

## Notice: BABA Deficiency, HVF and ASVF Dispositions

**FROM:** Thomas M. Collins, Executive Director, Arizona Citizens Clean Elections Commission  
**TO:** [COMPLAINANT NAME REDACTED]  
**DATE:** May 11, 2026 · 14:27 MST  
**SUBJECT:** Notice of Deficiency re: BABA, notice of time limit on CEA complaints

Mr. Logvin

I have an update on some of the complaints you filed last week. In this email are a notice of deficiency regarding Building a Better Arizona and the disposition of the Complaints against House Victory Fund and Arizona Senate Victory Fund.

**1) Building a Better Arizona** — Building a Better Arizona is a political committee subject to A.R.S. 16-973(I). As I understand the Complaint, your position is that additional, separate reports were required under 16-973. However, a “political action committee or political party that is a covered person may satisfy the timing requirements for reporting in this section by filing the periodic campaign finance reports as required by law for political action committees and political parties, provided that the disclosures required by this section are included in those periodic reports.” As I read the Complaint, the spending you allege was not reported under VRKA was reported on those reports. Furthermore, the periodic reports include donations from individuals, identify original sources where applicable, or include contributions from corporations, LLCs or labor groups. With respect to the latter, you do not allege that these entities are not using business income, nor does the face of the reports suggest these entities are not businesses. VRKA does not prescribe “fields” for PACs. If you think that the SOS forms should be clarified, I’d recommend you contact that Secretary’s office directly.

**2) House Victory Fund.** You allege violation or violations of A.R.S. 16-958, a provision of the Clean Elections Act. Under ARS 16-957(A)(7), “The commission shall not take action on any external complaint that is filed more than ninety days after the postelection report is filed or ninety days after the completion of the canvass of the election to which the complaint

relates, whichever is later.” This provision plainly applies to the allegations contained in that Act, article 2 of chapter 6 of title 16.

**3) Arizona Senate Victory Fund.** You allege violation or violation(s) of A.R.S. 16-958, a provision of the Clean Elections Act. Under ARS 16-957(A)(7), “The commission shall not take action on any external complaint that is filed more than ninety days after the postelection report is filed or ninety days after the completion of the canvass of the election to which the complaint relates, whichever is later.” This provision plainly applies to the allegations contained in that Act, article 2 of chapter 6 of title 16.

Thank you Tom Collins

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