

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

May 11, 2026
Via E-Mail
Ashley Ragan
Treasurer
Fortify AZ
2211 E Highland Ave, Ste 210,
Phoenix, AZ 85016

**MUR 26-04
Request for Response**

Dear Ms. Ragan:

The purpose of this letter is to inform the Arizona political action committee Fortify AZ that the Executive Director has received allegations as to possible violations of campaign finance laws by the Respondent. A copy of the complaint is included with this letter.

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

The deadline to respond is not more than 30 days after Respondent's receipt of the complaint.

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. It may include the legal and factual basis for an assertion that the matter is not subject to the Commission's jurisdiction. When possible, a Response should provide documentation, including sworn affidavits or declarations, to support the factual assertions in the Response.

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

Fortify Az's First Quarter Campaign Finance reports include the following expenditures reported as "Professional Services – Consultants:"

- \$200,000 paid to Arizona Petition Partners on March 17, 2026.
- \$1,250,000 paid to Arizona Petition Partners on March 24, 2026.
- \$7,000 paid to Marson Media on March 25, 2026.

Fortify AZ, *Campaign Finance Report* (Ariz. Sec'y of State 2026), <https://seethemoney.az.gov/PublicReports/2026/A06DB838-7192-44B9-A7D9-77232AB00FD3.pdf> (last visited May 11, 2026).

Under A.R.S. § 16-971(2)(a), "campaign media spending" includes spending monies or accepting in-kind contributions to pay for certain public communications and related electoral activities, including research, design, production, polling, data analytics, mailing or social media list acquisition, or any other activity conducted in preparation for or in conjunction with activities described in A.R.S. § 16-971(2)(a)(i)-(vi).

The expenditures identified above appear sufficient in amount that, if they constitute "campaign media spending" under A.R.S. § 16-971(2), the entity may satisfy the monetary thresholds for "covered person" status under A.R.S. § 16-971(7)(a).

Given the nature of the expenditures identified above, please explain why these expenditures do not constitute "campaign media spending" as defined in A.R.S. § 16-971(2)(a) sufficient to treat Fortify AZ as a covered person. Please address whether Commission Advisory Opinion 2023-01 affects the analysis relevant to the complaint.

The reports reviewed also identify contributions from American Federation for Children, 1020 19th Street NW, #675, Washington, D.C. 20036. Fortify AZ, *Campaign Finance Report* (Ariz. Sec'y of State 2026), <https://seethemoney.az.gov/PublicReports/2026/A06DB838-7192-44B9-A7D9-77232AB00FD3.pdf> (last visited May 11, 2026).

If Fortify Az is a covered person, it would be obligated to disclose the original sources of funds. In that regard, publicly available materials on American Federation for Children's website state that the organization is a "501(c)(4) issue advocacy organization," that solicits and accepts donations. American Federation for Children, Donate, <https://www.federationforchildren.org/get-involved/donate/> (last visited May 11, 2026).

The website further states that "[d]ecisions regarding how donated funds are allocated among AFC's activities will be determined by AFC in its sole discretion," while "[c]ontributions and donations to AFC may not be earmarked or otherwise designated by the donor, directly or indirectly, for political advocacy." *Id.* Because AFC accepts donations and may pass them to Fortify AZ, Fortify, may, in turn have obligations under the VRKA.

In short, the Complaint articulates facts that, along with the notations in the PAC's periodic reports, sufficiently support the request for a response.

The Commission's rules are at this link: https://apps.azsos.gov/public_services/Title_02/2-20.pdf. Commission advisory opinions are available for reference at XXX.

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

The Complainant is copied on the email transmitting this letter to you. However, Complainant need not be copied on your response. 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] (e-mail)