

April 24, 2026

VIA HAND DELIVERY AND E-MAIL

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

Re: Response to Campaign Finance Complaint CF-2026-001

Dear Ms. Dyster,

This firm represents Turning Point PAC with respect to Campaign Finance Complaint 2026-01 filed by ^[REDACTED]
^[REDACTED]. The Complaint alleges that Turning Point PAC violated Arizona campaign finance law by conducting independent expenditures in the recent SRP district election through a now-terminated county-level political action committee. According to the Complainant, Turning Point PAC should have reactivated its county-level PAC and filed campaign finance reports with Maricopa County to disclose spending in the SRP race.

In this case, the PAC that conducted independent expenditures in the SRP election was the Turning Point PAC registered with the Federal Election Commission (C00814152) as a hybrid PAC.¹ Turning Point PAC used its non-federal account to conduct the SRP expenditures, and any reportable financial activity would be reflected in the FEC campaign finance reports.

The Maricopa County Elections Department is normally the filing officer for special taxing district elections. However, the applicable campaign finance statute does not clearly apply to political action committees that conduct independent expenditures in a candidate election:

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, including bond, tax, budget and budget override measures or that oppose or support the circulation of a petition for a county, school district, community college district or special taxing district initiative or referendum or other county, school district, community college district or special taxing district ballot measure, question or proposition.**

¹ Statement of Organization: <https://docquery.fec.gov/pdf/314/202604209866625314/202604209866625314.pdf>.

A.R.S. § 16-928(B) (emphasis added).

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.

In conclusion, the Maricopa County Elections Department should find no reasonable cause to believe that Turning Point PAC violated any campaign finance law. A.R.S. § 16-928(B) is ambiguous with respect to reporting obligations for an independent expenditure committee in a special taxing district race, therefore the Complainant's allegations "fail to give rise to a reasonable inference that a violation has occurred." *See* 2025 EPM, pg. 297. Even if the Department finds A.R.S. § 16-928(B) not ambiguous, it should nonetheless dismiss the Complaint in its prosecutorial discretion. Turning 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. *See* 2025 EPM, pgs. 296-97 (the filing officer may dismiss a complaint based on "insignificance of the alleged violation," the alleged violation is "not likely to be repeated," and "the alleged violation was unintentional").

Thank you for your consideration.

Very truly yours,

Snell & Wilmer



Eric Spencer