



May 28, 2026

VIA E-MAIL

[REDACTED]

[CITY REDACTED]

[EMAIL REDACTED]

Re: SOS-CF-2026-010 Campaign Finance Complaint

Dear Mr. Logvin:

Enclosed is the response received from Eric Spencer, on behalf of Turning Point PAC. You have the option to submit a reply; if you would like to do so, please submit your reply by **June 11, 2026** (14 days from this notice).

Thank you for your attention to this matter. Please contact campaignfinance@azsos.gov or 602-542-8683 if you have any questions.

Sincerely,

Luke Douglas
Chief Legal Officer

Enclosures



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May 22, 2026

VIA E-MAIL

Arizona Secretary of State's Office
Luke Douglas, Chief Legal Officer
1700 W. Washington, 7th Floor
Phoenix, Arizona 85007
ldouglas@azsos.gov

Re: Response to Logvin Campaign Finance Complaints, SOS-CF-2026-010

Dear Mr. Douglas:

This firm represents Turning Point PAC, Inc. ("TPPAC") with respect to the sister campaign finance complaints submitted by ^{[REDACTE} _{D]} ^[REDACTED] ("Petitioner"). Because the Secretary of State assigned both complaints to matter number SOS-CF-2026-010, TPPAC files the following consolidated response to both.

Complaint #1 alleges that Turning Point PAC – Arizona violated A.R.S. § 16-926 by failing to report independent expenditures to the Secretary of State with regard to the recent Salt River Project Agriculture Improvement and Power District (SRP) election, which was held on April 7, 2026. Complaint #2 points to Turning Point PAC – Arizona's Q1 campaign finance report and alleges that: (1) \$4,285.52 in sign printing expenses should be characterized as independent expenditures instead of operating expenses; and (2) once re-characterized as independent expenditures, the \$4,285.52 expense does not reflect the full value of campaign signs deployed in the SRP election.

As set forth below, the complaints are baseless and devoid of legal merit. They should be summarily dismissed.

This response also requests that the Secretary formally admonish the Petitioner for engaging in a pattern of harassing filings. These are Petitioner's fourth and fifth campaign finance complaints filed in a single month—two prior complaints were filed with the Maricopa County Elections Department and one with the Citizens Clean Elections Commission. Petitioner has become the campaign finance equivalent of a vexatious litigant, and TPPAC respectfully urges the Secretary of State to recognize him as such. If this designation has never been applied in prior campaign finance proceedings, this case presents compelling grounds for establishing that precedent.

Legal Argument

The Complaints must be dismissed for three independent and dispositive reasons.

First, the Secretary of State lacks subject matter jurisdiction over campaign finance complaints involving special taxing district elections under Title 48. This threshold defect is fatal to the Complaints and requires dismissal without reaching the merits.

Arizona’s campaign finance statutory framework is unambiguous on this point. Under A.R.S. § 16-938(A), “a filing officer is the sole public officer who is authorized to initiate an investigation” into alleged campaign finance violations. The statute further mandates that “[a] filing officer shall limit an investigation to violations that are within the filing officer’s jurisdiction.” *Id.* These jurisdictional limitations are not discretionary—they are mandatory constraints on the Secretary’s authority.

The Legislature clearly delineated which officers have jurisdiction over which elections for campaign finance purposes. The Secretary of State is the filing officer exclusively for “statewide and legislative elections.” A.R.S. § 16-928(A)(1). By contrast, “[t]he county officer in charge of elections is the filing officer for . . . special taxing district elections.” A.R.S. § 16-928(A)(2). The SRP election is indisputably a special taxing district election, placing it squarely within the Maricopa County Elections Department’s exclusive jurisdiction—not the Secretary of State’s. Notably, Petitioner is well aware of this jurisdictional framework because he already filed the same basic campaign finance complaint with the Maricopa County Elections Department, expressly alleging that the county had jurisdiction. Petitioner cannot forum shop by simultaneously asserting that both the county and the Secretary have jurisdiction over the same matter.

Second, the Complaints fundamentally misidentify the entity that conducted independent expenditures in the SRP election. As TPPAC has previously explained in response to the Maricopa County complaints, the PAC identified in these complaints—Turning Point PAC – Arizona—is not the entity that conducted independent expenditures in the SRP election. Rather, Turning Point PAC, Inc.—a distinct federal hybrid PAC registered with the Federal Election Commission—is the entity that engaged in such activity.

This critical distinction explains why the expenditures disclosed in Turning Point PAC – Arizona’s Q1 campaign finance report do not correspond to the political activity Petitioner observed in the SRP race: Turning Point PAC – Arizona never participated in the SRP race whatsoever. Petitioner’s entire theory of liability collapses upon this simple case of mistaken identity. The Secretary cannot find a violation where the accused entity did not engage in the conduct alleged.

Third, even assuming *arguendo* that the Secretary of State possessed jurisdiction over these Complaints and that Petitioner correctly identified the respondent entity, the Secretary should still dismiss on the merits because Turning Point PAC – Arizona’s campaign finance reports are complete and accurate as filed. There is simply no violation to remedy.

Conclusion

For all the foregoing reasons, the Secretary of State should dismiss the Petitioner’s Complaints with prejudice. Most fundamentally, the Secretary lacks subject matter jurisdiction over any complaint involving expenditures in a special taxing district election under Title 48—jurisdiction lies exclusively with the Maricopa County Elections Department. But even if the Secretary were inclined to reach the merits,

the inquiry would be futile: Turning Point PAC – Arizona never participated in the SRP race, and all of its campaign finance reports were timely filed and accurate.

In addition to dismissal with prejudice, TPPAC respectfully requests that the Secretary of State formally admonish Petitioner to cease his repeated vexatious campaign finance filings. Arizona law recognizes that vexatious conduct, at least in litigation, includes the “repeated filing of court actions solely or primarily for the purpose of harassment,” “court actions brought . . . without substantial justification,” and a “pattern of making unreasonable, repetitive and excessive requests for information.” A.R.S. § 12-3201(E). Petitioner’s conduct—five overlapping complaints filed with three separate agencies within a single month, all targeting the same respondent based on flawed legal theories—constitutes precisely the type of abusive practice Arizona law seeks to deter. An admonishment from this office would serve as an appropriate corrective measure and discourage future frivolous filings.

Very truly yours,

Snell & Wilmer



Eric Spencer
Charlene Warner

cc: campaignfinance@azsos.gov