

April 27, 2026

Maricopa County Elections Department
ATTN: Candidate Services & Campaign Finance
510 S. 3rd Ave
Phoenix, AZ 85003
campfin@maricopa.gov

Re: Complainant's Reply to Snell & Wilmer's April 24, 2026 Response in CF-2026-001
(Turning Point PAC)

Dear Ms. Dyster:

I am the complainant in CF-2026-001. I have reviewed the April 24, 2026 letter from Eric Spencer of Snell & Wilmer on behalf of Turning Point PAC. The letter does not address the conduct alleged in my complaint, misquotes the Arizona statute on which it relies, and asks the Department to dismiss a campaign-finance violation through "prosecutorial discretion" while ignoring the respondent's documented compliance record. I respectfully submit this reply and ask the Department to find reasonable cause to believe a violation has occurred.

I. Spencer's Response Answers a Different Complaint

CF-2026-001 alleges that signs deployed across the Phoenix metropolitan area in connection with the April 2026 Salt River Project (SRP) Board of Directors election bear the disclaimer "**Paid for by Turning Point PAC (TPPAC.COM 602-815-3540)**" --- and that the name, website, and phone number on those signs match a Maricopa County committee (Committee ID **1002479**) that filed a sworn Termination Statement on January 17, 2025 declaring it would receive no further contributions and make no further disbursements.

The complaint asks the Department to determine which entity is actually paying for the signs and whether a registration or reporting obligation has been violated.

Spencer's response does not address that question. Instead, it reframes the complaint as one about a federal hybrid PAC ("Turning Point PAC Inc.," FEC ID C00814152) and argues that committee has no county filing obligation. That is not the entity identified in the complaint, on the signs, or in the Maricopa County registration database. The Department should note that Spencer's letter:

1. Never identifies the Maricopa County committee 1002479.
2. Never references the sworn Termination Statement filed January 17, 2025.
3. Never explains why signs in Maricopa County bear the exact name, website, and phone number of that terminated committee.

4. Never identifies which of the three "Turning Point PAC" entities (the terminated Maricopa committee, the federal hybrid PAC, or the state-level "Turning Point Pac Arizona," Filer ID 101981) actually purchased the signs.

That is a material non-response. The Department cannot evaluate whether reasonable cause exists if the respondent will not answer the basic factual question of who paid for the signs.

II. Spencer Misquotes the Controlling Statute

Spencer's central legal argument is that A.R.S. Sec. 16-928(B) "does not clearly apply to political action committees that conduct independent expenditures in a candidate election." He then offers what he presents as the text of Sec. 16-928(B):

"The county officer in charge of elections is . . . the filing officer for committees that support or oppose a recall election or the circulation of a petition for a recall election for an officeholder of a county office, a school district governing board office, a community college district governing board office or a special taxing district governing board office, for committees that support or oppose a county, school district, community college district or special taxing district initiative or referendum or other ballot measure, question or proposition" (Spencer Letter at 1.)

That is **not** the text of A.R.S. Sec. 16-928(B). It is a partial quotation of A.R.S. Sec. 16-928(A)(2), with the controlling first sentence omitted by ellipsis.

The actual text of A.R.S. Sec. 16-928(A)(2) reads, in full:

***"The county officer in charge of elections is the filing officer for county, school district, community college district and special taxing district elections, including retention elections for superior court judges.** The county officer in charge of elections is **also** the filing officer for committees that support or oppose a recall election or the circulation of a petition for a recall election for an officeholder of a county office . . . [and] for committees that support or oppose a county, school district, community college district or special taxing district initiative or referendum or other ballot measure, question or proposition" A.R.S. Sec. 16-928(A)(2) (emphasis added).*

The actual text of A.R.S. Sec. 16-928(B) reads, in full:

"Notwithstanding subsection A of this section, a standing committee shall file reports only with the secretary of state."

Spencer's ellipsis omits the operative first sentence of subsection (A)(2), which expressly assigns "**special taxing district elections**" --- exactly the SRP Board of Directors election at issue --- to the county officer in charge of elections. There is no ambiguity. The Maricopa County Elections Department is the filing officer for SRP candidate elections. The "is also" language Spencer quotes adds recall and ballot-measure activity to the county officer's

jurisdiction; it does not narrow the candidate-election jurisdiction the first sentence already establishes.

The Department should not credit a legal argument that depends on suppressing the language that disposes of it.

III. The Statutory Framework Spencer Ignores

Even setting aside the misquotation, Spencer's argument that "the applicable campaign finance statute does not clearly apply to political action committees that conduct independent expenditures in a candidate election" (Spencer Letter at 1) is contradicted by the statute he chose not to cite.

A.R.S. Sec. 16-926(H) provides:

"An entity that makes independent expenditures or ballot measure expenditures in excess of \$1,000 during a reporting period shall file an expenditure report with the filing officer for the applicable reporting period. Expenditure reports shall identify the candidate or ballot measure supported or opposed, office sought by the candidate, if any, election date, mode of advertising and first date of publication, display, delivery or broadcast of the advertisement."

The text is unambiguous. **Any entity** --- not only PACs, not only county committees --- that makes independent expenditures over \$1,000 must file an expenditure report **with the filing officer**. Per Sec. 16-928(A)(2), that filing officer for the SRP election is the Maricopa County Elections Department.

A metropolitan-wide sign campaign of the scale alleged in the complaint plainly exceeds \$1,000. By Spencer's own representation, "Turning Point PAC used its non-federal account to conduct the SRP expenditures" (Spencer Letter at 1). Whichever entity actually made those expenditures, it had a Sec. 16-926(H) obligation to file a county expenditure report. That obligation has not been satisfied.

A.R.S. Sec. 16-922(F) further provides:

"An entity that makes an independent expenditure, other than an individual or a committee, shall file independent expenditure reports pursuant to section 16-926, subsection H."

These statutes operate together. They are not ambiguous. Spencer's letter does not mention them.

IV. FEC Filings Do Not Contain the Data Arizona Law Requires

Spencer makes one substantive factual representation in his letter: that "any reportable

financial activity would be reflected in the FEC campaign finance reports" (Spencer Letter at 1) and, by extension, that "[t]urning Point PAC's SRP-related expenditures will be reflected in FEC campaign finance reports and therefore the basic transparency purpose of campaign finance law will have been satisfied" (Id. at 2).

That representation is incorrect as a matter of how FEC reporting works.

A. The FEC's candidate-specific independent-expenditure schedule contains zero entries for any 2026 SRP candidate.

The Federal Election Commission requires committees to file Schedule E ("Itemized Independent Expenditures") to report any independent expenditure that "expressly advocates the election or defeat of a clearly identified Federal candidate" (FEC Form 3X instructions; 11 C.F.R. Sec. 100.16). Schedule E is the only place in the FEC reporting framework where a committee identifies the candidate supported or opposed.

A query of the FEC's OpenFEC API for **all 149 Schedule E entries** ever filed by Turning Point PAC (committee C00814152) returns the following candidate breakdown for the 2026 cycle:

Candidate	Office	Schedule E Total
Steve Toth	U.S. House, Texas District 02	\$23,549.92
Michael Alfonso	U.S. House, Wisconsin	\$8,819.68
Jessica Hart Steinmann	U.S. House, Texas	\$8,819.68
Christopher Dobson (SRP)	SRP Board President	\$0.00
Barry Pacey (SRP)	SRP Board Vice-President	\$0.00
Rusty Kennedy (SRP)	SRP District 12 Board Governor	\$0.00
Kelly Cooper (SRP)	SRP District 14 Board Governor	\$0.00

(Source:

api.open.fec.gov/v1/schedules/schedule_e/?committee_id=C00814152&two_year_transaction_period=2026, queried 2026-04-27.)

Every dollar of independent expenditure activity Turning Point PAC has reported to the Federal Election Commission for the 2026 cycle has been on behalf of federal candidates --- congressional contests in Texas and Wisconsin. The committee has reported zero independent expenditures, of any amount, on behalf of any of the four SRP candidates whose signs are the subject of this complaint.

That outcome is structural. Schedule E reports federal-candidate IEs only. The SRP Board of Directors election is not a federal election, and the FEC's IE-specific schedule does not accept state or special-taxing-district IE entries. Whatever Turning Point PAC spent supporting or opposing the four SRP candidates, that spending was not, and structurally could not be, reported on FEC Schedule E. There is no version of FEC reporting that captures it. The data does not exist on FEC.gov to be looked up.

Notably, the FEC Form 3X "April Monthly 2026" report --- filed by Turning Point PAC on **April 20, 2026, the same day Spencer's cited Statement of Organization amendment was filed** --- reports **\$41,189.28 in independent expenditures** for the March 1, 2026 to March 31, 2026 reporting period. The Schedule E itemization for that same period shows that the entire \$41,189.28 was for federal-candidate IEs (Steve Toth, Michael Alfonso, and Jessica Hart Steinmann). The April Monthly that Spencer's footnote points to as evidence of TPP's hybrid status is the same report that, on its face, attributes none of its disclosed IE activity to SRP.

B. The FEC's disbursement schedule reports vendor payments, not candidate-specific IEs.

A separate query of the FEC's Schedule B ("Itemized Disbursements") for Turning Point PAC over the January 1, 2026 - February 28, 2026 window returns 73 disbursements totaling \$1,323,656.93. Within that universe, three disbursements to 1Ten LLC (Queen Creek, AZ) carry the disbursement description "**NON-FED PRINTING**":

Date	Amount	Description	Recipient
2026-01-30	\$340.11	NON-FED PRINTING	1TEN LLC
2026-01-31	\$31,508.62	NON-FED PRINTING	1TEN LLC
2026-02-20	\$15,505.96	NON-FED PRINTING	1TEN LLC
TOTAL	\$47,354.69		

(Source: api.open.fec.gov/v1/schedules/schedule_b/?committee_id=C00814152, queried 2026-04-27.)

The "NON-FED" prefix is FEC bookkeeping shorthand for disbursements paid out of the committee's non-contribution (non-federal) account --- precisely the account Spencer represents was used to "conduct the SRP expenditures." The complainant does not assert with certainty that these specific three disbursements paid for the signs at issue in this complaint. The complainant does, however, draw the Department's attention to two undisputed structural facts about these entries:

1. They are reported as **vendor payments**, not as **independent expenditures advocating an identified candidate**. The recipient field reads "1TEN LLC." The description field reads "NON-FED PRINTING." There is no candidate-attribution field populated for any of these entries, because Schedule B does not require, and the FEC's reporting framework does not accept, candidate-specific itemization for non-federal disbursements.

2. Nothing in the FEC's filings discloses **which candidate** the printing supported, **which office** that candidate was seeking, **the election date**, or **when the signs were first displayed** --- all data that A.R.S. Sec. 16-926(B)(3)(l) requires county IE reports to itemize.

C. The data Arizona law requires is not the data Spencer points to.

A.R.S. Sec. 16-926(B)(3)(l) requires that an IE expenditure report itemize:

"Independent expenditures that are made to advocate the election or defeat of a candidate, including identification of the candidate, office sought by the candidate, election date, mode of advertising and distribution or publication date."

A FEC Schedule B disbursement reading "NON-FED PRINTING" to "1TEN LLC" does not contain any of those data elements. A voter scrolling FEC.gov in search of who is paying for a "Paid for by Turning Point PAC" yard sign on a Phoenix street cannot determine, from the FEC's records:

- whether the sign was paid for by the federal hybrid committee or by an entity Turning Point PAC controls,
- which SRP candidate the sign promotes,
- when the sign was first displayed,
- how much of the printing cost is attributable to which candidate.

None of that is on the FEC's website. None of it can be on the FEC's website, because the FEC does not collect candidate-specific data for non-federal special-taxing-district IEs. That gap is exactly what A.R.S. Sec. Sec. 16-922(F), 16-926(B)(3)(I), and 16-926(H) exist to fill, and exactly what Maricopa County is the assigned filing officer to receive.

Spencer's representation that "the basic transparency purpose of campaign finance law will have been satisfied" by FEC filings is therefore not just unsupported. It is contradicted by the actual contents of the FEC's filings.

V. The Disclaimer on the Signs Does Not Match the Entity Spencer Identifies

A.R.S. Sec. 16-925(A) requires that any advertisement contain "[t]he words 'paid for by', followed by the name of the person making the expenditure for the advertisement."

The signs in question state, verbatim:

"PAID FOR BY TURNING POINT PAC (TPPAC.COM 602-815-3540)."

The name "Turning Point PAC" --- with the website TPPAC.COM and the phone number 602-815-3540 --- is the registered identity of **Maricopa County Committee 1002479**, the terminated committee. Spencer asserts that the spender is instead "Turning Point PAC Inc.," a federal hybrid PAC bearing FEC Identification Number C00814152, whose registered name on the FEC Statement of Organization is "**Turning Point PAC Inc.**" (FEC Form 1 filed April 20, 2026, Image No. 202604209866625314).

Those are different names. If Spencer's representation about which entity paid is correct, then

the disclaimer on the signs is materially false: it does not name the actual person making the expenditure, in violation of Sec. 16-925(A). If the disclaimer is in fact accurate --- if the spender is the Maricopa County entity whose name and contact information appear on the signs --- then the terminated committee is making post-termination disbursements in violation of its January 17, 2025 sworn statement, the substantive violation alleged in the complaint.

The Department should require Spencer to reconcile this contradiction on the record. Either the disclaimer is wrong or the termination statement was.

VI. Spencer's Cited FEC Filing Is an Amendment Filed Fourteen Days After This Complaint

Spencer's only documentary support for his factual claim that "Turning Point PAC . . . used its non-federal account to conduct the SRP expenditures" is a footnote citing <https://docquery.fec.gov/pdf/314/202604209866625314/202604209866625314.pdf>. (Spencer Letter at 1 n.1.)

That document is an **amended** FEC Form 1 filed on **April 20, 2026** --- fourteen days after this complaint was filed (April 6, 2026), ten days after the Department acknowledged the complaint to the respondent (April 10, 2026), and four days before Spencer's response. According to FEC records (api.open.fec.gov), it is the first Statement of Organization amendment Turning Point PAC has filed since June 30, 2022 --- a gap of nearly four years.

The April 20, 2026 amendment changed two material things about the committee of record:

1. The committee's classification was upgraded from FEC committee type "**V**" (Hybrid PAC, Nonqualified) to FEC committee type "**W**" (Hybrid PAC, Qualified).
2. The committee's treasurer of record was changed from **Jeff Webb** to **Joshua Parker**.

The Department should note four points about the timing.

First, the committee has been organized as a hybrid PAC (committee type V) since its original FEC registration on May 2, 2022. Spencer's representation that the committee is a hybrid PAC is therefore not new. But Spencer's footnote does not cite the original 2022 Statement of Organization or the 2022 amendment that was the operative governing document during the SRP independent-expenditure period. Spencer cites the April 20, 2026 amendment specifically.

Second, the **treasurer of record during the SRP independent-expenditure activity was Jeff Webb**, not Joshua Parker. The amendment substituting Parker as treasurer was filed after the SRP election was substantially complete. The Department is entitled to ask which individual signed off, under penalty of perjury, on the disclosure decisions made during the

SRP cycle.

Third, the April 20, 2026 docket entry contains both the Form 1 amendment Spencer cites and a separately filed Form 3X "April Monthly 2026" report covering the March 1 - 31, 2026 reporting period. That April Monthly Form 3X reports \$41,189.28 in independent expenditures for the period --- and the corresponding Schedule E itemization attributes every dollar of those IEs to **federal candidates Steve Toth, Michael Alfonso, and Jessica Hart Steinmann**, not to any SRP candidate. (See Section IV.A, supra.) The same-day filing Spencer relies on is therefore both (a) silent on any SRP-related IE activity and (b) explicitly inconsistent with the position that "FEC reports cover" the SRP spending.

Fourth, no FEC amendment can retroactively cure an unfiled Maricopa County independent-expenditure report. Whatever the committee's federal-side bookkeeping looked like before April 20, 2026, A.R.S. Sec. 16-926(H) required a filing with the county officer in charge of the SRP election. None has been filed.

VII. The "Willing to Transfer" Concession Is an Admission

Spencer writes:

"In the event the Maricopa County Elections Department determines that an independent expenditure-only committee like Turning Point PAC should also file campaign finance reports at the county level, Turning Point PAC is certainly willing to transfer its federally-reported spending data into a county report." (Spencer Letter at 2.)

That is an offer to cure. An offer to cure is not a defense; it is an acknowledgment that, if the Department applies the statutes as written, the cure is owed. The concession also undercuts the simultaneous claim of "ambiguity": a respondent that genuinely believed no county filing obligation existed would have nothing to transfer.

The Department should accept the offer to cure, but only after first finding reasonable cause and entering an enforcement order requiring it. A voluntary post-hoc data dump --- absent a finding --- creates no record of violation, no precedential effect for future SRP cycles, and no deterrent against the same conduct from the same respondents in 2027 and beyond.

VIII. Prosecutorial Discretion Does Not Apply on These Facts

Spencer asks the Department to dismiss "based on 'insignificance of the alleged violation,' [that] the alleged violation is 'not likely to be repeated,' and 'the alleged violation was unintentional'" (Spencer Letter at 2, citing 2025 EPM at 296-97). Each of those criteria is contradicted by the record.

A. Significance

The complaint concerns a metropolitan-wide independent expenditure campaign in a Maricopa County election in which approximately one million voters were eligible to participate. The disclaimer language identifies a terminated committee. No expenditure report has been filed with this Department. Voters in Maricopa County had no Maricopa County mechanism to identify who was funding the signs. That is the precise transparency harm Arizona's campaign-finance laws --- and Article 2, Sec. 38 of the Arizona Constitution as amended by Proposition 211 (2022) --- exist to prevent. It is not "insignificant."

B. Likelihood of Repetition

The respondent ecosystem has a documented multi-year pattern of campaign-finance noncompliance, paid fines, and pending enforcement matters across three jurisdictions:

Date	Forum	Matter	Outcome
Mar 2021	FEC	MUR 7892 -- Turning Point Action / Austin Smith	\$18,000 civil penalty; failure to disclose \$33,795 in contributions on 2020 reports
Aug 2022	AZ Sec. of State	Investigation of TP Action GOTV rallies (Goodyear, Mesa)	Investigation opened on alleged unlawful coordination with state-legislative candidates
2025	AZ Citizens Clean Elections Comm.	MUR 25-04 -- Unity Rising USA v. TPA / TP PAC	Pending; alleges \$500,000 transfer with zero VRKA donor disclosure
Jun 2025	AZ Attorney General	Indictment of TPA executive Austin Smith	14 counts of nomination-petition fraud
Nov 2025	AZ AG / Maricopa Sup. Ct.	Smith guilty plea	Probation; 5-year ban from holding public office
Feb 2026	AZ Sec. of State	Turning Point Pac Arizona (Filer ID 101981) -- 2026 March Pre-Election report	Filed one day late; \$10 fine assessed
2026	AZ CCEC	MUR 26-03 -- Logvin v. TPA	Pending; 90-day deadline 7/5/2026
2026	Maricopa County Elections	CF-2026-001 through CF-2026-006	Pending

The Federal Election Commission has already adjudicated and **sanctioned** the same Turning Point ecosystem for **failure to disclose contributions** (MUR 7892, \$18,000 penalty, October 2024). Citizens for Responsibility and Ethics in Washington summarized the matter:

*"Turning Point Action failed to disclose more than \$33,795 in contributions on its 2020 October Quarterly and Year-End Reports." (CREW Press Release, *Turning Point Action Fined Following CREW Complaint*, available at*

[https://www.citizensforethics.org/news/press-releases/turning-point-action-fined-following-crew-complaint/.](https://www.citizensforethics.org/news/press-releases/turning-point-action-fined-following-crew-complaint/))

The relevant Turning Point committees are not first-time filers. Their senior officers have been indicted, convicted, and sanctioned across multiple jurisdictions in successive years. The AZ-state PAC entity (101981) was assessed a late-filing penalty in this same election cycle. To find that the failure to file Maricopa County IE reports is "not likely to be repeated" would require the Department to ignore every other proceeding involving these same parties.

C. Intentionality

Spencer's "unintentional" framing is incompatible with the underlying facts:

- The Maricopa County committee 1002479 was self-terminated by sworn statement on January 17, 2025 by Chairman Tyler Bowyer and Treasurer Mercedes Carbajal under penalty of perjury. (Termination Statement, Filing ID 2025_53501.)
- Approximately nine months later, on October 1, 2025, an entity bearing the substantively identical name "Turning Point Pac Arizona" (Filer ID 101981) registered with the Arizona Secretary of State, with the same address (4930 E. Beverly Road Ste 2000, Phoenix, AZ 85044), the same email (info@tppac.com), the same phone (602-815-3540), and the same officers (Bowyer / Carbajal).
- That same officer team approved or did not prevent the deployment of signs in Maricopa County bearing the terminated committee's exact name and contact information.
- Treasurer Joshua Parker filed an amended FEC Form 1 on April 20, 2026, after the SRP election cycle was substantially complete and four days before this response.

Each of those steps was deliberate. Whether or not the failure to file with Maricopa was "intentional" in the colloquial sense, it was not accidental. A committee that is sophisticated enough to maintain a Carey/hybrid structure at the FEC, a separate state-level PAC at the AZ Secretary of State, and counsel at Snell & Wilmer is sophisticated enough to know that special taxing district IEs over \$1,000 require county filing.

D. The 2025 EPM Itself Argues Against Dismissal

Spencer cites the 2025 Elections Procedures Manual at pages 296-297 selectively. The same passage of the EPM is paired with the prior page's recital of the Department's enforcement obligations. Where the alleged conduct is significant, recurring, or committed by sophisticated parties with a record of prior violations, "prosecutorial discretion" cuts toward enforcement, not dismissal. The Department's role is to make a public record that voters can rely on, not to absorb the costs of repeat noncompliance.

IX. Requested Action

I respectfully request that the Department:

1. **Decline to dismiss** CF-2026-001 on prosecutorial-discretion grounds and find reasonable cause to believe Arizona campaign-finance law has been violated.

2. **Require Turning Point PAC to identify, on the record**, which legal entity --- the terminated Maricopa committee 1002479, "Turning Point PAC Inc." (FEC C00814152), or "Turning Point Pac Arizona" (AZ SOS Filer ID 101981) --- paid for the signs bearing the disclaimer "Paid for by Turning Point PAC (TPPAC.COM 602-815-3540)."

3. **Require the responsible entity to file** a complete Maricopa County independent-expenditure report under A.R.S. Sec. 16-926(H) and Sec. 16-922(F) covering all SRP-related expenditures.

4. **Investigate** whether the disclaimer on the signs accurately identifies "the person making the expenditure" as required by A.R.S. Sec. 16-925(A).

5. **Investigate** whether disbursements were made by the terminated Maricopa committee 1002479 in violation of its January 17, 2025 Termination Statement.

6. **Reject** the offer to "transfer federally-reported spending data into a county report" as a substitute for a finding of reasonable cause. Curative filings, if any, should be ordered, not volunteered.

Thank you for your attention. I am available to provide additional documentation or testimony as needed.

Respectfully submitted,

[REDACTED]

[CITY REDACTED]

[EMAIL REDACTED]

[PHONE REDACTED]

Sources Cited

1. A.R.S. Sec. 16-922 (Independent and coordinated expenditures), available at <https://www.azleg.gov/ars/16/00922.htm>

2. A.R.S. Sec. 16-925 (Advertising and fundraising disclosure statements), available at <https://www.azleg.gov/ars/16/00925.htm>

3. A.R.S. Sec. 16-926 (Campaign finance reports; contents), available at

<https://www.azleg.gov/ars/16/00926.htm>

4. A.R.S. Sec. 16-928 (Filing officer; statements and reports), available at <https://www.azleg.gov/ars/16/00928.htm>

5. Turning Point PAC Inc., FEC Form 1 (Statement of Organization, Amended), filed April 20, 2026, Image No. 202604209866625314, FEC File ID FEC-1970410, available at <https://docquery.fec.gov/pdf/314/202604209866625314/202604209866625314.pdf>

5a. Turning Point PAC Inc., FEC Form 1 (Statement of Organization, Amended), filed June 30, 2022, FEC File ID FEC-1605999 (committee type V -- Hybrid PAC, Nonqualified; Treasurer Jeff Webb; the operative governing Statement of Organization at the time of the SRP independent expenditures)

5b. Turning Point PAC Inc., FEC Form 1 (Statement of Organization, New), filed May 2, 2022, FEC File ID FEC-1591453 (original registration; committee type V -- Hybrid PAC, Nonqualified)

5c. Turning Point PAC Inc., FEC Form 3X (April Monthly 2026), filed April 20, 2026 (covering March 1 - March 31, 2026; reports \$41,189.28 in independent expenditures, all attributed on Schedule E to federal candidates Toth, Alfonso, and Steinmann)

5d. Turning Point PAC Inc., FEC Schedule E itemizations 2026-cycle (149 entries; zero entries for any SRP candidate), available via api.open.fec.gov/v1/schedules/schedule_e/?committee_id=C00814152

5e. Turning Point PAC Inc., FEC Schedule B itemizations 2026-cycle (Jan-Feb 2026; three entries totaling \$47,354.69 to 1Ten LLC under disbursement description "NON-FED PRINTING"), available via api.open.fec.gov/v1/schedules/schedule_b/?committee_id=C00814152

5f. 11 C.F.R. Sec. 100.16 (independent expenditure definition), available at <https://www.ecfr.gov/current/title-11/chapter-I/subchapter-A/part-100/subpart-D/section-100.16>

6. FEC Matter Under Review 7892 (Turning Point Action / Austin Smith), conciliation agreement October 2024, available at <https://www.fec.gov/data/legal/matter-under-review/7892/>

7. CREW, *Turning Point Action Fined Following CREW Complaint* (October 2024), available at <https://www.citizensforethics.org/news/press-releases/turning-point-action-fined-following-crew-complaint/>

8. AZ Attorney General, Press Release: *Attorney General Mayes Announces Sentencing of Former Legislator Austin Smith* (January 2026), available at <https://www.azag.gov/press-release/attorney-general-mayes-announces-sentencing-former-legislator-austin-smith>

9. AZ Mirror, *Turning Point USA's Political Arms Accused of Violating Arizona Dark Money Disclosure Law* (July 2025), available at <https://azmirror.com/briefs/turning-point-usa-political-arms-accused-of-violating-arizona-dark-money-disclosure-law/>

10. AZ SoS SeeTheMoney, "Turning Point Pac Arizona," Filer ID 101981 (committee record showing 2026 March Pre-Election report filed February 24, 2026, one day late, with \$10 fine assessed)

11. Maricopa County Elections, Termination Statement of Turning Point PAC, Committee ID 1002479, Filing ID 2025_53501, filed January 17, 2025

12. Original Complaint CF-2026-001 (filed April 6, 2026; Maricopa County Elections Department record)