

VERIFIED COMPLAINT UNDER THE VOTERS' RIGHT TO KNOW ACT

A.R.S. Title 16, Chapter 6.1

May 7, 2026

Via Email (ccec@azcleelections.gov)

Thomas M. Collins

Executive Director

Citizens Clean Elections Commission

1110 West Washington Street, Suite 250

Phoenix, AZ 85007

Dear Director Collins:

I am a qualified Arizona voter. I submit this complaint under A.R.S. § 16-977(A) and A.A.C. R2-20-809 against **Fortify AZ**, a political committee registered with the Arizona Secretary of State (Committee ID 102154), and against its sole disclosed funder, **American Federation for Children** (a 501(c)(4) nonprofit corporation), as a donor and intermediary whose contributions to a covered person trigger original-source-tracing obligations under A.R.S. §§ 16-972 and 16-973(A)(6)–(7), where Fortify AZ's \$1,257,000 in disbursements to AZ Petition Partners and Marson Media is "campaign media spending" within the meaning of A.R.S. § 16-971(2)(a)(iv) and (a)(vii).

Fortify AZ has spent **\$1,257,000.00** in eight calendar days (March 17–25, 2026) on the paid circulation of an Arizona ESA / school-voucher ballot initiative — every dollar of which is "campaign media spending" under A.R.S. § 16-971(2) — and has filed **zero VRKA reports**. The Voters' Right to Know Act's statewide disclosure threshold under A.R.S. § 16-973(A) is **\$50,000**. Fortify AZ crossed that threshold in a single \$200,000 transaction on **March 17, 2026** and has spent more than **twenty-five times** the threshold in cumulative cycle-to-date campaign media spending in the eight days that followed. The Commission's VRKA filings index, reviewed May 7, 2026, confirms Fortify AZ is not present.

This complaint identifies — with specific dates and amounts drawn from Fortify AZ's own filings with the Secretary of State — **one missed Initial Report and forty-eight missed Supplemental Reports**, for a total of forty-nine discrete violations of A.R.S. § 16-973.

The matter is **time-sensitive**. The Arizona 2026 initiative-filing deadline is **July 2, 2026**, and Fortify AZ is currently using the \$1,257,000 to circulate petitions across the state. Voters confronting paid circulators on the street are entitled to know **who is paying for the campaign** — that is the precise harm the Voters' Right to Know Act exists to prevent. Every day the Initial Report remains unfiled is a day Arizona voters sign a petition without the disclosure the people of Arizona enacted by 72% margin in 2022.

I. Compliance with R2-20-809(C)

This complaint satisfies each requirement of A.A.C. R2-20-809(C):

1. R2-20-809(C)(1): This complaint recites facts describing forty-nine discrete violations of A.R.S. § 16-973 (the Voters' Right to Know Act's reporting requirements) — one missed Initial Report under § 16-973(A) and forty-eight missed Supplemental Reports under § 16-973(B). The factual basis is set forth in Sections II and III.

2. R2-20-809(C)(2): This complaint identifies Fortify AZ (Arizona Secretary of State Committee ID 102154) as the entity alleged to have committed the violations, and American Federation for Children as the intermediary or original source of the funds.

3. R2-20-809(C)(3): This complaint includes supporting documentation. Every triggering disbursement and every triggering contribution is documented on Fortify AZ's own publicly filed reports with the Secretary of State, viewable on seethemoney.az.gov as Filer ID 102154.

4. R2-20-809(C)(4): Each factual allegation identifies its evidentiary basis (personal knowledge or information and belief). All factual allegations rest on personal knowledge from direct review of public records.

5. The contents of this complaint are sworn and will be notarized before filing, as set forth in the Verification page attached hereto.

II. Factual Background

A. The Respondent

1. I, [REDACTED], am a qualified voter registered in Maricopa County, Arizona (A.A.C. R2-20-809(A)). I am eligible to file this complaint pursuant to A.R.S. § 16-977(A).

2. **Based on personal knowledge and direct review of public records:** Fortify AZ is a political committee registered with the Arizona Secretary of State under Committee ID 102154. Its registered address is **2211 E Highland Avenue, Suite 210, Phoenix, AZ 85016** — the office of InCompliance LLC, the compliance shop principally identified with treasurer Ashley Ragan.

3. **Based on personal knowledge:** Fortify AZ is the registered applicant for an Arizona ESA / school-voucher ballot initiative filed with the Secretary of State for the November 2026 General Election ballot. The initiative is widely reported in Arizona media as one of two competing ESA reform measures circulating in the 2026 cycle. Coverage includes KJZZ ("Groups spend millions to shape Arizona school voucher reform," April 20, 2026); AZ Capitol Times ("Dueling ballot proposals compete to reform Arizona's ESA program," March 20, 2026); AZ Family ("Arizona school voucher ballot measures spark confusion claims," March 25, 2026); and AZ Luminaria ("Competing ESA reform propositions seek ballot spots, sow confusion," May 1, 2026). Each of those publications independently reports that Fortify AZ is funded by **American Federation for Children**.

B. Campaign Media Spending and the Initial Threshold

4. **Based on personal knowledge and direct review of Fortify AZ's publicly filed Schedule E1 disbursements (SeeTheMoney Filer ID 102154, 2026 cycle):** Fortify AZ has made three disbursements totaling \$1,257,000.00 — every one of them payments to vendors directly engaged in the paid circulation of, or paid media supporting, the initiative petition.

#	Date	Amount	Vendor	Cumulative cycle total
1	2026-03-17	\$200,000.00	AZ Petition Partners (paid signature-gathering firm, Tempe AZ)	\$200,000.00
2	2026-03-24	\$1,050,000.00	AZ Petition Partners	\$1,250,000.00
3	2026-03-25	\$7,000.00	Marson Media (Phoenix AZ)	\$1,257,000.00

5. Based on personal knowledge: Cycle-to-date campaign media spending equals **\$1,257,000.00**. Every dollar of that figure was paid to vendors engaged in promoting the circulation of an Arizona statewide ballot-measure petition. The applicable VRKA threshold under A.R.S. § 16-973(A) is **\$50,000** for a statewide campaign. That threshold was crossed in a single transaction on **March 17, 2026** — the \$200,000 payment to AZ Petition Partners.

C. Petition Circulation Is "Campaign Media Spending"

6. A.R.S. § 16-971(2) defines "campaign media spending" by reference to a list of qualifying activities. Two of those activities directly reach Fortify AZ's \$1,257,000 in disbursements to AZ Petition Partners and Marson Media:

a. § 16-971(2)(a)(iv) — qualification advocacy. Section 16-971(2)(a) provides that "campaign media spending" "[m]eans spending monies or accepting in-kind contributions to pay for any of the following: ... (iv) A public communication that promotes, supports, attacks or opposes the qualification or approval of any state or local initiative or referendum." Each paid signature solicitation in a paid signature-gathering operation is a public communication: a paid circulator approaches a member of the public, presents the proposed initiative text, and expressly asks the voter to support its qualification by signing the petition. The paid mass-circulation of an Arizona statewide initiative petition, distributed by paid commercial circulators on the public street, in shopping-center parking lots, at community events, and door-to-door, is on the face of (a)(iv) "[a] public communication that promotes ... the qualification ... of any state or local initiative." The statute's use of the disjunctive "qualification or approval" demonstrates that the legislature contemplated and reached two distinct phases — the qualification phase (signature-gathering and other pre-ballot activity to qualify a measure for the ballot) and the approval phase (post-qualification voting). Both phases are within scope.

b. § 16-971(2)(a)(vii) — activities in conjunction with qualification advocacy. Section 16-971(2)(a)(vii) further provides that "campaign media spending" includes spending for "[r]esearch, design, production, polling, data analytics, mailing or social media list acquisition or any other activity conducted in preparation for or in conjunction with any of the activities described in items (i) through (vi) of this subdivision." Even if a paid signature-gathering operation is not itself characterized as a "public communication" under (a)(iv) standing alone, the operation is, on any reasonable reading, "an activity conducted in preparation for or in conjunction with" the (a)(iv) qualification advocacy. The paid signature-gatherer's entire purpose is to qualify the initiative covered by subpart (iv); paying a commercial signature-gathering firm to conduct that operation is the textbook case of (a)(vii) "in conjunction with" spending. Fortify AZ's \$1,250,000 to AZ Petition Partners and \$7,000 to Marson Media for petition-related media work both fall within (a)(vii).

7. Under either subpart standing alone, and certainly under both read together, Fortify AZ's \$1,257,000 in disbursements is "campaign media spending" within the meaning of A.R.S. § 16-971(2). Any argument that paid signature-gathering for a not-yet-qualified initiative falls outside the Act would read the word "qualification" out of (2)(a)(iv) and ignore the "in conjunction with" hook in (2)(a)(vii); both readings are foreclosed by the statute's plain text.

8. **A.R.S. § 16-971(7)** defines "covered person" as follows:

(a) Means any person whose total campaign media spending or acceptance of in-kind contributions to enable campaign media spending, or a combination of both, in an election cycle is more than \$50,000 in statewide campaigns or more than \$25,000 in any other type of campaigns. For the purposes of this chapter, the amount of a person's campaign media spending includes campaign media spending made by entities established, financed, maintained or controlled by that person.

(b) Does not include:

(i) Individuals who spend only their own personal monies for campaign media spending.

(ii) Organizations that spend only their own business income for campaign media spending.

(iii) A candidate committee.

(iv) A political action committee or political party that receives not more than \$20,000 in contributions, including in-kind contributions, from any one person in an election cycle.

Fortify AZ became a covered person under § 16-971(7)(a) on March 17, 2026 — the date of its first \$200,000 disbursement to AZ Petition Partners — and remains so. Each of the (b) carve-outs is inapplicable on the face of Fortify AZ's own filings:

- **(b)(i) does not apply.** Fortify AZ is a registered political committee, not an individual spending personal monies.
- **(b)(ii) does not apply.** Fortify AZ is funded by transferred contributions from American Federation for Children (\$1,300,000), not by Fortify AZ's own business income.
- **(b)(iii) does not apply.** Fortify AZ is not a candidate committee.
- **(b)(iv) does not apply.** Fortify AZ received \$1,300,000 in contributions from a single person — American Federation for Children — in the 2026 election cycle. That amount is sixty-five times the \$20,000 single-donor cap that defines the (b)(iv) carve-out. The two-contribution split into a \$250,000 transfer on March 17 and a \$1,050,000 transfer on March 23 does not save the carve-out, because (b)(iv) operates on a cycle-aggregate per-person basis ("not more than \$20,000 in contributions ... from any one person in an election cycle"), and AFC's cycle-aggregate to Fortify AZ is \$1,300,000.

D. The Funder: American Federation for Children

9. Based on personal knowledge and direct review of Fortify AZ's publicly filed Schedule C (income) (SeeTheMoney Filer ID 102154, 2026 cycle): Fortify AZ has received exactly two contributions in the 2026 cycle, both from a single source:

#	Date	Amount	Source	City, State
1	2026-03-17	\$250,000.00	American Federation for Children	Washington, DC
2	2026-03-23	\$1,050,000.00	American Federation for Children	Washington, DC
		\$1,300,000.00		

10. Based on personal knowledge and public records: American Federation for Children Inc. is a 501(c)(4) tax-exempt social welfare organization (EIN 33-0627955). AFC's IRS-registered principal office

is in Columbia, Maryland; AFC's political office (the address used on Fortify AZ's Schedule C filing) is in Washington, DC. As a 501(c)(4) entity, AFC is permitted by federal tax law to engage in lobbying and political activity but is not required by federal tax law to publicly disclose its donors. AFC's tax status is confirmed by ProPublica's Nonprofit Explorer (project record at projects.propublica.org/nonprofits/organizations/330627955).

11. Based on personal knowledge: The structural feature of the contribution stream is **same-day pass-through**:

Date	Inflow (AFC → Fortify AZ)	Outflow (Fortify AZ → vendor)
2026-03-17	\$250,000 received	\$200,000 disbursed (same day)
2026-03-23	\$1,050,000 received	—
2026-03-24	—	\$1,050,000 disbursed (next business day)
2026-03-25	—	\$7,000 disbursed

The committee received \$250,000 from AFC and disbursed \$200,000 to the petition vendor **on the same day**, then received an additional \$1,050,000 from AFC and disbursed exactly \$1,050,000 to the same petition vendor **the next business day**. The retained float between the two windows is approximately \$43,000 — i.e., the only transactions on Fortify AZ's books in the 2026 cycle as of the date of this complaint are an inbound transfer from a single 501(c)(4) and an outbound payment to a paid signature-gathering firm. The committee has no other operational activity, no other donors, and no other vendors. It exists, on the face of its filings, as a one-purpose pass-through.

E. Fortify AZ Has Filed Zero VRKA Reports

12. Based on personal knowledge and direct review of the VRKA filings index at azsos.gov/elections/campaign-finance/vrka-reporting, confirmed May 7, 2026: Fortify AZ does not appear on the VRKA filer list for the 2025 or 2026 election cycle. The committee has not filed an Initial Report, a Supplemental Report, or an Amended Report.

13. American Federation for Children does not appear on the VRKA filer list either. To the extent AFC's \$1.3 million contribution to Fortify AZ is itself subject to VRKA disclosure as an intermediary's transfer of monies for campaign media spending, no such disclosure has been made.

F. The § 16-973(I) Safe Harbor Does Not Apply Because the Required Intermediary-Tracing Disclosure Is Not Included

14. Based on personal knowledge and direct review of Fortify AZ's periodic Schedule C entries: Fortify AZ's only Schedule C entries for the 2026 cycle are the two contributions of record from American Federation for Children (Washington, DC) on March 17 and March 23, 2026, totaling **\$1,300,000**. American Federation for Children Inc. is a 501(c)(4) social welfare organization (EIN 33-0627955). According to AFC's most recent publicly available IRS Form 990, as reported by ProPublica's Nonprofit Explorer, **97.3%** of AFC's approximately \$11.8 million in annual revenue is reported as contributions, with \$0 in program-service revenue and approximately 1.8% from investment income. This revenue mix is, on its face, consistent with an organization that pools contributions from underlying donors and transfers those pooled monies to other entities — and on information and belief based on AFC's publicly filed 990, the \$1,300,000 transferred to Fortify AZ consists overwhelmingly of contributed monies AFC received from underlying donors rather than AFC's own commercial revenue. The actual composition of the \$1,300,000 transfer is a factual question within AFC's own books and within the Commission's authority to resolve.

15. A.R.S. § 16-973(A)(7) specifically and independently requires a covered person to disclose "the identity of each person that acted as an intermediary and that transferred, in whole or in part, traceable monies of more than \$5,000 from original sources to the covered person and the date, amount and source, both original and intermediate, of the transferred monies." A.R.S. § 16-972(D) places a parallel obligation on AFC itself, as a >\$5,000 donor of traceable monies, to disclose to Fortify AZ "the identity of each other person that directly or indirectly contributed more than \$2,500 in original monies being transferred" — but only on Fortify AZ's written request, of which the public record contains no evidence. Fortify AZ's periodic Schedule C lists AFC by name as the contributor of record. The SOS-prescribed Schedule C format contains fields for donor name, address, date, amount, and cumulative — but no field for intermediary identification, no field for original-source tracing, and no field to indicate whether a contribution consists of the donor's own original monies or monies the donor received from other contributors. The structural absence of those fields means the periodic Schedule C cannot, on its face, "include" the intermediary-tracing disclosure that § 16-973(A)(7) requires and § 16-973(I) makes a condition of the safe harbor. The safe harbor language at A.R.S. § 16-973(I) is conditioned on inclusion of "the disclosures required by this section ... **including the requirement to identify the original sources of traceable monies who gave, directly or indirectly, and any intermediaries who transferred, directly or indirectly, more than \$5,000 in traceable monies.**" The condition is not satisfied where (a) the contributor of record's own publicly filed 990 indicates a revenue mix structurally consistent with intermediary status, and (b) the periodic-report format provides no field to disclose either intermediary status or original sources behind the contribution.

III. Violations of the Voters' Right to Know Act

The Commission's rule for computing deadlines, A.A.C. R2-20-802, excludes the day of the triggering event and — where the deadline is five days or fewer — excludes Saturdays, Sundays, and legal holidays observed by the State.

Violation 1 — Failure to File Initial VRKA Report (A.R.S. § 16-973(A))

16. A.R.S. § 16-973(A) requires a covered person to file an Initial disclosure report within five days of first spending monies or accepting in-kind contributions for campaign media spending totaling \$50,000 or more for a statewide campaign.

17. Fortify AZ's March 17, 2026 payment of \$200,000 to AZ Petition Partners — paid signature-gathering for promoting the qualification of a statewide ballot measure — met the statewide threshold in a single transaction.

18. Applying R2-20-802: excluding the day of the triggering event (Tue Mar 17, 2026); excluding weekends (Mar 21–22), the five business days run Mar 18, 19, 20, 23, and **24**. The Initial Report was due **Tuesday, March 24, 2026**.

19. No Initial Report has been filed. The violation has persisted for **approximately forty-four days** as of the date of this complaint and continues to grow as long as the petition drive continues.

Violations 2 through 49 — Failure to File Supplemental VRKA Reports (A.R.S. § 16-973(B)) (pleaded in the alternative)

20. Alternative pleading. A.R.S. § 16-973(B) opens "After a covered person makes an initial report, each time the covered person spends monies or accepts in-kind contributions totaling an additional \$25,000 or more...." On a literal reading of that opening clause, Supplemental obligations under § 16-973(B) do not accrue until after an Initial report has been filed under § 16-973(A). On that reading, the late-Initial violation in Violation 1 above is the sole § 16-973 violation, and Fortify AZ stands in continuous violation of § 16-973(A) without separate Supplemental obligations attaching.

21. Complainant pleads the forty-eight § 16-973(B) Supplemental violations in the alternative — under a contrary reading on which contemporaneous Supplemental obligations attach to additional \$25,000 increments crossed during a period when an Initial is overdue or unfiled. Under either reading, the **penalty range under A.R.S. § 16-976(A) is unchanged** because the civil penalty is one to three times the amount of undisclosed campaign media spending — not the count of missed filings — and the undisclosed amount of \$1,257,000 is captured by the § 16-973(A) Initial violation alone.

22. Under the alternative-pleading reading, A.R.S. § 16-973(B) requires a covered person to file a Supplemental Report within three days after each additional \$25,000 in cumulative campaign media spending. Fortify AZ's cumulative campaign media spending crossed forty-eight separate \$25,000 thresholds between March 17 and March 25, 2026. The 2026-03-17 AZ Petition Partners \$200,000 expenditure alone crossed the Initial \$50,000 threshold and **six** additional \$25,000 thresholds (\$75K, \$100K, \$125K, \$150K, \$175K, \$200K) in a single day. The 2026-03-24 AZ Petition Partners \$1,050,000 expenditure crossed **forty-two** additional \$25,000 thresholds (\$225K through \$1,250K) in a single day. The 2026-03-25 Marson Media \$7,000 expenditure crossed zero additional thresholds.

23. Total: forty-eight missed Supplemental Reports, bringing the cycle total to forty-nine missed VRKA filings when combined with the missed Initial.

IV. Penalty Considerations

24. Under A.R.S. § 16-976(A), the civil penalty for a VRKA violation is between one and three times the amount of the undisclosed contribution or campaign media spending. Fortify AZ's undisclosed campaign media spending is **\$1,257,000.00**:

	Amount
Statutory minimum (1x undisclosed, A.R.S. § 16-976(A))	\$1,257,000.00
Statutory maximum (3x undisclosed, A.R.S. § 16-976(A))	\$3,771,000.00
1% surcharge to Clean Elections Fund (A.R.S. § 16-976(C); at max)	\$37,710

25. Under A.R.S. § 16-977(C): "In any matter in which the civil penalty for the alleged violation could be greater than \$50,000, any claim or defense by the commission of prosecutorial discretion is not a basis for dismissing or failing to act on the complaint." The minimum civil penalty in this matter (\$1,257,000) exceeds the \$50,000 threshold by more than **twenty-five-fold. Prosecutorial discretion is not available in this matter.**

26. Under A.R.S. § 16-977(B): "If the commission determines that the complaint, if true, states the factual basis for a violation of this chapter or rules adopted pursuant to this chapter, the commission shall investigate the allegations." The threshold determination is straightforward on the face of this complaint: Fortify AZ's own SOS Schedule E1 documents each triggering disbursement; Fortify AZ's own Schedule C documents the \$1.3 million inflow from AFC; the Commission's own VRKA filings index confirms Fortify AZ has filed nothing. Investigation is therefore mandatory.

V. Statutory Timeline and Demands

I am providing the Commission with the following timeline expectations based on the Commission's own rules:

Action Required	Rule	Deadline
Jurisdictional review and determination	R2-20-809(D)	May 14, 2026
Assign complaint number, confirm receipt	R2-20-809(F)	May 14, 2026
Send respondent copy of complaint	R2-20-810(A)	May 21, 2026
Respondent response deadline	R2-20-810(A)(3)	June 22, 2026 (the next business day after the 30-day count of June 20, a Saturday, per R2-20-802(3))
90-day statutory deadline	A.R.S. § 16-977(C)	August 5, 2026

I request written confirmation of receipt and assignment of a complaint number pursuant to R2-20-809(F) no later than May 14, 2026.

Under A.R.S. § 16-977(C), if the Commission has not taken enforcement action within ninety days after the filing of the complaint, the complainant may bring a civil action to enforce the provisions of the article. The 90-day clock begins May 7, 2026 and runs through **August 5, 2026** — approximately one month after the July 2, 2026 initiative-filing deadline.

VI. Note on Dismissal Authority

The Commission's enforcement framework contains two rules under which the Executive Director can close a complaint without full Commission review. Neither permits dismissal of this complaint on its face.

A.A.C. R2-20-206(A)(3) sits in Article 2 of the Commission's rules. By Article 2's own scope clause, R2-20-201, "These rules provide procedures for processing possible violations of the Citizens Clean Elections Act." Article 2 does not on its face reach Voters' Right to Know Act complaints. Article 8 (R2-20-809 through R2-20-813), governing VRKA complaints, was adopted unanimously in October 2023 specifically because Article 2 did not reach VRKA matters.

A.A.C. R2-20-811(F) does sit in Article 8 and provide that "the Executive Director may dismiss the complaint at any time," including upon completion of an investigation that does not substantiate the allegations. R2-20-811(F) cannot be applied to dismiss the present complaint, for two independent reasons:

1. R2-20-811(F)'s "upon completion of an investigation" language presupposes an investigation having occurred. The rule contemplates dismissal *after* the Executive Director has investigated — not pre-investigation screening on the papers.

2. A.R.S. § 16-977(C) overrides any discretionary dismissal authority in matters where the civil penalty could exceed \$50,000. Discretionary dismissal under R2-20-811(F) is, on its face, an exercise of prosecutorial discretion. Where § 16-977(C)'s prohibition applies — as it does here, because the minimum civil penalty in this matter is \$1,257,000, more than twenty-five-fold the \$50,000 threshold — R2-20-811(F)'s discretionary authority must yield to the statutory prohibition.

This complaint rests entirely on documentary evidence drawn from the Commission's own public-record system: Fortify AZ's own Schedule E1 entries in Fortify AZ's own SOS campaign-finance reports show each triggering expenditure; Fortify AZ's own Schedule C entries show the \$1.3 million inflow from AFC; and the Commission's own VRKA filings index confirms Fortify AZ has filed nothing. There is no factual question to investigate.

VII. Requested Action

I respectfully request that the Commission:

1. Determine that Fortify AZ **violated A.R.S. § 16-973(A)** by failing to file an Initial VRKA Report on or before March 24, 2026, following the crossing of the \$50,000 statewide threshold in the March 17, 2026 payment to AZ Petition Partners;
2. Determine that Fortify AZ **violated A.R.S. § 16-973(B) on forty-eight separate occasions** by failing to file Supplemental VRKA Reports within three days of each \$25,000 cumulative threshold crossed between March 17 and March 25, 2026;
3. Determine that the A.R.S. § 16-973(I) safe harbor does not apply because Fortify AZ's periodic SOS campaign finance reports do not contain the disclosures required by A.R.S. § 16-973(A);
4. Determine that **paid signature-gathering for a proposed statewide ballot initiative is "campaign media spending" under A.R.S. § 16-971(2)(a)(iv) and (a)(vii)**, including for purposes of confirming the §§ 16-971(7) and 16-973(A) covered-person and statewide-threshold determinations;
5. Determine that **a 501(c)(4) nonprofit corporation that contributes more than \$5,000 of monies to a covered person engaged in campaign media spending is an intermediary or original source whose own donors must be traced and disclosed** under A.R.S. § 16-973(A)(6) and (A)(7);
6. Impose civil penalties under A.R.S. § 16-976(A) of between \$1,257,000 (1x) and \$3,771,000 (3x) the amount of undisclosed campaign media spending, plus the 1% surcharge to the Clean Elections Fund;

7. Require Fortify AZ to file complete retroactive VRKA disclosures — one Initial and forty-eight Supplementals, or equivalent compliant filings — identifying every donor of original monies over \$5,000 with source-tracing through American Federation for Children to its underlying donors, the Campaign Media Spending Manager, traceable-monies on hand at each reporting point, and every disbursement recipient receiving \$10,000 or more, as required by A.R.S. § 16-973(A);

 8. Require American Federation for Children, as the intermediary whose \$1.3 million transfer to Fortify AZ funded the campaign media spending at issue, to disclose **the original sources** of the monies it transferred to Fortify AZ — i.e., AFC's own donors whose contributions were used, in whole or in part, to fund the \$1.3 million transferred to Fortify AZ — under A.R.S. § 16-972 and § 16-973(A)(6);

 9. Apply the factual presumption under A.A.C. R2-20-807 against Fortify AZ to the extent it has failed to maintain records sufficient to allow retroactive compliance;

 10. Confirm that prosecutorial discretion is unavailable in this matter under A.R.S. § 16-977(C). The minimum civil penalty of \$1,257,000 exceeds the \$50,000 threshold by more than twenty-five-fold;

 11. Refer this complaint to the full Commission for a vote — do not dismiss at the staff level under R2-20-206(A)(3) for the reasons set forth in Section VI;

 12. Provide written confirmation of receipt and a complaint number pursuant to R2-20-809(F) no later than May 14, 2026.
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VIII. Exhibits

- **Exhibit A** — Screenshot of the Commission's VRKA filings index at azsos.gov/elections/campaign-finance/vrka-reporting captured on May 7, 2026, confirming the absence of any VRKA filings by Fortify AZ or American Federation for Children.

- **Exhibit B** — Fortify AZ Schedule C (Income) for the 2026 cycle, on file with the Arizona Secretary of State as part of the periodic report filings of Filer ID 102154, showing two contributions from

American Federation for Children (Washington, DC): \$250,000 on 2026-03-17 and \$1,050,000 on 2026-03-23.

- **Exhibit C** — Fortify AZ Schedule E1 (Operating Expenses) for the 2026 cycle, on file with the Arizona Secretary of State as part of the periodic report filings of Filer ID 102154, showing three disbursements: \$200,000 to AZ Petition Partners on 2026-03-17, \$1,050,000 to AZ Petition Partners on 2026-03-24, and \$7,000 to Marson Media on 2026-03-25 — all categorized as "Operating Expense - Pay Cash/Check."
- **Exhibit D** — ProPublica Nonprofit Explorer record for American Federation for Children Inc. (EIN 33-0627955), confirming 501(c)(4) tax status.
- **Exhibit E** — Compilation of public news coverage identifying Fortify AZ as the registered applicant for an Arizona ESA / school-voucher ballot initiative funded by American Federation for Children (KJZZ, AZ Capitol Times, AZ Family, AZ Luminaria, March–May 2026).

Respectfully submitted,

[REDACTED]

[EMAIL REDACTED]

[PHONE REDACTED]

[CITY REDACTED]

VERIFICATION

State of Arizona

County of Maricopa

I, [REDACTED], state that I have read the foregoing complaint and know the contents thereof by personal knowledge derived from direct review of public records — specifically Fortify AZ's campaign finance filings with the Arizona Secretary of State (Filer ID 102154); the Commission's VRKA filings index; ProPublica's publicly available record of American Federation for Children Inc.'s 501(c)(4) tax status; and Arizona news reporting cited herein. No factual allegation rests on unverified second-hand information.

I declare under penalty of perjury under the laws of the State of Arizona that the foregoing complaint is true and correct.

[REDACTED]

Date: May 7, 2026

NOTARIZATION

State of Arizona

County of Maricopa

Subscribed and sworn to before me this _____ day of _____, 2026.

Notary Public

My Commission Expires: _____

Exhibit A

Screenshot of the Citizens Clean Elections Commission / Arizona Secretary of State
Voters' Right to Know Act (VRKA) filings index at
azsos.gov/elections/campaign-finance/vrka-reporting

Captured May 7, 2026

Showing the most recent VRKA filings of record. The exhibit confirms the absence of any VRKA filings by Fortify AZ (Filer ID 102154) or American Federation for Children. Verified across all eight pages of the public index (programmatic verification, May 7, 2026): no entry on any page matches "Fortify" or "American Federation for Children."



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NOTICE

- » **Candidate Portal** will be unavailable for scheduled maintenance the morning of Wednesday, May 6, 2026. (Notice pursuant to A.R.S. § [16-316](#); cf [16-318](#).)
- » **Business Services** applications, including, but not limited to, Notary, UCC, Trade Name and Trademark, and Partnerships are currently experiencing intermittent service.

We apologize for the inconvenience. Thank you for your patience and understanding.

May 25, 2026

Closed for Memorial Day

June 22, 2026

Last day to register to vote in the July 21, 2026 Primary Election at 11:59 p.m.

June 24, 2026

Early voting begins and early ballots mailed

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Voters Right to Know Act (VRKA) Reporting

Voters Right to Know Reporting

The Voters Right to Know Act (VRKA) requires a covered person to file certain disclosures regarding campaign media spending. There are three types of disclosures available to filers. [Initial Report of Campaign Media Spending](#), [Supplemental Report of Campaign Media Spending](#), and [Amended Report of Campaign Media Spending](#).

While a covered person must file with the Office of the Secretary of State, the Citizens Clean Elections Commission has primary enforcement authority under the VRKA.

- » [VRKA Guide](#)

Instructions for Filing

- » Complete the fillable PDF
 - » Be sure to sign and date it
- » Email the completed (signed and dated) form to CampaignFinance@azsos.gov

Completed reports will be posted to this page within 24 hours of receipt

Filed Reports

Depending on your browser/system settings, when clicking on files, you may be asked to download files to your system or it may download automatically to a directory you've

set. This is based on individual browser and user settings.

Filer Name/Title

Search After

Items per page 25

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30 Mar 2026	Arizonans for Responsible Growth	Initial 3.30.2026_Arizonans_for_Responsible_Growth.pdf
20 Mar 2026	Arizonan's for Responsible Growth	Initial 3.20.2026_Arizonans_for_Responsible_Growth_0.pdf
17 Mar 2026	Chispa AZ PAC	Initial 3.17.2026_Chispa_AZ_PAC.pdf
11 Mar 2026	Chispa AZ PAC	Initial 03.11.2026_Chispa_AZ_PAC.pdf
19 Dec 2025	Mi Familia Vota	Initial 12.19.2025_Mi_Familia_Vota.pdf
11 Dec 2025	Win Arizona	Initial 12.11.2025_Win_Arizona_0.pdf
7 Nov 2025	Yes on 409 - Behavioral Health & Emergency Care	Supplemental 11.7.2025_Yes_On_409.pdf
29 Oct 2025	Turning Point PAC - Arizona	Supplemental 10.29.2025_Turning_Point_PAC.pdf
24 Oct 2025	Yes on 409 - Behavioral Health & Emergency Care	Supplemental 10.24.2025_Yes_on_409_0.pdf
10 Oct 2025	Yes on 409 - Behavioral Health & Emergency Care	Supplemental 10.10.2025_Yes_on_409.pdf
3 Oct 2025	Yes on 409 - Behavioral Health & Emergency Care	Supplemental Yes on 409 - Behavioral Health & Emergency Care
26 Sep 2025	Yes on 409 - Behavioral Health & Emergency Care	Supplemental Yes on 409 Sep 26, 2025
19 Sep 2025	Yes On 409 - Behavioral Health & Emergency care	Supplemental 9.19.2025_Yes_On_409_0.pdf
12 Sep 2025	Yes on 409 - Behavioral Health & Emergency Care	Initial 9.12.2025_Yes_On_409.pdf
29 Jul 2025	Turning Point PAC Inc	Initial 7.29.2025_Turning_Point_PAC.pdf
2 Jul 2025	National Association of Realtors Fund	Initial 7.2.2025_National_Association_of_Realtors_Fund.pdf
26 Jun 2025	National Association of Realtors Fund	Initial 6.26.2025_National_Realtors_Association_Fund.pdf
23 May 2025	Parks Not Parking Lots	Amended 5.23.2025_Parks_Not_Parking_Lots.pdf
2 May 2025	Parks Not Parking Lots	Initial 5.2.2025_Parks_Not_Parking_Lots_2.pdf

15 Apr 2025	Tucson Metro Chamber PAC	Supplemental 4.15.2025_Tucson_Metro_Chamber_PAC_0.pdf	Chat with us
11 Mar 2025	Tucson Metro Chamber PAC	Amended 3.11.2025_Tucson_Metro_Chamber_PAC.pdf	
5 Mar 2025	Tucson Metro Chamber PAC	Supplemental 3.5.2025_Tucson_Metro_Chhamber_PAC.pdf	
21 Feb 2025	Tucson Metro Chamber PAC	Supplemental 2.21.2025_Tucson_Metro_Chamber_PAC.pdf	
19 Feb 2025	Opportunity Arizona	Amended 2.19.2025_Opportunity_Arizona.pdf	
17 Feb 2025	Tucson Metro Chamber PAC	Amended 2.17.2025_Tucson_Metro_Chamber_PAC_0.pdf	

1 2 3 4 5 6 7 8 9 Next » Last »

Election Resources

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- » [Voter Registration Form](#) - English/Español (PDF)
- » [Large Print, Accessible Voter Registration Form \(Instructions\)](#) - English (PDF)
- » [No Residence Address Confirmation](#) - English (PDF)
- » [AZ Procedure for Restoring Voting Rights](#)
- » [SOS Citizen Engagement Manual](#) - English (PDF) 
- » [E-Qual | Equal Guide](#) - English (PDF)
- » [Signature Verification Guide \(2024\) \(2020\)](#)
- » [County Recorder Petition Signature Verification Guide 2021](#)
- » [Election Complaint Form](#) - English (PDF)
- » [National Mail Voter Registration Form](#) - English (PDF)
- » [Maricopa County Wait Time Reduction Plan](#) - English (PDF)
- » [ServiceArizona Guide](#) - English (PDF) | [AZMVDNow Guide](#) - English (PDF)
- » [Guidance on Polling Place Conduct](#)
- » [Unofficial Election Night Results Help](#)

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- + How do I register to vote?
- + Where is my polling location?
- + What do I need to bring with me on election day?
- + I am experiencing issues registering to vote or updating my voter information on AZMVDNow. How do I proceed?
- + Do I need to put a stamp or extra postage to mail my ballot back?

- + I lost or damaged my ballot-by-mail. How do I get a replacement ballot?
- + I will be out of town during the election. Will USPS forward my ballot-by-mail to my temporary-away address?
- + How do I track my ballot status?
- + Who do I contact if I have more questions?

Contact Elections

Office of the Secretary of State
Elections Division
1700 W Washington St Fl 7
Phoenix AZ 85007-2808

602-542-8683
1-877-THE VOTE

[Email Elections](#)



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Arizona Secretary of State

1700 W Washington St, Fl 7
Phoenix AZ 85007

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602-542-4285

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1-877-THE VOTE

Business Services:

602-542-6187

Exhibit B


Fortify AZ Schedule C (Income) for the 2026 cycle

Captured from the Arizona Secretary of State public-disclosure portal
(seethemoney.az.gov) for Filer ID 102154 on May 5, 2026.

Shows two contributions from American Federation for Children (Washington, DC):

- \$250,000 on 2026-03-17
- \$1,050,000 on 2026-03-23

These two contributions constitute Fortify AZ's entire disclosed income for the 2026 cycle.

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- Individual Contributors
- Vendors

Fortify Az

Details

Start Year: End Year: Table View:

PAC Income

Search Show entries

Page of 1

	Date	Received From Name	Amount	Transaction Type
	3/23/2026	American Federation For Children	\$1,050,000.00	Contributions from Corps and LLCs
	3/17/2026	American Federation For Children	\$250,000.00	Contributions from Corps and LLCs

Showing 1 to 2 of 2 entries

Page of 1

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Exhibit C


Fortify AZ Schedule E1 (Operating Expenses) for the 2026 cycle

Captured from the Arizona Secretary of State public-disclosure portal
(seethemoney.az.gov) for Filer ID 102154 on May 5, 2026.

Shows three disbursements:

- \$200,000 to AZ Petition Partners on 2026-03-17
- \$1,050,000 to AZ Petition Partners on 2026-03-24
- \$7,000 to Marson Media on 2026-03-25

All three disbursements are categorized as 'Operating Expense - Pay Cash/Check.'
Schedule E2 (Independent and Ballot Measure Expenditures) is empty for the 2026
cycle.

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Fortify Az

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Start Year: End Year: Table View:

PAC Expense

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Page of 1

	Date	Paid To Name	Amount	Transaction Type
	3/25/2026	Marson Media	\$7,000.00	Operating Expense - Pay Cash/Check
	3/24/2026	Az Petition Partners	\$1,050,000.00	Operating Expense - Pay Cash/Check
	3/17/2026	Az Petition Partners	\$200,000.00	Operating Expense - Pay Cash/Check

Showing 1 to 3 of 3 entries

Page of 1

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Exhibit D

ProPublica Nonprofit Explorer record for American Federation for Children Inc. (EIN 33-0627955)

Captured from projects.propublica.org/nonprofits/organizations/330627955 on May 5, 2026.

Confirms 501(c)(4) tax-exempt social-welfare-organization status. Donations are not tax-deductible. Under federal tax law, a 501(c)(4) is permitted to engage in lobbying and political activity but is not required to publicly disclose its donors -- making the VRKA's original-source tracing requirement (A.R.S. Section 16-973(A)(6)) the only mechanism by which Arizona voters can learn the underlying individual or entity sources whose monies funded the \$1.3 million transferred from AFC to Fortify AZ.

American Federation For Children Inc

Columbia, MD • Tax-exempt since May 1996 • EIN: 33-0627955

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Receive an email when new data is available for this organization.

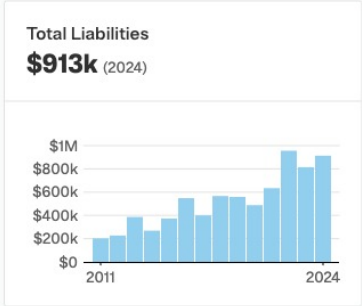
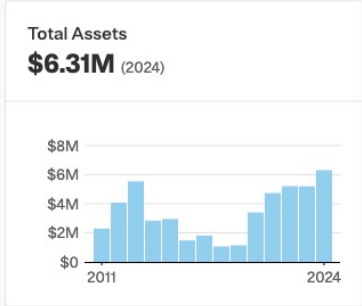
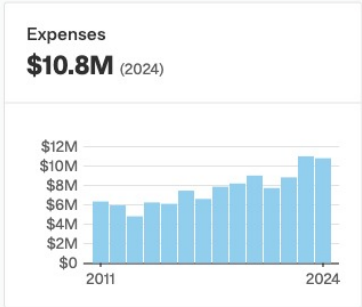
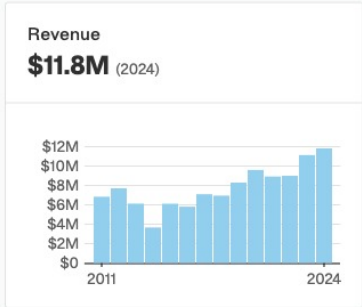
Type of Nonprofit

Designated as a 501(c)(4)

Civic leagues, social welfare organizations and local associations of employees, created to promote community welfare for charitable, educational or recreational purposes.

Category: Educational Institutions and Related Activities / Alliance/Advocacy Organizations (NTEE).

Donations to this organization are not tax deductible.



Source: Form 990 tax filings from 2011 to 2024

Tax Filings by Year

Form 990 is an information return that most organizations claiming federal tax-exempt status must file yearly with the IRS. [Show more](#)

See an issue with the data?

[Contact Us](#)

Fiscal Year Ending Dec.

2024

Revenue	\$11,825,233	
Expenses	Net Income	Net Assets
\$10,808,906	\$1,016,327	\$5,400,212
Notable Sources of Revenue		
Contributions	\$11,502,035	97.3%
Program Services	\$0	
Investment Income	\$213,252	1.8%
Bond Proceeds	\$0	
Royalties	\$0	
Rental Property Income	\$0	
Net Fundraising	\$0	

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Filed on Sept. 22, 2025

Primary tax return for a nonprofit's activities, finances, and governance

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Sales of Assets	\$49,506	0.4%
Net Inventory Sales	\$0	
Other Revenue	\$60,440	0.5%
Notable Expenses		
		Percent of Total Expenses
Executive Compensation	\$1,101,422	10.2%
Professional Fundraising Fees	\$94,123	0.9%
Other Salaries and Wages	\$2,099,399	19.4%
Assets/Debt		
Total Assets	\$6,313,490	
Total Liabilities	\$913,278	
Net Assets	\$5,400,212	

Compensation

Key Employees and Officers	Compensation	Related	Other
Thomas Schultz (Chief Executive Officer)	\$383,293	\$0	\$44,649
Elisa Clements Linde (Chief Operating Officer)	\$350,522	\$0	\$17,600
Ryan Cantrell (Vp Government Affairs)	\$316,320	\$0	\$51,974

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Fiscal Year Ending Dec.

2023

Revenue	\$11,135,289	
Expenses	Net Income	Net Assets
\$11,010,965	\$124,324	\$4,383,885
Notable Sources of Revenue		
		Percent of Total Revenue
Contributions	\$11,079,560	99.5%
Program Services	\$0	
Investment Income	\$83,716	0.8%
Bond Proceeds	\$0	
Royalties	\$0	
Rental Property Income	\$0	
Net Fundraising	\$0	
Sales of Assets	-\$40,420	

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Filed on Nov. 4, 2024

Primary tax return for a nonprofit's activities, finances, and governance

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Net Inventory Sales	\$0	
Other Revenue	\$12,433	0.1%
Notable Expenses		
Percent of Total Expenses		
Executive Compensation	\$1,057,681	■ 9.6%
Professional Fundraising Fees	\$177,543	1.6%
Other Salaries and Wages	\$1,671,731	■ 15.2%
Assets/Debt		
Total Assets	\$5,198,587	
Total Liabilities	\$814,702	
Net Assets	\$4,383,885	

Compensation

Key Employees and Officers	Compensation	Related	Other
Thomas Schultz (Chief Executive Officer)	\$404,096	\$0	\$32,333
Mark Z Dawes (Special Advisor)	\$352,472	\$0	\$53,240
Elisa Clements (Chief Operating Officer)	\$331,094	\$0	\$24,870

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Fiscal Year Ending Dec.

2022

Revenue	\$8,995,479	
Expenses		
\$8,835,736	Net Income	Net Assets
	\$159,743	\$4,259,561
Notable Sources of Revenue		
Percent of Total Revenue		
Contributions	\$8,904,961	■ 99.0%
Program Services	\$22,209	0.2%
Investment Income	\$23,722	0.3%
Bond Proceeds	\$0	
Royalties	\$0	
Rental Property Income	\$0	
Net Fundraising	\$0	
Sales of Assets	\$4,881	0.1%
Net Inventory Sales	\$0	
Other Revenue	\$39,706	0.4%
Notable Expenses		
Percent of Total Expenses		
Executive Compensation	\$938,037	■ 10.6%
Professional Fundraising Fees	\$0	
Other Salaries and Wages	\$1,480,900	■ 16.8%
Assets/Debt		
Total Assets	\$5,215,670	
Total Liabilities	\$956,109	
Net Assets	\$4,259,561	

Compensation

Key Employees and Officers	Compensation	Related	Other
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Filed on Nov. 15, 2023

Primary tax return for a nonprofit's activities, finances, and governance

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Thomas Schultz (Chief Executive Officer)	\$343,560	\$0	\$18,921
Mark Z Dawes (National Director Of Development)	\$271,570	\$0	\$50,267
Jennifer Miller (Cfo/Treasurer)	\$237,871	\$0	\$46,032

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Fiscal Year Ending Dec.
2021

Revenue	\$8,920,295	
Expenses	Net Income	Net Assets
\$7,734,161	\$1,186,134	\$4,099,818
Notable Sources of Revenue		Percent of Total Revenue
Contributions	\$8,835,988	99.1%
Program Services	\$71,455	0.8%
Investment Income	\$488	0.0%
Bond Proceeds	\$0	
Royalties	\$0	
Rental Property Income	\$0	
Net Fundraising	\$0	
Sales of Assets	-\$10,046	
Net Inventory Sales	\$0	
Other Revenue	\$22,410	0.3%
Notable Expenses		Percent of Total Expenses
Executive Compensation	\$633,087	8.2%
Professional Fundraising Fees	\$0	
Other Salaries and Wages	\$1,890,969	24.4%
Assets/Debt		
Total Assets	\$4,734,302	
Total Liabilities	\$634,484	
Net Assets	\$4,099,818	

Compensation			
Key Employees and Officers	Compensation	Related	Other
Thomas Schultz (Chief Executive Officer)	\$355,403	\$0	\$14,881
John Schilling (President (Thru 05/31/21))	\$275,674	\$57,750	\$12,147
Mark Z Dawes (National Director Of Development)	\$247,199	\$0	\$45,194

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Primary tax return for a nonprofit's activities, finances, and governance

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Fiscal Year Ending Dec.

2020**Revenue** **\$9,596,806**

Expenses	Net Income	Net Assets
\$9,018,429	\$578,377	\$2,913,684

Notable Sources of Revenue	Percent of Total Revenue	
Contributions	\$9,507,100	99.1%
Program Services	\$0	
Investment Income	\$523	0.0%
Bond Proceeds	\$0	
Royalties	\$0	
Rental Property Income	\$0	
Net Fundraising	\$0	
Sales of Assets	\$1,147	0.0%
Net Inventory Sales	\$0	
Other Revenue	\$88,036	0.9%

Notable Expenses	Percent of Total Expenses	
Executive Compensation	\$520,361	5.8%
Professional Fundraising Fees	\$0	
Other Salaries and Wages	\$1,703,827	18.9%

Assets/Debt	
Total Assets	\$3,401,526
Total Liabilities	\$487,842
Net Assets	\$2,913,684

Compensation

Key Employees and Officers	Compensation	Related	Other
John Schilling (President)	\$320,706	\$0	\$32,559
Gregory Brock (Chief Executive Officer)	\$318,504	\$0	\$23,545
Mark Z Dawes (National Director Of Development)	\$290,377	\$0	\$45,702

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Filed on Nov. 15, 2021

Primary tax return for a nonprofit's activities, finances, and governance

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Fiscal Year Ending Dec.

2019**Revenue** **\$8,291,908**

Expenses	Net Income	Net Assets
\$8,200,886	\$91,022	\$585,307

Notable Sources of Revenue	Percent of Total Revenue	
Contributions	\$8,190,792	98.8%
Program Services	\$77,172	0.9%
Investment Income	\$18,857	0.2%
Bond Proceeds	\$0	
Royalties	\$0	
Rental Property Income	\$0	
Net Fundraising	\$0	
Sales of Assets	-\$6,618	

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Filed on Nov. 17, 2020

Primary tax return for a nonprofit's activities, finances, and governance

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Net Inventory Sales	\$0	
Other Revenue	\$11,705	0.1%
Notable Expenses		
Percent of Total Expenses		
Executive Compensation	\$452,560	■ 5.5%
Professional Fundraising Fees	\$12,000	0.1%
Other Salaries and Wages	\$1,508,778	■ 18.4%
Assets/Debt		
Total Assets	\$1,144,408	
Total Liabilities	\$559,101	
Net Assets	\$585,307	

Compensation

Key Employees and Officers	Compensation	Related	Other
John Schilling (President)	\$278,434	\$0	\$30,178
Gregory Brook (Chief Executive Officer)	\$275,769	\$0	\$19,570
Mark Z Dawes (National Dir. Of Developmet)	\$238,529	\$0	\$39,367

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Fiscal Year Ending Dec.

2018

Revenue	\$6,951,175	
Expenses		
\$7,869,420	Net Income	Net Assets
	-\$918,245	\$494,285
Notable Sources of Revenue		
Percent of Total Revenue		
Contributions	\$6,848,807	■ 98.5%
Program Services	\$74,078	1.1%
Investment Income	\$17,649	0.3%
Bond Proceeds	\$0	
Royalties	\$0	
Rental Property Income	\$0	
Net Fundraising	\$0	
Sales of Assets	-\$1,742	
Net Inventory Sales	\$0	
Other Revenue	\$12,383	0.2%
Notable Expenses		
Percent of Total Expenses		
Executive Compensation	\$459,473	■ 5.8%
Professional Fundraising Fees	\$79,500	1.0%
Other Salaries and Wages	\$1,403,945	■ 17.8%
Assets/Debt		
Total Assets	\$1,061,119	
Total Liabilities	\$566,834	
Net Assets	\$494,285	

Compensation

Key Employees and Officers	Compensation	Related	Other
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Filed on Nov. 15, 2019

Primary tax return for a nonprofit's activities, finances, and governance

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Gregory Brock (Chief Executive Officer)	\$266,273	\$0	\$18,533
John Schilling (President)	\$261,760	\$0	\$26,609
Mark Z Dawes (National Dir. Of Development)	\$208,386	\$0	\$34,608

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Fiscal Year Ending Dec.

2017

Revenue	\$7,097,178	
Expenses	Net Income	Net Assets
\$6,611,234	\$485,944	\$1,412,530
Notable Sources of Revenue	Percent of Total Revenue	
Contributions	\$6,978,586	 98.3%
Program Services	\$103,922	1.5%
Investment Income	\$3,603	0.1%
Bond Proceeds	\$0	
Royalties	\$0	
Rental Property Income	\$0	
Net Fundraising	\$0	
Sales of Assets	\$1,311	0.0%
Net Inventory Sales	\$0	
Other Revenue	\$9,756	0.1%
Notable Expenses	Percent of Total Expenses	
Executive Compensation	\$435,460	 6.6%
Professional Fundraising Fees	\$0	
Other Salaries and Wages	\$1,122,198	 17.0%
Assets/Debt		
Total Assets	\$1,812,846	
Total Liabilities	\$400,316	
Net Assets	\$1,412,530	

Compensation

Key Employees and Officers	Compensation	Related	Other
John Schilling (Chief Operating Officer)	\$234,272	\$0	\$20,247
Gregory Brock (Executive Director)	\$230,573	\$0	\$15,287
Mark Z Dawes (National Director Of Development)	\$227,903	\$0	\$29,861

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Filed on Nov. 16, 2018

Primary tax return for a nonprofit's activities, finances, and governance

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2016**Revenue** **\$5,809,967**

Expenses	Net Income	Net Assets
\$7,464,192	-\$1,654,225	\$926,586

Notable Sources of Revenue		Percent of Total Revenue
Contributions	\$5,706,067	98.2%
Program Services	\$100,283	1.7%
Investment Income	\$141	0.0%
Bond Proceeds	\$0	
Royalties	\$0	
Rental Property Income	\$0	
Net Fundraising	-\$6,212	
Sales of Assets	-\$389	
Net Inventory Sales	\$0	
Other Revenue	\$10,077	0.2%

Notable Expenses		Percent of Total Expenses
Executive Compensation	\$443,613	5.9%
Professional Fundraising Fees	\$99,750	1.3%
Other Salaries and Wages	\$1,158,777	15.5%

Assets/Debt	
Total Assets	\$1,475,129
Total Liabilities	\$548,543
Net Assets	\$926,586

Compensation

Key Employees and Officers	Compensation	Related	Other
John Schilling (Chief Operating Officer)	\$238,245	\$0	\$25,536
Gregory Brock (Executive Director)	\$231,168	\$0	\$14,632
Mark Z Dawes (Director Of Development)	\$168,682	\$0	\$27,166

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Filed on Nov. 15, 2017

Primary tax return for a nonprofit's activities, finances, and governance

[View Filing](#)[Schedules ▼](#)[PDF](#)[XML](#)**2015****Revenue** **\$6,114,353**

Expenses	Net Income	Net Assets
\$6,105,796	\$8,557	\$2,580,811

Notable Sources of Revenue		Percent of Total Revenue
Contributions	\$6,054,663	99.0%
Program Services	\$73,025	1.2%
Investment Income	\$53	0.0%
Bond Proceeds	\$0	
Royalties	\$0	
Rental Property Income	\$0	
Net Fundraising	-\$22,144	
Sales of Assets	\$0	
Net Inventory Sales	\$0	

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Filed on Nov. 13, 2016

Primary tax return for a nonprofit's activities, finances, and governance

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Other Revenue	\$8,756	0.1%
Notable Expenses		
Executive Compensation	\$233,088	3.8%
Professional Fundraising Fees	\$13,750	0.2%
Other Salaries and Wages	\$1,213,408	19.9%
Assets/Debt		
Total Assets	\$2,954,134	
Total Liabilities	\$373,323	
Net Assets	\$2,580,811	

Compensation

Key Employees and Officers	Compensation	Related	Other
Kevin P Chavous (Executive Counsel)	\$387,400	\$0	\$25,085
John Schilling (Chief Operating Officer)	\$223,757	\$0	\$20,717
Mark Z Dawes (Director Of Development)	\$219,786	\$0	\$26,410

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Fiscal Year Ending Dec.

2014

Revenue	\$3,664,953	
Expenses	Net Income	Net Assets
\$6,247,366	-\$2,582,413	\$2,572,254
Notable Sources of Revenue		
Contributions	\$3,575,691	97.6%
Program Services	\$79,450	2.2%
Investment Income	\$193	0.0%
Bond Proceeds	\$0	
Royalties	\$0	
Rental Property Income	\$0	
Net Fundraising	\$0	
Sales of Assets	-\$528	
Net Inventory Sales	\$0	
Other Revenue	\$10,147	0.3%
Notable Expenses		
Executive Compensation	\$231,540	3.7%
Professional Fundraising Fees	\$95,000	1.5%
Other Salaries and Wages	\$1,188,958	19.0%
Assets/Debt		
Total Assets	\$2,841,150	
Total Liabilities	\$268,896	

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Net Assets	\$2,572,254
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Compensation

Key Employees and Officers	Compensation	Related	Other
Kevin P Chavous (External Counsel)	\$390,624	\$0	\$20,678
John Schilling (Chief Operating Officer)	\$218,423	\$0	\$20,493
Gregory Brook (Executive Director)	\$209,015	\$0	\$11,728


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Fiscal Year Ending Dec.

2013

Revenue **\$6,126,381**

Expenses	Net Income	Net Assets
\$4,817,968	\$1,308,413	\$5,154,667

Notable Sources of Revenue		Percent of Total Revenue
Contributions	\$6,045,106	 98.7%
Program Services	\$70,200	1.1%
Investment Income	\$199	0.0%
Bond Proceeds	\$0	
Royalties	\$0	
Rental Property Income	\$0	
Net Fundraising	\$0	
Sales of Assets	-\$52	
Net Inventory Sales	\$0	
Other Revenue	\$10,928	0.2%

Notable Expenses		Percent of Total Expenses
Executive Compensation	\$211,442	 4.4%
Professional Fundraising Fees	\$32,050	0.7%
Other Salaries and Wages	\$956,204	 19.8%

Assets/Debt	
Total Assets	\$5,541,053
Total Liabilities	\$386,386
Net Assets	\$5,154,667

Compensation

Key Employees and Officers	Compensation	Related	Other
Kevin P Chavous (External Counsel)	\$374,962	\$0	\$18,990
Mark Z Dawes (Director Of Development)	\$209,297	\$0	\$22,114
John Schilling (Chief Operating Officer)	\$206,326	\$0	\$19,006

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American Federation For Children Inc

Columbia, MD • Tax-exempt since May 1996 • EIN: 33-0627955

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Type of Nonprofit

Designated as a 501(c)(4)

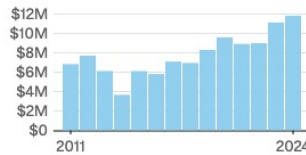
Civic leagues, social welfare organizations and local associations of employees, created to promote community welfare for charitable, educational or recreational purposes.

Category: Educational Institutions and Related Activities / Alliance/Advocacy Organizations (NTEE).

Donations to this organization are not tax deductible.

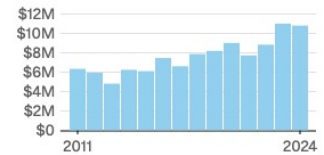
Revenue

\$11.8M (2024)



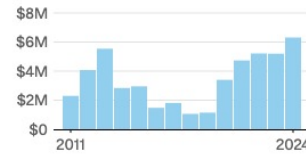
Expenses

\$10.8M (2024)



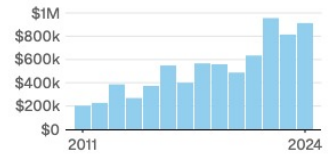
Total Assets

\$6.31M (2024)



Total Liabilities

\$913k (2024)



Source: Form 990 tax filings from 2011 to 2024

Tax Filings by Year

Form 990 is an information return that most organizations claiming federal tax-exempt status must file yearly with the IRS. [Show more](#)

See an issue with the data?

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Fiscal Year Ending Dec.

2024

Revenue

\$11,825,233

Expenses

\$10,808,906

Net Income

\$1,016,327

Net Assets

\$5,400,212

Notable Sources of Revenue

Percent of Total Revenue

Contributions	\$11,502,035	97.3%
Program Services	\$0	
Investment Income	\$213,252	1.8%
Bond Proceeds	\$0	
Royalties	\$0	
Rental Property Income	\$0	
Net Fundraising	\$0	
Sales of Assets	\$49,506	0.4%

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Filed on Sept. 22, 2025

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Net Inventory Sales	\$0	
Other Revenue	\$60,440	0.5%
Notable Expenses		
Executive Compensation	\$1,101,422	10.2%
Professional Fundraising Fees	\$94,123	0.9%
Other Salaries and Wages	\$2,099,399	19.4%
Assets/Debt		
Total Assets	\$6,313,490	
Total Liabilities	\$913,278	
Net Assets	\$5,400,212	

Compensation

Key Employees and Officers	Compensation	Related	Other
Thomas Schultz (Chief Executive Officer)	\$383,293	\$0	\$44,649
Elisa Clements Linde (Chief Operating Officer)	\$350,522	\$0	\$17,600
Ryan Cantrell (Vp Government Affairs)	\$316,320	\$0	\$51,974

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FIX THE CAR TO GET TO WORK LEAVES
US WITH NO MONEY TO BUY MEALS.**

Daniel, California

**HUNGER IS
A STORY WE
CAN END.**

[END IT](#)



Fiscal Year Ending Dec.

2023

Revenue	\$11,135,289	
Expenses	Net Income	Net Assets
\$11,010,965	\$124,324	\$4,383,885
Notable Sources of Revenue		
Contributions	\$11,079,560	99.5%
Program Services	\$0	
Investment Income	\$83,716	0.8%
Bond Proceeds	\$0	
Royalties	\$0	
Rental Property Income	\$0	
Net Fundraising	\$0	
Sales of Assets	-\$40,420	
Net Inventory Sales	\$0	

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Filed on Nov. 4, 2024

Primary tax return for a nonprofit's activities, finances, and governance

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Other Revenue	\$12,433	0.1%
Notable Expenses		
Executive Compensation	\$1,057,681	■ 9.6%
Professional Fundraising Fees	\$177,543	1.6%
Other Salaries and Wages	\$1,671,731	■ 15.2%
Assets/Debt		
Total Assets	\$5,198,587	
Total Liabilities	\$814,702	
Net Assets	\$4,383,885	

Compensation

Key Employees and Officers	Compensation	Related	Other
Thomas Schultz (Chief Executive Officer)	\$404,096	\$0	\$32,333
Mark Z Dawes (Special Advisor)	\$352,472	\$0	\$53,240
Elisa Clements (Chief Operating Officer)	\$331,094	\$0	\$24,870

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Fiscal Year Ending Dec.

2022

Revenue	\$8,995,479	
Expenses	Net Income	Net Assets
\$8,835,736	\$159,743	\$4,259,561
Notable Sources of Revenue		
Contributions	\$8,904,961	■ 99.0%
Program Services	\$22,209	0.2%
Investment Income	\$23,722	0.3%
Bond Proceeds	\$0	
Royalties	\$0	
Rental Property Income	\$0	
Net Fundraising	\$0	
Sales of Assets	\$4,881	0.1%
Net Inventory Sales	\$0	
Other Revenue	\$39,706	0.4%
Notable Expenses		
Executive Compensation	\$938,037	■ 10.6%
Professional Fundraising Fees	\$0	
Other Salaries and Wages	\$1,480,900	■ 16.8%
Assets/Debt		
Total Assets	\$5,215,670	
Total Liabilities	\$956,109	
Net Assets	\$4,259,561	

Compensation

Key Employees and Officers	Compensation	Related	Other
Thomas Schultz (Chief Executive Officer)	\$343,560	\$0	\$18,921

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Filed on Nov. 15, 2023

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Mark Z Dawes (National Director Of Development)	\$271,570	\$0	\$50,267
Jennifer Miller (Cfo/Treasurer)	\$237,871	\$0	\$46,032

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Fiscal Year Ending Dec.

2021

Revenue	\$8,920,295	
Expenses	Net Income	Net Assets
\$7,734,161	\$1,186,134	\$4,099,818
Notable Sources of Revenue		Percent of Total Revenue
Contributions	\$8,835,988	 99.1%
Program Services	\$71,455	0.8%

990

Filed on Nov. 14, 2022

Primary tax return for a nonprofit's activities, finances, and governance

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Exhibit E

Compilation of public news coverage identifying Fortify AZ as the registered applicant for an Arizona ESA / school-voucher ballot initiative funded by American Federation for Children.

Sources: KJZZ Phoenix, Arizona Capitol Times, Arizona Family / CBS 5, Arizona Luminaria. March - May 2026.

Exhibit E

Exhibit E: News Coverage Compilation

Public reporting identifying Fortify AZ as funded by American Federation for Children for an Arizona ESA / school-voucher ballot initiative

This exhibit compiles independent news coverage published in March, April, and May 2026 documenting (a) Fortify AZ's role as the registered applicant for an Arizona statewide ESA / school-voucher ballot initiative being circulated for the November 2026 General Election ballot, and (b) Fortify AZ's funding source: American Federation for Children. Each item below identifies the publication, publication date, URL, and a verbatim excerpt from the article relevant to the funding chain at issue in this complaint.

1. KJZZ - "Groups spend millions to shape Arizona school voucher reform"

Published: April 20, 2026

Outlet: KJZZ Phoenix (NPR member station)

URL:

<https://www.kjzz.org/politics/2026-04-20/groups-spend-millions-to-shape-arizona-school-voucher-reform>

KJZZ reported on the dueling 2026 ESA reform initiatives and identified Fortify AZ as the entity behind one of the two competing initiatives, with American Federation for Children supplying the funding.

2. Arizona Capitol Times - "Dueling ballot proposals compete to reform Arizona's ESA program"

Published: March 20, 2026

Outlet: Arizona Capitol Times

URL:

<https://azcapitoltimes.com/news/2026/03/20/dueling-ballot-proposals-compete-to-reform-arizona-esa-program/>

Arizona Capitol Times reported on the two competing ballot initiatives related to the state's Empowerment Scholarship Account (ESA) program. The article identifies Fortify AZ as one of the two initiative committees and identifies American Federation for Children as Fortify AZ's funder.

3. Arizona Family (CBS 5 / 3TV) - "Arizona school voucher ballot measures spark confusion claims"

Published: March 25, 2026

Outlet: Arizona's Family (CBS 5 / 3TV broadcast network)

URL:

<https://www.azfamily.com/2026/03/25/arizona-school-voucher-ballot-measures-spark-confusion-claims/>

The Arizona Family broadcast report covered the two ESA reform ballot initiatives circulating concurrently in 2026 and identified Fortify AZ as the entity sponsoring the initiative funded by American Federation for Children.

4. Arizona Luminaria - "Competing ESA reform propositions seek ballot spots, sow confusion"

Published: May 1, 2026

Outlet: Arizona Luminaria (independent newsroom)

URL:

<https://azluminaria.org/2026/05/01/competing-esa-reform-propositions-seek-ballot-spots-sow-confusion/>

The Arizona Luminaria reported on both ESA reform initiatives circulating petitions in spring 2026 and identified Fortify AZ as one of the two initiative committees, funded by American Federation for Children.

5. KJZZ - "Arizona school voucher reform campaign accuses rival effort of obstruction, misinformation"

Published: April 30, 2026

Outlet: KJZZ Phoenix

URL:

<https://www.kjzz.org/politics/2026-04-30/arizona-school-voucher-reform-campaign-accuses-rival-effort-of-obstruction-misinformation>

The KJZZ April 30 follow-up reporting on the dueling ESA initiatives further identifies Fortify AZ and American Federation for Children as the entities behind one of the two initiatives.

Summary

The above five contemporaneous, independently-published news reports - appearing in NPR-affiliated public radio (KJZZ), the daily-of-record for the Arizona legislature (Arizona Capitol Times), a major broadcast network affiliate (Arizona Family/CBS 5), and an independent investigative newsroom (Arizona Luminaria) - uniformly and consistently identify Fortify AZ as (a) the registered applicant for an Arizona statewide ESA / school-voucher ballot initiative for the November 2026 General Election ballot, and (b) funded by American Federation for Children. The funding-source identification is consistent across all five outlets and consistent with Fortify AZ's own disclosed Schedule C income on file with the Arizona

Secretary of State (Filer ID 102154), reproduced as Exhibit B of this complaint, which shows two contributions totaling \$1,300,000 from American Federation for Children (Washington, DC) on March 17 and March 23, 2026.

The news coverage establishes that the existence of Fortify AZ, its purpose (qualifying an ESA ballot initiative for the November 2026 statewide ballot), and its single funding source (American Federation for Children) are all public knowledge - and that the underlying donor-disclosure question that the Voters' Right to Know Act is designed to answer is not merely an academic question but a live public-information matter.