

CAMPAIGN FINANCE COMPLAINT

Arizona Secretary of State, Campaign Finance Division

April 6, 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]

Respondent:

Turning Point PAC Arizona AZ SOS Filer ID: 101981 Filer Type: Political Action Committee
(Standing) Registration Date: 10/01/2025 Chairman: Tyler Bowyer Treasurer: Mercedes
Carbajal Address: 4930 E Beverly Rd Ste 2000, Phoenix, AZ 85044 Email: info@tppac.com
Phone: 602-815-3540

I. Introduction

I am a qualified Arizona voter and Salt River Project ratepayer in Maricopa County. I submit this complaint against Turning Point PAC Arizona ("TP PAC AZ"), Filer ID 101981, a Standing Political Action Committee registered with the Arizona Secretary of State.

TP PAC AZ is actively making campaign expenditures in connection with the April 7, 2026 Salt River Project board election. Campaign signs bearing the disclaimer "Paid for by Turning Point PAC (TPPAC.COM 602-815-3540)" are deployed across the Phoenix metropolitan area promoting SRP board candidates. Yet none of TP PAC AZ's filed campaign finance reports disclose any SRP-related expenditures. All reported spending pertains to the 2026 gubernatorial election cycle.

This complaint concerns TP PAC AZ's failure to accurately report campaign expenditures as required by A.R.S. § 16-926 and § 16-927.

II. Factual Background

A. TP PAC AZ Registration and Filing History

1. **Based on public records maintained by the Arizona Secretary of State:** TP PAC AZ registered as a Standing Political Action Committee on October 1, 2025, under Filer ID 101981. Tyler Bowyer is listed as Chairman and Mercede Carbajal as Treasurer. The entity's mailing address is 4930 E Beverly Road, Suite 2000, Phoenix, AZ 85044.

2. **Based on direct review of the SeeTheMoney public disclosure portal:** As of April 5, 2026, TP PAC AZ has filed exactly three campaign finance reports with the Secretary of State:

Report Name	Report Period	Due Date	Date Filed	Status
2025 November Pre-Election	Oct 1 - Oct 18, 2025	10/20/2025	10/20/2025	On Time
2025 November Post-Election Q4	Oct 19 - Dec 31, 2025	01/15/2026	01/15/2026	On Time
2026 March Pre-Election	Jan 1 - Feb 21, 2026	02/23/2026	02/24/2026	1 Day Late

3. **Based on direct review of the SeeTheMoney portal:** The aggregate financial activity across these three reports is: Income of \$45,000.00, Expenses of \$25,246.28, Independent Expenditures For candidates of \$11,008.52, and Independent Expenditures Against candidates of \$14,237.76. All reported independent expenditures pertain to the 2026 gubernatorial election cycle. Zero dollars in SRP-related expenditures appear in any filed report.

4. **Based on public records:** TP PAC AZ's Statement of Organization, filed October 1, 2025, contains only organizational information (committee name, address, officers, bank). It does not contain financial data or identify target elections.

B. Evidence of SRP Election Expenditures

5. **Based on personal knowledge and direct observation:** Campaign signs have been placed throughout the Phoenix metropolitan area promoting candidates for the April 2026 SRP board election. These signs bear the disclaimer: "PAID FOR BY TURNING POINT PAC (TPPAC.COM 602-815-3540)." The phone number (602-815-3540) and website (TPPAC.COM) match the contact information listed in TP PAC AZ's registration with the Secretary of State. Photographic evidence is attached as Exhibit A.

6. **Based on personal knowledge and direct observation:** The signs I have personally observed promote SRP board candidates including Chris Dobson and Barry Paceley. Multiple sign designs are in circulation, including both candidate endorsement signs and opposition signs targeting incumbent SRP board members. The production, printing, and placement of campaign signs across a metropolitan area constitutes a substantial campaign expenditure.

C. Evidence of Q4 2025 SRP-Related Expenditures

7. **Based on WHOIS domain registration records:** The domain tppacaz.com was registered on October 17, 2025, through GoDaddy.com. DNS records show the domain was

configured with Cloudflare nameservers and the WHOIS record was updated on October 28, 2025, indicating active development work. Domain registration is a direct expenditure. This expenditure occurred during the Q4 2025 reporting period (October 19 - December 31, 2025) but does not appear in TP PAC AZ's Q4 report filed January 15, 2026. WHOIS records are attached as Exhibit D.

8. Based on published reporting: Turning Point Action, the 501(c)(4) organization that shares leadership (Tyler Bowyer, COO), address (4930 E Beverly Rd Ste 2000), phone number (602-815-3540), and email domain (tppac.com) with TP PAC AZ, has been conducting SRP election operations since mid-2025. The Arizona Capitol Times reported on August 22, 2025 that Turning Point "has been sending canvassers out to register voters since at least June" for the SRP election. These operations continued through Q4 2025.

9. Based on published reporting: At AmericaFest in Phoenix (December 18-21, 2025, attendance approximately 30,000), Turning Point operatives including Tyler Bowyer promoted SRP voter registration drives. This is a documented SRP election activity that occurred during the Q4 2025 reporting period. Any costs attributable to TP PAC AZ for SRP-related activities at this event should have appeared in the Q4 report.

10. Based on published reporting in Phoenix New Times and KTAR News: Tyler Bowyer has stated that TPA has "injected millions of dollars" into SRP election efforts and deployed "hundreds and hundreds of full-time staff." Spending of this magnitude cannot materialize overnight. The recruitment, hiring, training, and deployment of hundreds of staff members necessarily began well before the earliest filed evidence of SRP campaign activity in 2026. Payroll and operational costs attributable to SRP election work in Q4 2025 should be reflected in the filed reports.

D. Entity Migration: County to State

11. Based on public records maintained by the Maricopa County Elections

Department: A committee named "Turning Point PAC" previously operated as a Maricopa County political action committee under Committee ID 1002479. That committee was registered at the same address (4930 E Beverly Road, Suite 2000, Phoenix, AZ 85044), with the same Chairman (Tyler Bowyer), the same Treasurer (Mercede Carbajal), the same email (info@tppac.com), the same phone number (602-815-3540), and the same website (tppac.com).

12. Based on public records: On January 17, 2025, Tyler Bowyer and Mercede Carbajal signed a Termination Statement for the Maricopa County committee. In that statement, they declared under penalty of perjury that "the committee will no longer receive any contributions or make any disbursements." The Termination Statement is attached as Exhibit B.

13. Based on public records: Approximately nine months after terminating the county-level committee, a state-level entity with the same name, same leadership, same address, and same infrastructure was registered with the Secretary of State on October 1, 2025. While this transition may not be inherently improper, it warrants examination to ensure that all reporting obligations have been satisfied at both levels and that the termination was not used to reset the entity's disclosure history.

E. Reporting Timeline and the SRP Election

14. **Based on the Secretary of State's published reporting calendar:** The next report due from TP PAC AZ is the 2026 March Post-Election / Q1 report, covering February 22 through March 31, 2026. This report is due during the April 1-15, 2026 filing window. Any sign production, placement, or other SRP election expenditures incurred before March 31 should appear in this report.

15. **Based on the reporting calendar:** The SRP board election is April 7, 2026. Voters cast ballots before the Q1 report deadline of April 15. This means that the electorate will have voted without any disclosure of TP PAC AZ's SRP expenditures. The next report after that -- covering April 1 through the May pre-election cutoff -- is not due until early May. The practical effect is that TP PAC AZ's SRP spending occurs entirely in the dark: voters go to the polls with zero disclosure of the entity's financial activity in the race they are voting on.

III. Legal Basis

A. Reporting Requirements Under A.R.S. § 16-926

16. A.R.S. § 16-926 requires political committees to file campaign finance reports disclosing all contributions received and expenditures made. Reports must itemize expenditures exceeding \$250, including the payee, amount, date, and purpose.

17. A.R.S. § 16-926 also requires that independent expenditures exceeding \$1,000 be reported with specific information including: the candidate or ballot measure supported or opposed, the office sought, the election date, the mode of advertising, and the date of first publication or distribution. The campaign signs deployed across the Phoenix metropolitan area for SRP candidates clearly constitute independent expenditures exceeding \$1,000. These expenditures have not been reported.

B. Reporting Schedule Under A.R.S. § 16-927

18. A.R.S. § 16-927 establishes the reporting schedule for political committees. Standing PACs file on the Secretary of State's reporting calendar, with quarterly reports split into pre-election and post-election periods when an election falls within the quarter.

19. TP PAC AZ's three filed reports cover activity through February 21, 2026. None disclose SRP-related expenditures. If SRP expenditures occurred before February 21, they should have appeared in the March Pre-Election report filed February 24, 2026. If they occurred between February 22 and March 31, they should appear in the Q1 Post-Election report due April 15, 2026.

20. The domain registration for tppacaz.com on October 17, 2025 is an expenditure that occurred within the Q4 2025 reporting period (October 19 - December 31, 2025). If this expenditure does not appear in the Q4 report filed January 15, 2026, that report is incomplete.

C. Committee Obligations Under A.R.S. § 16-905

21. A.R.S. § 16-905 governs committee registration and disclosure. A political committee that makes expenditures must comply with the disclosure requirements applicable to those expenditures, regardless of which specific election triggered the spending.

IV. Summary of Concerns

The facts outlined above raise the following concerns:

- 1. Unreported SRP election expenditures:** TP PAC AZ has deployed campaign signs across the Phoenix metropolitan area for the April 2026 SRP board election bearing its name, phone number, and website. None of its three filed campaign finance reports disclose any SRP-related expenditures. All \$25,246.28 in reported expenses pertain to the 2026 gubernatorial election cycle.
 - 2. Potentially incomplete Q4 2025 report:** The tppacaz.com domain was registered on October 17, 2025, during the Q4 reporting period. If this expenditure does not appear in the Q4 report filed January 15, 2026, the report is incomplete. Additional SRP-directed activity occurred in Q4 2025, including SRP voter registration promotion at AmericaFest (December 18-21, 2025) and ongoing canvassing operations that began in mid-2025.
 - 3. Independent expenditure reporting:** Campaign signs promoting SRP candidates constitute independent expenditures exceeding \$1,000. A.R.S. § 16-926 requires specific reporting of such expenditures, including candidate identification, office, election date, and mode of advertising. No such reporting has occurred.
 - 4. Disclosure timing gap:** The SRP election is April 7, 2026. The next reporting deadline is April 15, 2026. Voters will cast ballots with zero disclosure of TP PAC AZ's SRP spending. While this is a structural feature of the reporting calendar rather than a violation, it underscores the importance of ensuring that all prior reports are complete and accurate -- particularly the Q4 2025 and March Pre-Election reports that should have captured any earlier SRP expenditures.
 - 5. Entity continuity after termination:** The county-level Turning Point PAC was terminated under oath in January 2025. The state-level TP PAC AZ was created nine months later with identical leadership, address, and infrastructure. This transition warrants examination to ensure that all reporting obligations have been met and that the termination was not used to evade county-level reporting requirements.
-

V. Requested Action

I respectfully request that the Campaign Finance Division:

- 1. Investigate** whether Turning Point PAC Arizona (Filer ID 101981) has met its campaign

finance reporting obligations under A.R.S. § 16-926 and § 16-927 for the 2026 SRP board election;

2. **Review** the Q4 2025 report (filed January 15, 2026) to determine whether it includes all expenditures incurred during that period, including the tppacaz.com domain registration on October 17, 2025 and any other SRP election-related costs;

3. **Determine** whether the campaign signs bearing the "Paid for by Turning Point PAC (TPPAC.COM 602-815-3540)" disclaimer represent independent expenditures that should have been separately reported under A.R.S. § 16-926 with candidate identification, office, election date, and advertising mode;

4. **Review** whether the transition from the terminated county-level committee (Committee ID 1002479) to the state-level entity (Filer ID 101981) complied with all applicable registration and reporting requirements;

5. **Assess** any applicable fines or penalties for incomplete or inaccurate reports;

6. **Provide written confirmation** of receipt of this complaint and any assigned case or reference number.

VI. Exhibits

The following exhibits are attached to this complaint and incorporated herein by reference:

- **Exhibit A:** Photographs of Turning Point PAC campaign signs in the Phoenix metropolitan area bearing the disclaimer "Paid for by Turning Point PAC (TPPAC.COM 602-815-3540)" promoting candidates in the April 2026 SRP board election (photographed April 2, 2026)

- **Exhibit B:** Maricopa County Committee Termination Statement for Turning Point PAC (Committee ID 1002479), filed January 17, 2025, signed by Chairman Tyler Bowyer and Treasurer Mercedes Carbajal under penalty of perjury

- **Exhibit C:** Screenshots of the SeeTheMoney public disclosure portal showing: (C-1) PAC search results with financial summary for Turning Point PAC Arizona, (C-2) demographic and registration information for Filer ID 101981, and (C-3) the three reports previously filed by the entity, all showing zero SRP-related expenditures

- **Exhibit D:** WHOIS domain registration records for tppacaz.com showing creation date of October 17, 2025, GoDaddy registrar, and Cloudflare DNS configuration updated October 28, 2025

- **Exhibit E:** Arizona Capitol Times article (August 22, 2025) reporting that Turning Point has been sending canvassers to register voters for the SRP election "since at least June" 2025

- **Exhibit F:** News articles documenting SRP election activities at AmericaFest (December 18-21, 2025) and Tyler Bowyer's statements regarding "millions of dollars" and "hundreds of staff" deployed for SRP

Respectfully submitted,

[REDACTED] [EMAIL REDACTED]

[PHONE REDACTED] [CITY REDACTED]

Exhibit A

Photographs of Turning Point PAC campaign signs in the Phoenix metropolitan area for the April 2026 SRP board election, bearing the disclaimer "Paid for by Turning Point PAC (TPPAC.COM 602-815-3540)"

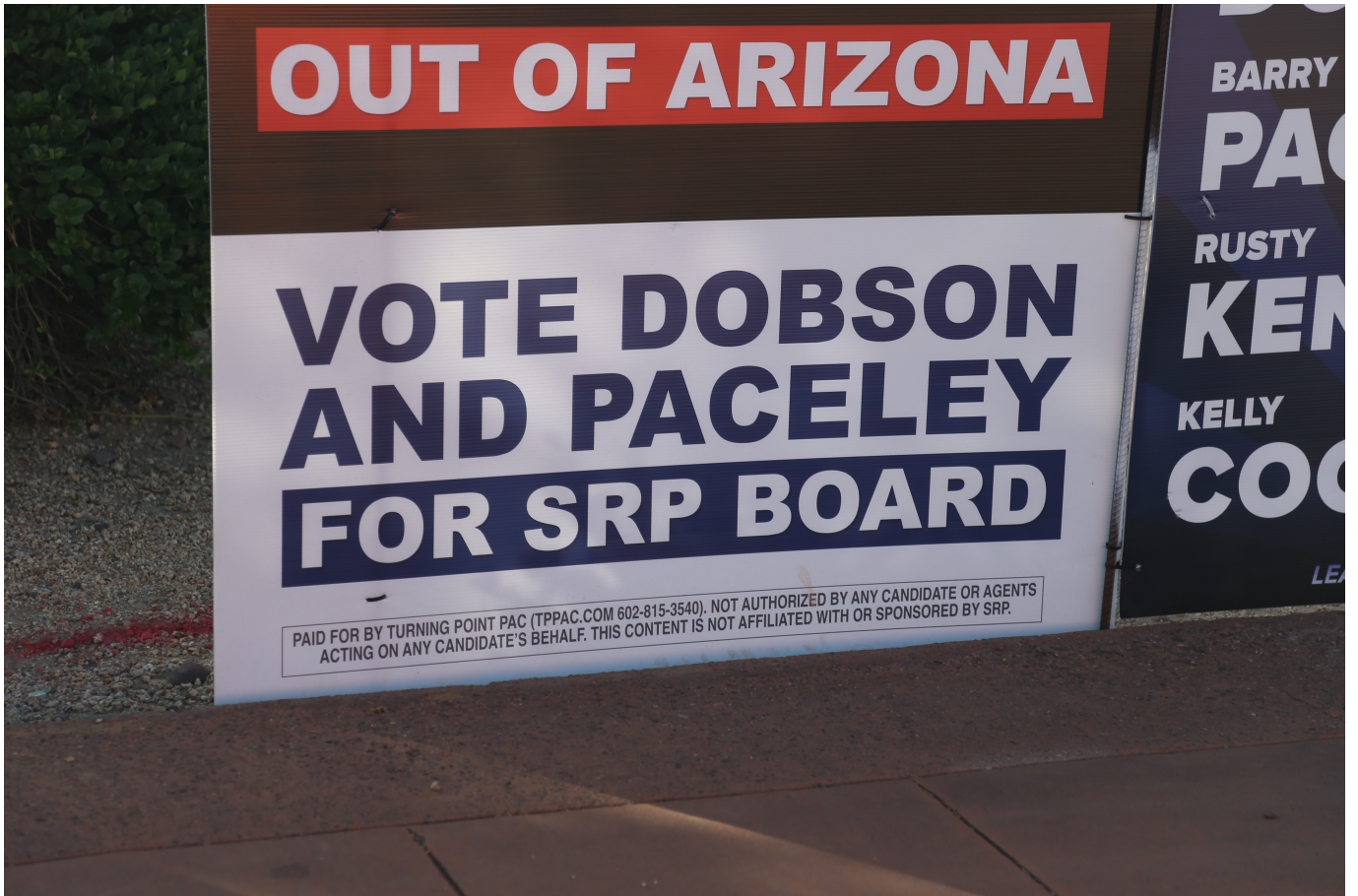


Exhibit A (Page 2) - Exhibit-A_sign-photo-02.jpg

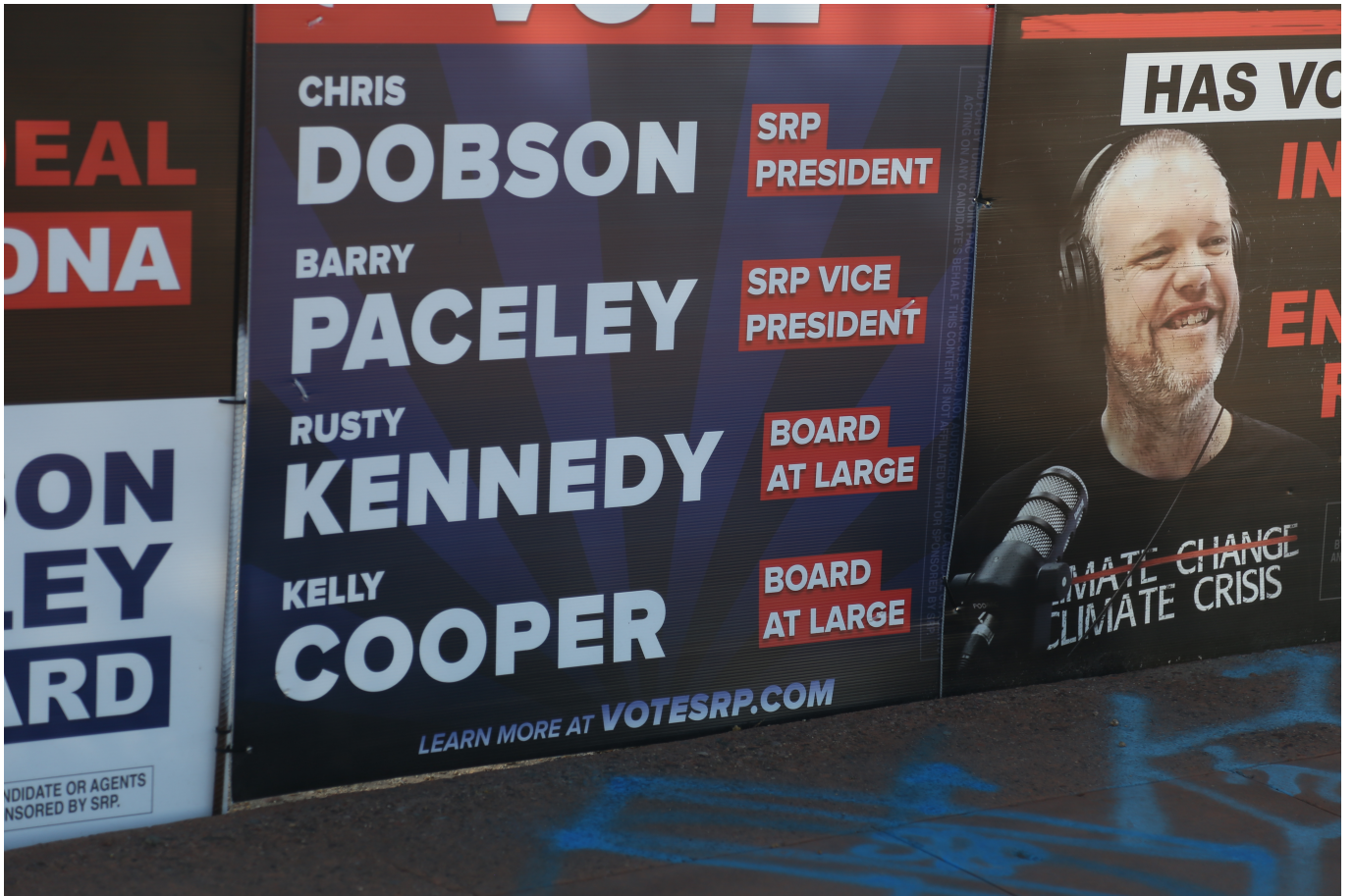


Exhibit A (Page 3) - Exhibit-A_sign-photo-03.jpg

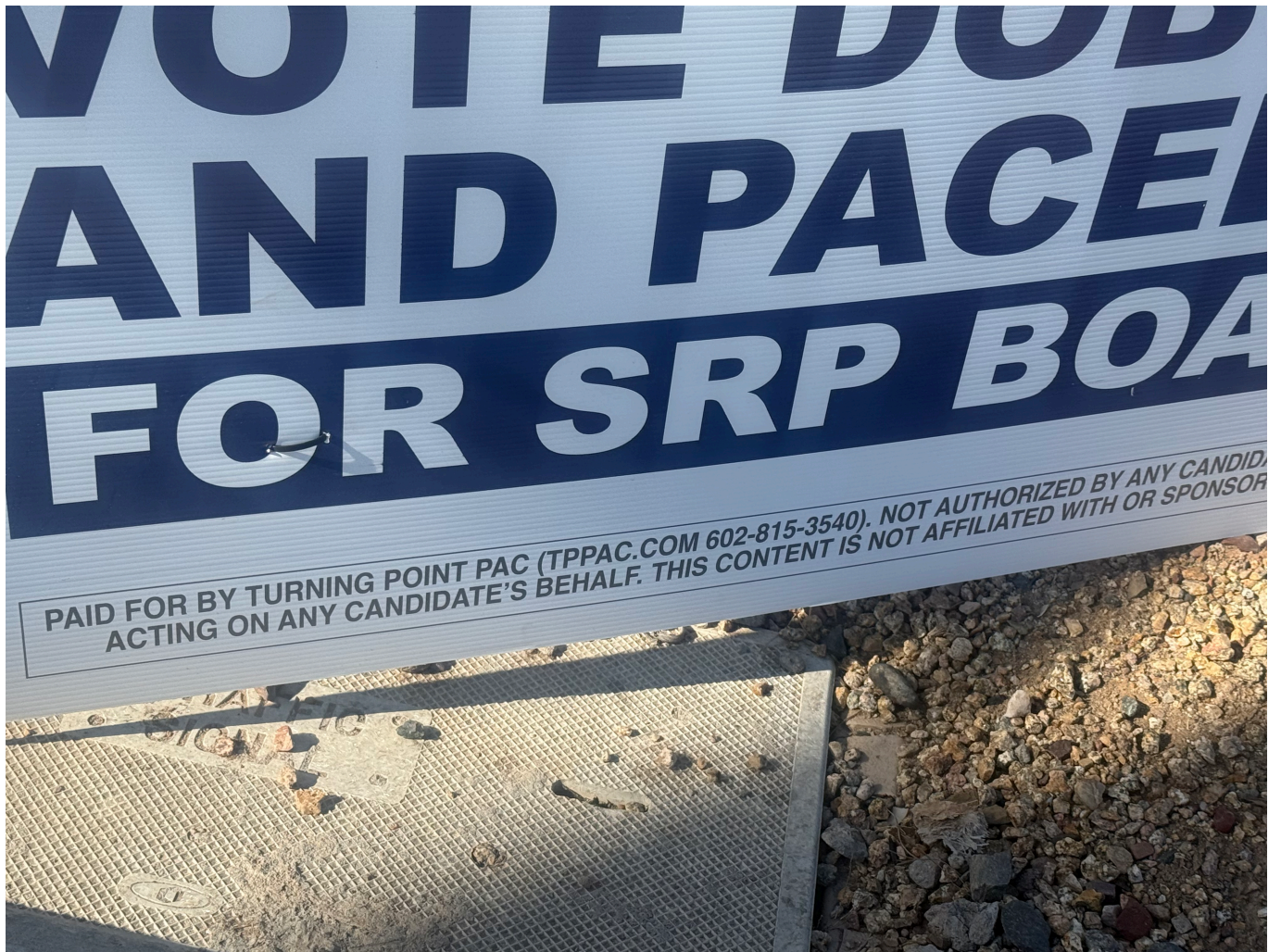


Exhibit A (Page 4) - Exhibit-A_sign-photo-04.jpg



Exhibit B

Maricopa County Committee Termination Statement for Turning Point
PAC (Committee ID 1002479), filed January 17, 2025



**MARICOPA COUNTY
COMMITTEE
TERMINATION STATEMENT**

**MARICOPA COUNTY
JAN 18 2025
ELECTIONS DEPT.**

COMMITTEE INFORMATION:			
COMMITTEE NAME TURNING POINT PAC			ID# 1002479
ADDRESS 4930 E, BEVERLY ROAD, STE 2000	CITY PHOENIX	STATE AZ	ZIP 85044
MAILING ADDRESS (IF DIFFERENT FROM ABOVE)	CITY	STATE	ZIP
EMAIL ADDRESS INFO@TPPAC.COM	PHONE NUMBER 602-815-3540		
WEBSITE (if any) TPPAC.COM			

CHAIRPERSON NAME TYLER BOWYER

TREASURER NAME MERCEDE CARBAJAL

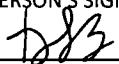

DECLARATION AND SIGNATURES:	
<p>I declare under penalty of perjury that the foregoing information is true and correct. I further declare that: (1) the committee will no longer receive any contributions or make any disbursements; (2) the committee either (a) has no outstanding debts or obligations, or (b) has outstanding debts or obligations that are all more than five years old, and the committee's creditors have agreed to discharge the debts and obligations and have agreed to the termination of the committee; (3) any surplus monies have been disposed of and that the committee has no cash on hand; and (4) all contributions and expenditures have been reported, including any disposal of surplus monies.</p>	
DATE: 01/17/2025	CHAIRPERSON'S SIGNATURE: 
DATE: 01/17/2025	TREASURER'S SIGNATURE: 
DATE:	CANDIDATE'S SIGNATURE (if applicable):

Exhibit C

SeeTheMoney public disclosure portal screenshots showing registration details and filing history for Turning Point PAC Arizona (Filer ID 101981)

- Candidates
- Political Action Committee**
- Political Parties
- Organizations
- Independent Expenditures
- Ballot Measures
- Individual Contributors
- Vendors

Political Action Committee

Start Year: End Year:

PAC Information

Show entries

Page of 1

Name	Income	Expense	Cash Balance	IE For	IE Against	BME For	BME Against
Turning Point PAC Arizona	\$45,000.00	\$25,246.28	\$19,753.72	\$11,008.52	\$14,237.76	\$0.00	\$0.00

Showing 1 to 1 of 1 entries Page of 1

[Export Political Action Committee](#)

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- Candidates
- Political Action Committee
- Political Parties
- Organizations
- Independent Expenditures
- Ballot Measures
- Individual Contributors
- Vendors


Turning Point Pac Arizona

Transactions

Demographic Information

Filer Name: Turning Point PAC Arizona	Status: Active
Filer ID: 101981	Filer Type: Political Action Committee (Standing)
Registration Date: 10/01/2025	Last Amended Date: 10/01/2025
County:	Last Reported:
Mailing Address: 4930E Beverly Road Ste. 2000 Phoenix AZ 85044 Email: info@tppac.com Phone: (602) 815-3540	Filer Address: 4930 E Beverly Rd Ste E 2000 Phoenix AZ 85044
Chairman: Bowyer, Tyler	Treasurer: Carbajal, Mercedes

Exhibit C (Page 3) - Exhibit-D_seethemoney-tppac-filings.png

Reports Previously Filed				
<input type="text"/>				Show 10 entries
CSV	Print	Column visibility		
				Page 1 of 1
Report Due Date	Date Filed	Report Name	Report Filings	Status
10/20/2025	10/20/2025	2025 - November Pre-Election	PDF	On Time
01/15/2026	01/15/2026	2025 - November Post-Election (Q4)	PDF	On Time
02/23/2026	02/24/2026	2026 - March Pre-Election	PDF	1 Day(s) Late Fines Due \$10.00

Showing 1 to 3 of 3 entries

Page 1 of 1

Exhibit D

WHOIS domain registration records for tppacaz.com showing registration through GoDaddy with Cloudflare nameservers

Exhibit D

WHOIS Domain Registration Record for tppacaz.com

This exhibit presents WHOIS registration data retrieved from public domain registration records. The information below was obtained via standard WHOIS lookup services.

Domain Name	tppacaz.com
Registration Date	October 17, 2025
Last Updated	October 28, 2025
Registrar	GoDaddy.com, LLC
Name Server 1	gemma.ns.cloudflare.com
Name Server 2	lennox.ns.cloudflare.com

Note: Registrant contact details are redacted per ICANN privacy regulations. Full WHOIS records available upon request.

Exhibit E

Arizona Capitol Times article: "Turning Point USA sets sights on SRP board elections in 2026" (August 22, 2025)

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Arizona Capitol Times article: "Turning Point USA sets sights on SRP board elections in 2026" (August 22, 2025)

This exhibit references online sources. The articles are available at the URLs listed below and are incorporated by reference. Printed copies are available upon request.

<https://azcapitoltimes.com/news/2025/08/22/turning-point-usa-sets-sights-on-srp-board-elections-in-2026/>

Exhibit F

News articles documenting Turning Point's involvement in SRP elections, AmericaFest announcements, and Tyler Bowyer's public statements regarding Turning Point PAC operations

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News articles documenting Turning Point's involvement in SRP elections, AmericaFest announcements, and Tyler Bowyer's public statements regarding Turning Point PAC operations

This exhibit references online sources. The articles are available at the URLs listed below and are incorporated by reference. Printed copies are available upon request.

<https://www.eenews.net/articles/turning-point-shakes-up-phoenix-utility-race/>

<https://www.phoenixnewtimes.com/news/google-yanks-money-turning-point-aligned-pac-srp-election-40651329/>

<https://ktar.com/arizona-news/srp-election-flashpoint-energy/5837854/>