

CAMPAIGN FINANCE COMPLAINT

Arizona Secretary of State, Campaign Finance Division

June 13, 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.

Respondents:

Respondent 1 — Kevin Thompson for Corporation Commissioner

- AZ Secretary of State Filer ID: 101859
- Jurisdiction: Arizona Secretary of State
- Treasurer: Khalaf, Youssef
- Address: 7140 E Monte Ave, Mesa, AZ 85209
- Phone: (480) 586-6472
- Email: kthomp2120@gmail.com

Respondent 2 — Nick Myers for Corporation Commissioner

- AZ Secretary of State Filer ID: 100484
 - Jurisdiction: Arizona Secretary of State
 - Treasurer: Malnar, Ray
 - Address: 4420 W Bush Bean Way, San Tan Valley, AZ 85144
 - Phone: (480) 331-7747
 - Email: info@nickmyers.us
-

I. Summary

This complaint concerns a joint slate sign produced and displayed by the two respondent candidate committees. The sign advocates the election of two clearly identified candidates for Arizona Corporation Commissioner — Kevin Thompson and Nick Myers — and bears two parallel "paid for by" disclosures, one attributing the sign to each respondent committee.

The sign violates the disclosure-size requirement of **A.R.S. § 16-925(D)(4)**. The statute requires that the disclosure on a candidate-paid sign be displayed in a height that is at least four percent of the vertical height of the sign. The signs at issue are forty-eight inches (48") in vertical height, requiring a minimum disclosure height of **1.92 inches**. The disclosure on the signs measures approximately **7/16 inch (0.4375 inch)** — approximately **0.91% of the sign's vertical height**, or roughly **23% of the statutory minimum**.

The violation is on the face of the printed signs and is established by direct measurement. The Secretary of State is the filing officer for both respondent committees under A.R.S. § 16-938(A) and A.R.S. § 16-901(27), and is the sole public officer authorized under § 16-938(A) to initiate an investigation into the alleged § 16-925 violation.

II. The Signs at Issue

The sign at issue is a joint slate sign advocating the election of Kevin Thompson and Nick Myers to the Arizona Corporation Commission in the 2026 primary election. Each sign bears, in equal-sized lettering displayed side by side:

- "KEVIN THOMPSON"
- "NICK MYERS"
- "REPUBLICANS FOR CORPORATION COMMISSION"

Each sign carries **two parallel "paid for by" disclosure lines**, one for each respondent committee. The disclosure attributable to Respondent 1 reads, in substance:

*"Paid for by Kevin Thompson for Corporation Commissioner. Authorized by Kevin Thompson.
(602) 402-1238"*

The disclosure attributable to Respondent 2 follows the parallel format. Both disclosure lines are printed at identical character heights and orientations.

On June 13, 2026, the complainant personally measured a deployed sign and photographed it together with its disclosures and measurement evidence. Photographs are attached as Exhibits A–E. The complainant has observed instances of the sign deployed in the public rights-of-way of multiple municipalities in Maricopa County.

III. The Respondents Are Candidate Committees and the Signs Are Their Advertisements

A. The respondents are candidate committees. Kevin Thompson for Corporation Commissioner (Filer ID 101859) and Nick Myers for Corporation Commissioner (Filer ID 100484) are political committees

registered with the Arizona Secretary of State, each with a designated treasurer, mailing address, telephone number, and committee email address as identified above. Each respondent is a "candidate committee" within A.R.S. § 16-901(8) and a "committee" within A.R.S. § 16-901(10). Corporation Commissioner is a "statewide office" within A.R.S. § 16-901(49). The Secretary of State is the filing officer for both committees under A.R.S. § 16-901(27) and A.R.S. § 16-938(A).

B. The signs are advertisements. A.R.S. § 16-901(1) defines "advertisement" as "information or materials ... that are mailed, e-mailed, posted, distributed, published, **displayed**, delivered, broadcasted or placed in a communication medium and that are for the purpose of influencing an election." A campaign sign naming a candidate and the office sought, displayed in public during the candidate's election cycle, is an advertisement displayed for the purpose of influencing an election. A.R.S. § 16-925(D)(4) addresses, in terms, advertisements "displayed on a sign or billboard." The signs at issue each name two clearly identified candidates within A.R.S. § 16-901(9) and the office sought.

C. Each committee made the expenditure for its own disclosure attribution. A sign that displays two parallel "paid for by" attributions represents, on its face, an expenditure by each named committee for its share of the advertisement. A payment for sign production and display is an "expenditure" under A.R.S. § 16-901(25). Each respondent committee is the "person ... other than an individual" that made an expenditure for the advertisement insofar as it is the attributed payor on its own disclosure line, triggering the disclosure obligations of A.R.S. § 16-925(A) and the sign-disclosure-height requirement of A.R.S. § 16-925(D)(4) for each disclosure line on the sign.

IV. Statutory Violation Alleged

A. § 16-925(D)(4) — the disclosures are below the statutory minimum height

A.R.S. § 16-925(D)(4) provides:

"[If the advertisement is displayed on a sign or billboard], the disclosure shall be displayed in a height that is at least four percent of the vertical height of the sign or billboard, except that if the advertisement is paid for by a political action committee, the disclosure shall be displayed in a height that is at least ten percent of the vertical height of the sign or billboard."

The respondents are candidate committees, not political action committees. The applicable minimum is **four percent of the vertical height of the sign**.

The signs at issue are **48 inches** in vertical height. Four percent of 48 inches is **1.92 inches**. The disclosure as printed on the signs measures **7/16 inch (0.4375 inch)** in cap height — approximately **0.91% of the sign's vertical height**, or roughly **23% of the statutory minimum**. The complainant documented the sign's 48-inch height and the disclosure's 7/16-inch height with a measuring tape against the sign; see Exhibits C and D.

Both "paid for by" lines on the sign are printed at the same character height. Each respondent committee is independently responsible for the disclosure attributing the expenditure to it, and each disclosure independently falls below the statutory minimum.

B. Reserved — financial-disclosure and expenditure-itemization matters

The complainant reserves the right to supplement this complaint with additional allegations concerning the respondent committees' itemization of sign-related expenditures on their periodic campaign finance reports, including the next Pre-Primary Reports due in mid-July 2026 under the Department's reporting calendar. The present complaint is established on the face of the printed signs and does not require resolution of those questions for the disclosure-size violation alleged in subsection A above.

V. Jurisdiction

A.R.S. § 16-938(A) provides that, on receipt of a complaint from a third party, the 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." A.R.S. § 16-925 is codified within **Article 1.4** (Reporting Requirements and Disclosure Statements) of Chapter 6 of Title 16, expressly within the enumerated articles in § 16-938(A).

A.R.S. § 16-901(27) defines "filing officer" as "the secretary of state or the county, city or town officer in charge of elections for that jurisdiction who accepts statements and reports for those elections pursuant to section 16-928." Each respondent is a committee registered with, and files its periodic campaign finance reports with, the Arizona Secretary of State. The Secretary of State is therefore the filing officer

for each respondent and the sole public officer authorized under § 16-938(A) to initiate an investigation into the alleged § 16-925 violations.

VI. Requested Action

The complainant respectfully requests that the Secretary of State, Campaign Finance Division:

- 1. Accept this complaint** under A.R.S. § 16-938 and assign a docket number.

- 2. Initiate an investigation** under A.R.S. § 16-938(A) into whether each respondent committee's slate signs comply with A.R.S. § 16-925(D)(4), and determine whether reasonable cause exists to believe the disclosures fall below the four-percent vertical-height minimum required by that section.

- 3. Request voluntary production** from each respondent committee, pursuant to A.R.S. § 16-938(D), of (a) the print/vendor proofs and artwork for the slate sign; (b) the quantity printed and currently displayed and the locations of display; and (c) the invoices and payments for the production and placement of the signs.

- 4. Declare** that the joint slate sign described and depicted in this complaint, as currently produced and deployed, is not in compliance with A.R.S. § 16-925(D)(4).

- 5. Issue a notice of corrective action** identifying the steps the respondent committees must take to bring the signs into compliance with A.R.S. § 16-925(D)(4), including but not limited to redesigning any future production of the sign to display each disclosure at a height of at least four percent of the sign's vertical height.

- 6. Communicate** with the cities, towns, and counties in which the noncompliant signs have been deployed, including but not limited to the cities of Phoenix, Tempe, and Chandler, advising those jurisdictions that the Department has determined the signs to be noncompliant with A.R.S. § 16-925(D)(4), and leaving to each jurisdiction's discretion whatever action it deems appropriate under its own sign code, A.R.S. § 16-1019, and its general police powers.

7. If reasonable cause is found, refer the matter to the Attorney General under A.R.S. § 16-938(C)(1), with the civil penalty under A.R.S. § 16-938(E)(2) computed as authorized by the statute.

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

VII. Verification

I, [REDACTED], declare under penalty of perjury that the facts stated in this complaint are true and correct to the best of my knowledge.

Dated this 13th day of June, 2026.

[REDACTED]

Exhibits

- **Exhibit A** — Full view of the Thompson/Myers joint slate sign.



- **Exhibit B** — Close-up of both committees' "paid for by" disclosure lines on the sign.



- **Exhibit C** — Measurement photograph: sign vertical dimension (48 inches), measured with measuring tape against the sign.





- **Exhibit D** — Measurement photograph: disclosure cap height ($7/16$ inch / 0.4375 inch), measured with measuring tape against the disclosure text.



- **Exhibit E** — Wide-angle photographs showing the slate sign deployed in public rights-of-way at multiple intersections in the East Valley of Maricopa County.

Chandler – Ray and McClintock



Phoenix – Chandler and 50th St.



Tempe- Rural and Warner

