



May 28, 2026

VIA E-MAIL

[REDACTED]

[CITY REDACTED]

[EMAIL REDACTED]

Re: SOS-CF-2026-014 – Campaign Finance Complaint

Dear Mr. Logvin:

Enclosed is the response received from Thomas Basile, on behalf of Arizonan's for Responsible Growth. 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

May 28, 2026

Arizona Secretary of State's Office
Attn: Luke Douglas, Chief Legal Officer
1700 West Washington Street, Seventh Floor
Phoenix, Arizona 85007
campaignfinance@azsos.gov
VIA EMAIL ONLY

Re: SOS-CF-2026-014: Response to Complaint

Dear Mr. Douglas:

This firm represents Arizonans for Responsible Growth (committee ID 101777) ("AFRG"), a standing committee registered with the Secretary of State pursuant to A.R.S. §§ 16-901(48), 16-906(E), in connection with the above-referenced complaint. The complaint alleges that AFRG's May 2026 Pre-Election Report erroneously categorized as "operating expenses" certain disbursements representing "independent expenditures" in the Salt River District agricultural improvement district election. The Secretary should dismiss the complaint for three reasons.

First, it does not allege any colorable violation of any identifiable statutory provision. A.R.S. § 16-926(B)(3)(*l*) and (H) require political committees to disclose in connection with their independent expenditures certain items of information, including the: (i) date, (ii) amount, (iii) recipient's name and address, (iv) identity of the candidate whose election or defeat was advocated and the office s/he is seeking, and (v) the mode of advertising. AFRG's report inarguably disclosed all these items of information, and as the complainant himself contends, the description of the disbursements as being "in support of" the referenced candidates denoted them as independent expenditures. The crux of the complaint is that this information should have appeared on Schedule E2 instead of Schedule E1. But the schedule carries no intrinsic and independent legal force. AFRG's disclosure obligations are defined by the governing statutes, with which the report fully complied.

Second, recognizing that partisan (or simply idle) complainants will try to abuse the campaign finance enforcement regime for tedious carping on technical minutiae, the 2025 Elections Procedures Manual authorizes the filing officer to dismiss a complaint because of "the insignificance of the alleged violation" (p. 267). A more apt example of insignificance would be difficult to find. Anyone reviewing the Pre-Election Report easily could glean all the information that A.R.S. § 16-926(B)(3)(*l*) and (H) demand; the complaint itself underscores the point well. Additionally, AFRG already had reported the same expenditures to the Secretary (and, by extension, the public at large) pursuant to the so-called Voters' Right to Know Act (available [here](#) and [here](#)).

Third, AFRG has amended the Pre-Election Report to re-list the relevant disbursements in Schedule E2, thereby resolving any actual or putative error. Pursuant to A.R.S. § 16-938(G)(1), even if the Secretary were to refer this complaint to the Attorney General and even if the latter were to credit the complainant's theory, AFRG "is not subject to any penalty" if it "[t]akes corrective action within twenty days after the issuance of the notice of violation." Because AFRG preemptively took "corrective action"—whether it was statutorily required to do so or not—there is no extant "violation," and any referral would be futile because no penalty can be imposed. The complaint hence is moot (if it were ever viable to begin with).

The complaint accordingly should be dismissed without further proceedings pursuant to A.R.S. § 16-938.

Please do not hesitate to contact me if you require any additional information.

Respectfully,

/s/ Thomas Basile

Thomas Basile