

April 6, 2026

Via Email (ccec@azcleaselections.gov)

Thomas M. Collins Executive Director Citizens Clean Elections Commission 1110 West Washington Street, Suite 250 Phoenix, AZ 85007

Dear Director Collins:

I am a qualified Arizona voter and SRP ratepayer in Maricopa County. I submit this complaint under A.R.S. § 16-977(A) and A.A.C. R2-20-809 against Arizonans for Responsible Growth ("AZFRG"), a political action committee registered with the Arizona Secretary of State (Committee ID 101777) and Maricopa County (Committee ID 1002584).

BEFORE THE ARIZONA CITIZENS CLEAN ELECTIONS COMMISSION

VERIFIED COMPLAINT UNDER THE VOTERS' RIGHT TO KNOW ACT

(A.R.S. Title 16, Chapter 6.1)

Complainant:

[REDACTED] [CITY REDACTED] [EMAIL REDACTED] [PHONE REDACTED]

Respondent:

Arizonans for Responsible Growth c/o Jimmy Lindblom, Chairman 1702 E Highland Suite 450 Phoenix, AZ 85016

I. COMPLAINANT STANDING

1. I, [REDACTED], am a qualified voter registered in Maricopa County, Arizona. I am eligible to file this complaint pursuant to A.R.S. § 16-977(A) and R2-20-809(A).
2. I am a resident of the Salt River Project Agricultural Improvement and Power District service territory. The matters described in this complaint directly affect my community and the governance of the utility that provides water and power to my home.

II. RESPONDENT IDENTIFICATION

3. Arizonans for Responsible Growth ("AZFRG") is a political action committee organized on October 4, 2024, registered with both the Arizona Secretary of State (Committee ID 101777) and the Maricopa County Recorder's Office (Committee ID 1002584). AZFRG is a standing PAC with federal tax status as a 527 organization.

4. AZFRG is chaired by James "Jimmy" Lindblom, who serves as Vice President of Economic Development at Willmeng Construction, Inc. AZFRG's registered address is 1702 E Highland Suite 450, Phoenix, AZ 85016. Its treasurer is Ashley Ragan of InCompliance LLC, located at 2211 E Highland Ave Suite 210, Phoenix, AZ 85016. AZFRG banks at Alliance Bank.

5. AZFRG's stated purpose is to support the "Elected Leadership for SRP" slate of candidates in the 2026 SRP board election, including Chris Dobson for President and Barry Paceley for Vice President. AZFRG maintains a website at azforrg.com and operates an attack website at srpelectionalert.com targeting the opposing Clean Energy Team candidates. AZFRG's campaign materials carry the disclaimer "Not authorized by any candidate or candidate's agent."

6. AZFRG shares its treasurer (Ashley Ragan / InCompliance LLC), treasurer address (2211 E Highland Ave Suite 210), and bank (Alliance Bank) with SRP Water and Ratepayer Protection PAC (Maricopa County Committee ID 1002430), chaired by Kimberly Owens of Gordon James Public Affairs.

III. FACTUAL BACKGROUND

A. The SRP Election

7. The Salt River Project Agricultural Improvement and Power District ("SRP") is a political subdivision of Arizona formed in 1937 under A.R.S. Title 48, Chapter 17. SRP provides water and electricity to approximately one million customers in the Phoenix metropolitan area.

8. The 2026 SRP board election has a voting period of March 11 through April 7, 2026, with ballots administered through the Maricopa County Elections Department.

B. AZFRG's Fundraising and Spending

9. AZFRG has raised at least \$219,000 in total contributions as of early 2026. AZFRG's chairman, Jimmy Lindblom, has publicly stated that the PAC expects to spend over \$500,000 on paid digital advertising alone, as reported by Axios Phoenix and KJZZ.

10. AZFRG has filed seven campaign finance reports at the state level with the Arizona Secretary of State, all on time:

Report	Date Filed
2024 Pre-General Election	10/25/2024
2024 Post-General Q4	01/11/2025
2025 Q1	04/03/2025
2025 Q2	07/21/2025
2025 Q3	10/06/2025
2025 Q4	01/04/2026

11. AZFRG has also filed two VRKA disclosure reports:

- **Initial Report (filed March 20, 2026):** Disclosed \$56,142.93 disbursed to Shipley Strategies on March 1, 2026 for "Mail and Digital" supporting the Elected Leadership for SRP slate. Listed traceable monies of \$8,900.24 and seven donors over \$5,000, including NextEra Energy Resources (\$15,000, Juno Beach, FL), Brody Riggs/Riggs Companies (\$10,500), Richard MacQueen/CCE (\$10,000), and Willmeng Construction (\$5,000). The Major Donors section was left blank.

- **Supplemental Report (filed March 30, 2026):** Disclosed \$155,481 disbursed to Shipley Strategies on March 27, 2026 for "Mail and Digital" supporting the same slate. Listed traceable monies of \$11,384.92 and four new donors over \$5,000, including Riggs Companies (\$50,000), Eric Pach/INSURICA SW (\$10,000), Shane Snyder/Cannon and Wendt Electric (\$5,000), and Derek Borum/Kinkaid Civil Construction (\$5,000). The Major Donors section was again left blank.

12. Total VRKA-disclosed media spending is \$211,623.93, all paid to Shipley Strategies (Colin Shipley, Campaign Media Spending Manager) for "Mail and Digital."

13. This complaint is specifically about AZFRG's VRKA non-compliance. The complaint does NOT allege that AZFRG has failed to file campaign finance reports generally. AZFRG has filed seven state-level reports on time. The issues are: late VRKA filing, blank Major Donors disclosures, inaccurate top-three-donor disclaimers on campaign communications, and a county-level reporting gap.

C. AZFRG's Donor Base

14. Based on AZFRG's own public supporters page (azforrg.com/supporters), VRKA filings, and campaign finance records, every publicly disclosed donor is a corporation or corporate officer. There are zero individual ratepayers, zero neighborhood groups, and zero community organizations among AZFRG's donors. The donor base is dominated by construction firms, data center operators, real estate developers, and companies with direct SRP business interests.

15. Key donors include:

Donor	Amount	Connection
Willmeng Construction	\$52,551+ (website) + \$5,000 (VRKA)	\$3.15M+ in SRP Job Order Contracts (32 orders since 2011). PAC chair Lindblom is VP.
Riggs Companies	\$50,000 corporate (VRKA 3/30)	Concrete/construction, 950 E Lone Cactus Dr, Phoenix
Brody Riggs	\$10,500 personal (VRKA 3/20)	Principal of Riggs Companies
Riggs family total	**\$60,500**	**Approximately 28% of total raised (\$219K+)**

VW Connect	\$25,000+ (Powerhouse tier)	Tempe utility construction; lists SRP as business partner
ViaWest Group	\$25,000+ (Powerhouse tier)	\$3.1B+ real estate developer; joint \$107M project with Willmeng
NextEra Energy Resources	\$15,000 (VRKA 3/20)	700 Universe Blvd, Juno Beach, FL 33408. **Out of state.**
EdgeCore Digital Infrastructure	\$10,000+ (High Voltage tier)	Mesa data center operator, 450 MW capacity
Eric Pach / INSURICA SW	\$10,000 (VRKA 3/30)	Insurance, Tempe
Richard MacQueen / CCE	\$10,000 (VRKA 3/20)	VP, CCE, Phoenix
Peter Ledger / Graydaze	\$5,000 (VRKA 3/20)	1801 Old Alabama Rd, Roswell, GA 30076. **Out of state.**
Paceley Constructors	\$1,000+ (Spark tier)	Owned by Barry Paceley, AZFRG's endorsed VP candidate

D. Conflicts of Interest

16. Barry Paceley, AZFRG's endorsed candidate for SRP Vice President, is simultaneously a donor to AZFRG through his company, Paceley Constructors (\$1,000+ tier). He has also filed a candidate committee (Committee 1000572) reporting \$1,500 in loans and \$862 in in-kind contributions through December 31, 2025. AZFRG claims on its materials to be "not authorized by any candidate or candidate's agent," yet one of its endorsed candidates is also a financial contributor to the PAC.

17. AZFRG's chairman, Jimmy Lindblom, is VP of Economic Development at Willmeng Construction, AZFRG's largest single corporate donor at \$52,551+. Willmeng holds over \$3.15 million in SRP Job Order Contracts spanning 32 orders since 2011. Lindblom also serves as Chairman of the Maricopa County Planning & Zoning Commission and Co-Chairman of the Political Affairs Committee for the Arizona Chamber of Commerce.

18. The candidates AZFRG supports will make decisions directly affecting contracts, rates, and policies that benefit AZFRG's corporate donor base.

IV. LEGAL FRAMEWORK AND VIOLATIONS

A. Applicability of the VRKA to the SRP Election

19. The Voters' Right to Know Act defines "campaign media spending" broadly to encompass spending on communications that support or oppose candidates. A.R.S. § 16-971. The Act applies to spending exceeding \$50,000 for statewide campaigns and \$25,000 for "any other type of campaigns." A.R.S. § 16-973. The phrase "any other type" is intentionally broad and does not exclude special district elections.

20. AZFRG itself appears to recognize that the VRKA applies to its SRP election spending. It has filed two VRKA reports with the Secretary of State disclosing \$211,623.93 in campaign media spending for the SRP election. The question before the Commission is not whether the VRKA applies to AZFRG's SRP spending, but whether AZFRG's VRKA filings are timely and complete.

21. A.R.S. § 16-978, which addresses the VRKA's interaction with existing law, references "state, county, and municipal" provisions but is silent on special districts. Silence is not exclusion. Prop 211 was a voter initiative approved by 72% of Arizona voters, and courts interpret voter initiatives broadly to effectuate voter intent. AZFRG's own decision to file VRKA reports for this election is consistent with the conclusion that the Act applies.

22. Complainant respectfully requests that the Commission confirm the VRKA's applicability to SRP board elections as a question of first impression.

Note on VRKA vs. Traditional Campaign Finance Reporting: The VRKA was enacted as Chapter 6.1 of Title 16 (A.R.S. §§ 16-971 through 16-979), separate from the traditional campaign finance provisions in Chapter 6 governing candidate committees and traditional PACs. AZFRG's compliance with traditional campaign finance reporting requirements (the seven state-level filings referenced above) does not satisfy or substitute for the separate and additional VRKA obligations, which require disclosure of "original sources" of money, identification of "major donors," and top-three-donor disclaimers on public communications.

B. Violation 1: Late VRKA Filing (A.R.S. § 16-973(A))

23. Under A.R.S. § 16-973, a covered person must file an initial disclosure report within five days of exceeding the applicable spending threshold. For non-statewide campaigns, that threshold is \$25,000.

24. Based on the disbursement data in AZFRG's own VRKA Initial Report, AZFRG disbursed \$56,142.93 to Shipley Strategies on March 1, 2026 for "Mail and Digital." This was the first VRKA-disclosed disbursement. AZFRG's campaign media spending therefore exceeded the \$25,000 threshold on approximately March 1, 2026, or shortly thereafter as disbursements were processed.

25. However, AZFRG's VRKA Initial Report was not filed until March 20, 2026, approximately 14 to 19 days after AZFRG became a covered person. The five-day filing deadline under A.R.S. § 16-973(A) would have required filing no later than approximately March 6, 2026.

26. For comparison, Chispa AZ PAC, which also filed VRKA reports for the 2026 SRP election, filed its initial VRKA report on March 11, 2026, within the required window after crossing the threshold.

27. Ashley Ragan, AZFRG's treasurer, included a handwritten note on the Initial Report stating: "In an effort to disclose all spending, I have included all contributions and disbursements for media spending since the close of books of last report on 2/21/2026." This note suggests awareness that the filing was retrospective and that spending had accumulated before the report was prepared.

C. Violation 2: Blank Major Donors Section (A.R.S. § 16-974(C))

28. The VRKA requires disclosure reports to identify "major donors." A.R.S. § 16-974(C). The Major Donors section exists to identify the dominant funders of campaign media spending so that voters can quickly evaluate who is financing political communications.

29. Both of AZFRG's VRKA reports, the Initial Report (March 20, 2026) and the Supplemental Report (March 30, 2026), leave the Major Donors section completely blank. (See Exhibits A and B.)

30. Yet AZFRG's own filings and public disclosures reveal that a single donor family, the Riggs family (Riggs Companies and Brody Riggs personally), contributed a combined \$60,500. This represents approximately 28% of AZFRG's total reported fundraising of \$219,000+.

31. The Riggs Companies' \$50,000 corporate contribution alone represents the single largest contribution disclosed in any VRKA filing for the 2026 SRP election. A disclosure regime that identifies donors over \$5,000 but leaves the Major Donors section blank when one entity contributed \$60,500 does not serve the transparency purpose of the Act.

32. Other substantial donors include NextEra Energy Resources (\$15,000, out-of-state from Florida), VW Connect (\$25,000+), ViaWest Group (\$25,000+), and Willmeng Construction (\$52,551+ total including both website-disclosed tiers and VRKA-disclosed amounts). The blank Major Donors section conceals the concentration of funding from a small number of corporate interests.

D. Violation 3: Inaccurate Top-Three-Donor Disclaimers on Campaign Communications (A.R.S. § 16-974(C))

33. A.R.S. § 16-974(C) requires that public communications by covered persons include "the names of the top three donors who directly or indirectly made the three largest contributions of original monies during the election cycle to the covered person." The purpose of this requirement is to give voters accurate, at-a-glance information about who is financing political communications.

34. Upon personal observation, AZFRG's campaign signs display a top-three-donor disclaimer reading "Top Donors: Willmeng, Google, and VW Connect." This disclaimer is inaccurate. Specifically:

a. Campaign signs placed throughout the SRP service territory bear a top-three-donor disclaimer identifying Google as a top donor. (See Exhibit D.) However, Google asked to be removed from AZFRG materials on February 24, 2026, and clawed back part of its \$25,000 donation. (Per Phoenix New Times, March 9, 2026.) Google is no longer among AZFRG's top three donors and should not appear on any disclaimer.

b. The signs omit Riggs Companies entirely. Per AZFRG's own March 30 VRKA Supplemental Report, Riggs Companies contributed \$50,000 in a single corporate donation, which combined with Brody Riggs's personal \$10,500 contribution totals \$60,500, approximately 28% of AZFRG's total fundraising. Riggs Companies is AZFRG's single

largest donor. The correct top-three-donor disclaimer should read: "Top Donors: Riggs Companies, Willmeng Construction, and VW Connect" (or similar formulation reflecting \$60,500, \$52,551+, and \$25,000+ respectively).

c. AZFRG's own VRKA filings identify donors over \$5,000 by name. The top three donors based on those filings are Riggs Companies/Brody Riggs (\$60,500 combined), Willmeng Construction (\$52,551+), and VW Connect (\$25,000+). The signs display a donor who withdrew and conceal the PAC's single largest funder.

35. The Commission should examine when AZFRG's campaign signs were printed and paid for, as the timing is directly relevant to whether the inaccurate disclaimers reflect negligence or knowing misrepresentation. If signs were produced after February 24, 2026 (the date Google requested removal from AZFRG materials), they were printed with a donor name AZFRG knew to be incorrect. If signs were produced after March 30, 2026 (the date AZFRG filed its VRKA Supplemental Report disclosing the Riggs Companies \$50,000 contribution), AZFRG knew Riggs was its largest donor and still distributed signs identifying Google instead. Complainant requests that the Commission compare sign production and payment dates in AZFRG's upcoming Q1 2026 campaign finance report against the donor timeline established by Google's February 24 withdrawal and the March 30 VRKA supplemental filing.

36. AZFRG's digital communications present a mixed and revealing picture. The attack website srpelectionalert.com has been updated and now correctly displays "Top Donors: Willmeng, Riggs Companies, and VW Connect." This proves that AZFRG knows the correct top-three donors and has the ability to update its communications accordingly. However, the physical campaign signs throughout the SRP service territory have not been updated and continue to display Google. More significantly, AZFRG's chairman has publicly stated the PAC plans to spend over \$500,000 on paid digital advertising. Every paid digital advertisement is a "public communication" under A.R.S. § 16-971(17)(a). If any of AZFRG's digital advertisements still display "Google" instead of "Riggs Companies," that constitutes a violation on a medium where correcting a disclaimer is instantaneous. The Commission should investigate whether AZFRG's paid digital ads carry accurate top-three-donor disclaimers.

37. Additionally, AZFRG's main website at azforrg.com contains zero disclaimers of any kind. There is no "paid for by" attribution, no committee identification, and no donor names. To the extent that azforrg.com constitutes a public communication under the Act, its complete absence of disclaimers is a separate deficiency.

E. Violation 4: County-Level Reporting Gap

38. AZFRG is registered with both the Arizona Secretary of State (Committee ID 101777) and the Maricopa County Recorder's Office (Committee ID 1002584). AZFRG has filed seven campaign finance reports at the state level. However, the only document on record with Maricopa County is a Statement of Organization. Zero financial reports have been filed at the county level.

39. SRP board elections are administered by the Maricopa County Elections Department. SRP is a political subdivision operating within Maricopa County. To the extent that

county-level PAC reporting is required for a committee registered with the county that is spending in a county-administered election, AZFRG's failure to file any financial reports with Maricopa County despite raising \$219,000+ and spending \$211,000+ represents a gap in disclosure.

40. Complainant requests that the Commission investigate whether AZFRG's county-level registration triggers county-level financial reporting obligations in addition to its state-level filings.

V. HARM TO VOTERS

41. The Voters' Right to Know Act was approved by over 72% of Arizona voters in 2022 specifically to ensure transparency in campaign spending. AZFRG's late VRKA filing, blank Major Donors sections, and inaccurate top-three-donor disclaimers deprive SRP voters and ratepayers of timely and complete information about who is spending hundreds of thousands of dollars to influence the governance of their water and power utility.

42. AZFRG's donor base consists entirely of corporations, many with direct financial interests in SRP decisions. Construction firms holding millions in SRP contracts, data center operators receiving commercial utility rates, real estate developers building in SRP territory, and out-of-state energy companies are funding a campaign to elect the board members who will set their rates and award their contracts. SRP ratepayers deserve to see those names on every campaign sign and every piece of digital advertising, as the VRKA requires.

43. AZFRG deserves credit for filing VRKA reports at all; many entities spending in the SRP election have filed nothing. But filing is not the same as compliance. A VRKA report filed two weeks late, with a blank Major Donors section, from a PAC whose campaign signs display an inaccurate top-three-donor disclaimer identifying a withdrawn donor while concealing the actual largest funder, does not satisfy the Act's requirements.

VI. ENFORCEMENT TIMELINE AND MANDATORY PROSECUTION

44. Under A.R.S. § 16-977(C), the Commission must initiate enforcement proceedings within 90 days of receiving a verified complaint, or the complainant may file a civil action directly.

45. Under A.R.S. § 16-977(C), the Commission "shall not exercise prosecutorial discretion" for violations involving amounts greater than \$50,000. AZFRG's total VRKA-disclosed campaign media spending of \$211,623.93, and its publicly stated planned spending of \$500,000+, far exceed this threshold. Prosecution is mandatory, not discretionary.

46. Anticipated timeline under the Commission's rules:

Date	Event
April 6, 2026	Complaint filed
~April 13, 2026	Jurisdictional review (R2-20-809(D))

~April 20, 2026	Respondent notification (R2-20-809(F))
~May 20, 2026	Respondent response deadline (30 days)
July 5, 2026	90-day clock expires; civil action available (A.R.S. § 16-977(C))

47. Penalties under A.R.S. § 16-976 range from one to three times the amount of the undisclosed contribution, plus a 1% surcharge deposited into the Clean Elections Fund.

VII. RELIEF REQUESTED

48. Complainant respectfully requests that the Commission:

a. Investigate AZFRG's VRKA compliance for the 2026 SRP board election, including the timeliness of filings, the completeness of Major Donors disclosures, and the presence or absence of required disclaimers on campaign communications;

b. Determine whether the Voters' Right to Know Act applies to campaign spending in SRP board elections and, if so, confirm that determination publicly;

c. Determine that AZFRG violated A.R.S. § 16-973(A) by filing its Initial VRKA Report approximately 14 to 19 days late;

d. Determine that AZFRG violated A.R.S. § 16-974(C) by leaving the Major Donors section blank on both VRKA reports despite having a single donor family contributing \$60,500 (approximately 28% of total fundraising);

e. Determine that AZFRG violated A.R.S. § 16-974(C) by displaying inaccurate top-three-donor disclaimers on its campaign signs (identifying Google, a donor who withdrew, while omitting Riggs Companies, the PAC's single largest donor), and by failing to include any disclaimers on its main website (azforrg.com). Investigate the timing of sign production and payment relative to Google's February 24, 2026 withdrawal and the March 30, 2026 VRKA supplemental filing disclosing Riggs Companies' \$50,000 contribution, and determine whether AZFRG's paid digital advertisements carry accurate top-three-donor disclaimers;

f. Investigate whether AZFRG's county-level registration with Maricopa County (Committee ID 1002584) triggers county-level financial reporting obligations that have not been met;

g. Impose civil penalties as provided by A.R.S. § 16-976;

h. Require AZFRG to immediately amend its VRKA reports to complete the Major Donors sections, correct the inaccurate top-three-donor disclaimers on all campaign signs and public communications to reflect actual current donors, and add disclaimers to azforrg.com;

i. Investigate the relationship between AZFRG and SRP Water and Ratepayer Protection PAC (Committee 1002430), which share the same treasurer, treasurer address, and bank;

j. Take any other action the Commission deems appropriate to enforce the Voters' Right to Know Act.

VERIFICATION

I, [REDACTED], declare under penalty of perjury that the foregoing complaint is true and correct to the best of my knowledge. Where statements are made on information and belief, I have identified them as such and provided the bases for that information.

Statements based on **personal knowledge** include: my voter registration and SRP ratepayer status (Paragraphs 1-2); my personal observation of AZFRG campaign signs displaying inaccurate top-three-donor disclaimers identifying Google instead of Riggs Companies (Paragraph 34(a)); my review of srpelectionalert.com showing corrected donor names and azforrg.com showing no disclaimers (Paragraphs 36-37); and my review of AZFRG's publicly available VRKA reports, campaign finance filings, and website (Paragraphs 10-12, 14-15, 29-32).

Statements based on **information and belief** include: the approximate date AZFRG first exceeded the \$25,000 spending threshold (Paragraphs 24-25), based on disbursement dates disclosed in AZFRG's own VRKA filings; AZFRG's total fundraising amount of \$219,000+ (Paragraph 9), based on news reporting and filings; AZFRG's planned spending of \$500,000+ (Paragraph 9), based on Jimmy Lindblom's public statements reported by Axios Phoenix and KJZZ; Google's February 24, 2026 withdrawal from AZFRG (Paragraph 34(a)), based on Phoenix New Times reporting dated March 9, 2026; and the county-level reporting gap (Paragraphs 38-39), based on review of Maricopa County Recorder records.

[REDACTED]

Date: April 6, 2026

NOTARIZATION

State of Arizona County of Maricopa

Subscribed and sworn to before me this _____ day of _____, 2026.

Notary Public

My Commission Expires: _____

EXHIBITS

- **Exhibit A:** AZFRG VRKA Initial Report (filed March 20, 2026) showing blank Major Donors section, \$56,142.93 to Shipley Strategies, and seven donors over \$5,000
 - **Exhibit B:** AZFRG VRKA Supplemental Report (filed March 30, 2026) showing blank Major Donors section, \$155,481 to Shipley Strategies, and four additional donors over \$5,000
 - **Exhibit C:** AZFRG supporter page (azforrg.com/supporters) showing Riggs Companies at top tier and 100% corporate donor base
 - **Exhibit D:** Photographs of AZFRG campaign signs in SRP service territory displaying inaccurate top-three-donor disclaimers ("Top Donors: Willmeng, Google, and VW Connect")
 - **Exhibit E:** Pacey Constructors donor listing on AZFRG supporter page and Barry Pacey candidate committee filing (Committee 1000572)
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Respectfully submitted,

[REDACTED]

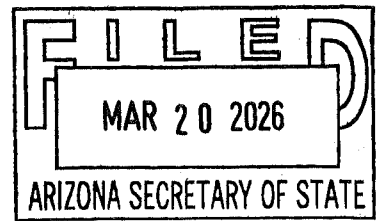
[EMAIL REDACTED]

[PHONE REDACTED] [CITY REDACTED]

Exhibit A

AZFRG VRKA Initial Report (filed March 20, 2026) showing blank Major Donors section, \$56,142.93 to Shipley Strategies, and seven donors over \$5,000

Voters Right to Know Act Initial Report: Campaign Media Spending



A covered person must file within five days after first spending monies or accepting in-kind contributions totaling \$50,000 or more for a statewide campaign or \$25,000 or more for any other type of campaigns. A.R.S. § 16-973(A).

Covered Person¹ Reporting Campaign Media Spending

In the case of an entity: Arizonans for Responsible Growth Name: Mailing address: 1702 East Highland Suite 450 Phoenix, AZ 85016 Federal tax status: 527 State of incorporation, registration or partnership: Arizona-Secretary of State
In the case of an individual: Name: Mailing address: Occupation: Employer:

Identity of Entity/Entities Under the Covered Person²

Name: Mailing address: Federal tax status: State of incorporation, registration or partnership: Relationship to the Covered Person:

¹ The identity of the person that owns or controls the traceable monies goes here. A.R.S. § 16-973(A)(1). Traceable monies are either money that has been given, loaned or promised for campaign media spending or in-kind contributions to enable campaign media spending. A.R.S. § 16-971(18)(a)-(b). "Person" includes both a natural person and an entity such as a corporation, limited liability company, labor organization, partnership or association, regardless of legal form. A.R.S. § 16-971(13). Identity means, in the case of an individual, the name mailing address, occupation, and employer of that individual. A.R.S. § 16-971(10). In the case of any other person, identity means the name, mailing address, federal tax status, and state of incorporation, registration, or partnership, if any. A.R.S. § 16-971(10).

² Includes any entity established, financed, maintained or controlled by the person who owns or controls the traceable monies and maintains its own transfer records and that entity's relationship to the covered person. A.R.S. § 16-973(2).



Custodian of Transfer Records

Name: Ashley Ragan

Mailing address: 2211 East Highland Suite 210 Phoenix AZ 85016

Position: Treasurer

Campaign Media Spending Manager³

Name: Colin Shipley

Mailing address: 1702 East Highland Suite 450 Phoenix AZ 85016

Position with Covered Person: consultant

Covered Person's Traceable Monies (Cash on hand for campaign media spending)⁴

Total amount of traceable monies: 8,900.24

³ Provide this information for at least one individual who controls, directly or indirectly, how the traceable monies are spent. A.R.S. § 16-973(A)(4).

⁴ Provide the total amount of traceable monies owned or controlled by the covered person on the date the report is made. A.R.S. § 16-973(A)(5). Traceable monies are monies that have been given, loaned or promised to be given to a covered person and for which no donor has opted out of their use or transfer for campaign media spending pursuant to A.R.S. §16-972 and monies used to pay for in-kind contributions to a covered person to enable campaign media spending. A.R.S. § 16-971(18).



Donors of original monies exceeding \$5,000 or more directly or indirectly to the Covered Person⁵

Donor	Mailing Address	Occupation (Individual)/ Federal Tax Status (Entity)	Employer (Individual)/ State of Incorporation, Partnership, or Registration	Amount	Date
Richard MacQueen	2836 W. Deer Valley Bldg E1, Phoenix AZ 85027	VP	CCE	10,000	2/25/26
Jeff Meyer	2915 W Fairview St Chandler AZ 85224	President	Siteworks	5,000	2/25/26
Brody Riggs	950 E Lone Cactus Dr Phoenix AZ 85024	Concrete	Riggs Companies	10,500	2/25/26
Peter Ledger	1801 Old Alabama Rd Roswell GA 30076	Division Director	Graydaze	5,000	3/12/26

⁵ The identity of each donor of original monies who contributed, directly or indirectly, more than \$5,000 of traceable monies or in-kind contributions for campaign media spending during the election cycle to the covered person and the date and amount of each of the donor's contributions. This includes donors to intermediaries that provided monies to the covered person.



Donors of original monies exceeding \$5,000 or more directly or indirectly to the Covered Person⁵

Donor	Mailing Address	Occupation (Individual)/ Federal Tax Status (Entity)	Employer (Individual)/ State of Incorporation, Partnership, or Registration	Amount	Date
Kelly Clark	4510 East Ivy Street Mesa AZ 85205	Mason	Denny Clark Masonry	5,000	3/13/26

⁵ The identity of each donor of original monies who contributed, directly or indirectly, more than \$5,000 of traceable monies or in-kind contributions for campaign media spending during the election cycle to the covered person and the date and amount of each of the donor's contributions. This includes donors to intermediaries that provided monies to the covered person.

Donors of original monies exceeding \$5,000 or more directly or indirectly to the Covered Person⁵

Donor	Mailing Address	Occupation (Individual)/ Federal Tax Status (Entity)	Employer (Individual)/ State of Incorporation, Partnership, or Registration	Amount	Date
NextEra Energy Resources	700 Universe Blvd, Juno Beach FL 33408	LLC	Florida	15,000	2/25/26
Willmeng Construction	1702 E Highland Phoenix AZ 85016	Corp	Arizona	5,000	3/6/26

⁵ The identity of each donor of original monies who contributed, directly or indirectly, more than \$5,000 of traceable monies or in-kind contributions for campaign media spending during the election cycle to the covered person and the date and amount of each of the donor's contributions. This includes donors to intermediaries that provided monies to the covered person.

Disbursements⁷

Example

Recipient and Amount of Disbursement	Mailing Address	Occupation (Individual)/ Federal Tax Status (Entity)	Employer (Individual)/ State of Incorporation, Partnership, or Registration	Date	In Support or Opposition of Candidate or Ballot Measure
ABC Consulting \$10,000	1234 W. Washington St. Phoenix, AZ 85007	Consultant	State of Arizona	8/02/2021	Supporting Jane Doe for State Senate District 01
ShipleY Strategies \$56,142.93	2114 E Montebello Avenue Phoenix AZ 85016	Consultant	State of Arizona	3/1/2026 Mail and Digital	Supporting SRP Agricultural District Rovey, Gieger, Naylor, Sheely, Williams, Brooks, Rakow, Vanderwey, Warren, White, CONT
\$					Select One Mullins, Lock, McKenzie, Pedersen, Pace, Lamoreaux, Pedersen, Schraeder, R Kennedy, Cooper
\$					Select One President C. Dibson Vice President B. Pacey

⁷ The purpose of each disbursement must include the full name and office sought of any candidate or a description of any ballot proposition that was supported, opposed or referenced in a public communication that was paid for, in whole or in part, with the disbursed monies. A.R.S. § 16-973(A)(8).



Disbursements⁷

Example

Recipient and Amount of Disbursement	Mailing Address	Occupation (Individual)/ Federal Tax Status (Entity)	Employer (Individual)/ State of Incorporation, Partnership, or Registration	Date	In Support or Opposition of Candidate or Ballot Measure
ABC Consulting \$10,000	1234 W. Washington St. Phoenix, AZ 85007	Consultant	State of Arizona	8/02/2021	Supporting Jane Doe for State Senate District 01
Shipleigh Strategies \$72,462.58	2114 E Montebello Avenue Phoenix AZ 85016	Consultant	State of Arizona	3/20/2026 Mail and Digital	Supporting SRP Agricultural District Rovey, Gieger, Naylor, Sheely, Williams, Brooks, Rakow, Vanderwey, Warren, White, CONT
\$					Select One Mullins, Lock, McKenzie, Pedersen, Pace, Lamoreaux, Pedersen, Schraeder, R Kennedy, Cooper
\$					Select One President C. Dobson Vice Pres. B. Packer

⁷ The purpose of each disbursement must include the full name and office sought of any candidate or a description of any ballot proposition that was supported, opposed or referenced in a public communication that was paid for, in whole or in part, with the disbursed monies. A.R.S. § 16-973(A)(8).



Major Donors⁹

Major Contributor's Name:

Mailing address:

Position:

I CERTIFY, UNDER PENALTY OF PERJURY, THAT I HAVE EXAMINED THE CONTENTS OF THIS REPORT AND TO THE BEST OF MY KNOWLEDGE AND BELIEVE IF IT TRUE AND COMPLETE.

Filer Name: Ashley Ragan

Signature: *Ashley Ragan*

Date: 3/20/2026

In an effort to disclose all spending, I have included all contributions and disbursements for media spending since the close of books of last report on 2/21/2026.

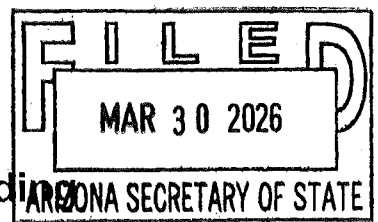
⁹ Any person whose total contributions of traceable monies to the covered person constituted more than half of the traceable monies of the covered person at the start of the election cycle. A.R.S. § 16-973(A)(9)



Exhibit B

AZFRG VRKA Supplemental Report (filed March 30, 2026) showing blank Major Donors section, \$155,481 to Shipley Strategies, and four additional donors over \$5,000

Voters Right to Know Act Supplemental Report: Campaign Media Spending



A covered person must file a supplemental report within three days after spending or accepting in-kind contributions for campaign media spending totaling an additional \$25,000 or more on statewide campaigns or an additional \$15,000 or more during an election cycle on local campaigns pursuant to A.R.S. § 16-973(B).

Covered Person¹ Reporting Campaign Media Spending

In the case of an entity: Arizonans for Responsible Growth Name: Mailing address: 1702 E Highland Suite 450 Federal tax status: 527 State of incorporation, registration or partnership: Arizona
In the case of an individual: Name: Mailing address: Occupation: Employer:

Identity of Entity/Entities Under the Covered Person²

Name: Mailing address: Federal tax status: State of incorporation, registration or partnership: Relationship to the Covered Person:

¹ The identity of the person that owns or controls the traceable monies goes here. A.R.S. § 16-973(A)(1). Traceable monies are either money that has been given, loaned or promised for campaign media spending or in-kind contributions to enable campaign media spending. A.R.S. § 16-971(18)(a)-(b). "Person" includes both a natural person and an entity such as a corporation, limited liability company, labor organization, partnership or association, regardless of legal form. A.R.S. § 16-971(13). Identity means, in the case of an individual, the name mailing address, occupation, and employer of that individual. A.R.S. § 16-971(10). In the case of any other person, identity means the name, mailing address, federal tax status, and state of incorporation, registration, or partnership, if any. A.R.S. § 16-971(10).

² Includes any entity established, financed, maintained or controlled by the person who owns or controls the traceable monies and maintains its own transfer records and that entity's relationship to the covered person. A.R.S. § 16-973(2).



Custodian of Transfer Records

Name: Ashley Ragan
Mailing address: 2211 East Highland Suite 210 Phx AZ 85016
Position: Treasurer

Campaign Media Spending Manager³

Name: Colin Shipley
Mailing address: 2211 East Highland Suite 210 Phx AZ 85016
Position with Covered Person: Consultant

Covered Person's Traceable Monies (Cash on hand for campaign media spending)⁴

Total amount of traceable monies: 11,384.92

³ Provide this information for at least one individual who controls, directly or indirectly, how the traceable monies are spent. A.R.S. § 16-973(A)(4).

⁴ Provide the total amount of traceable monies owned or controlled by the covered person on the date the report is made. A.R.S § 16-973(A)(5). Traceable monies are monies that have been given, loaned or promised to be given to a covered person and for which no donor has opted out of their use or transfer for campaign media spending pursuant to A.R.S. §16-972 and monies used to pay for in-kind contributions to a covered person to enable campaign media spending. A.R.S. § 16-971(18).

Donors of original monies exceeding \$5,000 or more directly or indirectly to the Covered Person⁵

Donor	Mailing Address	Occupation (Individual)/ Federal Tax Status (Entity)	Employer (Individual)/ State of Incorporation, Partnership, or Registration	Amount	Date
Shane Snyder	4020 N 16th St Phoenix AZ 85016	President	Cannon and Wendt Electric	5,000	3/24/26
Riggs Companies	950 E Lone Cactus Dr Phoenix AZ 85024	Corp	Arizona	50,000	3/23/26
Derek Borum	3813 N Higley Road Mesa AZ 85215	Chief Development Officer	Kinkaid Civil Construction	5,000	3/23/26
Eric Pach	8267 S Pecan Grove Circle Tempe AZ	Insurance	INSURICA SW	10,000	3/23/26

⁵ The identity of each donor of original monies who contributed, directly or indirectly, more than \$5,000 of traceable monies or in-kind contributions for campaign media spending during the election cycle to the covered person and the date and amount of each of the donor's contributions. This includes donors to intermediaries that provided monies to the covered person.

Disbursements⁷

Example

Recipient and Amount of Disbursement	Mailing Address	Occupation (Individual)/ Federal Tax Status (Entity)	Employer (Individual)/ State of Incorporation, Partnership, or Registration	Date	In Support or Opposition of Candidate or Ballot Measure
ABC Consulting \$10,000	1234 W. Washington St. Phoenix, AZ 85007	Consultant	State of Arizona	8/02/2021	Supporting Jane Doe for State Senate District 01
ShIPLEY Strategies \$155,481	2114 E Montebello Ave. Phoenix AZ 85016	Consultant	Arizona	3/27/2026	Supporting <input checked="" type="checkbox"/> SRP Agricultural District: Rovey, Geiger, Naylor, Sheely, Williams, Brooks, Rakow, Vanderwey, Warren, White CONT.
\$					Select One Mullins, Lock, McKenzie, Pedersen, Pace, Lamoreuuz, Pedersen, Schraeder, R Kennedy, Cooper CONT.
\$					Select One Pres. C Dobson and VP B. Pacey

⁷ The purpose of each disbursement must include the full name and office sought of any candidate or a description of any ballot proposition that was supported, opposed or referenced in a public communication that was paid for, in whole or in part, with the disbursed monies. A.R.S. § 16-973(A)(8).



Major Donors⁹

Major Contributor's Name:
Mailing address:
Position:

I CERTIFY, UNDER PENALTY OF PERJURY, THAT I HAVE EXAMINED THE CONTENTS OF THIS REPORT AND TO THE BEST OF MY KNOWLEDGE AND BELIEVE IF IT TRUE AND COMPLETE.

Filer Name: *ASHLEY RAGAN*
Signature: *[Handwritten Signature]*
Date: *3/30/2024*

⁹ Any person whose total contributions of traceable monies to the covered person constituted more than half of the traceable monies of the covered person at the start of the election cycle. A.R.S. § 16-973(A)(9)



Exhibit C

AZFRG supporter page (azforrg.com/supporters) showing Riggs
Companies at top tier and 100% corporate donor base

Exhibit C - Exhibit-C_azfrg-supporters-page.png



Contribution Level:
NUCLEAR
 \$50,000+



Contribution Level:
POWERHOUSE
 \$25,000+



Contribution Level:
HIGH VOLTAGE
 \$10,000+



Contribution Level:
GRID CHAMPION
 \$5,000+

Contribution Level:
SPARK
 \$1,000+

SIGN UP AS A SUPPORTER

Name (required)

First Name Last Name

Company Name (if applicable) **Email (required)** **Phone**

Name of Company name@email.com (123) 456-7890

SIGN UP

JOIN US IN BUILDING A STRONGER, MORE SUSTAINABLE FUTURE FOR ARIZONA!

Your contribution is an investment for the future of Arizona and is critical to help us preserve our state's position as an economic powerhouse, protect our communities from skyrocketing utility costs, and ensure reliable, affordable energy for generations to come.

DONATE

contact@azfrg.com



WHO WE ARE SUPPORTERS MEDIA SRP ELECTION DONATE

PAID FOR BY ARIZONANS FOR RESPONSIBLE GROWTH. TOP DONORS: WILLMENG, BIGGS, COMPANIES, AND VW CONNECT. NOT AUTHORIZED BY ANY CANDIDATE OR CANDIDATE'S AGENT.

Exhibit D

Photographs of AZFRG campaign signs in SRP service territory without
top-three-donor disclaimers

Exhibit D - Exhibit-D_sign-photo-01.jpg



Exhibit D - Exhibit-D_sign-photo-02.jpg



Exhibit E

Willmeng Construction SRP Job Order Contract history (\$3.15M+, 32 orders since 2011)

Exhibit E

Willmeng Construction SRP Job Order Contract history (\$3.15M+, 32 orders since 2011)

This exhibit references publicly available records.

Source: SRP procurement records and public contract database

Exhibit F

Paceley Constructors donor listing on AZFRG supporter page and Barry
Paceley candidate committee filing (Committee 1000572)

MARICOPA COUNTY

JAN 15 2026

ELECTIONS DEPT



**STATE OF ARIZONA
COMMITTEE CAMPAIGN
FINANCE REPORT**

COMMITTEE ID NUMBER
1000572

COMMITTEE INFORMATION (required):

Committee Information: Committee Name: Barry Paceley for SRP VP

CANDIDATE INFORMATION (only if filing as a candidate committee):

Office Sought: County Office: _____ Special District Office: SRP
 City/Town Office: _____ School Board District: _____

Cumulative Report:

Check here if this is the candidate committee's first, cumulative report for the election cycle. Also select appropriate Reporting Period below.
 Cumulative reporting period start date (which supersedes the start date for the Reporting Period selected below): _____

REPORTING PERIOD (check one):

REPORTING PERIOD	REPORT DUE
2025 August Post-Election (Q3) Report (Local Only): July 20, 2025 to September 30, 2025	October 1, 2025 to October 15, 2025
2025 Quarter 3 Report: July 1, 2025 to September 30, 2025	October 1, 2025 to October 15, 2025
2025 November PAC Pre-Election Report (Election in Qtr): October 1, 2025 to October 18, 2025	October 19, 2025 to October 20, 2025
2025 November PAC Post-Election (Q4) Report (Election in Qtr): October 19, 2025 to December 31, 2025	January 1, 2026 to January 15, 2026
2025 Quarter 4 Report: October 1, 2025 to December 31, 2025	January 1, 2026 to January 15, 2026
<input checked="" type="checkbox"/> 2025 Annual (Cumulative) Report (Local Candidates)*: January 1, 2025 to December 31, 2025	January 1, 2026 to January 15, 2026
2026 March PAC Pre-Election Report (Election in Qtr): January 1, 2026 to February 21, 2026	February 22, 2026 to February 23, 2026
2026 Post-Primary Election Report (Local March Candidates): January 1, 2026 to March 10, 2026	March 11, 2026 to March 25, 2026
2026 March PAC Post-Election (Q1) Report (Election in Qtr): February 22, 2026 to March 31, 2026	April 1, 2026 to April 15, 2026
2026 Quarter 1 Report (Local March Candidates): March 11, 2026 to March 31, 2026	April 1, 2026 to April 15, 2026
2026 Quarter 1 Report: January 1, 2026 to March 31, 2026	April 1, 2026 to April 15, 2026
2026 May PAC Pre-Election Report (Election in Qtr): April 1, 2026 to May 2, 2026	May 3, 2026 to May 4, 2026
2026 May PAC Post-Election (Q2) Report (Election in Qtr): May 3, 2026 to June 30, 2026	July 1, 2026 to July 15, 2026
2026 Quarter 2 Report: April 1, 2026 to June 30, 2026	July 1, 2026 to July 15, 2026
2026 August PAC Pre-Election Report (Election in Qtr): July 1, 2026 to July 18, 2026	July 19, 2026 to July 20, 2026
2026 August Post-Primary Election Report (State/Local Aug Candidates): July 1, 2026 to Aug 4, 2026	August 5, 2026 to August 19, 2026
2026 August PAC Post-Election (Q3) Report (Election in Qtr): July 19, 2026 to September 30, 2026	October 1, 2026 to October 15, 2026
2026 Quarter 3 Report (State/Local Aug Candidates): August 5, 2026 to September 30, 2026	October 1, 2026 to October 15, 2026
2026 Quarter 3 Report: July 1, 2026 to September 30, 2026	October 1, 2026 to October 15, 2026
2026 November PAC Pre-Election Report: October 1, 2026 to October 17, 2026	October 18, 2026 to October 19, 2026
2026 November Post-Primary Election Report (Local Nov Candidates)**: Oct. 1, 2026 to Nov. 3, 2026	November 4, 2026 to November 18, 2026
2026 November PAC Post-Election (Q4) Report: October 18, 2026 to December 31, 2026	January 1, 2027 to January 15, 2027
2026 Quarter 4 Report (Local Nov Candidates)**: November 4, 2026 to December 31, 2026	January 1, 2027 to January 15, 2027
2026 Quarter 4 Report: October 1, 2026 to December 31, 2026	January 1, 2027 to January 15, 2027
2026 Annual (Cumulative) Report (Local Candidates)*: January 1, 2026 to December 31, 2026	January 1, 2027 to January 15, 2027
Final Campaign Finance Report Prior to Committee Termination: End of Previous Period through Today's Date	Same Date of Termination

*Excluding local candidates who reported in their general election year.

**Applies to charter cities that allow candidate primary elections on November election date.



**STATE OF ARIZONA
COMMITTEE CAMPAIGN
FINANCE REPORT**

COMMITTEE ID NUMBER
1000572

FINANCIAL SUMMARY (required):

Activity	Cash Activity This Reporting Period	Election Cycle to Date
(a) Committee value at the beginning of this reporting period (i.e. ending balance from the previous reporting period)	\$ 1,500.00	\$ 1,500.00
(b) + Total receipts (from "Summary of Receipts," line 13 (cash column) for this reporting period)		
(c) - Total disbursements (from "Summary of Disbursements," line 16 (cash column) for this reporting period)		
(d) = Balance at close of reporting period	\$ 1,500.00	\$ 1,500.00
<input type="checkbox"/> Check here if filing <u>no</u> financial activity during the reporting period. Lines (a)-(d) must still be completed, but only this cover page and the following signed certification page need to be filed.		

Committees with financial activity must file the cover page, summary of receipts, summary of disbursements, and any schedules that contain financial activity.