

June 9, 2026

VIA EMAIL

Luke Douglas, Chief Legal Officer

Arizona Secretary of State's Office

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Phoenix, AZ 85007

campaignfinance@azsos.gov

Re: Complainant's Reply to Respondent's Response, SOS-CF-2026-010

Dear Mr. Douglas:

Thank you for forwarding the May 22, 2026 response from Eric Spencer and Charlene Warner of Snell & Wilmer, filed on behalf of Turning Point PAC, Inc. I am submitting this reply within the June 11, 2026 deadline.

The response makes three arguments for dismissal and asks your office to "admonish" me as a vexatious litigant. None of the three arguments holds up against Turning Point PAC – Arizona's own campaign finance filings. The request for an admonishment misstates the law and gets the complaint process exactly backwards. I will take each in turn.

I. Your office already considered the jurisdiction question and moved past it.

The response leads with jurisdiction. It argues that the April 7, 2026 Salt River Project election is a special taxing district election, that the county is the filing officer for those elections under A.R.S. § 16-928(A)(2), and that your office therefore has no authority here.

Your office already considered that argument and moved past it. The original complaint was dismissed on April 9, 2026 on exactly this jurisdictional theory. I refiled on a narrower basis: the accuracy of a report that Turning Point PAC – Arizona filed with the Secretary of State. On May 7, 2026 your office

accepted the complaint and opened an initial review under A.R.S. § 16-938. The response is asking you to reverse a decision your office has already made.

That acceptance was correct, and the reason is simple. The better reading is that campaign finance jurisdiction follows the filer and the report, not the underlying race. A.R.S. § 16-938(A) says a filing officer "is the sole public officer who is authorized to initiate an investigation" into alleged violations. Turning Point PAC – Arizona (Committee #101981) files its reports with the Secretary of State. The report at issue, the 2026 March Post-Election (Q1) report, Report ID 366407, says right on its face: "Jurisdiction: Arizona Secretary of State." The committee filed that report with your office on April 15, 2026.

This complaint does not ask you to referee the SRP election. It asks you to check whether a report Turning Point PAC – Arizona filed with you, on a schedule the committee picked itself, is accurate. That is what a filing officer does. It does not change based on which race the spending was for. A committee does not get to file a report with the Secretary of State and then claim the Secretary has no business checking whether that report is true.

The "forum shopping" accusation fails for the same reason. The Maricopa County complaints are about whether independent expenditures in the SRP race were properly conducted and reported at the county level. This complaint is about whether a report filed with the Secretary of State is accurate. Two different filings, two different filing officers, two different questions. Bringing the right question to the right officer is not forum shopping. It is following the same jurisdictional map the response spends two paragraphs describing.

There is also an independent reason your office is the filing officer here. Turning Point PAC – Arizona files all of its reports with the Secretary of State, across more than one election jurisdiction and more than one cycle: its November 2025 reports tied to city and recall elections, and its 2026 reports tied to the special-district cycle. A.R.S. § 16-928(B) says that "[n]otwithstanding subsection A of this section, a standing committee shall file reports only with the secretary of state." A committee active in more than one reporting jurisdiction that files only with the Secretary is filing the way the statute tells a standing committee to file, and the Secretary is its filing officer for those reports.

II. The "wrong entity" argument is contradicted by Turning Point's own report.

The response next argues that I named the wrong entity. It says Turning Point PAC – Arizona "never participated in the SRP race whatsoever," and that any independent expenditures were made by a separate federal committee, Turning Point PAC, Inc.

The committee's own report says otherwise. Turning Point PAC – Arizona's 2026 March Post-Election (Q1) report, Report ID 366407, discloses these expenditures, made in the weeks before the April 7 SRP election, on Schedule E1 (Operating Expenses):

Date	Vendor	Amount	Schedule (as filed)	Direction (as filed)
02/23/2026	INKED XPRESSION	\$3,350.53	E1	Opposed
02/23/2026	Alphagraphics	\$934.99	E1	Opposed
		\$4,285.52		

If Turning Point PAC – Arizona "never participated in the SRP race whatsoever," the response never explains why the committee's own sworn report books \$4,285.52 of sign printing in the weeks before the SRP election, and flags both line items as "Opposed," meaning spending directed against one or more candidates. An operating expense does not oppose a candidate. Spending that opposes a candidate is an independent expenditure. The committee described this spending in the language of campaign advocacy and then parked it on the schedule meant for routine overhead.

The response cannot have this both ways. Either the spending was about the SRP race, in which case the committee did participate and these belong on Schedule E2 with the disclosures A.R.S. § 16-926 requires, or the report misdescribes what \$4,285.52 paid for, in which case the report is not accurate. Both roads lead to the same place: a question about the accuracy of a report under § 16-926, which is the question your office accepted this complaint to review.

III. The committee knows how to use Schedule E2. It used it nine times this cycle, including for signs.

The response's third argument is that the reports are "complete and accurate as filed." The committee's own treatment of nearly identical activity earlier in the same cycle says otherwise.

In October 2025, Turning Point PAC – Arizona reported \$25,246.28 in independent expenditures on Schedule E2. Nine separate line items, including payments to a sign vendor, Mesa Sign Shop:

Date	Vendor	Amount	Schedule (as filed)
10/10/2025	1Ten	\$920.13	E2 (Ind. Expenditure)
10/10/2025	Mesa Sign Shop	\$4,323.81	E2 (Ind. Expenditure)

10/10/2025	1Ten	\$2,276.41	E2 (Recall Ind. Expenditure)
10/10/2025	Mesa Sign Shop	\$4,323.81	E2 (Recall Ind. Expenditure)
10/24/2025	1Ten	\$2,457.61	E2 (Recall Ind. Expenditure)
10/24/2025	Mesa Sign Shop	\$5,179.93	E2 (Recall Ind. Expenditure)
10/24/2025	1Ten	\$2,687.85	E2 (Ind. Expenditure)
10/27/2025	1Ten	\$1,827.91	E2 (Ind. Expenditure)
10/28/2025	Mesa Sign Shop	\$1,248.82	E2 (Ind. Expenditure)
		\$25,246.28	

This is the same committee, in the same election cycle, paying a sign shop for signs and reporting the cost correctly as an independent expenditure on Schedule E2. Four months later it paid two print shops for SRP-election signage and reported the cost as an operating expense on Schedule E1.

So the committee knows the difference between Schedule E1 and Schedule E2. It knows sign spending that supports or opposes candidates goes on E2. It got that right nine times in October 2025. The question this complaint raises is why the SRP signage, flagged "Opposed" on the committee's own report, went on E1 instead, where none of the candidate, office, election-date, advertising-mode, and first-publication-date disclosures required by A.R.S. § 16-926(B)(3)(l) and § 16-926(H) ever appear.

A committee contradicting its own classifications inside a single cycle is the definition of reasonable cause to investigate.

IV. \$4,285.52 does not begin to cover the signs that were actually out there.

There is a second problem with this report, and it is bigger than the schedule it sits on. The amount is not believable.

In the weeks before the April 7 election, Turning Point signs were all over the Phoenix metro. I personally observed them by the hundreds, across multiple cities, at major intersections and along arterial roads, many of them large format. That is not a \$4,285.52 operation. Sign printing at that volume runs well into five figures before you even count the stakes, the labor, the installation, and the

removal. Two invoices to two print shops totaling \$4,285.52 cannot have produced and deployed the number of signs that were physically in the ground.

So one of two things is true. Either there is SRP-related spending that is not on this report at all, or the spending that is on the report understates what was actually paid. Both are § 16-926 problems, and both go to the completeness of a report filed with the Secretary of State.

Here is the part that matters for why this complaint exists. A member of the public cannot make a committee open its books. I cannot subpoena Turning Point's vendor contracts. I cannot compel the committee to produce its invoices. No voter can. The only entity in this entire structure with the authority to find out what was actually spent on the SRP race is the filing officer. Under A.R.S. § 16-938(D) the Secretary can request voluntary production of the underlying records now, and if the office finds reasonable cause and refers the matter, the enforcement officer can compel production by subpoena under § 16-938(E). That authority is the whole point of the office. A committee can put thousands of signs in the ground, report four thousand dollars, and unless the filing officer asks the question, nobody ever checks.

I am asking the filing officer to ask the question.

V. The request to "admonish" me is wrong on the law and backwards on the purpose.

The response closes by asking you to formally admonish me as a "vexatious litigant" under A.R.S. § 12-3201. There are several independent reasons to reject that request.

First, the statute does not apply. A.R.S. § 12-3201 is about vexatious litigants in court. The response concedes this when it qualifies its own citation with the phrase "at least in litigation." A campaign finance complaint to a filing officer is not a court action, and the Secretary of State is not a court. The vexatious-litigant label is something a presiding judge of a superior court applies under § 12-3201. It is not something an administrative filing officer can hand out, and the response cites no authority saying otherwise.

Second, the premise is false. The response calls my filings "baseless" and "frivolous." But your office has now accepted three of my campaign finance complaints for investigation: SOS-CF-2026-010, SOS-CF-2026-014, and SOS-CF-2026-015. Each was accepted on the same § 16-926 schedule-accuracy theory, and each was accepted after an initial review. An office does not open initial reviews into complaints it considers frivolous. The acceptances are your office's own judgment that these matters are worth looking at.

Third, the request turns the complaint process upside down. A.R.S. § 16-938 exists so that members of the public can bring potential reporting violations to the filing officer. The response asks you to punish a citizen for doing exactly that. Follow that logic and the more reports a committee files wrong, the more protected it gets, because the second or third complaint becomes "vexatious." That cannot be the rule.

Fourth, and most simply: if Turning Point PAC – Arizona does not want to be the subject of campaign finance complaints, the answer is not to go after the people who read its reports. The answer is to file accurate reports. A committee that classified \$25,246.28 of independent expenditures correctly in October, then routed \$4,285.52 of "Opposed" sign spending to its operating-expense schedule in February, has a very simple way to stop drawing complaints about its classifications: classify its spending correctly. The complaint process is not the problem here. The reporting is.

VI. What I am asking for.

I respectfully request that the Secretary of State:

- 1.** Decline to dismiss SOS-CF-2026-010 and continue the initial review your office opened on May 7, 2026.
- 2.** Reach the schedule question: whether the \$4,285.52 in sign-printing expenditures on Report ID 366407, flagged "Opposed" and spent in the weeks before the April 7 SRP election, were correctly reported as operating expenses on Schedule E1 rather than as independent expenditures on Schedule E2 with the disclosures required by A.R.S. § 16-926(B)(3)(I) and § 16-926(H).
- 3.** Reach the completeness question: whether Turning Point PAC – Arizona's reports disclose all of its expenditures connected to the April 7, 2026 SRP election. The \$4,285.52 reported on Report ID 366407 is not consistent with the volume of Turning Point signage physically deployed across the Phoenix metro before the election, and that gap is itself reasonable cause to determine whether SRP-related expenditures have gone unreported or under-reported.
- 4.** Use the office's authority to find out what was actually spent. Request voluntary production under A.R.S. § 16-938(D) of, at minimum: the full vendor contracts, invoices, and payment records between Turning Point PAC – Arizona and INKED XPRESSION, Alphagraphics, and any other vendor used for signs, printing, design, installation, or distribution connected to the SRP election; the quantities, dimensions, and unit costs of every sign produced; and the committee's underlying ledger for the relevant reporting

periods. If the committee declines to produce these voluntarily, that refusal is itself relevant to a reasonable cause determination, after which the matter may be referred so the enforcement officer can compel production by subpoena under A.R.S. § 16-938(E). I have no power to obtain these records. The Secretary does.

5. Deny the request to admonish me, which has no support in A.R.S. § 12-3201 and runs against the purpose of A.R.S. § 16-938.

Thank you for your continued attention to this matter.

Respectfully,

[REDACTED]

[CITY REDACTED]

[EMAIL REDACTED]

[PHONE REDACTED]

Record cited in this reply

- Response under reply: Eric Spencer and Charlene Warner (Snell & Wilmer), "Response to Logvin Campaign Finance Complaints, SOS-CF-2026-010," May 22, 2026; forwarded by Luke Douglas (SOS) on May 28, 2026.
- Report at issue: Turning Point PAC – Arizona (Committee #101981), 2026 March Post-Election (Q1), Report ID 366407, filed April 15, 2026. Schedule E1 entries dated 02/23/2026 (INKED XPRESSION \$3,350.53; Alphagraphics \$934.99), both flagged "Opposed."
- Prior-period Schedule E2 independent expenditures: Committee #101981, October 2025, nine line items totaling \$25,246.28 (1Ten and Mesa Sign Shop), reported on Schedule E2 as Independent and Recall Independent Expenditures. Source: seethemoney.az.gov, Filer ID 101981, 2026 election cycle.
- A.R.S. § 16-926, Campaign finance reports; contents.
- A.R.S. § 16-928, Filing officer; statements and reports (subsection (A)(2), county special-district; subsection (B), standing committee files only with the Secretary of State).
- A.R.S. § 16-938, Enforcement authority; investigation; reasonable cause.

- A.R.S. § 12-3201, Vexatious litigants (judicial determination by a presiding judge; applies to court litigation).