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From: CampFin (ELE) <campfin@maricopa.gov>

To: [COMPLAINANT ? EMAIL REDACTED]

Date: 2026-07-31T19:00:00.000Z

Subject: Notice of Reasonable Cause Referral: CF-2026-006

Dear [COMPLAINANT],

Maricopa County Elections Department (?the Office?), as the filing officer, received a complaint on April 6, 2026 claiming that Turning Point Action (?the respondent?) potentially violated A.R.S. § 16-922. Pursuant to A.R.S. § 16-938 ,

the Office has found reasonable cause to believe that the respondent may be in violation of A.R.S. § 16-922(F). A.R.S. § 16-922(B) states that an expenditure is not an independent expenditure if there is actual coordination with respect to an expenditure between the candidate or candidate?s agent and the person making the expenditure or that person?s agent or if both

of the following apply: (a) the expenditure is based on nonpublic information about the candidate or candidate?s committee and (b) the candidate or candidate?s agent provides nonpublic information with the intent toward having the expenditure made.

Based on the available information, there is insufficient evidence to reasonably believe that the expenditures of the respondent were based on nonpublic information provided by the candidates or the candidates? agents with the intent toward having the expenditure made. This means the Office does not have reason to believe both of the conditions of A.R.S. § 16-922(B)(2) have been met.

A.R.S. § 16-922(C) provides that a filing officer may consider three conditions as rebuttable evidence of coordination. The Office does not have evidence provided through this complaint or any publicly available information to determine that any agent of the respondent is also an agent of the candidates, that the respondent or their agent have been authorized to raise or spend monies on behalf of the candidates, or that the candidates are or have been authorized to raise money or solicit contributions on behalf of the respondent. Therefore, the Office does not have reason to believe there is coordination defined in A.R.S. § 16-922(B)(1).

Pursuant to A.R.S. § 16-922(F), an entity that makes an independent expenditure, other than an individual or a committee, shall file independent expenditure reports pursuant to A.R.S. § 16-926(H). The evidence provided in this complaint identifies that the respondent has made an expenditure expressly advocating the election of a clearly identified candidate and has not made that expenditure in cooperation or consultation with or at the request or suggestion of the candidate or candidate?s agent. The Office was provided no evidence that the respondent has filed the independent expenditure reports. The Office has searched both the County campaign finance database and the Secretary of State?s database to confirm that no reports have been submitted for the independent expenditures made during the SRP election by Turning Point Action. Independent Expenditure entities are required to report per A.R.S. § 16-922(F), and therefore, there is reason to believe the respondent may have violated this statute.

This complaint, CF-2026-006, has been referred to the enforcement officer for further investigation. The enforcement officer shall make the final decision whether a campaign finance violation has occurred. Any further communication on this matter should be directed to the Maricopa County Attorney?s Office.

Sincerely,

Candidate Services and Campaign Finance

Elections, A Department of the Board of Supervisors

510 S. 3rd Ave. Phoenix, AZ 85003

O: 602-372-2262

E: campfin@maricopa.gov

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