SUPPLEMENT TO CAMPAIGN FINANCE COMPLAINT

SOS-CF-2026-015

July 7, 2026

Via Email (campaignfinance@azsos.gov)

Luke Douglas, Chief Legal Officer

Campaign Finance Division

Arizona Secretary of State

1700 W Washington St, Floor 7

Phoenix, AZ 85007

Complainant:

[REDACTED]

[CITY REDACTED]

[EMAIL REDACTED]

[PHONE REDACTED]

I am a qualified Arizona voter registered in Maricopa County, submitting this supplement as an individual.

Respondent: Fortify AZ (AZ Secretary of State Committee #102154)

This supplements the pending complaint in SOS-CF-2026-015. It does not raise a new legal theory. It reports a new fact that arose after the complaint was accepted and after Fortify AZ's June 1 response: on July 6, 2026, Fortify AZ filed its 2026 Quarter 2 report, and that report repeats the exact miscategorization at issue in this docket, on a far larger scale.

The new report

On July 6, 2026, Fortify AZ filed its **2026 Quarter 2 report (Report ID 386151)**, covering April 1 through June 30, 2026. In that quarter the committee again paid a professional signature-gathering firm to circulate the statewide initiative petition it is sponsoring, and again reported every dollar on Schedule E1 (Operating Expenses) as "Professional Services - Consultants." Schedule E2 (Independent & Ballot Measure Expenditures) again shows **$0.00**, this period and cycle-to-date.

The petition-circulation and related media disbursements on the Q2 report are:

Payee	Date	Amount	Schedule	Category as filed
AZ Petition Partners	04/15/2026	$50,000.00	E1	Professional Services - Consultants
AZ Petition Partners	04/20/2026	$1,200,000.00	E1	Professional Services - Consultants
AZ Petition Partners	05/12/2026	$1,800,000.00	E1	Professional Services - Consultants
AZ Petition Partners	06/01/2026	$1,000,000.00	E1	Professional Services - Consultants
Marson Media	05/05/2026	$7,000.00	E1	Professional Services - Consultants
Marson Media	06/18/2026	$7,000.00	E1	Professional Services - Consultants
Total		**$4,064,000.00**	all E1	
Schedule E2 (ballot measure expenditures)		**$0.00**	n/a	

AZ Petition Partners is the same paid signature-gathering firm identified in the original complaint, and Marson Media is the same media firm. The Q2 payments to AZ Petition Partners alone total **$4,050,000.00**. On the face of the report, and given the committee's own activity profile as the sponsor of the initiative, these are payments to circulate and support the same statewide initiative petition Fortify AZ is advancing for the November 2026 ballot. They are ballot measure expenditures under A.R.S. § 16-901(4) and belong on Schedule E2 with the disclosures A.R.S. §§ 16-926(B)(3)(m) and 16-926(H) require. None of it is there.

The funding source is unchanged. The Q2 report shows three contributions from the **American Federation for Children**, the same national organization that funded the Q1 activity: $1,250,000.00 (04/08/2026), $1,800,000.00 (05/11/2026), and $1,000,000.00 (06/01/2026).

Why this matters to the pending determination

This supplement bears directly on the two questions now before the Office.

First, it establishes a continuing course of conduct, not an isolated entry. The original complaint addressed $1,257,000.00 on the Q1 report. Fortify AZ filed its Q2 report on July 6, 2026, after this complaint was accepted on May 18 and after its own counsel filed a June 1 response defending the E1 treatment, and made the identical categorization choice with **another $4,064,000.00**. Across the two reports, the committee has now booked **$5,321,000.00** of ballot-measure signature-gathering and measure-support spending to the operating-expense line, and reported **$0.00** on the ballot-measure line for the entire election cycle. Whatever else it is, this is not a clerical slip on a single entry.

Second, it forecloses the response's "insignificance" argument. Fortify AZ's June 1 response asked the Office to dismiss this matter as insignificant, pointing to the "small dollar amount" factor in the 2025 Elections Procedures Manual. That argument was already untenable at $1,257,000.00. It is untenable at **$5,321,000.00** cycle-to-date, with $0.00 disclosed in the dedicated category the statute and the Office's own report form provide for exactly this spending. If seven figures of measure-specific spending can sit entirely on the operating-expense line, Schedule E2 is a dead letter.

I note for completeness that the Q2 report also itemizes a **$9,425.00 payment to Statecraft PLLC on 05/22/2026 for "Professional Services - Attorney fees."** The committee therefore continued to book its petition-circulation spending to operating expenses in the same period it was paying counsel to defend that treatment before this Office. The point is not the attorney fee itself, which is properly an operating expense; it is that the miscategorization at issue was a considered, ongoing choice rather than an oversight.

Requested action

I respectfully renew the requests in my complaint and June 9 reply, and ask that the Secretary of State, in resolving SOS-CF-2026-015:

1. Find reasonable cause to believe Fortify AZ violated A.R.S. § 16-926 by reporting ballot measure expenditures as operating expenses on both its 2026 Quarter 1 report (Report ID 371224) and its 2026 Quarter 2 report (Report ID 386151).

2. Require Fortify AZ to file amended Q1 and Q2 reports moving these disbursements to the ballot measure expenditure category, with the identifying information A.R.S. § 16-926(B)(3)(m) requires, including the ballot measure serial number and election date.

3. Direct Fortify AZ to categorize all ballot measure expenditures correctly in its current and subsequent reports for this election cycle.

4. Refer the matter to the Attorney General under A.R.S. § 16-938(C)(1) if Fortify AZ does not cure.

Respectfully submitted,

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Sources

- **Fortify AZ 2026 Quarter 2 report (Report ID 386151)**, filed 07/06/2026, covering 04/01/2026 to 06/30/2026: Schedule E1 disbursements to AZ Petition Partners ($50,000.00, $1,200,000.00, $1,800,000.00, $1,000,000.00) and Marson Media ($7,000.00, $7,000.00), all categorized "Professional Services - Consultants"; Schedule E2 $0.00 this period and cycle-to-date; Schedule C4b contributions from American Federation for Children ($1,250,000.00, $1,800,000.00, $1,000,000.00). Source: seethemoney.az.gov, Filer ID 102154.
- **Fortify AZ 2026 Quarter 1 report (Report ID 371224)**: the disbursements addressed in the original complaint.
- **A.R.S. § 16-901(4)**: definition of "ballot measure expenditure."
- **A.R.S. § 16-926(B)(3)(a), (m), (H)**: separate itemization categories for operating expenses and ballot measure expenditures; ballot-measure disclosures.
- **A.R.S. § 16-938(C), (C)(1)**: reasonable-cause standard and referral to the Attorney General.
- **2025 Elections Procedures Manual**: insignificance dismissal is discretionary and one of seven listed factors, including "whether there is a small dollar amount at issue."