

CAMPAIGN FINANCE COMPLAINT

Arizona Secretary of State, Campaign Finance Division

June 13, 2026

Via Email (campaignfinance@azsos.gov)

Campaign Finance Division

Arizona Secretary of State

1700 W Washington St, Floor 7

Phoenix, AZ 85007

Complainant:

[REDACTED]

[CITY REDACTED]

[EMAIL REDACTED]

[PHONE REDACTED]

Identity Verification (per A.R.S. § 16-938(A)): I am an identifiable human being. I am a qualified Arizona voter registered in Maricopa County. I am submitting this complaint as an individual, not on behalf of any entity.

Respondent:

NicoPAC

AZ Secretary of State Committee #: 101721

Jurisdiction: Arizona Secretary of State

Treasurer: Isaac Kelly Glover

Address: 16460 N 61st Ave, Glendale, AZ 85306

Phone: (248) 590-5626

Email: 1delgadonico@gmail.com

I. Summary

This complaint concerns campaign signs that NicoPAC — a political action committee registered with the Arizona Secretary of State (Committee #101721) — is displaying along a public roadway in the Chandler area. The signs advocate the election of clearly identified candidates and bear the committee's "NICO PAC" wordmark and the URL "www.Nico.Republican."

The signs violate the advertising-disclosure requirements of A.R.S. § 16-925 in two independent ways:

1. At least one sign bears no disclosure statement at all — the Elijah Norton (Arizona Treasurer) sign — in violation of A.R.S. § 16-925(A), which requires every advertisement paid for by a person other than an individual to state "paid for by" followed by the name of the person making the expenditure.

2. The signs that do bear a disclosure display it far below the statutory minimum height. A.R.S. § 16-925(D)(4) requires that, where an advertisement displayed on a sign is **paid for by a political action committee**, the disclosure be displayed "in a height that is at least **ten percent** of the vertical height of the sign." NicoPAC's signs are forty-eight inches (48") in vertical height, so the statute requires a disclosure at least 4.8 inches in height. The disclosure as printed is approximately one-half inch (0.5") — roughly one percent of the sign's vertical height, and about one-tenth of the statutory minimum.

NicoPAC is registered with the Secretary of State and is a "political action committee" within the meaning of A.R.S. § 16-901(41). The signs are "advertisements" within the meaning of A.R.S. § 16-901(1). Whether a committee registered with the Secretary of State complies with the disclosure requirements of Article 1.4 of Chapter 6 is squarely within the Department's mandate as filing officer under A.R.S. § 16-938(A).

II. The Signs at Issue

On the morning of **June 13, 2026**, the complainant personally observed and photographed three NicoPAC campaign signs displayed in a row in the landscaped public right-of-way at the **northeast corner of Chandler Boulevard and McClintock Drive, Chandler, Arizona**. Photographs are attached as Exhibits A–E.

#	Candidate named	Office advocated	Tagline on sign	Disclosure statement
1	Warren Petersen	Attorney General	"Endorsed by Arizona's Police & Law Enforcement"	Present — printed at ~0.5" height (see § IV.B)
2	Jeff Weninger	Chandler Mayor	"Support Small Businesses"	Present — printed at ~0.5" height (see § IV.B)
3	Elijah Norton	Arizona Treasurer	"Safe & Secure Investments"	None (see § IV.A)

Each sign prominently displays the candidate's name and the office sought, together with the "NICO PAC" wordmark and an Arizona-shape logo. Each is therefore an advertisement "for the purpose of influencing an election" within A.R.S. § 16-901(1), naming a "clearly identified candidate" within A.R.S. § 16-901(9).

Where a disclosure does appear (the Petersen and Weninger signs), it reads, in a single line of small type printed sideways along one edge of the sign:

"Paid for by NicoPAC and not authorized by any candidate or candidate's committee. Paid for with 90% in-state and with 10% from out-of-state contributors. www.Nico.Republican"

III. NicoPAC Is a Political Action Committee and the Signs Are Its Advertisements

A. The committee. NicoPAC is registered with the Arizona Secretary of State as a political action committee, Committee #101721, with a designated treasurer (Isaac Kelly Glover) and a registered address of 16460 N 61st Ave, Glendale, AZ 85306. Its periodic campaign finance reports are filed with and accepted by the Secretary of State; the cover page of each report states "Jurisdiction: Arizona Secretary of State." NicoPAC is therefore a "political action committee" (A.R.S. § 16-901(41)) and a "committee" (A.R.S. § 16-901(10)).

B. The signs are advertisements. A.R.S. § 16-901(1) defines "advertisement" as "information or materials ... that are mailed, e-mailed, posted, distributed, published, **displayed**, delivered, broadcasted or placed in a communication medium and that are for the purpose of influencing an election." A roadside campaign sign naming a candidate and the office sought, displayed during the candidate's election cycle, is an advertisement displayed for the purpose of influencing an election. A.R.S. § 16-925(D)(4) confirms the point by addressing, in terms, advertisements "displayed on a sign or billboard."

C. The signs were paid for by the committee. The signs themselves attribute payment to "NicoPAC," and the Petersen and Weninger signs state on their face that they are "Paid for by NicoPAC." A payment for sign production and display is an "expenditure" under A.R.S. § 16-901(25). The committee is the "person ... other than an individual" that made the expenditure, triggering the disclosure obligations of A.R.S. § 16-925(A) and, because that person is a political action committee, the heightened ten-percent sign-disclosure requirement of A.R.S. § 16-925(D)(4).

IV. Statutory Violations Alleged

A. § 16-925(A) — the Elijah Norton sign bears no "paid for by" disclosure

A.R.S. § 16-925(A) provides that "[a] person that makes an expenditure for an advertisement ... other than an individual, shall include the following disclosures in the advertisement," namely (1) "[t]he words 'paid for by', followed by the name of the person making the expenditure," and (2) "[w]hether the expenditure was authorized by any candidate."

The Elijah Norton (Arizona Treasurer) sign bears the "NICO PAC" wordmark and the Arizona-shape logo but **no "paid for by" disclosure statement** of any kind — no statement of who paid for it and no statement of whether it was authorized by a candidate. The omission of the disclosure required by § 16-925(A) from a PAC-paid advertisement is a facial violation. (Exhibit D is a close photograph of the Norton sign demonstrating the absence of any disclosure.)

B. § 16-925(D)(4) — the disclosure is roughly one-tenth of the required height

A.R.S. § 16-925(D)(4) provides:

*"[If the advertisement is] [d]isplayed on a sign or billboard, the disclosure shall be displayed in a height that is at least four percent of the vertical height of the sign or billboard, **except that if the advertisement is paid for by a political action committee, the disclosure shall be displayed in a height that is at least ten percent of the vertical height of the sign or billboard.**"*

Because NicoPAC is a political action committee, the **ten-percent** floor applies to its signs — not the four-percent floor that applies to other advertisers.

The NicoPAC signs are **forty-eight inches (48") in vertical height**. Ten percent of 48 inches is **4.8 inches**. The disclosure statement on the Petersen and Weninger signs is printed at a character height of approximately **one-half inch (0.5")** — about **one percent** of the sign's vertical height, and roughly **one-tenth** of the statutory minimum. To comply, the disclosure would need to be enlarged nearly tenfold.

The disclosure is additionally printed **sideways** — rotated ninety degrees to read vertically along one edge of the sign — but its orientation does not change the analysis: at one-half inch in character height, the disclosure falls roughly tenfold short of the 4.8-inch minimum however the dimension is measured. The complainant documented the sign's 48-inch height and the disclosure's half-inch height with a measuring tape against the sign; see Exhibit E.

C. Reserved — § 16-925(B)(2) out-of-state percentage

The Petersen and Weninger signs state "Paid for with ... 10% from out-of-state contributors." A.R.S. § 16-925(B)(2) requires that disclosure to reflect "the aggregate percentage of out-of-state contributors as calculated at the time the advertisement was produced." Whether the stated 10% figure is accurate is a question the Department can test against NicoPAC's own contributor itemizations on file. The

complainant reserves this allegation pending the committee's July 2026 reports and does not rely on it for the present complaint, which is established on the face of the signs under § IV.A and § IV.B.

V. Jurisdiction

A.R.S. § 16-938(A) provides that, on receipt of a third-party complaint, the filing officer "is the **sole** public officer who is authorized to initiate an investigation into alleged violations of this article and **articles 1, 1.1, 1.2, 1.3, 1.4, 1.5 and 1.6** of this chapter." A.R.S. § 16-925 is codified in **Article 1.4** (Reporting Requirements and Disclosure Statements) of Chapter 6 — expressly within the enumerated articles. A.R.S. § 16-901(27) defines "filing officer" as "the secretary of state or the county, city or town officer in charge of elections for that jurisdiction who accepts statements and reports for those elections pursuant to section 16-928."

NicoPAC is registered with, and files its campaign finance reports with, the Arizona Secretary of State. The Secretary of State is therefore the filing officer for NicoPAC and the sole public officer authorized to investigate this committee's compliance with the § 16-925 disclosure requirements. This complaint asks the Department to do exactly that, and nothing outside its jurisdiction.

VI. Requested Action

I respectfully request that the Campaign Finance Division of the Secretary of State's Office:

- 1. Accept this complaint** under A.R.S. § 16-938 and assign a docket number.
- 2. Initiate an investigation** under A.R.S. § 16-938(A) into whether NicoPAC's Chandler-area campaign signs comply with A.R.S. § 16-925, and determine whether reasonable cause exists to believe that (a) A.R.S. § 16-925(A) was violated by displaying a PAC-paid sign with no disclosure statement, and (b) A.R.S. § 16-925(D)(4) was violated by displaying disclosures at approximately one percent — far below the required ten percent — of the signs' vertical height.

3. Request voluntary production from NicoPAC, pursuant to A.R.S. § 16-938(D), of (a) the print/vendor proofs and artwork for the Petersen, Weninger, and Norton signs; (b) the quantity printed and displayed and the locations of display; and (c) the invoices and payments for the sign production and placement.

4. Declare that the NicoPAC signs described and depicted in this complaint, as currently produced and deployed, are not in compliance with A.R.S. § 16-925(A) (as to the Elijah Norton sign, which carries no "paid for by" disclosure) and A.R.S. § 16-925(D)(4) (as to the Petersen and Weninger signs, the disclosures on which fall below the ten-percent vertical-height minimum applicable to political-action-committee signs).

5. Determine the corrective action required to bring the signs into compliance, including redesign of the disclosure to satisfy the ten-percent height requirement of § 16-925(D)(4) and addition of the § 16-925(A) disclosure to any sign lacking it.

6. Communicate with the City of Chandler, in which the noncompliant signs are currently deployed in the public right-of-way at the northeast corner of Chandler Boulevard and McClintock Drive, and with any other jurisdiction in which the Department determines NicoPAC has deployed signs of the same design, advising those jurisdictions that the Department has determined the signs to be noncompliant with A.R.S. § 16-925, and leaving to each jurisdiction's discretion whatever action it deems appropriate under its own sign code, A.R.S. § 16-1019, and its general police powers.

7. If reasonable cause is found, refer the matter to the Attorney General under A.R.S. § 16-938(C)(1), with the civil penalty under A.R.S. § 16-938(E)(2) computed against the amount NicoPAC spent on the noncompliant signs, and, on a finding of special circumstances, authorize the enhanced penalty available under A.R.S. § 16-938(E)(2).

8. Provide written confirmation of receipt of this complaint, the assigned docket number, and the procedural timeline within ten (10) business days of receipt.

Respectfully submitted,

[REDACTED]

[CITY REDACTED]

[EMAIL REDACTED]

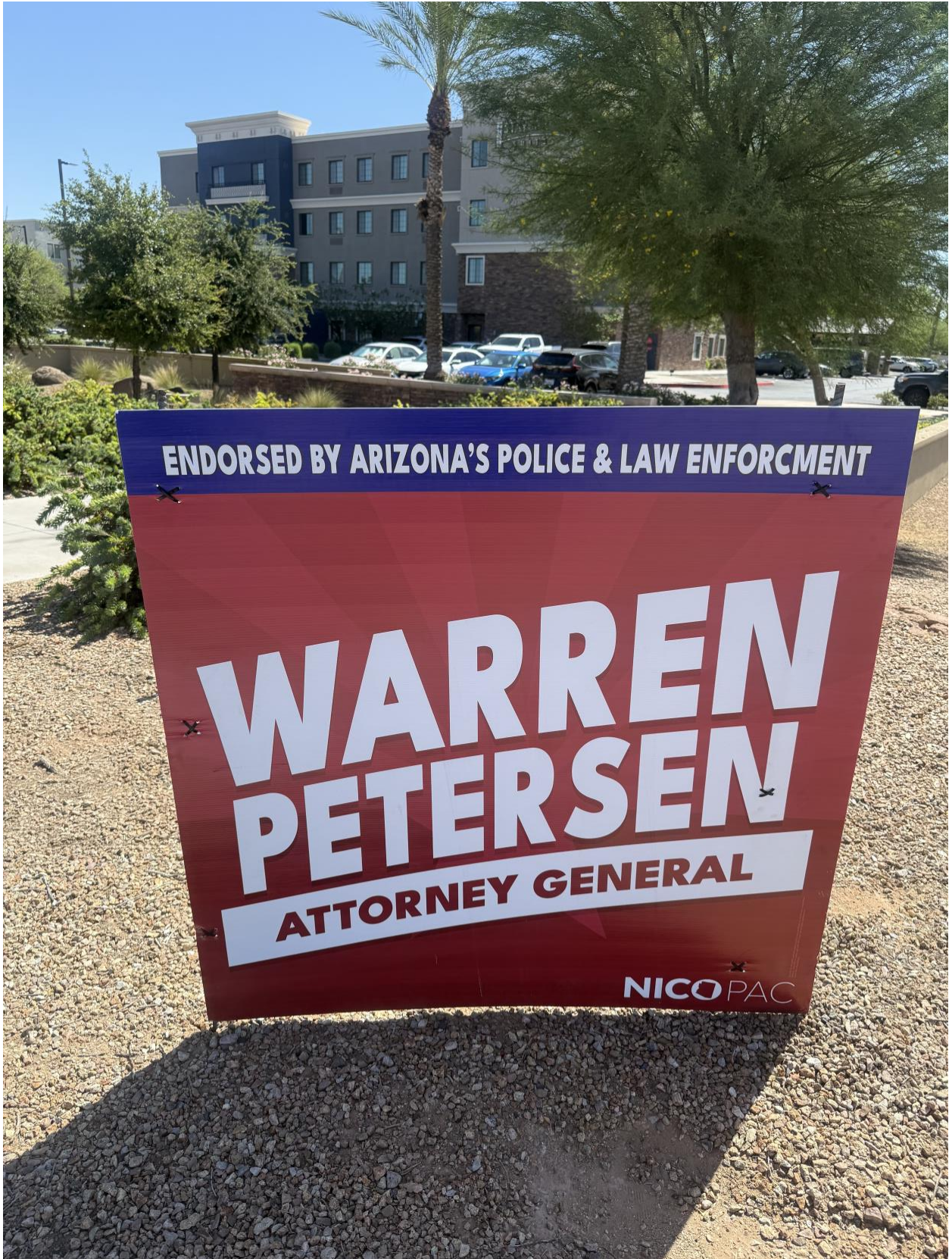
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Exhibits

- **Exhibit A** — The three NicoPAC signs displayed in a row at the NE corner of Chandler Blvd & McClintock Dr, June 13, 2026.



- **Exhibit B** — Warren Petersen / Attorney General sign: full face and disclosure close-up.



- **Exhibit C** — Jeff Weninger / Chandler Mayor sign: full face and disclosure close-up.



- **Exhibit D** — Elijah Norton / Arizona Treasurer sign: full face and close-up showing the absence of any disclosure statement.



- **Exhibit E** — Measurements: measuring tape against the sign establishing the 48-inch sign height and the approximately one-half-inch disclosure height.



