabaldon	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11/7/2016	\$6,043.96	M. Epstein	<input type="checkbox"/>	<input checked="" type="checkbox"/>
11/7/2016	\$521.99	J. Norgaard	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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11/7/2016	\$521.99	M. Hamway	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11/7/2016	\$521.99	M. Syms	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11/7/2016	\$577.53	K. Brophy-McGee	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11/7/2016	\$577.53	M. Syms	<input checked="" type="checkbox"/>	<input type="checkbox"/>

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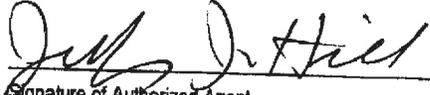
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11/7/2016	\$577.52	M. Hamway	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11/7/2016	\$302.20	M. Hamway	<input checked="" type="checkbox"/>	<input type="checkbox"/>
11/7/2016	\$302.20	M. Syms	<input checked="" type="checkbox"/>	<input type="checkbox"/>
			<input type="checkbox"/>	<input type="checkbox"/>
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