

May 8, 2026

Christine Dyster  
Deputy Director of Elections for Maricopa County  
510 South Third Avenue  
Phoenix, Arizona 85003  
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**Re: Response to Campaign Finance Complaints CF-2026-002, -003, -004, and -005**

This firm represents Chris Dobson, Barry Paceley, Rusty Kennedy, and Kelly Cooper (collectively, the “Candidates”) in connection with the complaint filed with your office by [REDACTED] on April 6, 2026.

The complaint contrives a theory of unlawful “coordination” between the candidates and Turning Point PAC<sup>1</sup> that rests on a slapdash agglomeration of rank speculation, reckless conjecture, and statutory misinterpretation. As detailed below, the Candidates never engaged in any conduct that could constitute “coordination,” within the meaning of A.R.S. § 16-922. The complainant’s ostensible “evidence” to the contrary—which consists largely of irrelevant facts and haphazard inferences—does not remotely approximate reasonable cause to believe that the Candidates violated any provision of the Arizona campaign finance code.

**FACTUAL BACKGROUND**

Each of the respondents sought election to the governing board of the Salt River Project agricultural improvement district (“SRP”) in a jurisdictional election held on April 7, 2026. Christopher Dobson, Barry Paceley, and Kelly Cooper each registered a candidate committee for his campaign, pursuant to A.R.S. § 16-905. Because Mr. Kennedy’s campaign contributions and expenditures never exceeded the statutory registration threshold, he was never required to establish an authorized candidate committee. *See* Dobson Decl. ¶¶ 3–4; Paceley Decl. ¶¶ 3–4; Cooper Decl. ¶¶ 3–4; Kennedy Decl. ¶¶ 3–4.

**LEGAL ANALYSIS**

Arizona law generally prohibits individuals and organizations (to include political action committees and non-profit corporations) from “coordinating” their political expenditures with candidates who benefit from those disbursements. If an expenditure is coordinated, its dollar value is imputed to the benefitted candidate as a potentially unlawful or excessive in-kind contribution from the third-party spender. *See* A.R.S. §§ 16-901(11), (13), (25), 16-922(E).

Arizona’s anti-coordination law is derived from, and is largely coextensive with, cognate federal statutes and regulations. *See* 52 U.S.C. § 30116; 11 C.F.R. §§ 109.20, 109.21. Guidance from the Federal Election Commission

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<sup>1</sup> Unless otherwise indicated, this response will use the name “Turning Point” to refer to any or all of Turning Point USA, Turning Point Action, and Turning Point PAC. Any distinctions between and among these entities are, for purposes of responding to the complaint’s allegations, immaterial.

(“FEC”) accordingly is persuasive authority in interpreting and applying analogous Arizona statutes. *See* Ariz. Att’y. Gen. Op. I11-006 (R11-010).

In that vein, the FEC has emphasized that complaint’s declaratory say-so that campaign finance infractions occurred is an inadequate basis for an investigation. Rather, reasonable cause to find a violation is present “only if a complaint sets forth sufficient specific facts, which, if proven true, would constitute a violation of the [law].” MUR 4960 (In re Hillary Rodham Clinton, *et al.*), Statement of Reasons of Commissioners Mason, Sandstrom, Smith, and Thomas, at 1. It follows that “[u]nwarranted legal conclusions from asserted facts or mere speculation, will not be accepted as true.” *Id.* at 2. And an investigation can never be predicated on facile “where there’s smoke, there’s fire” inferential shortcuts. MUR 6540 (Rick Santorum for President), Statement of Reasons of Vice Chairman Donald F. McGahn and Commissioner Caroline C. Hunter (July 25, 2013) at 23. Sworn declarations that directly rebut allegations of coordination generally are sufficient to defeat a complaint. *See* MUR 7169 (Democratic Congressional Campaign Committee, *et al.*), Factual & Legal Analysis at 11. Accordingly, the overtly speculative and conclusory character of the complaint at issue here cannot sustain a “reasonable cause” finding under A.R.S. § 16-938.

In any event, Turning Point did not coordinate its expenditures in the 2026 SRP elections with any of the Candidates. An expenditure is deemed coordinated if the benefitted candidate or his agent either (1) “actually coordinates” with the expenditure’s sponsor (*i.e.*, requests, suggests, or otherwise is involved in the expenditure), or (2) shares with the sponsor “nonpublic information about [the] candidate’s or candidate committee’s plans or needs” with the intent of inducing the expenditure. A.R.S. § 16-922(B). Neither variant of coordination occurred in this case. None of the Candidates or their respective campaign’s agents ever shared nonpublic strategic information—or even communicated *at all* about the 2026 SRP elections—with Turning Point or any of Turning Point’s known agents. *See* Dobson Decl. ¶¶ 5–12; Pacey Decl. ¶¶ 5–12; Kennedy Decl. ¶¶ 5–12; Cooper Decl. ¶¶ 5–12. It simply never happened.

Further, none of the intertwined financial or vendor relationships that can be “rebuttable evidence” of coordination is present here. *See* A.R.S. § 16-922(C). No agent of any of the Candidates’ campaigns was ever concomitantly an agent of Turning Point; no Candidate ever made fundraising solicitations for Turning Point’s benefit during the election cycle; and neither Turning Point nor its personnel were ever authorized to raise or spend money on a Candidate’s behalf during the election cycle. *See* Dobson Decl. ¶¶ 13–17; Pacey Decl. ¶¶ 13–17; Kennedy Decl. ¶¶ 13–17; Cooper Decl. ¶¶ 13–17.

The fragmentary information and unadorned hunches that the complaint proffers as “evidence” of coordination all are either factually incorrect or carry no legal significance. Addressing each in turn:

#### **A. Turning Point Email Addresses**

The complaint alleges that there are email accounts associated with a “@tpaction.com” domain for each of the Candidates. Preliminarily, the crux of unlawful coordination is the communication of certain information between and among a candidate and an outside organization supporting him; the mere existence of a *relationship* between the candidate and the outside organization is not evidence of anything. *See, e.g.*, MUR 6059 (In re Sean Parnell for Congress, *et al.*), Factual & Legal Analysis at 8 (dismissing complaint after finding that it “does not contain specific allegations as to” coordination, but rather rested solely on the assumption that coordination occurred because candidate had met with the independent expenditure committee); MUR 5754 (In re MoveOn.org Voter Fund), Factual & Legal Analysis at 3 (concluding that independent expenditure organization’s alleged meetings with Democratic Party officials and candidate’s attendance at events sponsored by the organization do “not provide a connection” between those contacts and actual coordination, particularly given the submission of affidavits specifically denying that coordination had occurred); MUR 6120 (In re Republican Campaign Committee of New

Mexico, *et al.*), Factual & Legal Analysis at 11-12 (“The complaint only states the use of a mutual vendor ‘further suggests’ information sharing, but does not indicate what information...was actually shared.”).

More to the point, however, none of the Candidates was aware of, or involved in, the creation of these email accounts. To this day, the Candidates have never used the email addresses, and have never had log-in credentials or other means of accessing these accounts. The Candidates do not know why Turning Point created these email accounts or who uses them. *See* Dobson Decl. ¶ 18; Pacey Decl. ¶ 18; Kennedy Decl. ¶ 18; Cooper Decl. ¶ 18.

## **B. Website Biographies**

The complaint points to biographies of the Candidates that Turning Point has posted to its website, and declares—without an iota of corroborating evidence—that this “suggests the entire slate is integrated into TPA’s organizational structure.” Some simple Google searches, however, would have informed the complainant that the Candidates already had published their biographies on SRP’s website. *See* Dobson Decl. ¶ 19; Pacey Decl. ¶ 19; Kennedy Decl. ¶ 19; Cooper Decl. ¶ 19.

An outside organization’s use of information that is in the public domain is not, as a matter of law or common sense, unlawful “coordination.” *See* A.R.S. § 16-922(B)(2) (defining coordination to entail the sharing of certain “nonpublic information”); FEC, *Coordinated Communications*, 71 Fed. Reg. 33190-02, 33025 (Jun. 8, 2006) (explaining that “a communication created with information found, for instance, on a candidate’s or political party’s Web site, or learned from a public campaign speech, is not a coordinated communication if that information is subsequently used in connection with a communication”). The Turning Point biographies are little more than short distillations of information easily found on SRP’s public website. The similarities suggest only that Turning Point personnel know how to run web searches and to use copy-and-paste functions; they are not evidence of “coordination” or the Candidates’ “integrat[ion]” into Turning Point.

## **C. Batch Onboarding**

The complaint’s prattle concerning “TPA’s content management system” is not entirely comprehensible, but it articulates no evidence (or even allege) that any of the Candidates were in any way involved in the creation or administration of Turning Point’s internal “content management system.”

## **D. Campaign Website Infrastructure and Campaign Operations**

In another *non sequitur*, the complaint argues that Turning Point’s website amplified the Candidates’ campaign “messaging” and “branding,” and that Turning Point spent significantly greater sums than the Candidates themselves. But as discussed above, an outside organization’s independent use of information that is already in the public domain, such as a candidate’s talking points, biographical information, or other campaign materials, is wholly lawful. And independent expenditure organizations typically outspend candidates for the simple reason that the former can (unlike candidates) solicit contributions from virtually any source in unlimited amounts. *See generally Citizens United v. FEC*, 558 U.S. 310 (2010).

Even the complaint appears to tacitly acknowledge that nothing unlawful inheres in Turning Point’s expenditures, conceding that an illicit in-kind contribution would occur only “if TPA’s campaign infrastructure was provided in coordination with the candidates.” But it wasn’t—and the complaint’s reliance on patent speculation underscores its frivolity. *See* Dobson Decl. ¶¶ 5–12; Pacey Decl. ¶¶ 5–12; Kennedy Decl. ¶¶ 5–12; Cooper Decl. ¶¶ 5–12. Turning Point’s facially independent advocacy activities are not “evidence” of anything, let alone unlawful activity.

### E. Dobson’s Role in Slate Formation

The complaint’s observation that Mr. Dobson recruited Mr. Pacey to run for SRP Vice President prompts only one sensible response: so what? Mr. Dobson did not consult with Turning Point about Mr. Pacey’s candidacy. *See* Dobson Decl. ¶ 20. But even if Mr. Dobson and Turning Point had discussed recruiting Mr. Pacey, any such communication about candidate recruitment would not itself constitute a coordinated expenditure of money.

To the complainant, Mr. Dobson’s endorsement “raises the question of who is directing the campaign strategy.” The complainant is free to ponder whatever misguided questions he wishes. But he cannot conscript formal regulatory proceedings—and force the attendant wasting of the Candidates’ and the County’s time and resources—to satisfy his idle hunches and musings.

### F. “Candidate Silence”

Next, the complainant asserts—apparently oblivious to the import of this allegation—that the Candidates have not “made any public statement explaining their relationship with TPA.” But unlawful coordination subsists in improper *communication* between candidates and outside organizations sponsoring independent expenditures. *See* A.R.S. § 16-922(B). The Candidates’ silence concerning a non-existent relationship is (to the extent it imparts anything at all) evidence of the *absence* of coordination.

The ostensible relevance of Jimmy Lindblom’s statement that his organization, Arizonans for Responsible Growth (“AZFRG”), is allied with Turning Point also remains entirely unclear. AZFRG is itself an independent expenditure committee. Arizona law does not (and, for First Amendment reasons, cannot) prohibit independent expenditure organizations from coordinating with *each other*. And nothing in Mr. Lindblom’s alleged statement evidences any “alliance” with *the Candidates*.

### G. Pacey Contribution to AZFRG

Mr. Pacey’s firm undisputedly contributed \$1,000 to AZFRG. Political committees, such as AZFRG, can accept contributions in any amount from individuals or corporations. *See* A.R.S. §§ 16-912(B), 16-916(B). Straining to extract some kind of impropriety from this lawful transaction, the complainant declares that “[t]his creates a financial loop” because AZFRG subsequently made \$211,000 in independent expenditures concerning the SRP election.

This statement is mathematically, logically, and legally fatuous. To begin with, there is no evidence that Mr. Pacey’s modest contribution actually was earmarked or used for AZFRG’s independent expenditures. And even if it was, Mr. Pacey’s donation would have financed a mere 0.47% of AZFRG’s independent expenditure budget—a curious definition of a “loop.” Finally, the “loop” theory (to the extent it is coherent at all) appears to posit that Mr. Pacey was personally subsidizing his own campaign, which would be entirely lawful in any event, *see* A.R.S. § 16-913(F).

### H. Campaign Signs

Bungling a basic precept of campaign finance law, the complainant asserts that “campaign materials such as signs that promote a candidate and are paid for by another entity constitute in-kind contributions to that candidate.” To the contrary, an outside organization’s disbursements of its own resources on public communications advocating for or against a candidate are independent expenditures, not in-kind contributions. *See* A.R.S. §§ 16-901(31), (32), 16-922(A). These transactions convert to in-kind contributions if—and *only* if—they are “coordinated” with the benefitted candidates. *Id.* § 16-922(E); *see also Buckley v. Valeo*, 424 U.S. 1, 36–37 (1976) (holding that while in-kind

contributions can be restricted, the First Amendment forbids “limiting actions voluntarily undertaken by citizens independently of a candidate’s campaign”). As outlined at length above, none of the Candidates ever directly or indirectly communicated with Turning Point concerning any expenditures, activities, or materials that the latter sponsored in connection with the 2026 SRP elections.

The complaint’s related assertion that Mr. Dobson’s committee paid for signs promoting Messrs. Pacey, Kennedy, and Cooper is false, and the complaint supplies no evidence of this ostensible sign’s existence.<sup>2</sup>

### I. “Firewall Analysis”

The complaint’s extended digression concerning Turning Point’s ostensible lack of a “firewall” evinces a misunderstanding of what a firewall agreement is and the purpose it serves. When a candidate and an outside organization that sponsors independent expenditures benefitting that candidate both retain a common vendor (e.g., a consulting firm), a presumption of unlawful coordination may arise. See A.R.S. § 16-922(C)(1). To extinguish that risk, an internal “firewall” will classify personnel of the vendor into two groups—those assigned to tasks for the candidate client and those assigned to the independent expenditure effort. The policy then memorializes protocols, procedures and safeguards that prevent personnel in each division from accessing strategic non-public information concerning the activities of their counterparts on the other side of the “wall.” See A.R.S. § 16-922(D)(1); FEC, *Coordinated Communications*, 71 Fed. Reg. 33190-02, 33206 (Jun. 8, 2006) (explaining that a political vendor may “create an effective firewall between different employees or between different units within its organization that prevents information obtained from one client from being used on behalf of another, and thereby prevents its staff from conveying information from one client to another”).

The Candidates did not share any common vendors with Turning Point, and no agent of the Candidates’ campaigns had any involvement whatsoever in Turning Point’s expenditures and activities relating to the 2026 SRP elections. See Dobson Decl. ¶¶ 13–17; Pacey Decl. ¶¶ 13–17; Kennedy Decl. ¶¶ 13–17; Cooper Decl. ¶¶ 13–17. There accordingly was nothing and no one to “firewall” in the first place.

### CONCLUSION

For the foregoing reasons, there is nothing close to reasonable cause to believe that any of the Candidates received illicit in-kind contributions in the form of coordinated expenditures by Turning Point. We respectfully request that you dismiss the complaint in its entirety pursuant to A.R.S. § 16-938 without further action.

Respectfully,

/s/ Kory Langhofer  
Kory Langhofer

/s/ Thomas Basile  
Thomas Basile

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<sup>2</sup> Per Exhibit D of the Complaint, Mr. Dobson’s committee did spend \$1,459.89 on signs promoting *other* SRP candidates who are not named as respondents in this matter.

**DECLARATION OF CHRISTOPHER DOBSON**

I, Christopher Dobson, declare as follows:

1. I am over 18 years of age, and am competent to testify in this matter.
2. I make this declaration based upon my own personal knowledge.
3. I was a candidate for President of the Salt River District agricultural improvement district ("SRP") in the election held on April 7, 2026.
4. "Chris Dobson for SRP President" (the "Committee") was my authorized campaign committee, and at all times relevant it was registered and filed campaign finance reports with the Maricopa County Elections Department.
5. I never coordinated with Turning Point, Turning Point Action or Turning Point PAC (collectively, "Turning Point") or any of its known agents in connection with Turning Point's expenditures in the 2026 SRP elections.
6. To the best of my knowledge, no agent of the Committee ever coordinated with Turning Point or any of its known agents in connection with Turning Point's expenditures in the 2026 SRP elections.
7. I never communicated directly or indirectly with Turning Point or any known agent of Turning Point concerning the existence, amount, timing, or any other attributes of any expenditures by Turning Point in connection with the 2026 SRP elections.
8. To the best of my knowledge, none of the Committee's agents ever communicated directly or indirectly with Turning Point or any known agent of Turning Point concerning the existence, amount, timing, or any other attributes of any expenditures by Turning Point in connection with the 2026 SRP elections.
9. I never communicated directly or indirectly with Turning Point or any known agent of Turning Point concerning the existence, contents, production, timing, mode, distribution, or other attributes of any advertisements or public communications sponsored by Turning Point (including but not limited to yard signs, websites, or field operations) in connection with the 2026 SRP elections.

10. To the best of my knowledge, no agent of the Committee ever communicated directly or indirectly with Turning Point or any known agent of Turning Point concerning the existence, contents, production, timing, mode, distribution, or other attributes of any advertisements or public communications sponsored by Turning Point (including but not limited to yard signs, websites, or field operations) in connection with the 2026 SRP elections.

11. I never provided to Turning Point or any known agent of Turning Point any nonpublic information concerning my campaign's plans, projects, activities, or needs.

12. To the best of my knowledge, no agent of the Committee ever provided to Turning Point or any known agent of Turning Point any nonpublic information concerning my campaign's plans, projects, activities, or needs.

13. To the best of my knowledge, no agent of the Committee was ever concomitantly an agent of Turning Point.

14. I was never authorized by Turning Point to solicit contributions to Turning Point during the 2026 election cycle.

15. To the best of my knowledge, no agent of the Committee was ever authorized by Turning Point to solicit contributions to Turning Point during the 2026 election cycle.

16. I never authorized Turning Point or any known agent of Turning Point to raise or spend monies on my or the Committee's behalf.

17. To the best of my knowledge, no agent of the Committee ever authorized Turning Point or any known agent of Turning Point to raise or spend monies on my or the Committee's behalf.

18. I had no involvement in, or communications with Turning Point or its known agents concerning, the creation of a [chrisdobson@tpaction.com](mailto:chrisdobson@tpaction.com) email account. At no time have I ever accessed that email account, possessed log-in credentials or any other means of accessing or using that email account, or otherwise had possession, custody, or control of that email account or its contents.

19. I did not directly or indirectly request, suggest, participate in, facilitate, assist with, or otherwise have any involvement in the development of the "tpaction.com/bio/chrisdobson" website. That website's contents consists of publicly available information about my biographical background,

19. I did not directly or indirectly request, suggest, participate in, facilitate, assist with, or otherwise have any involvement in the development of the “tpaction.com/bio/chrisdobson” website. That website’s contents consists of publicly available information about my biographical background, including information that previously was posted to SRP’s own website, *see* [https://www.srpnet.com/assets/srpnet/pdf/about/governance-leadership/elections/candidates/2026/2026\\_P\\_DobsonChristopherJ\\_CandidateInformation.pdf](https://www.srpnet.com/assets/srpnet/pdf/about/governance-leadership/elections/candidates/2026/2026_P_DobsonChristopherJ_CandidateInformation.pdf).

The contents of the tpaction.com webpage appears to have been copied-and-pasted almost verbatim from my candidate profile on SRP’s website.

20. I never communicated with Turning Point or any known agent of Turning Point concerning the recruitment of Barry Pacey to run as a candidate for Vice President of SRP.

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I declare under penalty of perjury under the laws of the United States of America and the State of Arizona that the foregoing is true and correct. Executed on this 6<sup>th</sup> day of May, 2026.



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Christopher Dobson

**DECLARATION OF BARRY PACELEY**

I, Barry Paceley, declare as follows:

1. I am over 18 years of age, and am competent to testify in this matter.
2. I make this declaration based upon my own personal knowledge.
3. I was a candidate for Vice President of the Salt River District agricultural improvement district ("SRP") in the election held on April 7, 2026.
4. "Barry Paceley for SRP VP" was my authorized campaign committee, and at all times relevant it was registered and filed campaign finance reports with the Maricopa County Elections Department.
5. I never coordinated with Turning Point, Turning Point Action or Turning Point PAC (collectively, "Turning Point") or any of its known agents in connection with Turning Point's expenditures in the 2026 SRP elections.
6. To the best of my knowledge, no agent of my campaign ever coordinated with Turning Point or any of its known agents in connection with Turning Point's expenditures in the 2026 SRP elections.
7. I never communicated directly or indirectly with Turning Point or any known agent of Turning Point concerning the existence, amount, timing, or any other attributes of any expenditures by Turning Point in connection with the 2026 SRP elections.
8. To the best of my knowledge, none of my campaign's agents ever communicated directly or indirectly with Turning Point or any known agent of Turning Point concerning the existence, amount, timing, or any other attributes of any expenditures by Turning Point in connection with the 2026 SRP elections.
9. I never communicated directly or indirectly with Turning Point or any known agent of Turning Point concerning the existence, contents, production, timing, mode, distribution, or other attributes of any advertisements or public communications sponsored by Turning Point (including but not limited to yard signs, websites, or field operations) in connection with the 2026 SRP elections.

10. To the best of my knowledge, no agent of my campaign ever communicated directly or indirectly with Turning Point or any known agent of Turning Point concerning the existence, contents, production, timing, mode, distribution, or other attributes of any advertisements or public communications sponsored by Turning Point (including but not limited to yard signs, websites, or field operations) in connection with the 2026 SRP elections.

11. I never provided to Turning Point or any known agent of Turning Point any nonpublic information concerning my campaign's plans, projects, activities, or needs.

12. To the best of my knowledge, no agent of my campaign ever provided to Turning Point or any known agent of Turning Point any nonpublic information concerning my campaign's plans, projects, activities, or needs.

13. To the best of my knowledge, no agent of my campaign was ever concomitantly an agent of Turning Point.

14. I was never authorized by Turning Point to solicit contributions to Turning Point during the 2026 election cycle.

15. To the best of my knowledge, no agent of my campaign was ever authorized by Turning Point to solicit contributions to Turning Point during the 2026 election cycle.

16. I never authorized Turning Point or any known agent of Turning Point to raise or spend monies on my or my campaign's behalf.

17. To the best of my knowledge, no agent of my campaign ever authorized Turning Point or any known agent of Turning Point to raise or spend monies on my or my campaign's behalf.

18. I had no involvement in, or communications with Turning Point or its known agents concerning, the creation of a [barrypaceley@tpaction.com](mailto:barrypaceley@tpaction.com) email account. At no time have I ever accessed that email account, possessed log-in credentials or any other means of accessing or using that email account, or otherwise had possession, custody, or control of that email account or its contents.

19. I did not directly or indirectly request, suggest, participate in, facilitate, assist with, or otherwise have any involvement in the development of the "tpaction.com/bio/barrypaceley" website. That website's contents consist of publicly available information about my biographical background,

including information that previously was posted to SRP's own website, *see* [https://www.srpnet.com/assets/srpnet/pdf/about/governance-leadership/elections/candidates/2026/2026\\_VP\\_PaceleyBarryE\\_CandidateInformation.pdf](https://www.srpnet.com/assets/srpnet/pdf/about/governance-leadership/elections/candidates/2026/2026_VP_PaceleyBarryE_CandidateInformation.pdf). The contents of the tpaction.com webpage appears to have been copied-and-pasted almost verbatim from my candidate profile on SRP's website.

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I declare under penalty of perjury under the laws of the United States of America and the State of Arizona that the foregoing is true and correct. Executed on this 7 day of May, 2026.

  
Barry Paceley

**DECLARATION OF RUSTY KENNEDY**

I, Rusty Kennedy, declare as follows:

1. I am over 18 years of age, and am competent to testify in this matter.
2. I make this declaration based upon my own personal knowledge.
3. I was a candidate for the Salt River District agricultural improvement district ("SRP")

Board in the election held on April 7, 2026.

4. My aggregate campaign contributions and expenditures for the 2026 election cycle did not exceed \$500, and so I did not register a campaign committee with the Maricopa County Elections Department.

5. I never coordinated with Turning Point, Turning Point Action or Turning Point PAC (collectively, "Turning Point") or any of its known agents in connection with Turning Point's expenditures in the 2026 SRP elections.

6. To the best of my knowledge, no agent of my campaign ever coordinated with Turning Point or any of its known agents in connection with Turning Point's expenditures in the 2026 SRP elections.

7. I never communicated directly or indirectly with Turning Point or any known agent of Turning Point concerning the existence, amount, timing, or any other attributes of any expenditures by Turning Point in connection with the 2026 SRP elections.

8. To the best of my knowledge, none of my campaign's agents ever communicated directly or indirectly with Turning Point or any known agent of Turning Point concerning the existence, amount, timing, or any other attributes of any expenditures by Turning Point in connection with the 2026 SRP elections.

9. I never communicated directly or indirectly with Turning Point or any known agent of Turning Point concerning the existence, contents, production, timing, mode, distribution, or other attributes of any advertisements or public communications sponsored by Turning Point (including but not limited to yard signs, websites, or field operations) in connection with the 2026 SRP elections.

10. To the best of my knowledge, no agent of my campaign ever communicated directly or indirectly with Turning Point or any known agent of Turning Point concerning the existence, contents, production, timing, mode, distribution, or other attributes of any advertisements or public communications sponsored by Turning Point (including but not limited to yard signs, websites, or field operations) in connection with the 2026 SRP elections.

11. I never provided to Turning Point or any known agent of Turning Point any nonpublic information concerning my campaign's plans, projects, activities, or needs.

12. To the best of my knowledge, no agent of my campaign ever provided to Turning Point or any known agent of Turning Point any nonpublic information concerning my campaign's plans, projects, activities, or needs.

13. To the best of my knowledge, no agent of my campaign was ever concomitantly an agent of Turning Point.

14. I was never authorized by Turning Point to solicit contributions to Turning Point during the 2026 election cycle.

15. To the best of my knowledge, no agent of my campaign was ever authorized by Turning Point to solicit contributions to Turning Point during the 2026 election cycle.

16. I never authorized Turning Point or any known agent of Turning Point to raise or spend monies on my or my campaign's behalf.

17. To the best of my knowledge, no agent of my campaign ever authorized Turning Point or any known agent of Turning Point to raise or spend monies on my or my campaign's behalf.

18. I had no involvement in, or communications with Turning Point or its known agents concerning, the creation of a [rustykennedy@tpaction.com](mailto:rustykennedy@tpaction.com) email account. At no time have I ever accessed that email account, possessed log-in credentials or any other means of accessing or using that email account, or otherwise had possession, custody, or control of that email account or its contents.

19. I did not directly or indirectly request, suggest, participate in, facilitate, assist with, or otherwise have any involvement in the development of the "tpaction.com/bio/rustykennedy" website. That website's contents consist of publicly available information about my biographical

background, including information that previously was posted to SRP's own website, *see* [https://www.srpnet.com/assets/srpnet/pdf/about/governance-leadership/elections/candidates/2026/2026\\_12\\_KennedyRusty\\_CandidateInformation.pdf](https://www.srpnet.com/assets/srpnet/pdf/about/governance-leadership/elections/candidates/2026/2026_12_KennedyRusty_CandidateInformation.pdf). The contents of the tpaction.com webpage appears to have been copied-and-pasted almost verbatim from my candidate profile on SRP's website.

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I declare under penalty of perjury under the laws of the United States of America and the State of Arizona that the foregoing is true and correct. Executed on this 7<sup>th</sup> day of May, 2026.

  
\_\_\_\_\_  
Rusty Kennedy

**DECLARATION OF KELLY COOPER**

I, Kelly Cooper, declare as follows:

1. I am over 18 years of age, and am competent to testify in this matter.
2. I make this declaration based upon my own personal knowledge.
3. I was a candidate for the Salt River District agricultural improvement district ("SRP")

Board in the election held on April 7, 2026.

4. "Cooper for SRP" was my authorized campaign committee, and at all times relevant it was registered and filed campaign finance reports with the Maricopa County Elections Department.

5. I never coordinated with Turning Point, Turning Point Action or Turning Point PAC (collectively, "Turning Point") or any of its known agents in connection with Turning Point's expenditures in the 2026 SRP elections.

6. To the best of my knowledge, no agent of my campaign ever coordinated with Turning Point or any of its known agents in connection with Turning Point's expenditures in the 2026 SRP elections.

7. I never communicated directly or indirectly with Turning Point or any known agent of Turning Point concerning the existence, amount, timing, or any other attributes of any expenditures by Turning Point in connection with the 2026 SRP elections.

8. To the best of my knowledge, none of my campaign's agents ever communicated directly or indirectly with Turning Point or any known agent of Turning Point concerning the existence, amount, timing, or any other attributes of any expenditures by Turning Point in connection with the 2026 SRP elections.

9. I never communicated directly or indirectly with Turning Point or any known agent of Turning Point concerning the existence, contents, production, timing, mode, distribution, or other attributes of any advertisements or public communications sponsored by Turning Point (including but not limited to yard signs, websites, or field operations) in connection with the 2026 SRP elections.

10. To the best of my knowledge, no agent of my campaign ever communicated directly or indirectly with Turning Point or any known agent of Turning Point concerning the existence,

contents, production, timing, mode, distribution, or other attributes of any advertisements or public communications sponsored by Turning Point (including but not limited to yard signs, websites, or field operations) in connection with the 2026 SRP elections.

11. I never provided to Turning Point or any known agent of Turning Point any nonpublic information concerning my campaign's plans, projects, activities, or needs.

12. To the best of my knowledge, no agent of my campaign ever provided to Turning Point or any known agent of Turning Point any nonpublic information concerning my campaign's plans, projects, activities, or needs.

13. To the best of my knowledge, no agent of my campaign was ever concomitantly an agent of Turning Point.

14. I was never authorized by Turning Point to solicit contributions to Turning Point during the 2026 election cycle.

15. To the best of my knowledge, no agent of my campaign was ever authorized by Turning Point to solicit contributions to Turning Point during the 2026 election cycle.

16. I never authorized Turning Point or any known agent of Turning Point to raise or spend monies on my or my campaign's behalf.

17. To the best of my knowledge, no agent of my campaign ever authorized Turning Point or any known agent of Turning Point to raise or spend monies on my or my campaign's behalf.

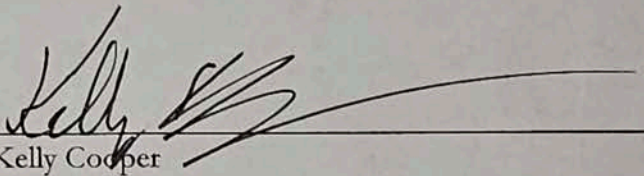
18. I had no involvement in, or communications with Turning Point or its known agents concerning, the creation of a [kellycooper@tpaction.com](mailto:kellycooper@tpaction.com) email account. At no time have I ever accessed that email account, possessed log-in credentials or any other means of accessing or using that email account, or otherwise had possession, custody, or control of that email account or its contents.

19. I did not directly or indirectly request, suggest, participate in, facilitate, assist with, or otherwise have any involvement in the development of the "tpaction.com/bio/kellycooper" website. That website's contents consist of publicly available information about my biographical background, including information that previously was posted to SRP's own website, *see* <https://www.srpnet.com/assets/srpnet/pdf/about/governance->

including information that previously was posted to SRP's own website, *see* [https://www.srpnet.com/assets/srpnet/pdf/about/governance-leadership/elections/candidates/2026/2026\\_14\\_CooperKelly\\_CandidateInformation.pdf](https://www.srpnet.com/assets/srpnet/pdf/about/governance-leadership/elections/candidates/2026/2026_14_CooperKelly_CandidateInformation.pdf). The contents of the tpaction.com webpage appears to have been copied-and-pasted almost verbatim from my candidate profile on SRP's website.

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I declare under penalty of perjury under the laws of the United States of America and the State of Arizona that the foregoing is true and correct. Executed on this 8th day of May, 2026.

  
\_\_\_\_\_  
Kelly Cooper