

CAMPAIGN FINANCE COMPLAINT

Arizona Secretary of State, Campaign Finance Division

June 8, 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:

Strong Communities Action PAC

AZ Secretary of State Committee #: 102148

Jurisdiction: Arizona Secretary of State

Chairperson: Merissa Caldwell

Treasurer: Manuela Callini

Address: 3326 N 7th St, Phoenix, AZ 85014

Phone: (480) 374-0102

Email: fight@strongazpac.com

I. Summary

This complaint concerns a single, narrow question about Strong Communities Action PAC's Statement of Organization filed with the Secretary of State.

The committee has a sponsor: **Strong Communities Action**, a 501(c)(4) social welfare organization (EIN 86-2950170). The two share a chairperson, Merissa Hamilton (who also uses the name Merissa Caldwell). Under A.R.S. § 16-901(47), a person with "common or overlapping membership or officers" with a political action committee is that committee's sponsor. A.R.S. § 16-906(B)(2) then requires the committee's Statement of Organization to disclose the sponsor's name, mailing address, email address, website, and telephone number.

The committee's publicly available records with the Secretary of State do not identify any sponsor. The complaint asks the Secretary, as the custodian of the Statement of Organization, to determine whether the committee disclosed Strong Communities Action as its sponsor, and if it did not, to find a violation of A.R.S. § 16-906(B)(2).

II. Strong Communities Action is a sponsor of the committee

A.R.S. § 16-901(47) defines "sponsor" as:

"[A]ny person that establishes, administers or contributes financial support to the administration of a political action committee or that has common or overlapping membership or officers with that political action committee."

The "person" definition in A.R.S. § 16-901(39) includes a corporation or organization, so a 501(c)(4) organization can be a sponsor.

Strong Communities Action satisfies the "common or overlapping ... officers" prong. The two entities share their chairperson:

- **The committee.** Per the committee's Statement of Organization on file with the Secretary of State (Filer ID 102148), and on information and belief, the chairperson of Strong Communities Action PAC is **Merissa Caldwell**.
- **The 501(c)(4).** Per Strong Communities Action's 2024 IRS Form 990-EZ, Part IV (List of Officers, Directors, Trustees, and Key Employees), the chairperson of the organization is listed as **Merisa L. Hamilton** (the IRS form's spelling of Merissa Hamilton).

Merissa Hamilton and Merissa Caldwell are the same individual. Her own public biography states, verbatim, "Merissa Hamilton (also known as Merissa Caldwell)." The identity is independently corroborated by a documentary cross-link: the 501(c)(4) and the committee share the same physical address, 3326 N 7th Street, Phoenix, Arizona 85014, as confirmed on both the organization's 2024 IRS Form 990-EZ and the committee's own report cover sheets filed with the Secretary of State. Hamilton is therefore the chairperson of both the committee and the 501(c)(4), and that shared officer makes Strong Communities Action a sponsor of the committee as a matter of the statutory definition.

Two additional facts corroborate the sponsor relationship, though the overlapping-officer test above is sufficient on its own:

1. The committee is named after the sponsor. A.R.S. § 16-906(B)(1)(b) requires a sponsored political action committee's name to include "the sponsor's name or commonly known nickname." The committee chose the name "Strong Communities Action PAC," which incorporates the 501(c)(4)'s full

name, "Strong Communities Action." Naming the committee after the organization is strong evidence that the organization is its sponsor.

2. Shared address. The committee's registered address (3326 N 7th St, Phoenix, AZ 85014) is the same address the 501(c)(4) uses as its principal place of business.

III. The Statement of Organization does not disclose the sponsor

A.R.S. § 16-906(B) provides that a Statement of Organization "shall include," among other items:

"2. The name, mailing address, e-mail address, website, if any, and telephone number of any sponsor."

This is a mandatory disclosure. If a committee has a sponsor, the sponsor's identifying information must appear on the Statement of Organization.

The committee's publicly available records with the Secretary of State contain no such disclosure. Neither the committee detail record for Filer ID 102148 nor the cover sheets of the committee's filed reports (its 2026 March Post-Election report, its 2026 May Pre-Election report, and its 2026 CCEC Primary Tuesday Trigger report) identify Strong Communities Action, or any other organization, as a sponsor.

The complainant does not have access to the underlying Statement of Organization PDF, which the Secretary of State does not publish. The Secretary of State holds that document in its own files. The complaint therefore asks the Secretary to examine the Statement of Organization on file for Filer ID 102148 and determine whether it discloses Strong Communities Action (EIN 86-2950170) as a sponsor as A.R.S. § 16-906(B)(2) requires.

If the Statement of Organization does not disclose the sponsor, the committee is in violation of A.R.S. § 16-906(B)(2). A.R.S. § 16-906(C) separately requires the committee to file an amended Statement of Organization within ten days of any change in committee information, so the obligation to disclose the sponsor is continuing.

IV. Jurisdiction

A.R.S. § 16-906 is part of Title 16, Chapter 6, Article 1, which A.R.S. § 16-938(A) expressly places within the filing officer's investigative authority ("this article and articles 1, 1.1, 1.2, 1.3, 1.4, 1.5 and 1.6").

A.R.S. § 16-938(A) provides that, on receipt of a third-party complaint, "a 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, including the alleged failure to register as a committee."

Strong Communities Action PAC is registered with the Secretary of State (Filer ID 102148), and the jurisdiction stated on each of its reports is "Arizona Secretary of State." The Secretary is therefore the committee's filing officer. A.R.S. § 16-906(A) requires a committee to file its Statement of Organization "with the filing officer," and A.R.S. § 16-906(D) provides that the filing officer issues the committee's identification number. The Secretary of State both holds the Statement of Organization at issue and is the sole officer authorized to investigate an alleged § 16-906 violation by this committee.

V. 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. Examine the Statement of Organization on file for Strong Communities Action PAC (Filer ID 102148) and determine whether it discloses the committee's sponsor, Strong Communities Action (EIN 86-2950170), as required by A.R.S. § 16-906(B)(2).

3. If the sponsor is not disclosed, determine that reasonable cause exists to believe the committee violated A.R.S. § 16-906(B)(2), and require the committee to file an amended Statement of Organization disclosing the sponsor's name, mailing address, email address, website, and telephone number, consistent with A.R.S. § 16-906(B)(2) and (C).

4. Refer the matter to the Attorney General under A.R.S. § 16-938(C)(1) if the Secretary's office finds reasonable cause and the committee does not cure.

5. Provide written confirmation of receipt of this complaint and the assigned docket number.

The complaint can be resolved on the face of the Statement of Organization that the Secretary already holds, together with the 501(c)(4)'s publicly filed 2024 IRS Form 990-EZ.

Respectfully submitted,

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Sources

- **A.R.S. § 16-901(39)**: definition of "person" (includes a corporation or organization).
- **A.R.S. § 16-901(47)**: definition of "sponsor" ("common or overlapping membership or officers").
- **A.R.S. § 16-906**: Committee statement of organization; subsection (B)(1)(b) (sponsored committee's name must include sponsor's name); subsection (B)(2) (sponsor disclosure); subsection (C) (amendment within ten days); subsection (D) (filing officer issues ID number).
- **A.R.S. § 16-938**: Enforcement authority; subsection (A) (filing officer is sole investigator of Article 1 violations); subsection (C)(1) (referral to Attorney General).
- **Strong Communities Action PAC, Committee #102148**: registration and reports on file with the Arizona Secretary of State; chairperson Merissa Caldwell; address 3326 N 7th St, Phoenix, AZ 85014. Source: seethemoney.az.gov, Filer ID 102148.

- **Strong Communities Action (501(c)(4), EIN 86-2950170):** 2024 IRS Form 990-EZ, Part IV (officers): "Merisa L Hamilton," Chairperson (the IRS form's spelling of Merissa Hamilton). IRS-filed return; copy retained by complainant.
- **Merissa Hamilton a/k/a Merissa Caldwell:** public biography stating "Merissa Hamilton (also known as Merissa Caldwell)" (merissacaldwell.com).