

Thomas M. Collins
Executive Director



**State of Arizona
Citizens Clean Elections Commission**

1110 W. Washington St. - Suite 250 - Phoenix, Arizona 85007 - Tel (602) 364-3477 - Fax (602) 364-3487 - www.azcleanelections.gov

April 13, 2026

Via E-mail and U.S. Mail

Turning Point PAC, Inc.
Turning Point Action
c/o Eric Spencer
Snell and Wilmer
One East Washington Street
Suite 2700
Phoenix, AZ 85004

Re: MUR 26-03

Dear Mr. Spencer:

Please find included with this letter and attached to the email delivering it a Complaint under the Voter's Right to Know Act. The Complainant is also copied on this correspondence, but need not be included on any response. I am writing you because you have previously responded to Complaints on behalf of these entities. If you are not an appropriate person to receive this correspondence please let me know as soon as possible.

The purpose of this letter is to inform the organizations, Turning Point Action (the "Action Fund") and Turning Point PAC (the "PAC") that the Executive Director has received allegations as to possible violations of campaign finance laws by the Respondents.

This notice reflects no judgement about the accuracy of the allegations contained in the Complaint.

The deadline to respond is not more than 30 days after Respondents' receipt.

A response shall be sworn to and notarized. The failure to respond may be viewed as an admission to the allegations made in the Complaint.

The purpose of a Response is to provide the reasons why no further action should be taken on the Complaint and include the legal and factual basis for an assertion the matter is not subject to the Commission's jurisdiction. When possible, a Response should provide documentation, including sworn affidavits or declarations.

You may provide whatever materials you wish respecting the Complaint. I would ask that your response address the following questions.

1. The Voters Right to Know Act defines “covered person” as 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. A.R.S. § 16-971(7)(a). The definition also states that “[f]or 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.” *Id.*

The PAC states that it is a separate entity that was “established to complement [the Action Fund], a 501(c)(4) organization that works to support nationwide candidates who are dedicated to saving our country” and states that it is “proud to support the educational and infrastructure goals and the mission of Turning Point Action.” <https://www.tppac.com/>.

Is Turning Point PAC “established, financed, maintained or controlled by” Turning Point Action?

2. Was the PAC subject to reporting under VRKA for spending in the Salt River Project Agricultural Improvement and Power District campaign? Did it file reports with the Arizona Secretary of State’s office under that law?

3. Did the PAC spend more than \$25,000 on signs that constitute campaign media spending under VRKA?

4. Was the Action Fund subject to reporting under VRKA for spending in the Salt River Project Agricultural Improvement and Power District campaign? Did it file reports with the Arizona Secretary of State’s office under that law?

5. Did the PAC itself have any donors of original money greater than \$5,000 in the election cycle that were subject to disclosure on campaign advertisements such as signs? A.R.S. § 16-974(c); Ariz. Admin. Code R2-20-805(B).

6. Are Action Fund activities, such as canvassing, voter registration, and ballot chasing, “campaign media spending” under A.R.S. § 16-971(2)?

7. Did canvassing, voter registration, and ballot chasing involve “paid communication to the public by means of . . . mass mailing or another mass distribution, telephone bank or any other form of general public political advertising or marketing, regardless of medium” that would constitute “campaign media spending” respecting “candidates”? A.R.S. §§ 16-971(2), 16-971(3), 16-971(17). Which entity spent money for the preparation of the materials to be distributed? Which entity spent money for the distribution?

8. Is the website <https://www.tpaction.com/srp> a “public communication” that constitutes “campaign media spending” under A.R.S. § 16-971(2), (17)? Did the Action Fund spend more than \$25,000 on the website?

The Commission’s rules are at this link: https://apps.azsos.gov/public_services/Title_02/2-20.pdf

The response may be submitted by email. If a response is submitted by email, which is preferred, it must be sent to ccec@azcleelections.gov, in addition to any other email.

The Complainant, again, need not be copied. A Complainant who wants a copy of any Responses may request it from the Commission staff. *The Complainant is not a party.*

Sincerely,

s/ Thomas M. Collins
Executive Director

cc: [REDACTED] (email only)