

STATE OF ARIZONA
CITIZENS CLEAN ELECTIONS COMMISSION

In the Matter of:

Ken Bennett and Committee(s), Respondent

MUR No. 14-025

CONCILIATION AGREEMENT

Pursuant to ARS § 16-957(A), the Citizens Clean Elections Commission (the "Commission") and Ken Bennett, participating candidate for the office of governor ("Respondent") enter this Conciliation Agreement (the "Conciliation Agreement") in the manner described below:

1. On January 29, 2015, 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").
2. Candidates who participate in public financing 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).
3. A.R.S. §§ 16-941 and -948(A) requires participating candidates to conduct all campaign finance activity through a single campaign account of the candidate's campaign committee.
4. According to the Commission, R2-20-109(B) and (D) require participating candidates to reimburse for mileage expenditures within seven days of incurring the expenditure.

- 1 5. According to the Commission, direct campaign expenditures are to be reported on the
2 candidate's campaign finance reports for the reporting period in which they are
3 incurred, not when they are paid. A.R.S. §§ 16-942, -948.
- 4 6. On December 29, 2014, the independent auditors issued the final audit report
5 regarding Respondent's primary election candidate campaign committee. On January
6 6, 2015, Commission staff generated an internal enforcement matter regarding the
7 independent auditors' findings that Respondent utilized a secondary bank account to
8 make direct campaign expenditures and reimbursed himself for travel related expenses
9 incurred during the primary election period instead of returning the remaining monies to
10 the Clean Elections Fund after the Primary Election.
- 11 7. Between September 5, 2014 and September 15, 2014 Respondent reimbursed himself
12 for primary election mileage expenditures totaling \$4,180.27. Mileage reimbursement
13 expenditures incurred during the reporting period June 1, 2014 through August 14,
14 2014, should have been reported on the Pre-Primary campaign finance report. Mileage
15 reimbursement expenditures incurred after August 14, 2014 through the primary
16 election date should have been reported on the Post-Primary campaign finance report.
- 17 8. Respondent utilized his constituent services' bank account as a secondary bank
18 account for his candidate campaign committee. On March 13, 2013, Respondent
19 transferred \$2,500 to the secondary bank account. Again on August 14, 2013,
20 Respondent transferred \$500 to the secondary bank account from his candidate
21 campaign committee account.
- 22 9. Respondent made direct campaign expenditures totaling \$2,051.62 from the secondary
23 bank account on August 28, 2014.
- 24 10. Between September 13, 2014 and December 31, 2014, Respondent deposited \$970 in
25 constituent services contributions into his campaign committee account as repayment
26 towards the \$3,000 Respondent originally transferred from the campaign committee

1 account to the constituent services account. Respondent reported these contributions
2 on the Constituent Services Account 2014 January 31st Campaign Finance Report.

3 11. Respondent waives any right he may have under A.R.S. §16-957; A.R.S. §§ 41-1092,
4 *et seq.*, and A.A.C. R2-20-201, *et seq.*, including the right to hearing or appeal in this
5 matter, and agrees with the Commission to enter into this Conciliation Agreement
6 pursuant to A.A.C. R2-20-216.

7 12. This Conciliation Agreement concludes the Commission's enforcement proceeding
8 respecting the facts outlined in the attached Statement of Reasons.

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

11 1. Respondent maintains the expenditures in question were for direct campaign
12 expenditures and contests the Commission's view of the facts and the law, but
13 acknowledges that the Commission voted to find reason to believe a violation may
14 have occurred as set forth in the attached Statement.

15 2. In view of the Commission's concerns respecting the facts outlined in the Statement of
16 Reasons, Respondents agrees to settle this matter by amending his campaign finance
17 reports as set forth:

18 a. Reporting all travel expenditures during the reporting periods in which they were
19 incurred, not when the expenditures were reimbursed. Respondent will amend the
20 following reports for travel expenses occurred within the corresponding reporting
21 periods:

22 i. Pre-Primary Report (June 1, 2014 through August 14, 2014);

23 ii. Qualifying Period Report (August 15, 2014 through August 19, 2014);

24 iii. Primary Recap Report (August 20, 2014 through August 26, 2014);

25 iv. Post-Primary Report (August 27, 2014 through September 15, 2014).

26 b. Amend the following transactions reported on his Post-Primary Election Report to
note in the "memo" line that the expenditures were "Paid for with funds transferred

to the Ken Bennett Constituent Services Account (201200014) bank account on 3/13/13 and 8/14/13":

- i. An expenditure made on August 28, 2014 to Chris Scotten for \$1,500;
 - ii. An expenditure made on August 28, 2014 to Chris Scotten for \$298.39;
 - iii. An expenditure made on August 28, 2014 to Matt Roberts for \$253.23.
- c. Reporting all contributions deposited into the candidate's campaign committee bank account and refunded from the campaign committee to the constituent services account.

- i. Respondent stipulates he contacted the following individuals, who then gave him permission to utilize the amounts for constituent services contributions and purposes:

- 1. John Hester (\$140 on 9/13/13)
- 2. Richard Foreman (\$140 on 9/20/13)
- 3. James P. Kane (\$140 on 9/20/13)
- 4. Jeffrey Shaw (\$140 on 9/20/13)
- 5. Ernest Calderon (\$140 on 11/1/13)
- 6. Mead Treadwell (\$90 on 11/1/13)
- 7. Donald McNulty (\$90 on 12/31/13)
- 8. Eleanor McNulty (\$90 on 12/31/13)

3. Respondent avows that statements to the Commission made by them, their committees and attorneys and agents are truthful and acknowledge that if such statements were false, incorrect, or misleading the Commission may reopen this matter and proceed with further enforcement, including any applicable penalties and sanctions.

4. Respondent shall be in default of this Agreement and any outstanding matters will be forwarded to the Office of the Attorney General upon the occurrence of any of the following:

- a. Respondent provides false information to the Commission.

- 1 5. The Commission may waive any condition of default without waiving any other
2 condition of default and without waiving its rights to full, timely future performance of
3 the conditions waived.
- 4 6. This Agreement shall be construed under the laws of the State of Arizona.
- 5 7. In the event that any paragraph or provision hereof shall be ruled unenforceable, all
6 other provisions hereof shall be unaffected thereby.
- 7 8. This Agreement shall constitute the entire agreement between the parties regarding the
8 subject matter. This Agreement shall not be modified or amended except in a writing
9 signed by all parties hereto.
- 10 9. This Agreement shall not be subject to assignment.
- 11 10. No delay, omission or failure by the Commission to exercise any right or power
12 hereunder shall be construed to be a waiver or consent of any breach of any of the
13 terms of this Agreement by the Respondent.
- 14 11. Respondent has obtained independent legal advice in connection with the execution of
15 this Agreement or have freely chosen not to do so. Any rule construing this Agreement
16 against the drafter is inapplicable and is waived.
- 17 12. This Agreement shall be void unless executed by the Respondent and delivered to the
18 Commission, along with a copy of all primary election campaign bank statements, no
19 later than March 26, 2015.
- 20 13. All proceedings commenced by the Commission in this matter will be terminated and
21 the matter closed as set forth in this Agreement.

22
23 Dated this ____ day of March, 2015.

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

26 By: _____
 Ken Bennett, Respondent

STATE OF ARIZONA
CITIZENS CLEAN ELECTIONS COMMISSION
MUR: No. 14-025 KEN BENNETT
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 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 October 16, 2014, Ken Bennett (“Respondent”), a participating candidate for Governor, was randomly selected for a campaign finance audit of his primary election candidate campaign committee. On December 29, 2014, the independent auditors issued the final audit report regarding Respondent’s primary candidate campaign committee. On January 6, 2015, Commission staff generated an internal enforcement matter regarding the independent auditors’ findings (**Exhibit A**). Respondent received notice of the findings and potential campaign finance violations the same day. On January 16, 2015, Respondent filed his response (**Exhibit B**).

II. Alleged Violations

A. Failure to reimburse expenses and failure to return primary funding to the Clean Elections Fund

Pursuant to A.R.S. §§ 16-941(A) & -953(A), participating candidates are required to return all monies in the candidate’s campaign account above the amount sufficient to pay any unpaid bills for expenditures made during the primary election period. (*See also* R2-20-106(E) and (G))

Pursuant to R2-20-109(B) and R2-20-109(D) travel reimbursements are required to be made within seven days of incurring the expenditure (the date of travel). Mileage reimbursements are considered direct campaign expenses and should be reported as expenditures. If a candidate chooses to reimburse for mileage, “the candidate shall keep an

itinerary of the trip, including name and type of event(s) attended, miles traveled and the rate at which the reimbursement was made.” Expenditures are to be reported on the candidate’s campaign finance reports for the reporting period in which they are incurred, not when they are paid. A.R.S. §§ 16-942, -948.

Between September 5, 2014 and September 15, 2014 Respondent reimbursed himself for primary election mileage expenditures totaling \$4,180.27. Respondent provided the independent auditors with mileage reimbursement logs indicating expenditures were incurred between June 7, 2014 and August 25, 2014. Mileage reimbursement expenditures incurred during the reporting period June 1, 2014 through August 14, 2014, should have been reported on the Pre-Primary campaign finance report.

In his response, Respondent argues he had interpreted the requirements for transportation expenditures to only apply to third-party vehicles and states the Mileage Reimbursement section of the Participating Candidate Guide does not specifically mention the 7 day reimbursement limit. Respondent also believes he was not informed during the candidate training that the mileage reimbursement limitations also applied to the candidate’s own vehicle. Respondent states had he known about the reimbursement requirements he would have adhered to the Commission’s rules and made the same total of payments but at earlier intervals.

Respondent states that the expenditures were not reported on his pre-primary campaign finance reports because of two book keeping errors that were not discovered prior to the audit. Once Respondent was aware of the book keeping errors and the money available, he reimbursed himself for the mileage expenditures. Respondent states these expenditures were for direct campaign purposes and were reported on the post-primary campaign finance reports.

Pursuant to R2-20-109(B) and R2-20-109(D) reimbursements are required to be made within seven days of incurring the expenditure not at the end of the primary election period.

While Respondent argues that the seven day reimbursement requirement is not in the section Mileage Reimbursement Form section of the Participating Candidate Guide, the requirement is found the same page of the Guide under the Transportation Expenses section. The first sentence explicitly informs the reader that travel reimbursements need to occur within seven days of the date of travel (**Exhibit C**). The travel reimbursement requirements are also discussed in the candidate training workshop and can be found in the Commission's Act and Rules Manual posted on the Commission's website.

Although the respondent states that he did not reimburse for mileage expenditure until the accounting errors revealed additional funds were available, the expenditures should have been reported on the Pre-Primary campaign finance report. At the time of travel, the candidate must determine if the mileage is a campaign related expenditure. The Commission's rules do not permit to candidates to determine campaign mileage expenditures based on the amount of funds available. If Respondent had intended to reimburse himself for mileage expenditures, those should have been reported on the candidates campaign finance reports and reimbursed within a timely fashion. Once the auditors revealed there were funds in the candidate's campaign account above the amount sufficient to pay for outstanding bills and services, Respondent should have returned those monies to the Clean Elections Fund in accordance with A.R.S. §§ 16-941(A), -953(A), R2-20-106(E) and (G). Therefore, I recommend the Commission find reason to believe violation occurred.¹

¹ Respondent's primary campaign account had a remaining balance of \$41.07 while Respondent's campaign finance reports indicate a \$0 account balance. On January 8, 2015, Respondent returned \$46.69 to the Clean Elections Fund. Respondent also provided copies of the bank statement indicating a bank account balance of \$46.69. Because Respondent ultimately returned the remaining balance of the campaign account, I do not recommend any additional determination related to this audit finding.

B. Failure to conduct campaign finance activity through a single bank account

Pursuant to A.R.S. §§ 16-941(A) and -948(A) participating candidates are required to conduct all campaign finance activity through a single campaign account of the candidate's campaign committee. The Clean Elections Act also places limitations on the amount and sources of money for participating candidates may accept and expend and requires reporting of campaign transactions. *See, e.g.*, A.R.S. §§ 16-941(A); -942.

The independent auditors found Respondent, on August 28, 2014, made a direct campaign expenditure to Chris Scotten for \$298.39. This campaign expenditure was made from a secondary bank account. In his responses, Respondent disclosed that in 2013 he moved \$3,000 to his Constituent Services account to avoid a monthly service fee in the account and to create reserve funds to ensure he did not spend more than funds available to him. Respondent states the campaign finance reports always reported the combined balance of these accounts. Respondent also admit that the expenditure selected during the audit was one of three expenditures made from the Constituent Services account during the primary election. Respondent states he would not have transferred the funds had he known of single bank account limitation or he would have transferred the funds back to the campaign account.

Respondent argues that these were unintentional violations due to unclear requirements in the Participating Candidate Guide. Respondent states he does not recall the candidate training workshop discussing the use of one bank account for the campaign committee. Respondent refers to the Participating Candidate Guide page 24 that refers to "all bank accounts."

On February 14, 2014, Respondent submitted his Application for Certification as a Participating Candidate. Under penalty of perjury, Respondent certified he complied with the restrictions of A.R.S. §§ 16-941 and -948 including conducting "all financial activity through a single campaign account." (**Exhibit D**). At the very least, Respondent was aware of the single

bank account requirement early 2014. Commission staff also addressed the issue and necessity of participating candidates utilizing a single bank account in the wake of House Bills 2593 and 2665 (the creation of the two account system). This information was provided to candidates and posted on the Commission's website.

Furthermore, although Respondent argues that the combined account balance was reported on campaign finance reports, he concedes the transfer of \$3,000 was never reported in either the campaign finance report or the similar reports required respecting Constituent Services accounts. Office holders may create constituent services accounts to "defray the costs of performing office holder duties." A.R.S. § 41-133(A). These funds may not be used for campaign purposes. A.R.S. § 41-133(D). These accounts "shall be separate from any candidate campaign account." A.R.S. § 41-133(C). Funds in the account may not be used after April 30 in an election year. A.R.S. § 41-133(E). "Monies raised or spent for officeholder expenses shall be reported under campaign finance reporting requirements." A.R.S. § 41-133(C). In order to avoid having the monies in the account "not constitutes a contribution as defined in A.R.S. § 16-901. . . the monies [must be] received, expended and reported as prescribed in . . . section [41-133]. Thus, 41-133 makes clear that such a transfer between accounts is both unauthorized and requires a reporting."²

Respondent nevertheless states he only transferred early individual contributions. Participating candidates are permitted to raise limited individual contributions of \$160. However, constituent services account contributions must be limited to \$150 from individuals. Additionally, as noted above, there is no authorization for a candidate to transfer or contribute

² Clean Elections rules at one time provided for such accounts. Section 41-133 states that "[a]ny monies held by an officeholder pursuant to the officeholder expense account rules established by the citizens clean elections commission are subject to this section, and the citizens clean elections commission has no further authority with respect to those monies." Because there is no money held pursuant to those rules involved, this section is inapplicable.

campaign money to the constituent services account; nor is using a constituent service account for campaigning permitted under the Clean Elections Act, although any transfer would have required reporting. A.R.S. § 16-942(B).

For these reasons I recommend the Commission find reason to believe a violation A.R.S. §§ 16-941, -942 and -948 occurred.

III. Investigation After Reason to Believe Finding

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

After the Commission finds reason to believe that a violation of a statute or rule over which the Commission has jurisdiction has occurred, the Commission shall conduct an investigation. A.A.C. R2-20-209(A). The Commission may authorize the Executive Director to subpoena all of the Respondent's records documenting disbursements, debts, or obligations to the present, and may authorize 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 27th day of January, 2015.

By: 
Thomas M. Collins, Executive Director

EXHIBIT A

Doug Ducey
Governor

Thomas M. Collins
Executive Director



Thomas J. Koester
Chair

Timothy J. Reckart
Mitchell C. Laird
Steve M. Titla
Damien R. Meyer
Commissioners

State of Arizona
Citizens Clean Elections Commission

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

NOTICE OF COMPLAINT AND RESPONSE OPPORTUNITY
Via Certified U.S. Mail and E-mail

January 6, 2015

Mr. Ken Bennett
P.O. Box 97399
Phoenix, AZ 85060
kjbennettaz@gmail.com

RE: CCEC MUR #14-025

Dear Mr. Bennett,

This letter is to notify you that on December 29, 2014, Citizens Clean Elections Commission received the final independent accountants' report (enclosed) regarding your campaign committee for the 2014 Primary Election. The report yielding the following findings:

1. The primary campaign account had a remaining balance of \$41.07. Campaign finance reports indicate a \$0 account balance. The remaining \$41.07 has not yet been returned to the Commission in accordance with A.R.S. §§ 16-941(A) & -953(A).
2. Between September 5, 2014 and September 15, 2014 you were reimbursed for mileage expenditures totaling \$4,180.27. The mileage expenditures were incurred between June 7, 2014 and August 25, 2014. Pursuant to R2-20-109(B) and R2-20-109(D) reimbursements are required to be made within seven days of incurring the expenditure not at the end of the primary election period. Expenditures are to be reported on the candidate's campaign finance reports for the reporting period in which they are incurred, not when they are paid. Mileage reimbursement expenditures during the reporting period June 1, 2014 through August 14, 2014, should have been reported on the Pre-Primary campaign finance report. A.R.S. §§ 16-942, -948. Additionally, all remaining funds were to be returned to the Commission within 10 days of the primary election in accordance with A.R.S. §§ 16-941(A), -953(A), R2-20-106(E) and (G).
3. On August 28, 2014, an expenditure was made to Chris Scotten for \$298.39. This expenditure was made from a secondary bank account. Pursuant to A.R.S. §§ 16-941(A) and -948(A) participating candidates are required to conduct all campaign finance activity through a single campaign account of the candidate's campaign committee.

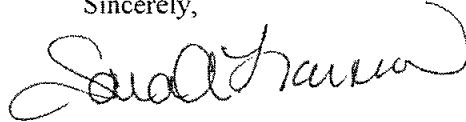
The Commission's rules provide that a respondent "be afforded an opportunity to demonstrate that no action should be taken on the basis of a complaint by submitting, *within five days from receipt of a written copy of the complaint*, a letter or memorandum setting forth reasons why the Commission should take no action." Ariz. Admin. Code R2-20-205(A). *Your response must be notarized, or the Commission*

will not consider it. Ariz. Admin. Code R2-20-205(C). Failure to respond to this complaint within five days may be viewed as an admission to the allegations. *Id.*

Additionally, the rule provides for an advisement of compliance procedures. Those procedures are set forth in Article 2 of the Commission's Rules (Arizona Administrative Code Sections R2-20-201 to R2-20-228) as well as the Clean Elections Act (specifically Arizona Revised Statutes Section 16-940 to 16-961).

This matter is in the initial stages of review. A finding will be made only after the Commission has fully reviewed this matter. Please contact me if you have any questions at (602) 364-3477 or by e-mail at sara.larsen@azcleanelections.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Sara A. Larsen", with a stylized flourish at the end.

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

Enclosure

CITIZENS CLEAN ELECTIONS COMMISSION

Report on Agreed-Upon Procedures

**Ken Bennett
Participating Candidate for
Governor
Primary Election 2014**

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

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

We (the Contractor) have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Bennett for Governor (the Candidate) Campaign Finance Reports for both the Pre-Primary (June 1, 2014 to August 14, 2014) and the Post-Primary (August 15, 2014 to September 15, 2014) reporting periods were prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Pre-Primary and Post-Primary Campaign Finance Reports. This agreed-upon procedures engagement was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and the associated findings are as follows:

1. Preliminary Procedures

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

Finding

We obtained both the Pre-Primary (June 1, 2014 to August 14, 2014) and Post-Primary (August 15, 2014 to September 15, 2014) Campaign Finance Reports from the Arizona Secretary of State's website.

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

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

Finding

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

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

Finding

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

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

Finding

Early contributions received during the periods reviewed did not exceed the \$55,910 limit for a Governor candidate.

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

Finding

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

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

Finding

We noted no unusual disbursements during our review.

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

Finding

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

2. Fieldwork Procedures

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

Finding

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

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

Finding

See comment in a) above.

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

Finding

The Candidate provided a description of bookkeeping policies and procedures utilized by the campaign committee.

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

Finding

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

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

Finding

We selected five deposits and five withdrawals from the bank statements for the periods reviewed and determined that they appeared to be properly recorded in the Candidate's campaign finance reports, with one exception. One deposit tested was comprised of personal monies mistakenly deposited into the campaign bank account. The deposit was subsequently reimbursed to the candidate. Per the Citizens Clean Election Act & Rules Manual rule 16-948, candidates shall not make any deposits into the campaign account other than those permitted under section 16-945, relating to limits on early contributions and section 16-946, relating to qualifying contributions. Per inquiry of the Candidate, once the error was discovered, it was promptly corrected by reimbursing the personal monies.

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

Finding

Proof of receipts and disbursements were performed for the reporting period. After performing proof of cash procedures, we calculated a Post-Primary ending cash balance of \$41.07. However, the ending cash balance per the amended Post-Primary campaign finance report was \$0, which represented an unreconciled difference of \$41.07. Per inquiry of the Candidate, he acknowledges the \$41.07 difference and indicated that it will be transferred to the Commission at the conclusion of the audit.

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

Finding

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

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

Finding

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

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

Finding

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

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

Finding

We reviewed twelve expenditures and agreed them to supporting invoices or other documentation and to the Candidate's finance report, noting the following exceptions. Three of the expenditures tested reimbursed the Candidate for transportation expenses of \$1,989.47, \$1,765.61 and \$425.19, respectively. The Candidate provided travel logs documenting a total of \$4,512.31 in transportation expenses that were incurred during the reporting periods reviewed. However, the reimbursements did not correspond to specific travel expenses or dates. In addition, according to the campaign finance report, these reimbursements were made on September 5, 2014 and September 15, 2014, but the expenses were incurred between June 7, 2014 and August 25, 2014. Per the Citizens Clean Elections Act & Rule Manual rules R2-20-109(B) and R2-20-109(D), candidates may use campaign funds to reimburse costs of transportation within seven days from the date of travel. Per inquiry of the Candidate, he interpreted that the rules described above applied to third party vehicles, and not personal vehicles. He indicated that reimbursing himself every seven days would have required a significant number of small checks to have been written throughout the campaign and therefore waited until the end of the campaign to issue three larger checks. The Candidate also indicated that the amount reimbursed was less than the actual transportation expenses incurred.

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

Finding

We reviewed twelve expenditures and agreed the name, address and nature of goods or services provided to the information reported in the Candidate's campaign finance report without exception.

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

Finding

We reviewed twelve expenditures and agreed amounts to the campaign account bank statements, with one exception. One disbursement of \$298.39 was made from a secondary bank account. Per the Citizens Clean Elections Act & Rule Manual rule 16-948, a participating candidate shall conduct all financial activity through a single campaign account of the candidate's campaign committee. Per inquiry of the Candidate, he utilized his Constituent Services account by transferring campaign funds from the campaign account to act as a "reserve fund" for the campaign. Disbursements from this account used only campaign funds, and all transactions were properly accounted for in the campaign finance report. The additional account was used to ensure that funds received from the Commission were not overspent.

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

Finding

We reviewed twelve expenditures and determined that all appeared to have been made for direct campaign purposes.

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

Finding

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

- f) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,390.

Finding

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

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

Finding

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

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

Finding

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

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

Finding

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

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

Finding

We discussed our findings with the Candidate and the Candidate's responses are included with the respective findings.

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

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

Foster & Chapman P.C.

December 24, 2014

EXHIBIT B

*15 JAN 16 AM 11:05 CCEC

Citizens Clean Elections Commission
1616 W. Adams, Suite 110
Phoenix, AZ 85007

HAND DELIVERED

January 16, 2015

RESPONSE TO COMPLAINT: CCEC MUR #14-025

Dear Commission Members:

This is my response to the above complaint which I received earlier this week.

First, the accountants report yielded several other findings that were not cited in the complaint. I hope all the positive findings will be considered in our overall compliance with Clean Election requirements, including findings that:

- Contributions were received only from individuals
- Contributions did not exceed the \$160 per individual limit
- Contributions did not exceed the \$55,910 combined limit
- Personal and family contributions did not exceed allowed limits
- Deposits and withdrawals were properly recorded in our campaign finance reports, with one exception that had already been corrected by the time the audit was conducted
- Expenditures were made for direct campaign purposes only
- Campaign finance reports were filed timely

As to the findings cited in the Complaint, the following responses are respectfully submitted:

1. The remaining campaign account balance, which actually ended up being \$46.69, was returned to the Commission on January 8th, 2015, upon completion of the audit.

15 JAN 16 AM 11:06 CCEC

2. When I participated in the candidate training in 2013 as required, I do not believe the Transportation Expenses section on page 32 of the Guide was explained as pertaining to a candidate's own vehicle. I interpreted Transportation Expenses to apply to third-party vehicles (including planes and rentals) and the Mileage Reimbursement Form on the same page to be the method for reimbursing oneself for their own vehicle use. There is no mention in the Mileage Reimbursement section of a 7 day limit and the number of lines on the sample form seems to contemplate reimbursement at longer intervals. My mileage reimbursements would have been made in the Pre-Primary Report except for two bookkeeping errors that were discovered early in the audit. Once those errors were corrected and I confirmed that higher balances were available, I wrote the reimbursement checks. The main emphasis in the training was to NOT spend more than available funds. These expenses were for direct campaign purposes and were reported in the next period when the checks were actually written. Had I known the 7 day limit applied to my own vehicle expenses, I would have made the same total of payments, but at earlier intervals.
3. I also do not remember any specific mention in the training of only using one bank account. In fact, on page 24 of the Guide, it refers to "all bank accounts" (emphasis added). In the fall of 2013, I moved \$3,000 to my Constituent Services account for two reasons: 1) to avoid monthly service charges for having less than a \$2,500 balance, and 2) to create a reserve of funds to help insure we didn't spend more than what was available. The combined balance was always correctly reported on campaign finance reports. The \$298.39 check, plus two other checks not referenced in the audit, were written to use those funds within the campaign. Had I known of the single account restriction, I would have never moved the funds over in the first place, or transferred the funds back when needed, and no checks would have been written from that account. Again, these were expenses for direct campaign purposes and were reported in our campaign finance reports.

As I hope responses 2 and 3 indicate, these were innocent misunderstandings of unclear requirements in the Participant's Guide. I respectfully suggest that minor changes to the guide will help future candidates avoid these mistakes. There was

no malicious or ill intent in either situation, and I believe the campaign was in substantial compliance with Clean Election laws and rules.

I respectfully request that no action be taken on this Complaint.

Sincerely,



Ken Bennett
Candidate

15 JAN 16 PM 11:06 CCEC

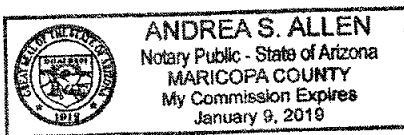
State of Arizona)

County of Maricopa)

The foregoing instrument was acknowledged before me this 16th day of

January, 2015, by Ken Bennett.

Seal:



Andrea S. Allen
Notary Public

My commission expires: January 9, 2019

EXHIBIT C

Transportation Expenses

If a candidate travels for campaign purposes in a privately owned vehicle, within 7 days from the date of travel the candidate may use campaign funds to reimburse the owner of the vehicle for the costs of transportation. The reimbursement shall be reported as an expenditure and may not exceed 44.5 cents per mile.

If a candidate travels for campaign purposes in a privately owned airplane, the candidate shall use campaign funds to reimburse the owner of the airplane at a rate of \$150 per hour of flying time, in which event the reimbursement shall be reported as an expenditure. If the owner of the airplane is unwilling or unable to accept reimbursement, the candidate shall pay to the Commission an amount equal to \$150 per hour of flying time.

If a candidate rents a vehicle or purchases a ticket or fare on a commercial carrier for campaign purposes, the actual costs of such rental (including fuel costs), ticket or fare shall be reported as an expenditure.

Mileage Reimbursement Form

If a candidate chooses to use campaign funds to reimburse, the candidate shall maintain a travel log. The travel log shall include the name and type of event(s) attended, miles traveled, and the rate at which the reimbursement was made. A candidate may choose to develop their own form or use the Commission mileage reimbursement form. The Commission mileage reimbursement form can be found at the Citizens Clean Elections Commission website <http://www.azcleelections.gov/forms-pubs/forms.aspx>

Citizens Clean Elections Commission Mileage Reimbursement Form					
Candidate Name Office Sought	<input style="width: 100%;" type="text"/> <input style="width: 100%;" type="text"/>	Rate Per Mile For Period Total Mileage Total Reimbursement	<div style="display: flex; justify-content: space-between;"> <div> <input style="width: 100%;" type="text"/> <input style="width: 100%;" type="text"/> <input style="width: 100%;" type="text"/> <input style="width: 100%;" type="text"/> </div> <div> \$ From to \$ </div> </div>		
Date	Starting Location	Destination	Description/Notes	Mileage	Reimbursement
<div style="text-align: right; margin-top: 10px;">TOTAL</div>					
<small>CCEC Mileage Reimbursement Form 03/15</small>					

EXHIBIT D



☒ Initial Application
☐ Amended Application



STATE OF ARIZONA
APPLICATION FOR CERTIFICATION
AS A PARTICIPATING CANDIDATE

SECRETARY OF STATE

2014 FEB -6 PM 1:11

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

COMMITTEE ID NUMBER

201200109

NAME OF CANDIDATE KEN BENNETT			DATE 02/06/2014	
OFFICE SOUGHT GOVERNOR	PARTY AFFILIATION REPUBLICAN	ELECTION CYCLE 2014		
CANDIDATE'S ADDRESS 1700 W WASHINGTON ST FL 7		CITY PHOENIX	STATE AZ	ZIP 85007
CANDIDATE'S TELEPHONE # (602) 492-5531	CANDIDATE'S FAX #	CANDIDATE'S EMAIL ADDRESS INFO@BENNETTARIZONA.COM		
NAME OF POLITICAL COMMITTEE BENNETT FOR GOVERNOR - PRIMARY				
COMMITTEE ADDRESS P.O. BOX 97399		CITY PHOENIX	STATE AZ	ZIP 85060
COMMITTEE MAILING ADDRESS (if different from above) PO BOX 97399		CITY PHOENIX	STATE AZ	ZIP 85060
COMMITTEE TELEPHONE # (602) 492-5531	COMMITTEE FAX #	COMMITTEE EMAIL ADDRESS INFO@BENNETTARIZONA.COM		
NAME OF DESIGNATED INDIVIDUAL WITH AUTHORITY TO WITHDRAW FUNDS (IF APPLICABLE) (A.R.S. §16 -948)				
DESIGNATED INDIVIDUAL'S ADDRESS none		CITY	STATE	ZIP
DESIGNATED INDIVIDUAL'S TELEPHONE #	DESIGNATED INDIVIDUAL'S FAX #	DESIGNATED INDIVIDUAL'S EMAIL		
LIST THE NAME OF THE FINANCIAL INSTITUTION FROM WHICH THE CANDIDATE AND THE DESIGNATED INDIVIDUAL WILL CONDUCT ALL FINANCIAL ACTIVITY FOR THE CANDIDATE'S CAMPAIGN COMMITTEE (Do not list account numbers). (A.R.S. §16-948(A))				
NAME OF FINANCIAL INSTITUTION NATIONAL BANK OF ARIZONA				

DESIGNATED CANDIDATE'S STATEMENT (if applicable) (A.R.S. §16-948(B)): I hereby
designate none as my duly authorized Designated Individual,
with the authority to withdraw funds and make expenditures from my campaign account on my behalf.

Candidate's Signature

Date

Committee ID: 201200109

Date: 02/06/2014

Form ID: 0000188797

Application for Certification - Part II

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

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

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

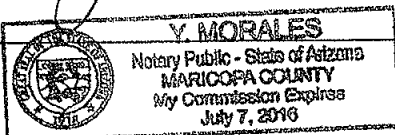
State of Arizona)
County of MARICOPA) ss.

[Signature]
Candidate's Signature

[Signature]
Notary Public

SUBSCRIBED AND SWORN TO before me this 6 day
of February 20 14.

[Signature]
Notary Public



State of Arizona)
County of _____) ss.

[Signature]
Designated Individual's Signature

[Signature]
Notary Public

SUBSCRIBED AND SWORN TO before me this _____ day
of _____ 20 _____

[Signature]
Notary Public

16-941. Limits on spending and contributions for political campaigns

(Caution: 1998 Prop 105 applies)

A. Notwithstanding any law to the contrary, a participating candidate:

1. Shall not accept any contributions, other than a limited number of five-dollar qualifying contributions as specified in section 16-946 and early contributions as specified in section 16-945, except in the emergency situation specified in section 16-954, subsection F.
2. Shall not make expenditures of more than a total of five hundred dollars of the candidate's personal monies for a candidate for the legislature or more than one thousand dollars for a candidate for statewide office.
3. Shall not make expenditures in the primary election period in excess of the adjusted primary election spending limit.
4. Shall not make expenditures in the general election period in excess of the adjusted general election spending limit.

5. Shall comply with section 16-948 regarding campaign accounts and section 16-953 regarding returning unused monies to the citizens clean elections fund described in this article.

B. Notwithstanding any law to the contrary, a nonparticipating candidate shall not accept contributions in excess of an amount that is twenty per cent less than the limits specified in section 16-905, subsections A through E, as adjusted by the secretary of state pursuant to section 16-905, subsection H. Any violation of this subsection shall be subject to the civil penalties and procedures set forth in section 16-905, subsections J through M and section 16-924.

C. Notwithstanding any law to the contrary, a candidate, whether participating or nonparticipating:

1. If specified in a written agreement signed by the candidate and one or more opposing candidates and filed with the citizens clean elections commission, shall not make any expenditure in the primary or general election period exceeding an agreed-upon amount lower than spending limits otherwise applicable by statute.
2. Shall continue to be bound by all other applicable election and campaign finance statutes and rules, with the exception of those provisions in express or clear conflict with this article.

D. Notwithstanding any law to the contrary, any person who makes independent expenditures related to a particular office cumulatively exceeding five hundred dollars in an election cycle, with the exception of any expenditure listed in section 16-920 and any independent expenditure by an organization arising from a communication directly to the organization's members, shareholders, employees, affiliated persons and subscribers, shall file reports with the secretary of state in accordance with section 16-958 so indicating, identifying the office and the candidate or group of candidates whose election or defeat is being advocated and stating whether the person is advocating election or advocating defeat.

16-948. Controls on participating candidates' campaign accounts

(Caution: 1998 Prop 105 applies)

- A. A participating candidate shall conduct all financial activity through a single campaign account of the candidate's campaign committee. A participating candidate shall not make any deposits into the campaign account other than those permitted under section 16-945 or 16-946.
- B. A candidate may designate other persons with authority to withdraw funds from the candidate's campaign account. The candidate and any person so designated shall sign a joint statement under oath promising to comply with the requirements of this title.
- C. The candidate or a person authorized under subsection B of this section shall pay monies from a participating candidate's campaign account directly to the person providing goods or services to the campaign and shall identify, on a report filed pursuant to article 1 of this chapter, the full name and street address of the person and the nature of the goods and services and compensation for which payment has been made. Notwithstanding the previous sentence, a campaign committee may establish one or more petty cash accounts, which in aggregate shall not exceed one thousand dollars at any time. No single expenditure shall be made from a petty cash account exceeding one hundred dollars.
- D. Monies in a participating candidate's campaign account shall not be used to pay fines or civil penalties, for costs or legal fees related to representation before the commission, or for defense of any enforcement action under this chapter. Nothing in this subsection shall prevent a participating candidate from having a legal defense fund.
- E. A participating candidate shall not use clean elections monies to purchase goods or services that bear a distinctive trade name, trademark or trade dress item, including a logo, that is owned by a business or other entity that is owned by that participating candidate or in which the candidate has a controlling interest. The use of goods or services that are prohibited by this subsection is deemed to be an unlawful in-kind contribution to the participating candidate.

Article 1. General Provisions

R2-20-101 Definitions

In addition to the definitions provided in A.R.S. §§ 16-901 and 16-961, the following shall apply to the Chapter, unless the context otherwise requires:

1. **"Act"** means the Citizens Clean Elections Act set forth in the Arizona Revised Statutes, Title 16, Chapter 6, Article 2.
2. **"Audit"** means a written report pertaining to an examination of a candidate's campaign finances that is reviewed by the Commission in accordance with A.A.C. Title 2, Chapter 20, Article 4.
3. **"Campaign account"** means an account designated by a political committee that is used solely for political campaign purposes as required in A.R.S. § 16-902(C).
4. **"Candidate"** means natural person who receives or gives consent for receipt of a contribution for the person's nomination for or election to any office in this state, and includes the person's campaign committee, the political committee designated and authorized by the person, or any agents or personnel of the person. When not otherwise specified by statute or these rules, "Candidate" includes a Candidate for Statewide Office or a Legislative Candidate.
5. **"Candidate for Statewide Office"** means:
A natural person seeking the office of governor, attorney general, secretary of state, treasurer, superintendent of public instruction, or mine inspector
6. **"Current campaign account"** means a campaign account used solely for election campaign purposes in the present election cycle.
7. **"Direct campaign purpose"** includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of a candidate. This does not include the candidate's personal appearance, support, or support of a candidate's family member.
8. **"Early contributions"** means private contributions that are permitted pursuant to A.R.S. § 16-945.
9. **"Examination"** means an inspection by the Commission or agent of the Commission of a candidate's books, records, accounts, receipts, disbursements, debts and obligations, bank account records, and campaign finance reports related to the candidate's campaign, which may include fieldwork, or a visit to the campaign headquarters, to ensure compliance with campaign finance laws and rules.
10. **"Executive Director"** means the highest ranking Commission staff member, who is appointed pursuant to A.R.S. § 16-955(J) and is responsible for directing the day-today operations of the Commission.
11. **"Expressly advocates"** means:
 - a. 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.
 - b. Making a general public communication, such as in broadcast medium, newspaper, magazine, billboard, or direct mailer referring to one or more clearly identified candidates and targeted to the electorate of that candidate(s) that in context can have no reasonable meaning other than to advocate the election or defeat of the candidate(s), as evidenced by factors such as the presentation of the candidate(s) in

16-902. Organization of political committees; accounting

- A. Each political committee shall have a chairman and treasurer. The position of chairman and treasurer of a single political committee may not be held by the same individual, except that a candidate may be chairman and treasurer of his own campaign committee.
- B. The name of each political committee shall include the name of any sponsoring organization, and, in the case of a candidate's campaign committee, the committee's name shall include the name of the candidate, or, if for an exploratory committee, the individual, who designated the committee pursuant to section 16-903.
- C. Before a political committee accepts a contribution or makes an expenditure it shall designate one or more state banks, federally chartered depository institutions or depository institutions the deposits or accounts of which are insured by the federal deposit insurance corporation or the national credit union administration as its campaign depository or depositories. The political committee shall notify the filing officer of the designation of the financial institution either at the time of filing the statement of organization pursuant to section 16-902.01 or within five business days after opening an account. All withdrawals or disbursements from these accounts require the signature of the treasurer or a designated agent of the political committee.
- D. If a committee receives contributions designated for use in the general election before the primary election, the committee must use an acceptable accounting method to distinguish between contributions received for the primary election and contributions received for the general election. Acceptable accounting methods include designating separate accounts for each election or establishing separate books and records for each election.

A.A.C. R2-20-105(B) within seven days after the end of the qualifying period; or (2) the candidate is denied Clean Elections funding by the Secretary of State and the candidate is ineligible to make a supplemental filing with the Secretary of State in accordance with A.A.C. R2-20-105(G).

- C. A candidate whose participating candidate status has been terminated in accordance with this Section shall be ineligible to receive Clean Elections funding for that election cycle unless he/she reapplies for certification and is in compliance with R2-20-104(A) and R2-20-104(C).
- D. In the event that a candidate who has collected qualifying contributions decides not to seek certification as a participating candidate, the candidate shall return all qualifying contributions received from contributors who have not given written permission to use their qualify contributions as campaign contributions. Written permission may include a check box on the original \$5 form that authorizes a candidate to treat the qualifying contribution as a general campaign contribution if he or she decides not to participate in the Clean Elections system. If a good faith attempt to return the funds to the contributor is unsuccessful, the contributions shall be submitted to the Fund.

R2-20-109. Reporting Requirements

- A. In accordance with A.R.S. § 16-958(E), all persons obligated to file any campaign finance report under any provisions of Chapter 6, Article 2 of the Arizona Revised Statutes shall file such reports using the Secretary of State's Internet-based finance reporting system, except if expressly provided otherwise by another Commission rule.
- B. All participating candidates shall file campaign finance reports that include all receipts and disbursements for their current campaign account as follows:
 - 1. Expenditures for consulting, advising, or other such services to a candidate shall include a detailed description of what is included in the service, including an allocation of services to a particular election. When appropriate, the Commission may treat such expenditures as though made during the general election period.
 - 2. If a participating candidate makes an expenditure on behalf of the campaign using personal funds, the candidate's campaign shall reimburse the candidate within seven calendar days of the expenditure. After the 7 day period has passed, the expenditure shall be deemed an in-kind contribution subject to all applicable limits.
 - 3. A candidate may authorize an agent to purchase goods or services on behalf of such candidate, provided that:
 - a. Expenditures shall be reported as of the date that the agent promises, agrees, contracts or otherwise incurs an obligation to pay for the goods or services;
 - b. The candidate shall have sufficient funds in the candidate's campaign account to pay for the amount of such expenditure at the time it is made and all other outstanding obligations of the candidate's campaign committee; and
 - c. Within seven calendar days of the date upon which the amount of the expenditure is known, the candidate shall pay such amount from the candidate's campaign account to the agent who purchases the goods or services.
 - 4. A joint expenditure is made when two or more candidates agree to share the cost of goods or services. Candidates may make a joint expenditure on behalf of one or more other campaigns, but must be authorized in advance by the other candidates involved in the expenditure, and must be reimbursed within seven days. Participating candidates may participate in joint expenditures for the cost of goods and services with one or more candidates, subject to the following:
 - a. Joint expenditures must be authorized in advance by all candidates sharing in the expenditure and allocated fairly among candidates. An allocated share of a

joint expenditure paid by one candidate pursuant to such an agreement must be reimbursed within seven days.

- b. Any violator of part (a) shall be liable for a penalty pursuant to R2-20-222, in addition to penalties prescribed by any other law.
 - c. If a fairly allocated share of any joint expenditure is not reimbursed to a candidate, the unreimbursed amount of the joint expenditure fairly allocated to that candidate shall be deemed a contribution to that candidate by the campaign committee of the candidate obligated to reimburse the share.
 - d. If a fairly allocated share of any joint expenditure is not reimbursed to a participating candidate, the candidate obligated to reimburse the share shall reimburse the fund for the unreimbursed amount of the joint expenditure fairly allocated to the obligated candidate, in addition to any penalty specified by law.
5. 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.

C. Timing of reporting expenditures.

1. Except as set forth in subsection (B)(2) above, a participating candidate shall report a contract, promise or agreement to make an expenditure resulting in an extension of credit as an expenditure, in an amount equal to the full future payment obligation, as of the date the contract, promise or agreement is made.
2. In the alternative to reporting in accordance with subsection (B)(1) above, a participating candidate may report a contract, promise or agreement to make an expenditure resulting in an extension of credit as follows:
 - a. For a month-to-month or other such periodic contract or agreement that is terminable by a candidate at will and without any termination penalty or payment, the candidate may report an expenditure, in an amount equal to each future periodic payment, as of the date upon which the candidate's right to terminate the contract or agreement and avoid such future periodic payment elapses.
 - b. For a contract, promise or agreement to provide goods or services during the general election period that is contingent upon a candidate advancing to the general election period, the candidate may report an expenditure, in an amount equal to the general election period payment obligation, as of the date upon which such contingency is satisfied.
 - c. For a contract, promise or agreement to pay rent, utility charges or salaries payable to individuals employed by a candidate's campaign committee as staff, the candidate may report an expenditure, in an amount equal to each periodic payment, as of the date that is the sooner of (i) the date upon which payment is made; or (ii) the date upon which payment is due.

D. Transportation expenses.

1. Except as otherwise provided in this subsection (D), the costs of transportation relating to the election of a participating statewide or legislative office candidate shall not be considered a direct campaign expense and shall not be reported by the candidate as expenditures or as in-kind contributions.
2. If a participating candidate travels for campaign purposes in a privately owned automobile, the candidate may use campaign funds to reimburse the owner of the automobile at a rate not to exceed the state mileage reimbursement rate in which event the reimbursement shall be considered a direct campaign expense and shall be reported as an expenditure. If a candidate chooses to use campaign funds to

reimburse, the candidate shall keep an itinerary of the trip, including name and type of events(s) attended, miles traveled and the rate at which the reimbursement was made. Traditional candidates may reimburse in a similar fashion, but are not required to stay within the State mileage rate.

3. Use of airplanes.

- a. If a participating candidate travels for campaign purposes in a privately owned airplane, within 7 days from the date of travel, the candidate shall use campaign funds to reimburse the owner of the airplane at a rate of \$150 per hour of flying time, in which event the reimbursement shall be considered a direct campaign expense and shall be reported as an expenditure. If the owner of the airplane is unwilling or unable to accept reimbursement, the participating candidate shall remit to the fund an amount equal to \$150 per hour of flying time.
- b. If a participating candidate travels for campaign purposes in a state-owned airplane, within 7 days from the date of travel, the candidate shall use campaign funds to reimburse the state for the portion allocable to the campaign in accordance with subsection 3a, above. The portion of the trip attributable to state business shall not be reimbursed. If payment to the State is not possible, the payment shall be remitted to the Clean Elections Fund.

4. If a participating candidate rents a vehicle or purchases a ticket or fare on a commercial carrier for campaign purposes, the actual costs of such rental (including fuel costs), ticket or fare shall be considered a direct campaign expense and shall be reported as an expenditure.

E. Reports and Refunds of Excess Monies by Participating Candidates

1. In addition to the campaign finance reports filed pursuant to A.R.S. §16-913, participating candidates shall file the following campaign finance reports and dispose of excess monies as follows:
 - a. Prior to filing the application for funding pursuant to A.R.S. §16-950, participating candidates shall file a campaign finance report with the names of the persons who have made qualifying contributions to the candidate.
 - b. At the end of the qualifying period, a participating candidate shall file a campaign finance report consisting of all early contributions received, including personal monies and the expenditures of such monies.
 - i. The campaign finance report shall be filed with the Secretary of State no later than five days after the last day of the qualifying period and shall include all campaign activity through the last day of the qualifying period.
 - ii. If the campaign finance report shows any amount unspent monies, the participating candidate, within five days after filing the campaign finance report, shall remit all unspent contributions to the Fund, pursuant to A.R.S. §16-945(B). Any unspent personal monies shall be returned to the candidate or the candidates' family member within five days.
2. Each participating candidate shall file a campaign finance report consisting of all expenditures made in connection with an election, all contributions received in the election cycle in which such election occurs, and all payments made to the Clean Elections Fund. If the campaign finance report shows any amount unspent, the participating candidate, within five days after filing the campaign finance report, shall send a check from the candidate's campaign account to the Commission in the amount of all unspent monies to be deposited the Fund.
 - a. The campaign finance report for the primary election shall be filed within five days after the primary election day and shall reflect all activity through the primary election day.

CITIZEN'S CLEAN ELECTIONS COMMISSION
MILEAGE REIMBURSEMENT FORM
KEN BENNETT FOR GOVERNOR

DATE	ORIGIN	DESTINATION	DESCRIPTION	MILES	\$.445/MILE REIMB	TOTAL
1/8/14	PHX	KINGMAN	GOV FORUM	400	178.00	
1/9/14	PHX	PHX	POLICE SARGEANTS MTG	25	11.13	
1/10/14	PHX	CHANDLER	C OF C FORUM	60	26.70	
1/12/14	PHX	GOLD CANYON	GOV FORUM	90	40.05	
1/15/14	PHX	TUCSON	FEAT DINNER	240	106.80	
1/16/14	PHX	SIERRA VISTA	GOP EVENT, SVPD	400	178.00	
1/18/14	PHX	FOUNTAIN HILLS	FUNDRAISER	80	35.60	
1/21/14	PHX	TUCSON	AZ BLDRS ALLIANCE DINNER	240	106.80	
1/24/14	PHX	GOLD CANYON	LUCKY CHESLEY EVENT	100	44.50	
1/28/14	PHX	PRESCOTT	GOV DEBATE	200	89.00	
1/30/14	PHX	TUCSON	MEET THE CANDIDATES	240	106.80	
1/31/14	PHX	PHX	KUTAK ROCK PRESENTATION	20	8.90	
						932.28
2/1/14	PHX	TEMPE	DAYSRING MENS GROUP	15	6.68	
	TEMPE	FT. MCDOWELL	CONSERV BUS LEAGUE EVENT	25	11.13	
	FT. MCD	FLAGSTAFF	VFW	300	133.50	
2/5/14	PHX	GILBERT	HUGHES OPEN HOUSE	60	26.70	
2/6/14	PHX	PEBBLECREEK	P/C REPUBS	60	26.70	
2/7/14	PHX	PHX MARRIOTT	AZ BLDRS ALLIANCE	10	4.45	
2/8/14	PHX	BUCKEYE	AIR FAIR	70	31.15	
2/11/14	PHX	SUN LAKES	S/L REPUBS	80	35.60	
2/13/14	PHX	TEMPE	ARTS SCIENCE LDRSHIP	20	8.90	
	PHX	SAN TAN VALLEY	HUGHES OPEN HOUSE	60	26.70	
2/14/14	PHX	PRESCOTT	FUNDRAISER	200	89.00	
2/15/14	PHX	GREEN VALLEY	GV/S REPUBS	250	111.25	
	PHX	PRESCOTT	LINCOLN DAY DINNER	200	89.00	
2/17/14	PHX	SAFFORD	GRAHAM REPUBS	330	146.85	
	PHX	FLAGSTAFF	COCONINO REPUBS	300	133.50	
2/18/14	PHX	FOUNTAIN HILLS	FH TEA PARTY	70	31.15	
2/19/14	PHX	MESA	GAME RANGER CLINIC	50	22.25	
2/20/14	PHX	MESA	EVIT CANDIDATE PANEL	40	17.80	
2/22/14	PHX	PHX CONV CTR	GOV FORUM	10	4.45	
2/23/14	PHX	PRESCOTT	ASKARI FRIENDS	200	89.00	
2/27/14	PHX	SCOTTSDALE	ARCHITECTS MEET/GREET	40	17.80	
						1,063.55
3/1/14	PHX	FLORENCE	PINAL REPUBS	100	44.50	
3/3/14	PHX	LAKE HAVASU CITY	LONDON BRIDGE REP WOMEN	420	186.90	

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DATE	ORIGIN	DESTINATION	DESCRIPTION	MILES	\$.445/MILE REIMB	TOTAL
3/5/14	PHX	PRESCOTT	FUNDRAISER	200	89.00	
3/7/14	PHX	PRESCOTT	YAC CTY EDUC SVCS GOV DEBATE	200	89.00	
3/8/14	PHX	TEMPE	AZCPOA	50	22.25	
	PHX	PAYSON	RIM COUNTRY REPUBS	175	77.88	
3/10/14	PHX	PRESCOTT	YRMF GOV FORUM	200	89.00	
3/13/14	PHX	SCOTTSDALE	FORWARD ECON SYMPOSIUM	50	22.25	
3/14/14	PHX	TEMPE	FRANK SCHMUCK EVENT	50	22.25	
3/15/14	PHX	SCOTTSDALE	PV REPUB WOMEN	50	22.25	
	SCOTTSDALE	SUN CITY WEST	SCW REP FORUM	60	26.70	
	SCW	MESA	EAST VALLEY ACTION ALLIANCE	50	22.25	
3/17/14	PHX	MESA	RED MOUNTAIN PATRIOTS	60	26.70	
3/21/14	PHX	SCOTTSDALE	REALTORS GOV DEBATE	50	22.25	
	PHX	SIERRA VISTA	1200 CLUB GOV FORUM	400	178.00	
3/22/14	PHX	GREEN VALLEY	SAHUARITA TEA PARTY GOV FORUM	250	111.25	
3/24/14	PHX	PRESCOTT	ERAU GOV DEBATE	200	89.00	
3/25/14	PHX	YUMA	REPUB GOV FORUM	380	169.10	
3/26/14	PHX	PEORIA	TOWN HALL	50	22.25	
	PHX	MESA	SKYHOOK	50	22.25	
3/31/14	PHX	COTTONWOOD	FARM BUREAU GOV FORUM	200	89.00	
						1,444.03
4/2/14	PHX	TUCSON	CE ROSE, NFIB LUNCH	240	106.80	
4/4/14	PHX	CAVE CREEK	BIKE WEEK	80	35.60	
4/7/14	PHX	CASA GRANDE	AZ CONSERV COALITION	100	44.50	
4/8/14	PHX	CASA GRANDE	FARM BUREAU FORUM	100	44.50	
4/9/14	PHX	TUCSON	SAHBA BREAKFAST	200	89.00	
	PHX	GILBERT	SBA INTERVIEW	50	22.25	
4/10/14	PHX	GILBERT	LD 17 FORUM	50	22.25	
4/11/14	PHX	CASA GRANDE	REP WOMEN FORUM	70	31.15	
	CASA GRANDE	YUMA	M&G, FOP, FARM BUREAU FORUM	380	169.10	
4/12/14	PHX	FOUNTAIN HILLS	FH REPUB FORUM	70	31.15	
	PHX	AMADO	SACPAC FORUM	320	142.40	
4/16/14	PHX	WEST PHX	TEA PARTY	50	22.25	
4/19/14	PHX	FLORENCE	PINAL REPUB FORUM	100	44.50	
	FLORENCE	TUCSON	M&G	200	89.00	
4/21/14	PHX	MESA	LEISURE WORLD FORUM	50	22.25	
4/22/14	PHX	SIERRA VISTA	THUNDER MTN REPUB FORUM	400	178.00	
	PHX	ANTHEM	GOV FORUM	100	44.50	
4/23/14	PHX	PEORIA	RIVERO TOWN HALL	60	26.70	

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	PHX	SCOTTSDALE	GLOBAL MED FORUM	50	22.25	
4/25/14	PHX	PHX	DESERT RIDGE CONSUL FORUM	30	13.35	
4/26/14	PHX	SUN CITY GRAND	REPUBLIC GOV FORUM	60	26.70	
	PHX	GLENDALE	MCKENNA EVENT	50	22.25	
	PHX	SCOTTSDALE	CROZIER DINNER	20	8.90	
4/28/14	PHX	TUCSON	REPUBLIC WOMEN LUNCH	100	44.50	
	TUCSON	TEMPE	REPUBLIC WOMEN FORUM	105	46.73	
4/29/14	PHX	PHX	CONSUL DINNER	10	4.45	
						1,355.03
5/1/14	PHX	SCOTTSDALE	GPL FORUM	20	8.90	
	PHX	PHX	CENTRAL REP WOMEN FORUM	10	4.45	
5/3/14	PHX	PAYSON	REPUBLICAN MEET & GREET	175	77.88	
5/5/14	PHX	SCOTTSDALE	LINCOLN REP WOMEN FORUM	20	8.90	
5/7/14	PHX	SCOTTSDALE	AZ SMALL BUS CONF FORUM	20	8.90	
5/10/14	PHX	PRESCOTT	NRA BANQUET	200	89.00	
5/12/14	PHX	PRESCOTT VALLEY	HWY 69 REPUBLIC SOCIAL	175	77.88	
5/13/14	PHX	PHX	LD28 FORUM	20	8.90	
5/14/14	PHX	PHX	AZ CHAMBER GOV LUNCH PANEL	10	4.45	
	PHX	TUCSON	SADDLEBROOK FORUM	200	89.00	
5/15/14	PHX	TEMPE	KIWANIS CLUB	20	8.90	
5/16/14	PHX	ANTHEM	MEET W ROB LINDER	60	26.70	
5/17/14	PHX	SIERRA VISTA	COCHISE REPUBLIC PICNIC	400	178.00	
5/20/14	PHX	GILBERT	SMALL BUS ALLIANCE TOUR	70	31.15	
5/21/14	PHX	SCOTTSDALE	PALO VERDE REP WOMEN FORUM	30	13.35	
	PHX	SCOTTSDALE	ODLE OPEN HOUSE	30	13.35	
5/22/14	PHX	TEMPE	CIRCLE K MANAGEMENT MTG	20	8.90	
5/24/14	PHX	MESA	MESA HIGH COMMON CORE MTG	30	13.35	
5/27/14	PHX	PHX	AZ TECH COUNCIL INTERVIEW	10	4.45	
5/28/14	PHX	YUMA	YUMA REP WOMEN LUNCH	380	169.10	
5/30/14	PHX	TUCSON	TEP SR MANAGEMENT INTERVIEW	240	106.80	
						952.30
6/7/14	PHX	SUN CITY WEST	ARROWHEAD REP WOMEN FORUM	70	31.15	
	PHX	TUCSON	PIMA REP WOMEN	240	106.80	
6/10/14	PHX	CHANDLER	CHANDLER CHAMBER INTERVIEW	45	20.03	
	PHX	MESA	LD26 MEETING	30	13.35	
6/11/14	PHX	PHX	FLINN FOUNDATION CANDIDATE FC	10	4.45	
6/12/14	TUCSON	TUCSON	TUCSON CHAMBER INTERVIEW	20	8.90	
6/13/14	PHX	PHX	IBEW BOARD MTG	20	8.90	

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	PHX	SAFFORD	GRAHAM TEA PARTY FORUM	330	146.85	
6/14/14	PHX	PRESCOTT VALLEY	PV DAYS PARADE	100	44.50	
	SELIGMAN	FLAGSTAFF	FLAG REP WOMEN PICNIC	60	26.70	
	FLAG	PHX	M & G ANTHEM/RETURN HOME	150	66.75	
6/16/14	PHX	PRESCOTT	SUPPLIES TO YAV CTY	200	89.00	
6/17/14	PHX	PHX	SALT RIVER PIMAS MTG	30	13.35	
	PHX	FOUNTAIN HILLS	FH TEA PARTY FORUM	70	31.15	
6/18/14	PHX	PHX	AHHA INTERVIEW/APOA INTERVIEW	20	8.90	
	PHX	SAN TAN VALLEY	SECURITY SUMMIT	90	40.05	
6/19/14	PHX	TUCSON	TEP CANDIDATE PICNIC	240	106.80	
	PHX	MESA	WALKER MEET & GREET	40	17.80	
6/20/14	PHX	WILLCOX	FARM BUREAU GOV FORUM	400	178.00	
6/21/14	PHX	COTTONWOOD	VERDE VALLEY REPUBS FORUM	200	89.00	
6/23/14	PHX	SCOTTSDALE	MELUSKY MEET & GREET	60	26.70	
6/24/14	PHX	PHX	CAPITOL TIMES RECEPTION	10	4.45	
6/25/14	PHX	SCOTTSDALE	BROOMHEAD FORUM	20	8.90	
6/26/14	PHX	PARADISE VALLEY	MTG WITH JUSTIN HENRY	40	17.80	
	PHX	SCOTTSDALE	SRP PIC FORUM	15	6.68	
	PHX	GOLD CANYON	GC ASSOC FORUM	80	35.60	
6/27/14	TUCSON	TUCSON	AZCOPS ENDORSEMENT	20	8.90	
6/28/14	PHX	PHX	VIDEO RECORDING	20	8.90	
6/30/14	PHX	PHX	FOP ENDORSEMENT ANNOUNCE	30	13.35	
						1,183.70
7/1/14	PHX	PAYSON	CAMPAIGN WITH MAYOR	175	77.88	
	PHX	PHX	HISPANIC FORUM	20	8.90	
7/2/14	PHX	PHX	FOX 10 INTERVIEW	25	11.13	
7/5/14	PHX	PAULDEN	PRESCOTT PARADE/MILLS RECEPTIC	260	115.70	
7/9/14	PHX	SCOTTSDALE	TECH COUNCIL FORUM	20	8.90	
	PHX	PHX	3 TV INTERVIEW	40	17.80	
7/10/14	PHX	GOLD CANYON	PAM BURKS EVENT	80	35.60	
	PHX	PAYSON	TEA PARTY FORUM	175	77.88	
7/11/14	PHX	PHX	ENERGY CONSORTIUM INTERVIEW	10	4.45	
	PHX	PRESCOTT	LAS FUENTES FORUM	200	89.00	
	PHX	GLENDALE	JEFF BLAKE MEET & GREET	40	17.80	
7/12/14	PHX	LAKE HAVASU CITY	TEA PARTY FORUM	420	186.90	
7/13/14	PHX	MESA	HINTON MEET & GREET	40	17.80	
7/14/14	PHX	TUCSON	DAILY STAR ED BOARD	240	106.80	
7/15/14	PHX	PHX	AZ NEWS RECEPTION	20	8.90	

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7/16/14	PHX	GLENDALE	WEST VALLEY REPUB FORUM	60	26.70	
	PHX	PHX	TELEMUNDO INTERVIEW	20	8.90	
7/17/14	PHX	TEMPE	GREEN CHAMBER COFFEE	15	6.68	
	PHX	PHX	TOURISM FORUM/NEWSMAKER TA	30	13.35	
	PHX	MESA	LD16 FORUM	50	22.25	
7/18/14	PHX	TOLLESON	VFW 6310 BRKFST	35	15.58	
	PHX	CHANDLER	CATTLEGROWERS DINNER	40	17.80	
7/19/14	PHX	TUCSON	ASBO FORUM	250	111.25	
	PHX	APACHE JUNCTION	SUPERSTITION REPUB ICE CREAM	65	28.93	
	PHX	GLENDALE	HEIDI CHAPP EVENT	35	15.58	
7/20/14	PHX	MARICOPA	PROVINCE REPUBS M&G	70	31.15	
7/21/14	PHX	PHX	CLEAN ELECTIONS DEBATE	15	6.68	
7/22/14	PHX	ASU WEST	WEST VALLEY DEBATE	50	22.25	
	PHX	TEMPE	KJZZ DEBATE	15	6.68	
7/23/14	PHX	CHANDLER	INTEL MEETING	30	13.35	
	PHX	PHX	AZ REPUBLIC ED BOARD	10	4.45	
	PHX	TEMPE	LD18 REP WOMEN FORUM	30	13.35	
7/24/14	PHX	PRESCOTT	YAVAPAI COUNTY FORUM	200	89.00	
7/25/14	PHX	PHX	KFYI, POLITICS UNPLUGGED	40	17.80	
7/26/14	PHX	PRESCOTT	DUTKO MEET & GREET	200	89.00	
	PHX	PHX	PARADISE REP WOMEN FORUM	20	8.90	
7/27/14	PHX	PHX	KFNX INTERVIEW	10	4.45	
7/28/14	PHX	CHANDLER	EAST VALLEY CHAMBER FORUM	50	22.25	
7/29/14	PHX	PRESCOTT	KYCA INTERVIEW	200	89.00	
	PHX	BUCKEYE	MAYOR MECK EVENT	65	28.93	
7/30/14	PHX	TUCSON	LWV FORUM	225	100.13	
7/31/14	PHX	TUCSON	TONI HELLON EVENT	220	97.90	
						1,697.68
8/1/14	PHX	PAYSON	FIRST FRIDAY GOV FORUM	175	77.88	
8/4/14	PHX	CASA GRANDE	CENTRAL AZ BUSINESS FORUM	100	44.50	
8/5/14	PHX	FLAGSTAFF	FOP CONVENTION SPEAK	150	66.75	
	FLAGSTAFF	ANTHEM/PHX	DAISY MOUNTAIN TEA PARTY	150	66.75	
8/6/14	PHX	MESA	OPEN HOUSE	40	17.80	
8/7/14	PHX	SCOTTSDALE	KFYI/KETELAAR FORUM	30	13.35	
8/8/14	PHX	CLIFTON	MEET & GREET	415	184.68	
8/9/14	HEBER	WILLIAMS	FARM BUREAU SUMMER MTG	170	75.65	
	WILLIAMS	PHX	HAGAN FRIEND RAISER	175	77.88	
8/11/14	PHX	BUCKEYE	LEWIS PRISON MEET & GREET	80	35.60	

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8/12/14	PHX	TUCSON	JOHN C SCOTT/4 TUCSON	120	53.40	
	TUCSON	SIERRA VISTA	SV CHAMBER CANDIDATE M&G	75	33.38	
8/13/14	SIERRA VISTA	NACO/PHX	MEET & GREET BORDER FAMS	225	100.13	
8/14/14	PHX	PHX	960 PATRIOT INTERVIEW	10	4.45	
	PHX	GILBERT	LD 12 GOV FORUM	50	22.25	
8/15/14	PHX	SCOTTSDALE	AZCOPS RECEPTION	30	13.35	
8/16/14	PHX	KINGMAN	MOHAVE REPUBS PICNIC	400	178.00	
	PHX	GLOBE	COBRE VALLEY REPUBS MTG	170	75.65	
8/17/14	PHX	SCOTTSDALE	NORTH SCOTTS CHRIST CHURCH	20	8.90	
	SCOTTSDALE	SCOTTSDALE	ARMENIAN CHURCH M&G	10	4.45	
	SCOTTSDALE	GLENDALE	AZFAM MEET & GREET	40	17.80	
8/18/14	PHX	FLAGSTAFF	NAU GOV DEBATE	300	133.50	
8/19/14	PHX	PHX	LEAGUE OF CITIES DEBATE	20	8.90	
8/20/14	PHX	PHX	LIBRE GOV FORUM	30	13.35	
8/21/14	PHX	SHOW LOW	WHITE MTN COSERVS DEBATE	350	155.75	
	PHX	PHX	MUJERAS UNICAS INTERVIEW	10	4.45	
8/22/14	PHX	PHX	ANDY HULL MEET & GREET	20	8.90	
8/25/14	PHX	FLAGSTAFF	REALTORS PAC MEET & GREET	300	133.50	
						1,630.93
						10,259.48