

# CAMPAIGN FINANCE COMPLAINT

## Arizona Secretary of State, Campaign Finance Division

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April 30, 2026

Via Email (campaignfinance@azsos.gov)

Campaign Finance Division  
Arizona Secretary of State  
1700 W Washington St, Floor 7  
Phoenix, AZ 85007

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### Complainant:

[REDACTED]

[CITY REDACTED]

[EMAIL REDACTED]

[PHONE REDACTED]

**Identity Verification (per A.R.S. Sec. 16-938(A)):** I am an identifiable human being. I am a qualified Arizona voter registered in Maricopa County and a Salt River Project ratepayer. I am submitting this complaint as an individual, not on behalf of any entity. My direct contact information is above. Photographic identification is available upon request.

### Respondent:

Turning Point PAC Arizona  
AZ Secretary of State Filer ID: 101981  
Filer Type: Political Action Committee (Standing)  
Registration Date: October 1, 2025  
Chairman: Tyler Bowyer  
Treasurer: Mercede Carbajal  
Address: 4930 E Beverly Rd, Suite 2000, Phoenix, AZ 85044  
Email: info@tppac.com  
Phone: 602-815-3540

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## I. Summary of Complaint

This complaint concerns the completeness of Turning Point PAC Arizona's **2026 March Pre-Election** campaign finance report, filed with the Secretary of State on February 24, 2026 under penalty of perjury, covering the reporting period **January 1, 2026 through February 21, 2026**.

That report discloses zero expenditures of any kind in connection with the April 7, 2026 Salt River Project Board of Directors election. The report's Schedule E1 (Operating Expenses) and Schedule E2 (Independent & Ballot Measure Expenditures) show no SRP-related activity for the period.

Photographic evidence in the complainant's possession, captured on three separate dates during the March Pre-Election reporting period and authenticated by EXIF metadata from the originating device, documents three visually distinct Turning Point PAC sign designs physically deployed in Maricopa County during that period. The earliest photograph is dated **February 2, 2026** -- twenty-one days before TP PAC AZ's only disclosed sign-printing payments anywhere in any of its filings (which are dated February 23, 2026, and appear on the subsequently filed March Post-Election (Q1) report).

Three distinct sign designs, each in deployment by February 20, 2026, indicate at least three separate sign-production runs completed before TP PAC AZ's only disclosed printing date. By the plain text of A.R.S. Sec. 16-901(14), expenditures for printed signs that bear "Paid for by Turning Point PAC" disclaimers and expressly advocate for clearly identified candidates for the SRP election are independent expenditures. Independent expenditures incurred during the March Pre-Election reporting period (Jan 1 - Feb 21) are required by A.R.S. Sec. Sec. 16-927 and 16-926 to appear on the March Pre-Election report. None do.

This complaint is filed as a separate matter from the campaign finance complaint dated April 29, 2026 against the same respondent. That April 29 complaint addresses the schedule classification of the Q1 report's two sign-printing line items dated February 23, 2026. The present complaint addresses different reports, a different reporting period, and the question of whether expenditures incurred prior to the Q1 reporting period were captured in the proper report. The two matters are independent of one another and do not overlap in their factual or legal allegations.

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## II. The Respondent: Turning Point PAC Arizona (Filer ID 101981)

1. **Based on public records maintained by the Arizona Secretary of State:** Turning Point PAC Arizona registered as a Standing Political Action Committee with the Secretary of

State on October 1, 2025, under Filer ID 101981.

2. **Based on public records:** As of April 30, 2026, TP PAC AZ has filed four campaign finance reports with the Secretary of State:

Report Name	Reporting Period	Date Filed
2025 November Pre-Election	Oct 1 - Oct 18, 2025	10/20/2025
2025 November Post-Election (Q4)	Oct 19 - Dec 31, 2025	01/15/2026
2026 March Pre-Election (subject of this complaint)	Jan 1 - Feb 21, 2026	02/24/2026
2026 March Post-Election (Q1)	Feb 22 - Mar 31, 2026	04/15/2026

3. **Based on the Secretary of State's own records:** The 2026 March Pre-Election report was filed on February 24, 2026 -- one day after the statutory due date -- and TP PAC AZ paid a \$10 late-filing fine assessed by the Secretary of State.

4. **Based on direct review of the SeeTheMoney public disclosure portal:** Across the four filed reports, TP PAC AZ's Schedule E2 (Independent & Ballot Measure Expenditures) cumulative total is \$25,246.28. According to the entity's own filings, that entire amount pertains to the 2026 gubernatorial election cycle. None of the four reports discloses any independent expenditure on Schedule E2 in connection with the SRP board election.

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### III. The 2026 March Pre-Election Report

5. **Based on direct review of the 2026 March Pre-Election report on file with the Secretary of State:** The report covers the reporting period January 1, 2026 through February 21, 2026 and was filed by TP PAC AZ on February 24, 2026, signed under penalty of perjury as required by A.R.S. Sec. 16-926(B)(5).

6. **Based on direct review of the same report:** Schedule E2 (Independent & Ballot Measure Expenditures) discloses zero independent expenditures for the period.

7. **Based on direct review of the same report:** Schedule E1 (Operating Expenses) discloses no line items connected to SRP candidates or the April 7, 2026 SRP Board of Directors election by any reasonable reading of the disclosed memos.

8. **Based on direct review of the same report:** No other schedule of the report discloses any SRP-related expenditure for the January 1 - February 21, 2026 period.

## IV. Photographic Evidence with Authenticated Timestamps

9. **Photographic source:** Three photographs in the complainant's possession were taken with an Apple iPhone 15 Pro Max running iOS 26.2.1 by a member of the complainant's household between February 2, 2026 and February 20, 2026. Each photograph contains an unaltered EXIF `DateTimeOriginal` timestamp recorded by the camera at the time of capture and includes camera-make and software metadata. The original device and original image files are available for inspection by the Department upon request.

10. **The three photographs and their authenticated capture timestamps are:**

Exhibit	Filename	Capture (MST)	Camera
A-1	FullSizeRender.jpeg	2026-02-02 14:49:15	Apple iPhone 15 Pro Max
A-2	IMG_7554.jpeg	2026-02-13 09:04:05	Apple iPhone 15 Pro Max
A-3	IMG_7676.jpeg	2026-02-20 18:02:13	Apple iPhone 15 Pro Max

Capture timestamps shown above are taken from each photograph's unaltered EXIF `DateTimeOriginal` field, expressed in Mountain Standard Time as recorded by the originating device.

11. **Based on direct review of the photographs:** Each of the three photographs depicts a Turning Point PAC sign physically deployed and visible to the public. The three photographs depict three visually distinct Turning Point PAC sign designs.

12. **Based on direct review of the photographs:** The signs depicted bear the "Paid for by Turning Point PAC" disclaimer language matching the registered name (in colloquial form), website (TPPAC.COM), and phone number (602-815-3540) of TP PAC AZ Filer ID 101981.

13. **Each photograph's capture date falls within the 2026 March Pre-Election reporting period** (January 1 through February 21, 2026):

- The February 2, 2026 photograph was captured **twenty-one days** before TP PAC AZ's only disclosed sign-printing payments, which appear on the subsequently filed Q1 report and are dated February 23, 2026.
- The February 13, 2026 photograph was captured **ten days** before those same disclosed payments.
- The February 20, 2026 photograph was captured **three days** before those same disclosed payments and **one day** before the close of the March Pre-Election reporting period.

14. **The complete metadata index for the three photographs is included in Exhibit A.** The original camera files with full unaltered EXIF data are available for inspection upon request.

## V. The Implications

15. The Q1 report (Report ID 366407) discloses TP PAC AZ's only sign-printing payments anywhere in any of its four filed reports: two line items dated February 23, 2026, totaling \$4,285.52 (paid to Alphagraphics and INKED XPRESSION). The 2026 March Pre-Election report, which covers the immediately preceding period (January 1 through February 21, 2026), discloses no sign-printing payments at all.

16. The three photographs in Section IV establish that signs bearing "Paid for by Turning Point PAC" disclaimers were physically deployed at specific Maricopa County locations on February 2, February 13, and February 20, 2026. Each deployment necessarily required prior production and distribution. By February 20, 2026, three visually distinct Turning Point PAC sign designs had been produced and were in deployment in Maricopa County.

17. Production of three distinct sign designs ordinarily entails at least three production runs and at least three separate vendor invoices. None of the four filed TP PAC AZ reports discloses any sign-related vendor payments before February 23, 2026.

18. **The complaint does not at this stage assert with certainty that TP PAC AZ paid for the photographed signs.** The complaint observes (a) that the disclaimer language on each of the three photographed signs matches TP PAC AZ's registered name, website, and phone number, and (b) that TP PAC AZ has subsequently disclosed sign-printing payments under nearly identical vendor descriptions on its Q1 report. These facts together raise a question that A.R.S. Sec. 16-938(A) authorizes the Secretary of State, and only the Secretary of State, to investigate.

19. If the Department determines after voluntary production that an entity other than TP PAC AZ paid for some or all of the photographed signs, the complaint's under-reporting theory would not apply to those particular signs. Resolution of that attribution question is among the matters for which voluntary production is requested in Section VIII below.

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## VI. Statutory Authority and Jurisdiction

20. **A.R.S. Sec. 16-938(A)** provides:

*"[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."*

21. **A.R.S. Sec. 16-901(27)** defines "filing officer" as the Secretary of State or the local

officer in charge of elections "who accepts statements and reports for those elections pursuant to section 16-928." TP PAC AZ registered with the Secretary of State and files its campaign finance reports with the Secretary of State. The Secretary of State has accepted those filings, including the 2026 March Pre-Election report at issue here. The Secretary of State is therefore the filing officer for TP PAC AZ within the meaning of Sec. 16-901(27) and the sole public officer authorized to investigate the accuracy and completeness of TP PAC AZ's reports under Sec. 16-938(A).

22. **A.R.S. Sec. 16-938(D)** provides that, before a reasonable-cause determination, the filing officer "may request the voluntary production of evidence or attendance of witnesses in making a reasonable cause determination." This complaint asks the Secretary of State to use that voluntary-production authority as set forth in Section VIII below.

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## **VII. Statutory Violations Alleged**

### **A. Failure to Disclose SRP-Related Expenditures Incurred During the March Pre-Election Reporting Period**

23. **A.R.S. Sec. 16-927(A)(2)(a)** establishes the timing and content of pre-election reports for political action committees: a pre-election report shall be "[c]omplete from the first day of the applicable calendar quarter through the seventeenth day before the election." The 2026 March Pre-Election report TP PAC AZ filed on February 24, 2026 covers January 1 through February 21, 2026.

24. **A.R.S. Sec. 16-926(A)** requires committees to file campaign finance reports "with the filing officer" and Sec. 16-926(B) prescribes the contents. Sec. 16-926(B)(3) requires the report to include "an itemized list of all disbursements in excess of \$250 during the reporting period," with sub-categories for the various types of disbursements.

25. **A.R.S. Sec. 16-926(B)(3)(I)** requires the itemization to specifically include:

*"Independent expenditures that are made to advocate the election or defeat of a candidate, including identification of the candidate, office sought by the candidate, election date, mode of advertising and distribution or publication date."*

26. **A.R.S. Sec. 16-901(14)** defines "independent expenditure" as:

*"[A]n expenditure by a person or political committee, other than a candidate's campaign committee, that expressly advocates the election or defeat of a clearly identified candidate, that is*

*made without cooperation or consultation with any candidate or any committee or agent of the candidate and that is not made in concert with or at the request or suggestion of any candidate, or any committee or agent of the candidate."*

27. **A.R.S. Sec. 16-901.01(A)** defines "expressly advocates" to include communications using magic words such as "vote for," "elect," "support," "endorse," "vote against," "defeat," and "reject" identifying a clearly identified candidate. The "VOTE [candidate name]" formulation that appears on the photographed Turning Point PAC slate signs falls squarely within Sec. 16-901.01(A)(1) on its face.

28. **A.R.S. Sec. 16-901(17)** defines "election" to include "any candidate election during a primary, general, recall, special or runoff election for any office in this state other than a federal office and a political party office." Sec. 16-901(15) separately defines "district office" to include offices established or organized pursuant to Title 48. The Salt River Project's elected board is a Title 48 special-taxing-district office and is within the chapter's scope.

29. **A.R.S. Sec. 16-926(H)** further provides:

*"An entity that makes independent expenditures or ballot measure expenditures in excess of \$1,000 during a reporting period shall file an expenditure report with the filing officer for the applicable reporting period."*

30. **The 2026 March Pre-Election report on its face does not contain any disclosure of SRP-related independent expenditures, including the disclosures required by Sec. Sec. 16-926(B)(3)(I) and 16-926(H), for the January 1 - February 21, 2026 reporting period.** If the Department determines after investigation that any qualifying SRP-related expenditure was incurred by TP PAC AZ during that reporting period, the absence of that disclosure on the March Pre-Election report is a violation of Sec. Sec. 16-926(B)(3)(I), 16-926(H), and 16-927(A)(2)(a).

## **B. Three Distinct Sign Designs in Deployment Before TP PAC AZ's Only Disclosed Printing Date**

31. By February 20, 2026 -- three days before TP PAC AZ's only disclosed sign-printing payments anywhere in any of its filings, and one day before the close of the March Pre-Election reporting period -- three visually distinct Turning Point PAC sign designs were physically deployed in Maricopa County, as established by the EXIF-authenticated photographs in Section IV. Each design ordinarily requires a separate production setup. The disclosure on the Q1 report of two line items totaling \$4,285.52, both dated February 23, 2026 and both paid to commercial print vendors, is on its face a partial disclosure that does not account for the production runs that must have preceded the February 2, February 13, and February 20 deployment dates documented in the photographs.

32. Whether TP PAC AZ paid for some, all, or none of the photographed signs during the March Pre-Election reporting period is a fact-specific question that the Secretary of State is positioned to answer through the voluntary-production authority of A.R.S. Sec. 16-938(D). To the extent the Department determines that any sign-related expenditure was incurred by TP PAC AZ during the January 1 - February 21, 2026 reporting period and was not disclosed on the March Pre-Election report, that under-reporting is an additional violation of Sec. Sec. 16-926(B)(3)(I), 16-926(H), and 16-927(A)(2)(a).

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## VIII. 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. Sec. 16-938 and assign a docket number distinct from the April 29, 2026 complaint against the same respondent (which addresses the Q1 report's schedule classification, not the March Pre-Election report's completeness).

2. **Initiate an investigation** under A.R.S. Sec. 16-938(A) into the completeness of TP PAC AZ's 2026 March Pre-Election campaign finance report (filed February 24, 2026, covering January 1 through February 21, 2026), and determine whether reasonable cause exists to believe that A.R.S. Sec. Sec. 16-926(B)(3)(I), 16-926(H), and 16-927(A)(2)(a) have been violated by the absence of any SRP-related independent expenditure disclosure on that report.

3. **Request voluntary production from TP PAC AZ pursuant to A.R.S. Sec. 16-938(D)** of the following records, sufficient to permit a complete reasonable-cause determination:

a. All vendor invoices issued to TP PAC AZ on or before February 21, 2026 for sign production, sign design, sign printing, sign installation, sign distribution, sign storage, or sign-related consulting in connection with the April 7, 2026 SRP Board of Directors election.

b. A complete list of every distinct Turning Point PAC sign design produced for or placed by TP PAC AZ in Maricopa County in connection with the 2026 SRP election, with the production date, vendor, quantity, dimensions, total cost, and date of first deployment for each design.

c. Records of every Maricopa County location at which a Turning Point PAC sign was physically placed by or on behalf of TP PAC AZ between January 1, 2026 and February 21, 2026, with associated dates.

d. Records of any in-kind contribution received by TP PAC AZ in the form of sign design, printing, distribution, or installation services from any other entity, including but not

limited to Turning Point Action, Turning Point USA, or Turning Point PAC Inc. (FEC committee C00814152), at any time on or before February 21, 2026.

e. The treasurer's working ledger or general-ledger entries for the January 1 - February 21, 2026 period, sufficient to show all expenditures incurred during that period whether or not those expenditures appear on any filed report.

4. **Determine** whether the 2026 March Pre-Election report requires amendment to disclose any SRP-related expenditures incurred during the January 1 - February 21, 2026 reporting period and not previously disclosed.

5. **Determine** whether prior reports (the 2025 November Pre-Election and 2025 November Post-Election (Q4) reports) require amendment to disclose any SRP-related expenditures incurred during their respective reporting periods.

6. **If the Department finds reasonable cause to believe a violation has occurred**, refer the matter to the Attorney General under A.R.S. Sec. 16-938(C)(1) for enforcement, with the civil penalty calculation under A.R.S. Sec. 16-938(E)(2) computed against the full amount of unreported independent expenditures established by the requested voluntary production.

7. **Provide written confirmation** of receipt of this complaint, the assigned docket number, and the procedural timeline within ten (10) business days.

I am available to provide additional documentation, including the original camera files with unaltered EXIF data for forensic verification, or testimony as needed.

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## IX. Exhibits

The following exhibits are attached and incorporated by reference:

- **Exhibit A:** Three photographs of Turning Point PAC signs deployed in Maricopa County between February 2 and February 20, 2026, with embedded EXIF `DateTimeOriginal` timestamps preserved on each. Cameras: Apple iPhone 15 Pro Max running iOS 26.2.1. The original camera files with full unaltered EXIF are available for inspection upon request.

- **Exhibit B:** Reference to the 2026 March Pre-Election Campaign Finance Report filed by Turning Point PAC Arizona (Filer ID 101981) on February 24, 2026. The report is on file with the Secretary of State and is incorporated by reference.

- **Exhibit C:** Reference to the 2026 March Post-Election (Q1) Campaign Finance Report filed by Turning Point PAC Arizona (Filer ID 101981) on April 15, 2026 (Report ID 366407).

The report is on file with the Secretary of State and is incorporated by reference. Schedule E1 of that report contains the two February 23, 2026 sign-printing line items referenced in this complaint.

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Respectfully submitted,

[REDACTED]

[CITY REDACTED]

[EMAIL REDACTED]

[PHONE REDACTED]

# Exhibit A

Three photographs of Turning Point PAC signs deployed in Maricopa County between February 2 and February 20, 2026 -- inside the 2026 March Pre-Election reporting period (January 1 -- February 21, 2026). Each photograph below carries an unaltered EXIF DateTimeOriginal timestamp recorded by the originating Apple iPhone 15 Pro Max. Original camera files available for inspection upon request.

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Exhibit A-1: Turning Point PAC sign deployed in Maricopa County. Captured 2026-02-02 at 14:49:15 MST. The sign bears the disclaimer "PAID FOR BY TURNING POINT PAC (TPPAC.COM 602-815-3540)" matching the registered name (in colloquial form), website, and phone number of TP PAC AZ Filer ID 101981.

2026-02-02\_FullSizeRender.jpeg | Captured: 2026:02:02 14:49:15 | Camera: Apple iPhone 15 Pro Max



Exhibit A-2: A second, visually distinct Turning Point PAC sign design deployed in Maricopa County. Captured 2026-02-13 at 09:04:05 MST -- ten days before TP PAC AZ's only disclosed sign-printing payments anywhere in any of its filings (which are dated February 23, 2026).

2026-02-13\_IMG\_7554.jpeg | Captured: 2026:02:13 09:04:05 | Camera: Apple iPhone 15 Pro Max



**Exhibit A-3: A third, visually distinct Turning Point PAC sign design deployed in Maricopa County. Captured 2026-02-20 at 18:02:13 MST -- one day before the close of the 2026 March Pre-Election reporting period and three days before TP PAC AZ's only disclosed sign-printing payments.**

*2026-02-20\_IMG\_7676.jpeg | Captured: 2026:02:20 18:02:13 | Camera: Apple iPhone 15 Pro Max*

