



**NOTICE OF PUBLIC MEETING  
AND POSSIBLE EXECUTIVE SESSION OF THE  
STATE OF ARIZONA  
CITIZENS CLEAN ELECTIONS COMMISSION**

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**Location:**     Citizens Clean Elections Commission  
                  1110 W. Washington, Suite 250  
                  Phoenix, Arizona 85007

**Date:**           Thursday, February 27, 2025

**Time:**          10:00 a. m.

Pursuant to A.R.S. § 38-431.02, notice is hereby given to the Commissioners of the Citizens Clean Elections Commission and the general public that the Citizens Clean Elections Commission will hold a regular meeting, which is open to the public on February 27, 2025. This meeting will be held at 10:00 a.m. **This meeting will be held in person and virtually. The meeting location will be open by 9:45 a.m. at the latest.** Instructions on how the public may participate in this meeting are below. For additional information, please call (602) 364-3477 or contact Commission staff at [ccec@azcleanelections.gov](mailto:ccec@azcleanelections.gov).

The meeting may be available for live streaming online at <https://www.youtube.com/c/AZCCEC>. You can also visit <https://www.azcleanelections.gov/clean-elections-commission-meetings>. Members of the Citizens Clean Elections Commission may attend in person, by telephone, video, or internet conferencing.

**Join Zoom Meeting**

**<https://us02web.zoom.us/j/85453027278>**

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Please note that members of the public that choose to use the Zoom video link must keep their microphone muted for the duration of the meeting. If a member of the public wishes to speak, they may use the Zoom raise hand feature and once called on, unmute themselves on Zoom once the meeting is open for public comment.

Members of the public may participate via Zoom by computer, tablet or telephone. A dial-in option is also available but you will not be able to use the Zoom raise hand feature, so the meeting administrator will assist phone attendees. Please keep yourself muted unless you are prompted to speak.

The Commission may allow time for public comment on any item on the agenda. Commission members may not discuss items that are not specifically identified on the agenda. Therefore, pursuant to A.R.S. § 38-431.01(H), action taken as a result of public comment will be limited to directing Commission staff to study the matter, responding to any criticism, or scheduling the matter for further consideration and decision at a later date.

The Commission may vote to go into executive session, which will not be open to the public, for the purpose of obtaining legal advice on any item listed on the agenda, pursuant to A.R.S. § 38-431.03 (A)(3). The Commission reserves the right at its discretion to address the agenda matters in an order different than outlined below.

Any person with a disability may request a reasonable accommodation, such as a sign language interpreter, by contacting the Commission at (602) 364-3477. Requests should be made as early as possible to allow time to arrange accommodations.
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**The agenda for the meeting is as follows:**

- I. Call to Order.
- II. Discussion and Possible Action on Meeting Minutes for January 30, 2025.
- III. Discussion and Possible Action on Executive Director's Report, Enforcement and Regulatory Updates, and Legislative Update.

Note: The executive director's report includes announcements and information about elections and campaign finance, a report on voter education activities, administrative information, information on candidates running clean, reports on legal proceedings involving Clean Elections and other Arizona election officials, a report on correspondence from other agencies, appointments, enforcement status (including complaints that have been closed), and the regulatory agenda. The legislative update includes bills under consideration by the Arizona legislature. It is included in the Commission packet available on the Commission's website or by request at [ccec@azcleaselections.gov](mailto:ccec@azcleaselections.gov).

- IV. Discussion and Possible Action on the 2024 Annual Report.
- V. Discussion and Possible Action on Montenegro (formerly Toma) v. Fontes, Arizona Supreme Court No. CV-24-0166-PR and litigation arising from the Voters Right to Know Act.

The Commission may vote to go into executive session, which will not be open to the public, for the purpose of obtaining legal advice on any item listed on the agenda, pursuant to A.R.S. § 38-431.03 (A)(3).

- VI. Discussion and Possible Action on the following 2024 Primary and General Election Candidate Audits:

**A. Primary**

Betsy Munoz, House, LD 22

James Holmes, House, LD 23

Rene Lopez, Corp Comm

**B. General**

Alan Smith Senate, LD 15	Gregg Frostrom Senate, LD 19	Lisa Fink House, LD 27
Barbara Beneitone House, LD 15	Helen Hunter House, LD 10	Marcia Smith House, LD 1
Bill Olear House, LD 25	J'aime Morgaine Senate, LD 30	Rachel Walden Corp Comm
Bob Karp Senate, LD 19	Jay Ruby House, LD 1	Rene Lopez Corp Comm
Brian Garcia House, LD 8	Jonathon Hill Corp Comm	Richard Corles House, LD 3
Cara Vicini Senate, LD 12	Lawrence Hudson House, LD 12	Tom Tzitzura House, LD 29
Cesar Aleman House, LD 11	Lea Marquez Peterson Corp Comm	Victor Harris Senate, LD 26
Eric Stafford Senate, LD 29	Leonard Rosenblum House, LD 18	Ylenia Aguilar Corp Comm
Mike Fogel Senate, LD 1		

VII. Public Comment.

This is the time for consideration of comments and suggestions from the public. Action taken as a result of public comment will be limited to directing staff to study the matter or rescheduling the matter for further consideration and decision at a later date or responding to criticism

VIII. Adjournment.

This agenda is subject to change up to 24 hours prior to the meeting. A copy of the agenda background material provided to the Commission (with the exception of material relating to possible executive sessions) is available for public inspection at the Commission's office, 1110 W Washington St, #250, Phoenix, AZ 85007.

Dated this 25th day of February, 2025  
Citizens Clean Elections Commission  
Thomas M. Collins, Executive Director



THE STATE OF ARIZONA  
CITIZENS CLEAN ELECTIONS COMMISSION

REPORTER'S TRANSCRIPT OF PUBLIC MEETING

Phoenix, Arizona

January 30, 2025

10:00 a.m.

**Miller Certified Reporting, LLC**  
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<p>2</p> <p>1 PUBLIC MEETING, BEFORE THE CITIZENS CLEAN ELECTIONS 2 COMMISSION, convened at 10:00 a.m. on January 30, 2025, at 3 the State of Arizona, Citizens Clean Elections Commission, 4 1110 West Washington, Suite 250, Phoenix, Arizona, in the 5 presence of the following Board Members: 6 Mr. Mark S. Kimble, Chairman 7 Mr. Galen Paton 8 Ms. Christina Estes-Werther 9 Ms. Amy Chan (videoconference) 10 Mr. Steve Titla (videoconference)</p> <p>9 OTHERS PRESENT:</p> <p>10 Thomas M. Collins, Executive Director 11 Mike Becker, Policy Director 12 Gina Roberts, Voter Education Director 13 Avery Xola, Voter Education Manager 14 Alec Shaffer, Web Content Manager 15 Cathy Herring, KCA, Inc.</p> <p>16 17 18 19 20 21 22 23 24 25</p> <p>Miller Certified Reporting, LLC www.MillerCertifiedReporting.com</p>	<p>3</p> <p>1 P R O C E E D I N G 2 3 CHAIRMAN KIMBLE: Good morning. Agenda Item 4 Number I is the call to order. It's now 10:00 a.m. on 5 January 30th, 2025. I will call this meeting of the Clean 6 Elections Commission to order. 7 I am Mark Kimble. We will begin by taking 8 attendance. Commissioners, please identify yourselves for 9 the record. 10 COMMISSIONER ESTES-WERTHER: Christina 11 Werther. 12 COMMISSIONER PATON: Galen Paton. 13 CHAIRMAN KIMBLE: Commissioner Chan? 14 COMMISSIONER CHAN: Sorry. Commissioner Amy 15 Chan here. 16 CHAIRMAN KIMBLE: And Commissioner Titla. 17 COMMISSIONER TITLA: Here. Good morning. 18 CHAIRMAN KIMBLE: Good morning, 19 Commissioner Titla. 20 We have all five of us here. 21 Item II, discussion and possible action on minutes 22 from our December 5th meeting. 23 Commissioners, I believe you've all had a chance to 24 review the minutes. Are there any corrections/additions to 25 the minutes from our December 5th meeting?</p> <p>Miller Certified Reporting, LLC www.MillerCertifiedReporting.com</p>
<p>4</p> <p>1 (No audible response.) 2 CHAIRMAN KIMBLE: Hearing none, do I have a motion 3 to approve them? 4 COMMISSIONER WERTHER: I motion to approve the 5 meeting minutes on December 5th, 2024. 6 CHAIRMAN KIMBLE: Thank you. Is there a 7 second? 8 COMMISSIONER PATON: I'll second. 9 CHAIRMAN KIMBLE: It's been moved by 10 Commissioner Werther, seconded by Commissioner Paton that we 11 approve the minutes for the December meeting -- December 5th 12 meeting, excuse me. 13 I will call the roll. Commissioner Werther. 14 COMMISSIONER WERTHER: Aye. 15 CHAIRMAN KIMBLE: Commissioner Paton. 16 COMMISSIONER PATON: Aye. 17 CHAIRMAN KIMBLE: Commissioner Titla. 18 COMMISSIONER TITLA: Aye. 19 CHAIRMAN KIMBLE: Commissioner Chan. 20 COMMISSIONER CHAN: Aye. 21 CHAIRMAN KIMBLE: The Chair votes aye. 22 The minutes are approved five-to-nothing. 23 Item III, discussion possible action on the 24 Executive Director's reports. 25 Tom.</p> <p>Miller Certified Reporting, LLC www.MillerCertifiedReporting.com</p>	<p>5</p> <p>1 MR. COLLINS: Thank you, Commissioners, for 2 all being here. 3 I wanted to highlight a couple of things. We'll 4 have another meeting before then, but the deadlines for -- 5 for the election but the, you know, the next consolidated 6 election date is March 11th and the -- the biggest election, 7 I think maybe the only election, yeah -- is Tucson where 8 they're holding a half cent sales tax increase referendum and 9 we have information on that on the website. 10 I also wanted to highlight that we have a new page 11 on the website that's also highlighted today in our CRM 12 newsletter -- is that the right word for that? -- The 13 People's Ledger which is going to be a work -- a compilation 14 of articles on relevant election topics that Alec has been 15 putting together. So we're -- so we're happy to -- happy to 16 launch that today. 17 And as you can see, you know, we're gearing up for 18 this -- this year in terms of how we do our outreach 19 throughout the counties and with the State; and Gina and 20 Avery have been working on that. 21 I wanted to highlight that we will be filing our 22 response to the petition for review of the <u>Center for Arizona</u> 23 <u>Policy versus Arizona Secretary of State</u> case that the State 24 Supreme Court in the -- in the next -- shortly. 25 So just because it's a little confusing to me, I</p> <p>Miller Certified Reporting, LLC www.MillerCertifiedReporting.com</p>

<p style="text-align: right;">6</p> <p>1 wanted to lay that we now have -- so there's two cases  2 related to Prop 211 that are at the State Supreme Court. One  3 they've accepted review for, that's <u>Toma v. Fontes</u>, and then  4 one that is pending their review which is <u>Center for Arizona</u>  5 <u>Policy versus Secretary of State</u>.  6 The two cases are different, they raise different  7 issues. The <u>Toma</u> case is principally about sort of  8 separation of powers, delegation of authority issues as well  9 as severability of the one clause of the Voter's Right to  10 Know Act that the Court of Appeals took issue with but found  11 severable. And that oral argument, that case is going to be  12 on March 6th at ASU. The Court goes out and does oral  13 argument at the universities throughout the year and they  14 usually try to pick something that sounds interesting. And  15 you know, I mean, people love separation of -- law students  16 love separation of powers.  17 And then -- and then so the other one we'll just  18 wait and see.  19 And then -- and then the third case which is the --  20 the federal case Americans versus Prosperity [verbatim],  21 they'll -- that we're anticipating oral argument in May and  22 we're anticipating that will be here in Phoenix.  23 We -- so those are -- that's sort of the major  24 developments there.  25 I did want to highlight on the legislative front we  Miller Certified Reporting, LLC  www.MillerCertifiedReporting.com</p>	<p style="text-align: right;">7</p> <p>1 have, there's -- there's a number of elections bills moving  2 that Mike's report highlights. We had a bill yesterday up  3 called HB 2376 that would put county-wide candidates into the  4 voter education guide, and it passed out of committee 7-to-0.  5 You know, we've -- our -- we worked with the  6 legislative staff on both sides to talk through this bill and  7 we think it's good.  8 We've looked at the budget implications and  9 they're -- and they're fairly -- they're fairly minimal.  10 The -- what Gina pointed out and which I think is the smart  11 way to look at it is what it essentially does is, you know,  12 statewide election years with the governor and -- and  13 Secretary of State and all those other offices, the book  14 is -- you know, basically being in the off years, the book  15 would offer the same -- you know, essentially the same amount  16 of information as it does in terms of pages in a -- in a year  17 where you have the governor, right? Because all the county  18 offices are in the off year from the -- from the governor.  19 It also addresses a thing that we hear pretty  20 regularly from -- on the phone from voters during the  21 election cycle which is they get their book and they want to  22 know where the county candidates are. I think it also, at  23 least so far, that people see the book as a -- the tool that  24 is of -- that, you know, that has -- that works and -- and  25 that works for both candidates and voters.  Miller Certified Reporting, LLC  www.MillerCertifiedReporting.com</p>
<p style="text-align: right;">8</p> <p>1 So that is -- that was -- that was good and we'll  2 keep track of that.  3 CHAIRMAN KIMBLE: If I could interrupt for  4 second.  5 MR. COLLINS: Please, go ahead.  6 CHAIRMAN KIMBLE: I just want to make a point  7 of the clarification. You said this is county-wide offices,  8 but it's also members of the Board of Supervisors who are not  9 county wide.  10 MR. COLLINS: The -- the well, the intent of  11 the bill is to capture, as at least as I understand it,  12 County Attorney, County Treasurer, et cetera, and the County  13 Board of -- county boards. The -- the language might end up  14 getting clarified to deal with the potential of what "county  15 wide" means. In other words, county supervisors are elected  16 to serve the entire county, but they're elected by district.  17 You know, I think that -- I mean many of those -- I mean, a  18 lot of those races, especially outside of Maricopa County,  19 aren't contested quite honestly. So it, you know, there's --  20 but you know -- yeah.  21 So the idea would be to get the top level of the  22 county race; and those are the ones we get questions about,  23 quite honestly. I mean, I think the bigger issue for us  24 would be if they would go to precinct-level county offices  25 like constable and JP, those would be -- that would become  Miller Certified Reporting, LLC  www.MillerCertifiedReporting.com</p>	<p style="text-align: right;">9</p> <p>1 problematic cost-wise and then it would become -- it would be  2 a major issue mail-wise; and then it would become -- it  3 would -- it would impose some significant staff time cost.  4 So, you know, our point of view on that is that --  5 is that, you know, we can absorb and want to absorb the --  6 the need for the, you know, in the county offices that --  7 that people -- that are top of mind to voters. The few  8 voters who are -- who have ever called us looking for  9 constable or JP, I mean, at the end of the day, they're --  10 they're the -- the whole enterprise of providing information  11 to voters about candidates, whether it's our debates or the  12 voter education guide, at the end of the day you have to --  13 you have to exercise judgment. We do it all the time, you  14 know, about what is viable, what is not. What is -- what  15 is -- what is going to diminish -- you know, in other words  16 you don't -- you can't have the voter education program's  17 requirements diminish the ability to do the voter education  18 duties, right? That's really the balance we're trying to --  19 trying to get at when we evaluate these kind of proposals.  20 CHAIRMAN KIMBLE: Okay. Are is that all on  21 your report, Tom?  22 MR. COLLINS: I just want to mention that, you  23 know, if you haven't, that we have we moved through a number  24 of the Prop 211 complaints and we're -- and we're hope -- I'm  25 hopeful to get the remainder of those reviewed here in the --  Miller Certified Reporting, LLC  www.MillerCertifiedReporting.com</p>

<p style="text-align: right;">10</p> <p>1 by next month.</p> <p>2 So that's pretty much it.</p> <p>3 CHAIRMAN KIMBLE: I have one question</p> <p>4 regarding The People's Ledger.</p> <p>5 MR. COLLINS: Yeah.</p> <p>6 CHAIRMAN KIMBLE: So it will contain articles</p> <p>7 that explore, summarize or explain relevant election topics</p> <p>8 and ways to become involved and engaged.</p> <p>9 So is there going to be some review of these</p> <p>10 articles to make sure they are factual and not adding to the</p> <p>11 confusion of election disinformation? I mean, everything</p> <p>12 else we have on our website is ours with the exception of the</p> <p>13 candidate statements, and so by putting certain articles on</p> <p>14 our website, we are giving them some stamp of approval</p> <p>15 almost.</p> <p>16 So, who is going to decide is this really factual,</p> <p>17 is this accurate, is this something that we want to be</p> <p>18 associated with?</p> <p>19 MR. COLLINS: Yeah. Well Alec is going to</p> <p>20 serve as the editor of it essentially as if you were going to</p> <p>21 be putting the content together as -- as if, you know, we</p> <p>22 were putting together any kind of newsletter. So I think</p> <p>23 that anything we put out is always going to have a -- you</p> <p>24 know, we're going to make sure that it's constructive, A, and</p> <p>25 valid, B.</p> <p style="text-align: center;">Miller Certified Reporting, LLC www.MillerCertifiedReporting.com</p>	<p style="text-align: right;">11</p> <p>1 And we do, you know, interestingly enough, we do do</p> <p>2 both the -- all, I think Gina and Alec and Avery all do</p> <p>3 presentations on combatting, you know, getting good</p> <p>4 information, how to determine good information or bad</p> <p>5 information, so those same standards would apply, I think.</p> <p>6 Do you want to...</p> <p>7 CHAIRMAN KIMBLE: Okay. Gina, did you want to say</p> <p>8 something?</p> <p>9 MS. ROBERTS: Yes. Mr. Chairman,</p> <p>10 Commissioners, to -- to clarify these articles are</p> <p>11 originating in-house, so staff and our -- our vendors are</p> <p>12 writing them. So it's the same content that we would produce</p> <p>13 just for our website, we're just doing it more as an article</p> <p>14 format. We might reference other articles, you know, for if</p> <p>15 it's an article from an educator on civic engagement, you</p> <p>16 know, things like that, or if there's a new poll that comes</p> <p>17 out, we might do things like that, but the content itself is</p> <p>18 still being originated by Clean Elections staff.</p> <p>19 CHAIRMAN KIMBLE: Okay. Thank you. That's an</p> <p>20 important point.</p> <p>21 Are there any questions?</p> <p>22 COMMISSIONER PATON: I would just like to add</p> <p>23 in --</p> <p>24 CHAIRMAN KIMBLE: Commissioner Paton.</p> <p>25 COMMISSIONER PATON: -- I appreciate your</p> <p style="text-align: center;">Miller Certified Reporting, LLC www.MillerCertifiedReporting.com</p>
<p style="text-align: right;">12</p> <p>1 concern about that because I would hate for somebody to say</p> <p>2 that: Well, yeah, you're siding one way or the other. I</p> <p>3 mean, we get enough of that as it is.</p> <p>4 But, you know, if she's saying that then I -- I</p> <p>5 agree that that's something that would be a good thing.</p> <p>6 CHAIRMAN KIMBLE: Okay, thank you.</p> <p>7 Alec, did you want to comment?</p> <p>8 MR. SHAFFER: I never really get up and speak,</p> <p>9 but I did want to talk about it, too, because I'm involved</p> <p>10 with this project.</p> <p>11 Yeah, I can give you an example, like the next two</p> <p>12 months, so we'll be having one for February and one for</p> <p>13 March, and the topic for February is going to be like the</p> <p>14 importance of local elections and why participation matters</p> <p>15 so much as opposed to the belief that only voting in the</p> <p>16 statewide ones is -- is important. And March's topic will be</p> <p>17 about like demystifying the ballot counting process.</p> <p>18 So it's basically just breaking down the context of</p> <p>19 how elections work, what our laws are and -- and stuff like</p> <p>20 that to kind of give people context and understand elections</p> <p>21 more. So that's the main purpose of it.</p> <p>22 CHAIRMAN KIMBLE: Okay. Okay, thank you.</p> <p>23 Are there any other comments from members of the</p> <p>24 Commission about Tom's report?</p> <p>25 (No audible response.)</p> <p style="text-align: center;">Miller Certified Reporting, LLC www.MillerCertifiedReporting.com</p>	<p style="text-align: right;">13</p> <p>1 CHAIRMAN KIMBLE: Okay. Hearing none, we'll</p> <p>2 move on to Item IV, discussion and possible action on the 202</p> <p>3 voter education plan.</p> <p>4 Our goal this year is to maintain our momentum in</p> <p>5 providing quality information to voters, keep them engaged</p> <p>6 with our election process, including issues and candidates,</p> <p>7 and prepare for 2026 when all of our statewide offices will</p> <p>8 be on the ballot and we will be electing our first lieutenant</p> <p>9 governor.</p> <p>10 Gina is here to outline our plans for 2025. Gina?</p> <p>11 MS. ROBERTS: Mr. Chairman, Commissioners,</p> <p>12 thank you.</p> <p>13 Okay, we've got slides for you. Always have</p> <p>14 slides. Okay, we'll jump to the first one please.</p> <p>15 So this is our -- our plan for this year. So 2025,</p> <p>16 just to clarify, there are elections every year. So we know</p> <p>17 sometimes elections officials get asked, what do you do, you</p> <p>18 know, when it's not a presidential election year, things like</p> <p>19 that. Always an election happening.</p> <p>20 So we will, of course, be doing our education for</p> <p>21 voters on the four local elections that happen this year, but</p> <p>22 this is our plan that we'd like to -- to kick off.</p> <p>23 I always like to start by giving sort of a lay of</p> <p>24 the land. So here are the current voter registration numbers</p> <p>25 from the Secretary of State's office. You can see we have</p> <p style="text-align: center;">Miller Certified Reporting, LLC www.MillerCertifiedReporting.com</p>

<p style="text-align: right;">14</p> <p>1 our five recognized parties: We still have the Republicans,  2 the Democrats, the Libertarian Party, the No Labels Party,  3 and the Green Party. And then any voter who is not  4 registered with one of those recognized parties, they are  5 classified in the "other" category, that would be such as our  6 Independents.</p> <p>7 So you can see we've got still a -- I suppose you  8 can still refer to it as a third, a third, and a third with  9 those top parties being the Republican Party and then the  10 Independent category and then the Democratic Party. So those  11 numbers make up the composition of our voter registration for  12 the entire state.</p> <p>13 So if we go to the next slide, please, we'll take a  14 look at what elections we have coming up.</p> <p>15 As Tom mentioned in the ED report for March, there  16 is an election occurring in the City of Tucson, so we have  17 information available on our website for that. Essentially  18 our process is we will continue to up our communications with  19 our local election official partners. We'll gather all of  20 the election information that voters need to know, and we  21 will have that information available on our website. We'll  22 do our -- our paid media outreach which I'll show in a few  23 slides, but we will continue to educate voters on how they  24 can participate.</p> <p>25 Again, and as Alec mentioned, when talking about  Miller Certified Reporting, LLC  www.MillerCertifiedReporting.com</p>	<p style="text-align: right;">15</p> <p>1 The People's Ledger, just because it's not a presidential  2 election year or it's not a statewide election, those local  3 elections are still important. So, for example, voting on  4 Tucson's "All Mail" election on Prop, you know, 414, that's  5 going to impact your pocketbook; looking at some of these  6 local elections, Goodyear, looking at charter amendments,  7 things like this, these have a direct impact on voters and  8 it's really elections in their backyard. So we want to  9 continue to do that election outreach for -- for our voters  10 across the state.</p> <p>11 Next slide, please.</p> <p>12 One of the things that we do every odd year is we  13 kick off research and we use this research as the basis for  14 how we communicate to voters and what we communicate to  15 voters on. We -- we wouldn't be able to have an effective  16 communications plan and voter education plan without talking  17 to voters directly to see what is it that you need: what are  18 your needs; what are your wants. And how can we meet those  19 needs.</p> <p>20 So at the end of 2024, we launched a survey where  21 we reached out to voters with questions on the voting  22 process, and we are going to conduct focus groups at the end  23 of February. And really, again, just talking directly to  24 voters, asking them, okay, you know, what education do you  25 need? Are you confident are knowing where your voting</p> <p style="text-align: right;">Miller Certified Reporting, LLC  www.MillerCertifiedReporting.com</p>
<p style="text-align: right;">16</p> <p>1 location is? You know, are you confident in the security of  2 the elections? What do you feel that you need? Where did  3 you go to get your information? Who do you talk to get  4 educated on candidates and the ballot measures, things like  5 that.</p> <p>6 So we'll take all of this information and this  7 research will, again, serve as the basis for how we develop  8 our 2025 but also our 2026 communications plans.</p> <p>9 So all of the creative work that we do -- those  10 communication assets, those, you know, TV ads, the radio  11 reads -- all of it is tied back to the research and what  12 voters are telling us directly. So that is how we are  13 strategizing and making those decisions. And of course when  14 we have this research finalized, we're happy to share that  15 with the Commission.</p> <p>16 Next slide, please.</p> <p>17 So once we know what we need to talk to voters  18 about, we work with our partners to develop an effective --  19 effective from both connecting with the voters but also cost  20 effective as well a paid media plan. Because if we want to  21 reach voters across the state, we have to pay, we have to  22 invest to do that. And so we utilize paid media to reach our  23 audience and we have to know, okay, well how do we connect  24 with our -- our different populations? We have our young  25 adults, we have our Spanish speaking voters, we've got</p> <p style="text-align: right;">Miller Certified Reporting, LLC  www.MillerCertifiedReporting.com</p>	<p style="text-align: right;">17</p> <p>1 somebody -- how we need to reach somebody here in the city of  2 Phoenix is different than when we're looking at a rural  3 county. So we have to look at what communication mechanisms  4 exist for us to connect to those voters and meet them where  5 they are.</p> <p>6 So we are looking at our population, we're looking  7 at the diversity of our state, and we are looking at, okay,  8 how do we need to reach them, what is the best media tactic  9 that we can do this with?</p> <p>10 Next slide, please.</p> <p>11 So this is what our plans are for 2025. So for  12 2025, we intend to reach voters through those different  13 subcategories that I had on the previous slide. We will of  14 course have our social media; we will have search and display  15 ads. We will be on over the top television. So for example,  16 if you are on YouTube and you get an add or you're watching  17 Hulu or something like that, those ads that pop up, things  18 like that, we will connect with voters, so we'll have those  19 video ads.</p> <p>20 We'll have our traditional media, so of course  21 we'll run print ads. So if there's, you know, again a voter  22 registration deadline, we can run a print ad for that. A  23 radio read letting voters know, okay, if we are in a Native  24 American communities, if we're up in Apache County, we can  25 run a radio read on KTNN stating, okay, you know, election</p> <p style="text-align: right;">Miller Certified Reporting, LLC  www.MillerCertifiedReporting.com</p>

<p style="text-align: right;">18</p> <p>1 day is Tuesday this day and this is how you find your voting 2 location.</p> <p>3 Out of home media is very effective, too. So 4 billboards. When people are driving and they see those 5 billboards, they can know to come to the Clean Elections' 6 website. This is very effective, too, for our rural 7 communities as well.</p> <p>8 Actually, out of home is really increasing, too, so 9 we really have to work with our partners and purchase the 10 inventory for this in advance because it's very highly 11 utilized media tactic, so it works well.</p> <p>12 But, again, we are making these decisions, one, 13 based off of our budget but, two, looking at where our target 14 audience is going to consume media and meeting them where 15 they are.</p> <p>16 So if you look at this -- this graph here you can 17 see that it's -- it's, you know, pretty -- pretty even. You 18 know, there's -- you can tell, you can just look from the 19 social media where we have about 25 percent, the over the top 20 20 percent, the paid search. It's a very comprehensive plan. 21 So we're grateful to work with our experienced partners so, 22 again, we can get the most effectiveness out of our -- out of 23 our budget and knowing that we are going directly to where 24 those voters consume that media.</p> <p>25 Next slide, please.</p> <p style="text-align: center;">Miller Certified Reporting, LLC www.MillerCertifiedReporting.com</p>	<p style="text-align: right;">19</p> <p>1 Of course through all of that, through all of that 2 paid media, the goal is to send them to that website; our 3 website is where we have all the information. So all of that 4 outreach work that Alec is doing to talk to our local 5 election officials and get all of the information we need to 6 put on our website, that's where we're driving voters to. So 7 the goal is -- you know, again we can be very direct in 8 those -- in those paid media communications that the 9 registration deadline is this date, but go to 10 AZCleanElections.gov so that you can learn the requirements 11 to register to vote. You can register to vote online; we 12 walk them through the process.</p> <p>13 We are also looking at updating our website. Last 14 year we went through a redesign and we continue to work on 15 our website to make sure that it meets the needs of voters. 16 So this means we will be adding new content to it, we will be 17 refreshing content, depending on any law changes that occur, 18 we'll make sure that our website is the most accurate and 19 up-to-date election website for our voters; and of course 20 just making those general optimizations. We're going to be 21 reviewing the page speeds, so if you go to our website and 22 you pull it up on your mobile phone, how long is it taking to 23 load, things like that. So, again, making sure that our 24 website is really the best possible performing website out 25 there for voters.</p> <p style="text-align: center;">Miller Certified Reporting, LLC www.MillerCertifiedReporting.com</p>
<p style="text-align: right;">20</p> <p>1 We are continuing to work on the recommendations 2 from the Governor's task force, elections task force that we 3 started work on last year. So the goal is to continue to 4 work with the Secretary of State's office to get access to 5 the voter registration information that we need because once 6 we have that data, we have so many more opportunities to 7 provide such detailed voting information for voters. Such as 8 if you're in Pinal County, you can now look up your assigned 9 polling place, too, on the website. We can provide candidate 10 information all the way down to on our website such as 11 justice of the peace. We can provide more customized 12 information to voters once we get access to that data. So we 13 are making progress on that.</p> <p>14 Next slide, please.</p> <p>15 And then the following few slides will really focus 16 on public relations and outreach. So of course we're going 17 to be out in the community, boots on the ground, you know, 18 having our face out there, that's really important to us. 19 This is a lot of the good work that Avery is doing in 20 connecting directly with voters in the community. It helps 21 build trust but also, again, that brand recognition for 22 saying Clean Elections out there and then of course the 23 ability to talk directly to voters as opposed to not just 24 through our website. And it really gets us that face-to-face 25 connection with voters.</p> <p style="text-align: center;">Miller Certified Reporting, LLC www.MillerCertifiedReporting.com</p>	<p style="text-align: right;">21</p> <p>1 The other idea that we have too is specific to our 2 Native American outreach. We want to continue to partner 3 with our colleagues in that area and this includes 4 potentially meeting with tribal elders, working with ITCA, 5 working directly with the Get Out The Vote groups that 6 represent tribal communities. And one idea that we're really 7 excited about to share here is the Arizona Native Vote 8 collection. We are excited to endeavor on this where we 9 would in -- in the means of appreciating the Native American 10 culture and recognizing civic engagement, we want to do a 11 call for art, for an original art piece that really 12 represents voting from our respective Arizona tribes, and 13 then take that collective art and use it for some of the 14 Clean Elections' merchandise that we pass out. So whether 15 that's a hat or it's a T-shirt that we develop, when we go to 16 these community events in person, we typically bring what we 17 call "swag," because it helps get people to our booth to talk 18 to us. So it's an effective way to get the attention of 19 voters.</p> <p>20 So one of the ideas that we have is specifically to 21 work with the Native American communities and look for this 22 expressive art and translate that into, you know, what it 23 means for voting, this original vote art form, and then 24 represent that in Clean Elections merchandise.</p> <p>25 COMMISSIONER PATON: I have a comment.</p> <p style="text-align: center;">Miller Certified Reporting, LLC www.MillerCertifiedReporting.com</p>

<p style="text-align: right;">22</p> <p>1 CHAIRMAN KIMBLE: Commissioner Paton.</p> <p>2 COMMISSIONER PATON: When I used to work on</p> <p>3 the Reservation years ago, in Sells they have community</p> <p>4 events where something like that they have the -- used to be</p> <p>5 called the Papago Rodeo, now it's the, I'm sure, the O'odham</p> <p>6 Rodeo, but there's people from all over the Reservation goes</p> <p>7 to the radio -- that rodeo. I think it's maybe in October or</p> <p>8 maybe in the spring, I forget now, but hun- -- thousands of</p> <p>9 people go to those and the Native Americans love their</p> <p>10 rodeos, so that may be something you can find out when their</p> <p>11 rodeos are, and you're going to get a lot of people showing</p> <p>12 up for those. And it's like a multiple-day affair.</p> <p>13 MS. ROBERTS: Mr. Chairman, Commissioner</p> <p>14 Paton, Commissioners, absolutely. Those are the types of</p> <p>15 events we look for, especially when they have such a high</p> <p>16 traffic of people, that makes it really effective for us in</p> <p>17 terms of our time to go there. So we will absolutely looking</p> <p>18 for that particular event. Thank you for that.</p> <p>19 All right next side, please.</p> <p>20 COMMISSIONER TITLA: Yeah, Chairman?</p> <p>21 MS. ROGERS: Commissioner Titla?</p> <p>22 CHAIRMAN KIMBLE: Commissioner Titla.</p> <p>23 COMMISSIONER TITLA: Yeah, the rodeo my fellow</p> <p>24 colleague is referring to is the Tohono O'odham Rodeo they</p> <p>25 call it now, it's this weekend. This weekend is that, their</p> <p style="text-align: center;">Miller Certified Reporting, LLC www.MillerCertifiedReporting.com</p>	<p style="text-align: right;">23</p> <p>1 annual rodeo there in Sells, Arizona. So, thank you.</p> <p>2 CHAIRMAN KIMBLE: Thank you, Commissioner</p> <p>3 Titla.</p> <p>4 Gina?</p> <p>5 MS. ROBERTS: Mr. Chairman, Commissioners, we</p> <p>6 will continue to look for -- for more opportunities like</p> <p>7 that; thank you.</p> <p>8 For the current slide that we're on, let's see,</p> <p>9 current issues production and thought leadership.</p> <p>10 So coming off of 2024, we held great conversations</p> <p>11 with candidates about the issues that voters identified were</p> <p>12 important to them. This was in our candidate debates but</p> <p>13 also in our debates that we held on certain propositions,</p> <p>14 too.</p> <p>15 So during 2024 Clean Elections brought a</p> <p>16 conversation to voters about top issues affecting the state.</p> <p>17 We want to keep that going; we don't want to lose that</p> <p>18 momentum. So we want to keep going in 2026 so voters will</p> <p>19 stay engaged on these issues, these important conversations</p> <p>20 about what Arizona voters care about.</p> <p>21 So the thought is, you know, potentially we could</p> <p>22 do polls around the state about, okay, what are the issues</p> <p>23 that are important to you right now. You know, these are the</p> <p>24 items that are going through the legislature right now, and</p> <p>25 potentially host roundtable discussions with these voters.</p> <p style="text-align: center;">Miller Certified Reporting, LLC www.MillerCertifiedReporting.com</p>
<p style="text-align: right;">24</p> <p>1 Maybe it's a town hall, maybe it's something that we can</p> <p>2 actually record and work with our partners at the Arizona</p> <p>3 Media Association to disseminate to the news.</p> <p>4 But the thought is that we will keep this public</p> <p>5 dialogue going on the issues that are impacting the State of</p> <p>6 Arizona right now. That keeps us going with that thought</p> <p>7 leadership, people will continue to look to Clean Elections</p> <p>8 on the important discussions and, one, we don't lose the</p> <p>9 momentum from 2024, but it also prepares us with the</p> <p>10 continuation of our 2026 debates.</p> <p>11 So, again, polling voters, talking directly to</p> <p>12 them, what issues do you care about, are you concerned about</p> <p>13 the budget right now, are you concerned about schools and the</p> <p>14 management of money, are you concerned about healthcare right</p> <p>15 now. So having these discussions on these important topics</p> <p>16 will continue to keep Arizona voters in that civic engagement</p> <p>17 but participation in the political process mind frame and,</p> <p>18 again, really lead directly into our 2026 debate cycle.</p> <p>19 Next slide, please.</p> <p>20 And then again as part of our outreach, we will</p> <p>21 continue to work with our wonderful partners at our 15</p> <p>22 counties. So we have many new county recorders that were</p> <p>23 elected this year, there's plenty of new election staff as</p> <p>24 well, so the thought is we want to keep that relationship</p> <p>25 going with our election colleagues and Clean Elections, and</p> <p style="text-align: center;">Miller Certified Reporting, LLC www.MillerCertifiedReporting.com</p>	<p style="text-align: right;">25</p> <p>1 we'd love to go out to each county, visit with them, get an</p> <p>2 understanding of what are your voter education needs for your</p> <p>3 county, what are voters contacting you about; and just, you</p> <p>4 know, work directly with their communications and outreach</p> <p>5 staff, what projects do they have going on, look for ideas</p> <p>6 for possible collaboration.</p> <p>7 For example, Alec right now is working with</p> <p>8 Coconino County to develop signage, they need help in</p> <p>9 communicating with their voters who come in person to vote;</p> <p>10 and so we're working on you, okay, what signage can we</p> <p>11 prepare for them to help them through this voting process in</p> <p>12 a way that's easy to follow, it's clean and clear. So,</p> <p>13 again, just working with our county partners to see what is</p> <p>14 your voter education need for your county and how can we work</p> <p>15 together.</p> <p>16 Next slide, please.</p> <p>17 Extending on that is doing even more local</p> <p>18 government outreach. Arizona has 91 cities and towns. These</p> <p>19 cities and towns are again -- that's local government, that</p> <p>20 is direct government, these local elections that we are</p> <p>21 having this year, those are the ones that arguably impact</p> <p>22 voters even more so than some of our statewide elections. So</p> <p>23 we would love to do more connections and meet-and-greets with</p> <p>24 our city clerks across the state. The city clerks are</p> <p>25 responsible -- well, really, they're a hub, they're really</p> <p style="text-align: center;">Miller Certified Reporting, LLC www.MillerCertifiedReporting.com</p>

<p style="text-align: right;">26</p> <p>1 responsible for doing many things, but it includes elections,  2 but it also includes they prepare for their city council  3 agendas, they know all of the issues that are going on. The  4 city clerk is really the information center. So a member of  5 the public will go to the city clerk and seek direction.  6 So the city clerk's office is a wonderful  7 opportunity for us to connect with and talk directly to them:  8 What's going on with your local elections, how can we  9 potentially corroborate on voter education and outreach; and,  10 you know, what content do you need, what do your voters need.  11 And additionally many of our local governments have  12 their own TV channel as well, too. So they have their  13 government TV station. So, for example, this -- you know,  14 Phoenix, Phoenix TV; City of Peoria, Cox channel 11; some of  15 them even have their own production studios on their -- on  16 their city campuses. So the thought here is, okay, we can,  17 you know, if their residents know about this, we can then  18 potentially run some of our media on their communication  19 channels, maybe they can even pick up our debate and run it,  20 too, when we're preparing in 2026.  21 So how great would that be when somebody in Tucson  22 tune to Channel 12 and see the, whether it's the legislative  23 district or if it's the congressional district debate that  24 impacts and covers Tucson, they can turn right there to watch  25 it as well, too.</p> <p style="text-align: center;">Miller Certified Reporting, LLC  www.MillerCertifiedReporting.com</p>	<p style="text-align: right;">27</p> <p>1 So the thought is to connect more with our local  2 government election -- not just election officials, but local  3 government officials to see how we can continue, one, to  4 promote that participation in the political process, getting  5 people to attend those city council meetings, review those  6 city council packets, but also learning about their local  7 elections too.  8 Next slide, please.  9 And then more at the local events -- or local level  10 is looking at Chamber of Commerce events. This is the  11 business community here at the local level. So the business  12 community represents a large portion of voters and speaking  13 directly to them about voting and civic engagement, promoting  14 that civic -- that civic health within the business  15 community. So looking at upcoming Chamber events that Clean  16 Elections staff can go to and attend and speak to these local  17 elections for that particular jurisdiction. We really want  18 to focus on this in our outlying counties and our rural  19 counties. We think we can have some great success there. So  20 that's probably where we're going to start off, but really  21 connecting with the business community at the local level to  22 reach those voters directly as well, too.  23 Next slide, please.  24 And then of course -- this is the only photo I  25 included.</p> <p style="text-align: center;">Miller Certified Reporting, LLC  www.MillerCertifiedReporting.com</p>
<p style="text-align: right;">28</p> <p>1 And then of course continuing on with our civic  2 education. So civic education is critical to producing a  3 voter, to producing a lifelong voter, and want to continue to  4 work in that area. So as we've mentioned before, we will  5 working on Issue 2 of Captain Activate! We're also going to  6 be doing a call for artists. So we are looking to the art  7 community that is local here and seeing is there anybody who  8 is interested in working with us on designing the cover for  9 the next issue. Trying to get the local comic bookstores,  10 local artists involved in the project as well, too, to again  11 help promote that, that civic education component and really  12 have that community connection.  13 We are launching a refresh of our civics  14 curriculum. We have a civics curriculum that is for fourth  15 through sixth grade, seventh through eighth, and ninth  16 through twelfth and we've been updating that accordingly.  17 And we're also resigning it to making it more digestible  18 for -- for our teachers and for our students. And so we're  19 working on refreshing that and then as soon as that's done,  20 then we're going to again push it out to all of our -- our  21 educators across the state.  22 And then attending those conferences. So if  23 there's an educator conference, if there's a civic  24 conference, we like to be there in person. We host tables,  25 we bring our election information, our civics information.</p> <p style="text-align: center;">Miller Certified Reporting, LLC  www.MillerCertifiedReporting.com</p>	<p style="text-align: right;">29</p> <p>1 So we're going to continue to build our relationship and our  2 partnerships with schools.  3 I think and when you saw the presentation of our  4 recap for last year Captain Activate! is a great way for us  5 to get into those schools. We attended assemblies, we had  6 conversations about, you know, civic education. We had  7 conversations about research candidates, voting, voter  8 registration. So continuing to make our way into the  9 classrooms both, you know, with our K through 12 but also our  10 colleges and universities as well to, again, promote that  11 civic education.  12 Specifically with our colleges and universities, we  13 had a great opportunity last year to partner with Arizona  14 State University in their athletics department to provide  15 information on civil discourse, how to have conversations  16 that are difficult in a civil manner, again how elections  17 work and government works. And so we were able to develop  18 this programming and we had several events with them, which  19 is fantastic, and want expand that and reach out to all of  20 our community colleges across the state and all of our  21 universities so we can continue to share that information so  22 that we can reach those students directly.  23 Next slide, please.  24 We are also going to be launching a podcast. So  25 our hope is to do a podcast for our -- our Arizona voters and</p> <p style="text-align: center;">Miller Certified Reporting, LLC  www.MillerCertifiedReporting.com</p>



<p style="text-align: right;">30</p> <p>1 really connect with information in a way that -- we know</p> <p>2 podcasts are very popular, connect and provide this important</p> <p>3 information to voters, again, in a consumable way, ways that</p> <p>4 we know people are utilizing how they are accepting</p> <p>5 information.</p> <p>6         So previously what we've done is we have filmed</p> <p>7 subject matter expert videos where we would have somebody who</p> <p>8 would come in and talk to -- talk to us about the economy,</p> <p>9 how the economy works. We had conversations about abortion.</p> <p>10 We've had conversations about the budget. So all of those</p> <p>11 top issues that voters have identified to us in our polling</p> <p>12 and our research, we would bring in subject matter experts to</p> <p>13 talk about these, so the thought is we would redesign that</p> <p>14 and turn that into podcasts. We would also break down</p> <p>15 government topics explaining how does Social Security work,</p> <p>16 what -- how does the school choice and ESA vouchers work,</p> <p>17 explaining how these government topics work to the Arizona</p> <p>18 electorate.</p> <p>19         We could collaborate with other podcasts. And</p> <p>20 again, of course, all of this leads back to voting and voter</p> <p>21 education. So when we're in election, talking and bringing</p> <p>22 in county election direction talking about the upcoming</p> <p>23 election, bringing in somebody from the City of Tucson to</p> <p>24 explain what that proposition does.</p> <p>25         So hosting this -- creating that podcast is another</p> <p style="text-align: right;">Miller Certified Reporting, LLC www.MillerCertifiedReporting.com</p>	<p style="text-align: right;">31</p> <p>1 tool to communicate with voters on these important subjects.</p> <p>2         Next slide, please.</p> <p>3         And then of course we have to utilize this year to</p> <p>4 plan for next year. So we will be looking at our planning</p> <p>5 and production for 2026. This includes developing this</p> <p>6 creative assets for our elections for next year for our</p> <p>7 primary and general. Again, this comes off of the research</p> <p>8 that we're doing this year. We take that research, we</p> <p>9 develop a communications plan that responds directly to what</p> <p>10 voters have told us in -- in those surveys, in those focus</p> <p>11 groups, and then we create those assets this year so that</p> <p>12 way, we're ready to deploy those in 2026.</p> <p>13         And then of course we create our plan, our</p> <p>14 timeline. We look at what elections we're going to be having</p> <p>15 next year, when are we going to be on paid media, what is our</p> <p>16 plan to start communicating to voters about debates, about</p> <p>17 the voter education guide. So we do all of that work in</p> <p>18 advance.</p> <p>19         Next slide.</p> <p>20         We also need to start preparing for our 2026</p> <p>21 debates production as well. For example, we held our debates</p> <p>22 at Bit Fire, that is not an option going forward because Bit</p> <p>23 Fire has sold their company. So we have to look now for</p> <p>24 where are we going to be producing these debates, our</p> <p>25 physical location, we have to identify that production</p> <p style="text-align: right;">Miller Certified Reporting, LLC www.MillerCertifiedReporting.com</p>
<p style="text-align: right;">32</p> <p>1 studio. We have to start communicating with candidates now.</p> <p>2 Candidates are already announcing that they are running for</p> <p>3 2026 offices -- or, you know, for the 2026 ballot. So we</p> <p>4 need to be a part of the conversation now to let these folks</p> <p>5 know, you will want to block time on your calendar for the</p> <p>6 Clean Elections debates.</p> <p>7         We need to look at our -- our format and the</p> <p>8 technical components of it and then design of it, what that</p> <p>9 will look like. We need to have conversations about our</p> <p>10 moderators again, how are we going to do that, how are we</p> <p>11 going to select those moderators. We need to look at our</p> <p>12 legislative debates as well, too, so we have the production</p> <p>13 for that. How can we better disseminate those videos, going</p> <p>14 back to maybe those government channels, things like that.</p> <p>15 So we have to start the planning of that now because the</p> <p>16 calendars and how much the debate process has grown, we</p> <p>17 really must start that work now to -- to stay on top of</p> <p>18 things.</p> <p>19         With the debate lineup there, we have for 2026 our</p> <p>20 congressional districts, we will have the governor on the</p> <p>21 ballot, for the first time ever our lieutenant governor, and</p> <p>22 then of course all of our statewide offices, our corporation</p> <p>23 commissioners, our legislative districts, we have local</p> <p>24 races, and we'll see what ballot measures end up on 2026 as</p> <p>25 well too.</p> <p style="text-align: right;">Miller Certified Reporting, LLC www.MillerCertifiedReporting.com</p>	<p style="text-align: right;">33</p> <p>1         So we have to start. These are such massive</p> <p>2 productions, we have to start the work now.</p> <p>3         Next slide, please.</p> <p>4         With that also comes the preparation of our voter</p> <p>5 guide. We consistently see from our research that the voter</p> <p>6 education guide is ranked as one of the top trusted sources</p> <p>7 from voters. With that we want to make sure that we aren't</p> <p>8 stagnant with that information. We want to again continue to</p> <p>9 look at our research, what are voters telling us that they</p> <p>10 need, and reimagine the voter guide to make sure we are</p> <p>11 meeting those needs. That could be, you know, something as</p> <p>12 simple as adding another page of additional content,</p> <p>13 explaining something or providing more information about the</p> <p>14 voting process, again depending on our research.</p> <p>15         We also want to talk to county elections officials.</p> <p>16 So every time we have a production of a voter guide, we send</p> <p>17 bulk shipments to all of our 15 counties, they then put those</p> <p>18 at the voting locations, they keep them in their office, they</p> <p>19 are also distributing those to voters, which means they are</p> <p>20 also on the receiving end of questions for that guide.</p> <p>21 Voters often call our county election folks with questions on</p> <p>22 it, so we want to talk to them and say, what are you hearing</p> <p>23 from voters? Most often it's "We want more candidates." So</p> <p>24 learning more about that and getting their feedback on the</p> <p>25 voter guide and how it can be more useful to the counties as</p> <p style="text-align: right;">Miller Certified Reporting, LLC www.MillerCertifiedReporting.com</p>

<p>34</p> <p>1 well.</p> <p>2 And so again just looking at our voter guide,</p> <p>3 determining potential changes, because if we do that this</p> <p>4 year, that will give us time to implement both the technical</p> <p>5 side of things and then working with our vendors to make sure</p> <p>6 we can produce those changes.</p> <p>7 And then with that, our next slide, that is the</p> <p>8 main guts of our -- of our plan this year. Of course we will</p> <p>9 continue to be flexible when we have county elections</p> <p>10 officials that reach out to us, have projects, things like</p> <p>11 that, events we will be able to respond to those quickly.</p> <p>12 But these are the majority of our goals that we have</p> <p>13 presented to the Commission for consideration. And with</p> <p>14 that, I'm happy to answer any questions.</p> <p>15 CHAIRMAN KIMBLE: Thank you very much, Gina.</p> <p>16 Any questions or comments --</p> <p>17 COMMISSIONER PATON: Yes.</p> <p>18 CHAIRMAN KIMBLE: -- from members of the</p> <p>19 Commission?</p> <p>20 Commissioner Paton.</p> <p>21 COMMISSIONER PATON: Now I don't know, you may</p> <p>22 do this already, but I was thinking that particularly from --</p> <p>23 before the next big -- big election in '26, if you and your</p> <p>24 crew, do you ever go to, like, the tailgating before games,</p> <p>25 like the Wildcats or the ASU games? The ASU, U of A game is</p> <p>Miller Certified Reporting, LLC www.MillerCertifiedReporting.com</p>	<p>35</p> <p>1 always after the election so that wouldn't be good, but</p> <p>2 you're going to have all these Arizona people coming to those</p> <p>3 things and maybe you can do one issue tailgating thing or</p> <p>4 maybe one Arizona one and one at NAU or whatever, find out</p> <p>5 when a big game is coming up and you're going to have plenty</p> <p>6 of people and most of them are going to have Arizona</p> <p>7 connections, so.</p> <p>8 The biggest one would be U of A-ASU, but that's</p> <p>9 after the election so that wouldn't be any good.</p> <p>10 So that was my comment.</p> <p>11 MS. ROBERTS: Mr. Chairman.</p> <p>12 CHAIRMAN KIMBLE: Thank you.</p> <p>13 Gina?</p> <p>14 MS. ROBERTS: Mr. Chairman, Commissioner</p> <p>15 Paton, yes, absolutely love that idea because that connects</p> <p>16 us again also with those college students who need a lot of</p> <p>17 support when it comes to voting. But, of course, the general</p> <p>18 population as well. Everybody attends those.</p> <p>19 COMMISSIONER PATON: Right, there will be</p> <p>20 children there and so your Captain Activate! guy could be</p> <p>21 roaming around doing his cartwheels --</p> <p>22 MS. ROBERTS: Absolutely.</p> <p>23 COMMISSIONER PATON: -- and passing out the</p> <p>24 stuff that you have.</p> <p>25 MS. ROBERTS: So a few things we have in the</p> <p>Miller Certified Reporting, LLC www.MillerCertifiedReporting.com</p>
<p>36</p> <p>1 works right now for that, we have been working with U of A</p> <p>2 and their -- trying to connect their mascot with</p> <p>3 Captain Activate! They've presented a couple of</p> <p>4 opportunities for us that we need to nail down and figure out</p> <p>5 how we're going to do that.</p> <p>6 At the end of last year, Tom was able to go up to</p> <p>7 NAU with Captain Activate! to a basketball game and attend --</p> <p>8 and attend theirs. But those are absolutely great ideas.</p> <p>9 I'm -- I'm happy to volunteer for tailgating and staff those</p> <p>10 table, and -- and we can definitely manage those tables and</p> <p>11 bring our outreach and resources there too, you're right.</p> <p>12 COMMISSIONER PATON: For instance, this will</p> <p>13 be too soon, I mean ASU is playing Arizona in basketball on</p> <p>14 Saturday, but that would be too soon to try to figure</p> <p>15 something out, but they're going to play another basketball</p> <p>16 game in Tucson and so that may be a good opportunity. That</p> <p>17 should probably within maybe a month and a half or so maybe.</p> <p>18 Maybe you can plan something for that -- that time period.</p> <p>19 MS. ROBERTS: Mr. Chairman, Commissioners,</p> <p>20 absolutely, we will take a look at the schedule. Might have</p> <p>21 to get a Captain Activate! an ASU sweatshirt.</p> <p>22 MR. COLLINS: Captain Activate! he can't wear</p> <p>23 an ASU shirt in Tucson.</p> <p>24 MS. ROBERTS: Oh. Come on.</p> <p>25 COMMISSIONER PATON: No. That wouldn't be</p> <p>Miller Certified Reporting, LLC www.MillerCertifiedReporting.com</p>	<p>37</p> <p>1 good.</p> <p>2 CHAIRMAN KIMBLE: No. No. No, no, no, no.</p> <p>3 COMMISSIONER PATON: Too many Wildcats.</p> <p>4 CHAIRMAN KIMBLE: Any other comments or</p> <p>5 questions from members of the Commission?</p> <p>6 COMMISSIONER ESTES-WERTHER: Yes, I do.</p> <p>7 CHAIRMAN KIMBLE: Commissioner Werther.</p> <p>8 COMMISSIONER ESTES-WERTHER: Gina, thank you</p> <p>9 for the presentation. That's a -- whew, that's a lot.</p> <p>10 That's what goes into the planning for all of this.</p> <p>11 So in terms of I guess I would say municipal,</p> <p>12 right, to kind of support city/towns and their voter</p> <p>13 education, I know that Clean Elections has already gone some</p> <p>14 to like their annual elections conference with the clerks, so</p> <p>15 I know that's a great opportunity. I know they also have,</p> <p>16 like, their spring and their fall, which are usually much</p> <p>17 smaller and more virtual, but that also might be another</p> <p>18 opportunity for -- you know what I mean, to kind of reach out</p> <p>19 to the clerks about different opportunities to engage with</p> <p>20 them.</p> <p>21 And then also I was going to say, I don't know that</p> <p>22 you guys have been to the League conference. Because that</p> <p>23 would -- I mean obviously it's a big conference, all the city</p> <p>24 and town officials and staff, you know, from around the state</p> <p>25 come to that. It's a huge conference; it's usually in</p> <p>Miller Certified Reporting, LLC www.MillerCertifiedReporting.com</p>

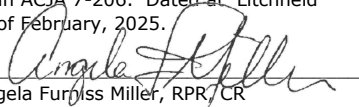

<p style="text-align: right;">38</p> <p>1 August. I think this year it's going to be at the Princess.  2 So I mean that might be something -- because obviously they  3 do vendor tables as well -- to have Clean Elections' presence  4 there.  5 And then I was going to ask, because I know we have  6 more local information on the website, but in terms of the  7 voter education guide, I do know like some of that is  8 limited, is there something in there that essentially says:  9 Hey, are you looking for your city/town candidates, and then  10 kind of sort of directs them to, hey, you need to go to your  11 jurisdictional web page? Or I don't know, some type of  12 almost just general comments maybe, so that way they  13 understand, why am I not seeing something in here? Oh, I  14 have to go elsewhere.  15 That would just be one other suggestion.  16 MS. ROBERTS: Mr. Chairman and --  17 CHAIRMAN KIMBLE: Gina.  18 MS. ROBERTS: -- and Commissioner Werther,  19 Commissioners, absolutely, thank you. And our plan was to  20 actually speak to you directly, too, with your contacts  21 with -- with our cities; and the League conference,  22 absolutely. We know that what thousands -- a thousand folks  23 show up there.  24 COMMISSIONER ESTES-WERTHER: 1,400 last year.  25 MS. ROBERTS: Right, and that includes members  Miller Certified Reporting, LLC  www.MillerCertifiedReporting.com</p>	<p style="text-align: right;">39</p> <p>1 of legislature too. And so not just our local county, but  2 that is a wonderful opportunity for us to look into it. And  3 then, of course, looking -- potentially meeting with the  4 clerk's president and the executive officers.  5 We actually do send out bulk shipments to our  6 clerks who request it, and then within the printed voter  7 guide, we do make reference of if you're looking for your  8 local candidates, your council candidates, you can go to our  9 website for -- for those names. Because one of the things  10 Alec works on is he also pulls all of the names for those  11 local candidates and lists them on our website, too.  12 So we do direct them there for that, but absolutely  13 we look forward to -- to more suggestions on how we can  14 connect with our local clerks and -- and local government.  15 Thank you.  16 CHAIRMAN KIMBLE: Thank you.  17 Any other comments or questions from Commissioners?  18 COMMISSIONER PATON: I had something else.  19 CHAIRMAN KIMBLE: Commissioner Paton.  20 COMMISSIONER PATON: I was also thinking,  21 could we do like a -- like a section of our website  22 explaining about the new lieutenant governor, what the duties  23 are, what -- you know, all the kind of requirements for it  24 and is it tied to the governor and -- and -- because it's  25 going to be all new to everybody. So I think maybe if we  Miller Certified Reporting, LLC  www.MillerCertifiedReporting.com</p>
<p style="text-align: right;">40</p> <p>1 explained that position like on our website that may benefit  2 quite a few people.  3 MS. ROBERTS: Mr. Chairman, Commissioners,  4 absolutely, that's a wonderful idea.  5 CHAIRMAN KIMBLE: Anything else from members  6 of the Commission?  7 If not, is there a motion to approve the 2024 --  8 excuse me, 2025 voter education plan?  9 COMMISSIONER ESTES-WERTHER: Motion to approve  10 the 2025 voter education plan.  11 CHAIRMAN KIMBLE: Thank you, Commissioner  12 Werther.  13 Is there a second?  14 COMMISSIONER PATON: I'll second it.  15 CHAIRMAN KIMBLE: It's been moved by  16 Commissioner Werther, seconded by Commissioner Paton that we  17 approve the 2024 voter education plan.  18 I will call the roll.  19 Commissioner Chan.  20 COMMISSIONER CHAN: Aye.  21 CHAIRMAN KIMBLE: Commissioner Titla.  22 COMMISSIONER TITLA: Aye.  23 CHAIRMAN KIMBLE: Commissioner Paton.  24 COMMISSIONER PATON: Aye.  25 CHAIRMAN KIMBLE: Commissioner Werther.  Miller Certified Reporting, LLC  www.MillerCertifiedReporting.com</p>	<p style="text-align: right;">41</p> <p>1 COMMISSIONER ESTES-WERTHER: Aye.  2 CHAIRMAN KIMBLE: Chair votes aye, the  3 Commission -- the voter education plan is approved  4 five-to-nothing.  5 Thank you very much, Gina.  6 Item V, public comment. This is the time for  7 consideration of comments and suggestions from the public.  8 Action taken as a result of public comment will be limited to  9 directing staff to study the matter, rescheduling the matter  10 for further consideration or responding to criticism.  11 Please limit your comment to no more than two  12 minutes.  13 Does anyone on Zoom want to make a comment?  14 I don't see anyone.  15 (No audible response.)  16 CHAIRMAN KIMBLE: No? Okay.  17 And then there's no one here that wants to make a  18 comment.  19 The public may also send comments to the Commission  20 by e-mail at CCEC@CleanElections.gov.  21 Item X, at this time I would -- well, it's not  22 really X, it's VI, at this time I would enter a motion to  23 adjourn.  24 COMMISSIONER ESTES-WERTHER: I move to  25 adjourn.  Miller Certified Reporting, LLC  www.MillerCertifiedReporting.com</p>

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1 CHAIRMAN KIMBLE: Thank you, Commissioner  
2 Werther.  
3 Is there a second?  
4 COMMISSIONER PATON: I'll second.  
5 CHAIRMAN KIMBLE: Thank you, Commissioner  
6 Paton. I will call the roll.  
7 Commissioner Chan.  
8 COMMISSIONER CHAN: Aye.  
9 CHAIRMAN KIMBLE: Commissioner Titla.  
10 COMMISSIONER TITLA: Aye.  
11 CHAIRMAN KIMBLE: Commissioner Paton.  
12 COMMISSIONER PATON: Aye.  
13 CHAIRMAN KIMBLE: Commissioner Werther.  
14 COMMISSIONER ESTES-WERTHER: Aye.  
15 CHAIRMAN KIMBLE: Chair votes aye.  
16 We are adjourned. Thank you.  
17 (Meeting concludes at 10:51 a.m.)  
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C E R T I F I C A T E

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2  
3 STATE OF ARIZONA )  
4 ) ss.  
5 COUNTY OF MARICOPA )  
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7 BE IT KNOWN that the foregoing proceedings were  
8 taken before me, Angela Furniss Miller, Certified Reporter  
9 No. 50127, all done to the best of my skill and ability;  
10 that the proceedings were taken down by me in shorthand and  
11 thereafter reduced to print under my direction.  
12  
13 I CERTIFY that I am in no way related to any of the  
14 parties hereto nor am I in any way interested in the outcome  
15 thereof.  
16  
17 I FURTHER CERTIFY that I have complied with the  
18 requirements set forth in ACJA 7-206. Dated at Litchfield  
19 Park, Arizona, this 4th of February, 2025.  
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21   
22 Angela Furniss Miller, RPR/CR  
23 CERTIFIED REPORTER (AZ50127)  
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25 \* \* \*  
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27 I CERTIFY that Miller Certified Reporting, LLC, has  
28 complied with the requirements set forth in ACJA 7-201 and  
29 7-206. Dated at LITCHFIELD PARK, Arizona, this 4th of  
30 February, 2025.  
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**CITIZENS CLEAN ELECTIONS COMMISSION  
EXECUTIVE DIRECTOR REPORT  
February 27, 2025**

**Announcements:**

- Local elections will occur on March 11, 2025.
  - The City of Tucson is holding a ballot by mail election for Proposition 414 – Safe & Vibrant City (half-cent sales tax increase for the next 10 years).
    - The election is an all-mail election (every eligible voter was mailed a ballot).
    - The last day to request a replacement ballot by mail is February 28<sup>th</sup>.
    - Voters should mail their ballot back no later than March 4<sup>th</sup>.
  - Voters can find details on the Clean Elections website.

**Voter Education and Outreach:**

- Avery launched a Clean Elections-County Voter Outreach workgroup this month. The initial meeting included 5 of 15 counties (Maricopa, Pinal, Navajo, Coconino, Gila and Pima). This effort builds on the Commission's work with local election officials. Meetings will allow election officials to identify issues, discuss solutions and leverage resources.
- Captain Activate! made an appearance at the 23rd Annual Legislative conference Youth Day at the Capitol.
- Focus groups will occur March 4<sup>th</sup> through March 13<sup>th</sup>. This research will lead our outreach efforts as we learn more about voter needs and behaviors.
- In other outreach efforts, Avery met with June Shorthair with Phoenix Indian Center to discuss upcoming events and presented to Mesa Community College students about lobbying.



**Legal:**

- Center for Arizona Policy v. Arizona Secretary of State, Arizona Supreme Court No. CV-24-0295-PR.
  - Responses were filed by the Commission and other respondents this month. This case involves state constitutional law challenges to the Voters Right to Know Act. The Arizona Supreme Court will consider the petition at a future conference.

- Americans for Prosperity v. Meyer, No. 24-2933 (9th Cir.).
  - With briefing complete, we are anticipating Oral Argument in May, likely in Phoenix.
  - This case is a First Amendment challenge to the Voters Right to Know Act. The District Court granted the Commission et al.'s motion to dismiss.
- Montenegro v. Fontes, Arizona Supreme Court No. CV-24-0166-PR.
  - Petitioner Legislative Leaders and Respondents Commission, et al. filed simultaneous supplemental briefs last month. There is one amicus brief by the Goldwater Institute and our response is pending.
  - Oral argument is March 6 at 9:45 a.m. at Arizona State University's College of Law in Phoenix. Please let us know if you are planning to attend.
- The Power of Fives, LLC v. Clean Elections, CV2021-015826, Superior Court for Maricopa County & Clean Elections v. The Power of Fives, LLC et al. CV2022-053917, Superior Court for Arizona. No new developments.
- Branch et al. v. Collins, et al., CV2024-004136 in Superior Court for Maricopa County. Motion to dismiss was granted in part. We anticipate an amended complaint from the Plaintiffs. For information about this matter please let us know so we can connect you with the Commission's attorneys.

#### **Appointments:**

- No additional information.

#### **Complaints**

- MUR 24-01, Barnett
- MUR 24-05, Roberts
- MUR 24-07, Arizona Solutions PAC
- MUR 24-08, Opportunity Arizona.
  - Dismissed. Complaint alleged that public communications lacked appropriate donor disclosure. Error in VRKA report led to an organization being listed as original donor, not intermediary. Therefore disclosure was not incorrect.
- MUR 25-01, Jaramillo

Reports of Proposition 211 Dismissals are attached to this report.

### **2025 Regulatory Agenda:**

The Commission may conduct a rulemaking even if the rulemaking is not included on the annual regulatory agenda. Staff will be taking a look at Proposition 211 implementation rules for improvement.

The following information is provided under A.R.S. § 41-1021.02:

- Notice of Docket Opening: **None.**
- Notice of Proposed Rulemaking: **None.**
- Federal funds for proposed rulemaking: **None**
- Review of existing rules: **None pending**
- Notice of Final Rulemaking: **None.**
- Rulemakings terminated: **None.**
- Privatization option or nontraditional regulatory approach considered: **None Applicable.**

Katie Hobbs  
Governor

Thomas M. Collins  
Executive Director



**State of Arizona  
Citizens Clean Elections Commission**

1110 W. Washington St. - Suite 250 - Phoenix, Arizona 85007 - Tel (602) 364-3477 - Fax (602) 364-3487 - [www.azcleanelections.gov](http://www.azcleanelections.gov)

**Via E-Mail**

February 24, 2025

Jillian Andrews  
Herrera Arellano LLP  
1001 North Central Ave  
Suite 404  
Phoenix, AZ 85004

**Re: MUR 24-08 Opportunity Arizona**

Dear Ms. Andrews:

I am writing to notify you that I have dismissed this Complaint and provide the report required by Ariz. Admin. Code R2-20-811(F).

The Complaint

The Complaint asserts that the Opportunity Arizona, an Arizona nonprofit corporation, failed to provide required complete disclaimers on public communications in legislative campaigns.

The Response

Opportunity Arizona argues that because it had no original sources of greater than \$5,000 that would have been required to disclose on the public communication.

*See* Ariz. Clean Elections Comm'n Advisory Opinion 24-06.

The organization did, however, note that its Prop. 211 initial report incorrectly identified the "League of Conservation Voters," as a donor of original monies. *See* Opportunity Arizona, Voters Right to Know Act Initial Report, Ariz. Sec. of State, [https://azsos.gov/sites/default/files/vrka/2025/8.29.2024\\_Opportunity\\_AZ.pdf](https://azsos.gov/sites/default/files/vrka/2025/8.29.2024_Opportunity_AZ.pdf). The organization later filed a corrected report. Opportunity Arizona, Voters Right to

Know Act Amended Report, Ariz. Sec. of State,  
[https://azsos.gov/sites/default/files/vrka/2025/2.19.2025\\_Opportunity\\_Arizona.pdf](https://azsos.gov/sites/default/files/vrka/2025/2.19.2025_Opportunity_Arizona.pdf).

### Analysis

The Act requires that “public communications by covered persons shall state, at a minimum, the names of the top three donors who directly or indirectly made the three largest contributions of original monies during the election cycle to the covered person.” A.R.S. § 16-974(C); Ariz. Admin. Code § R2-20-805(B) (requiring the disclosure of donors of original monies who have donated more than \$5,000 and who have not opted out of their donation being used for campaign media spending). Opportunity Arizona is a covered person.

The Commission’s A.O. 24-06 addressed how a covered person should resolve a disclaimer issue where there is no donor or original monies greater than \$5,000 but there are intermediary donors, that is donors who collect money from others and funnel that money to the covered person. The opinion concluded that to ensure original sources were disclosed intermediaries should not be treated as donors who “directly or indirectly” made contributions. A contrary opinion would create situations where the top three intermediaries could crowd out original donors.

Here, Opportunity Arizona represents that it’s disclosure of the League of Conservation Donors as an original source on its Proposition 211 reports was mistaken. It has filed a corrected report.

Absent this erroneous disclosure, Staff in this instance concludes that there the disclaimers did not have “donors . . . . of original monies” to disclose on the public communications. Under the circumstances, including consideration of the corrected report and the staff emphasis last cycle on compliance rather than penalizing good faith efforts to comply with the Act, no further action is warranted.



Conclusion

For the reason identified above, the Complaint is not substantiated and is dismissed.

Thank you for your response in this matter. This letter, along with the Complaint and Response will be made available to the Commission as part of the Executive Director's Report at the next regular Commission meeting.

Sincerely,

S/ Thomas M. Collins

cc: Ryan O'Daniel

December 13, 2024

Clean Elections Commission  
C/O Tom Collins  
1110 W Washington St  
Phoenix, AZ 85007

To Whom It May Concern,

On behalf of multiple Arizona candidates, I am filing a formal complaint against "Opportunity Arizona", [ref] Filer ID 100355 ("Committee"), for failure to provide the original source of campaign funding in their printed disclaimer and failure to disclose the original source of funding through mandated VRKA reports.

Since registering as an Independent Expenditure organization in 2020, the Committee has not filed campaign finance reports disclosing critical financial information - namely donors. The Committee has undoubtedly relied upon their status as a 501c4 to circumvent mandated disclosures. However, with the passage of Prop 211 in 2022, the Committee is now, for the first time, mandated to report the original source of funds in their VRKA reports as well as list the top three sources of funding in the distributed campaign literature, which directly advocates for the election/defeat of various candidates.

Attached are various examples of electioneering and advocacy in various legislative districts that contain the "paid for by" disclaimer, but fail to disclose the top three donors. The attached are just a small sample of materials made publicly available by the "Committee" via Google Drive, but none of the advocacy the Committee distributed contained the required donor disclosure (see "MadLibs LD4 Opportunity AZ", "TwoChoices LD4\_Opportunity Arizona", "Leeches LD16 Opportunity AZ", "Commandments LD27Opportunity AZ", "Crossword\_LD27 Opportunity AZ Howard", and "Toy LD23 Opportunity AZ Pena").

Please take appropriate action against the 'Committee' immediately. It is critical that dark money, out-of-state special interests, reveal the original source of their funding under the Arizona Voter's Right to Know Act *and* make timely reports to the Secretary of State so the public can be made aware of the campaign activities by mega-donors impacting candidates for local office.

Thank you for your prompt attention to this matter.

Sincerely,

Ryan O'Daniel  
(602) 332-2039  
[RyanO@Intrepidaz.com](mailto:RyanO@Intrepidaz.com)



VERIFICATION

State of Arizona

)  
) ss.  
)

County of Maricopa

I, Ryan O'Daniel, state that I have read the foregoing complaint and know the contents thereof by personal knowledge. I know the allegations of the complaint to be true, except any matters therein on information and belief, which I believe to be true.

Signed under penalty of perjury this 24th day of October, 2024.

Ryan O'Daniel  
[Name]

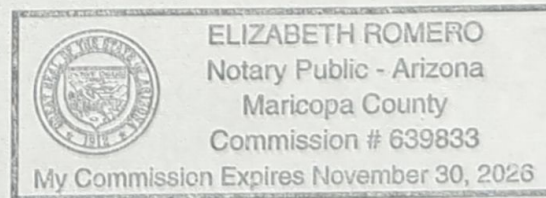
[Signature]  
[Signature]

Subscribed and sworn to before me this 13<sup>th</sup> day of December, 2024.

Elizabeth Romero  
Notary Public Name  
Elizabeth Romero

Elizabeth Romero  
[Signature]

My Commission Expires: 11/30/2026



# SAD FIBS

## REPUBLICAN LEGISLATIVE PRIORITIES

Fill in the blanks to uncover what Republican legislators are up to:

Republican legislators in Arizona want to \_\_\_\_\_ abortion  
VERB  
with no exceptions. They even want to arrest \_\_\_\_\_ who  
PLURAL NOUN  
perform one. In schools, they want to \_\_\_\_\_ books but  
VERB  
are also stopping teachers from \_\_\_\_\_ about evolution  
VERB  
and the history of slavery.

They actually voted to \_\_\_\_\_ US Presidential elections in  
VERB  
our state. From restricting access to \_\_\_\_\_ to outlawing  
NOUN  
\_\_\_\_\_ in schools, their agenda is about control.  
PLURAL NOUN

Now, when times are \_\_\_\_\_, Republicans are more  
ADJECTIVE  
focused on controlling our lives than helping.



# **DON'T LET REPUBLICANS CONTROL WHO FILLS IN THE BLANKS!**

**CARINE  
WERNER:**



**REP. MATT  
GRESS:**



**PAMELA  
CARTER:**



**Support extreme abortion bans<sup>1</sup>**

---

**Voted to restrict IVF access<sup>2</sup>**

---

**Support banning books in schools<sup>3</sup>**

**VOTE MAIL YOUR BALLOT BACK BY OCTOBER 29  
ELECTION DAY IS NOVEMBER 5**

<sup>1</sup>Matt Gress *LinkedIn* 6/22/24, Pamela Carter *iVoterGuide* | <sup>2</sup>HB2502, 2023 | <sup>3</sup>SB1007, 2024, "How \$4,000 of right-wing kids books landed in Scottsdale schools" *Phoenix New Times* 6/14/24, @pamelacarter888 X 7/8/2024

**Carine Werner  
for State  
Senate & Matt  
Gress & Pamela  
Carter for  
State House**

**OPPORTUNITY  
ARIZONA**  
Opportunity Arizona  
530 E McDowell Rd #107-138  
Phoenix, AZ 85004

Paid for by Opportunity Arizona.  
Not Authorized by Any Candidate  
or Any Candidate's Agent.



NONPROFIT ORG  
U.S. POSTAGE  
**PAID**  
PERMIT # 1417  
PHOENIX, AZ

**Sen. Christine  
Marsh for State  
Senate & Kelli  
Butler & Karen  
Gresham for  
State House**

**VOTE Sen. Christine  
Marsh for State Senate  
& Kelli Butler & Karen  
Gresham for State House**



- ✓ **Eliminating junk fees<sup>1</sup>**
- ✓ **Reducing the cost to buy or rent a home<sup>2</sup>**
- ✓ **Lowering the price of prescription drugs<sup>3</sup>**


**YOU  
DECIDE.**

**OUR  
FUTURE,**

**EARLY VOTING BEGINS OCTOBER 9<sup>TH</sup> | ELECTION DAY IS TUESDAY NOVEMBER 5<sup>TH</sup>**

<sup>1</sup>HB 2122, 2024 | <sup>2</sup>HB 2813, 2024 | <sup>3</sup>SB 1532 & HB 2559, 2024





# Sen. Christine Marsh for State Senate & Kelli Butler & Karen Gresham for State House

**Sen. Christine Marsh, Kelli Butler, and Karen Gresham** are looking out for hardworking Arizona families, not for special interests or big corporations, leveling the playing field so that you can succeed.

Carine Werner, Matt Gress, and Pamela Carter don't trust you to make your own decisions. They want to **control your life** and impose their extreme values.



<sup>1</sup>HB2502, 2023 | <sup>2</sup>SB1007, 2024, "How \$4,000 of right-wing kids books landed in Scottsdale schools" *Phoenix New Times* 6/14/24, @pamelacarter888 X 7/8/2024 | <sup>3</sup>HB2393, 2024 | <sup>4</sup>Matt Gress *LinkedIn* 6/22/24, Pamela Carter *iVoterGuide*

<sup>1</sup>HB 2122, 2024 | <sup>2</sup>HB 2813, 2024 | <sup>3</sup>SB 1532 & HB 2559, 2024





IN A WORLD WHERE CORPORATE CASH  
CREATES POLITICAL MONSTERS,

**SEN. TJ SHOPE AND CHRIS  
LOPEZ ARE SELLING OUT —**

**WHILE THE REST OF US  
GET DRAINED DRY!**

# ATTACK OF THE GIANT LEECHES

STARRING: **REPUBLICAN LEGISLATORS AS THE LEECHES • SPECIAL INTERESTS  
AS THE SILENT THREAT • YOU AS THE HERO WHO FIGHTS BACK**

**COMING TO A POLLING PLACE NEAR YOU THIS ELECTION DAY!**





# CAN WE STOP THEM BEFORE IT'S TOO LATE?

***PREPARE FOR THE TERRIFYING INVASION OF THE GIANT LEECHES,  
WHERE THE VILLAINS ARE LURKING IN PLAIN SIGHT, THREATENING TO  
DRAIN YOUR WALLET SO THEIR BILLIONAIRE DONORS GET RICHER.***



## **SENATOR TJ SHOPE**

Voted to hide  
political gifts  
from lobbyists<sup>1</sup>

Voted to cut the  
minimum wage<sup>2</sup>

Voted for tax  
loopholes for  
the wealthy  
and big  
corporations<sup>3</sup>

## **CHRIS LOPEZ**

While hard-working Arizonans  
struggle to make ends meet,  
Republican house candidate  
Chris Lopez leaves others to  
pick up the tab. He has<sup>4</sup>:

- 3 failed businesses
- 3 liens against him

At the same time, he supports<sup>5</sup>:

- Cuts to public schools
- Eliminating important  
worker protections
- Tax loopholes for billionaires

*All in service to the special  
interest donors he represents.*

***MAIL YOUR BALLOT BACK BY  
OCT 29. ELECTION DAY IS NOV 5.***



**THE 4 NEW  
COMMANDMENTS  
FROM REPUBLICANS  
FOR WOMEN**

I.  
THOU SHALT NOT USE I.V.F. TO  
MAKE YOUR DREAMS OF  
MOTHERHOOD COME TRUE

II.  
THOU SHALT NEVER TERMINATE  
A PREGNANCY, EVEN IN CASES  
OF RAPE OR INCEST

III.  
THOU SHALT NOT BE ALLOWED  
TO USE CONTRACEPTION

IV.  
THOU SHALT NOT EARN EQUAL  
PAY FOR EQUAL WORK

**EARLY VOTING BEGINS OCTOBER 9  
ELECTION DAY IS NOVEMBER 5**





Paid for by Opportunity  
Arizona. Not Authorized  
by Any Candidate or Any  
Candidate's Agent.

**OPPORTUNITY  
ARIZONA**

Opportunity Arizona  
530 E McDowell Rd #107-138  
Phoenix, AZ 85004



**FORMER REP.  
TONY RIVERO**

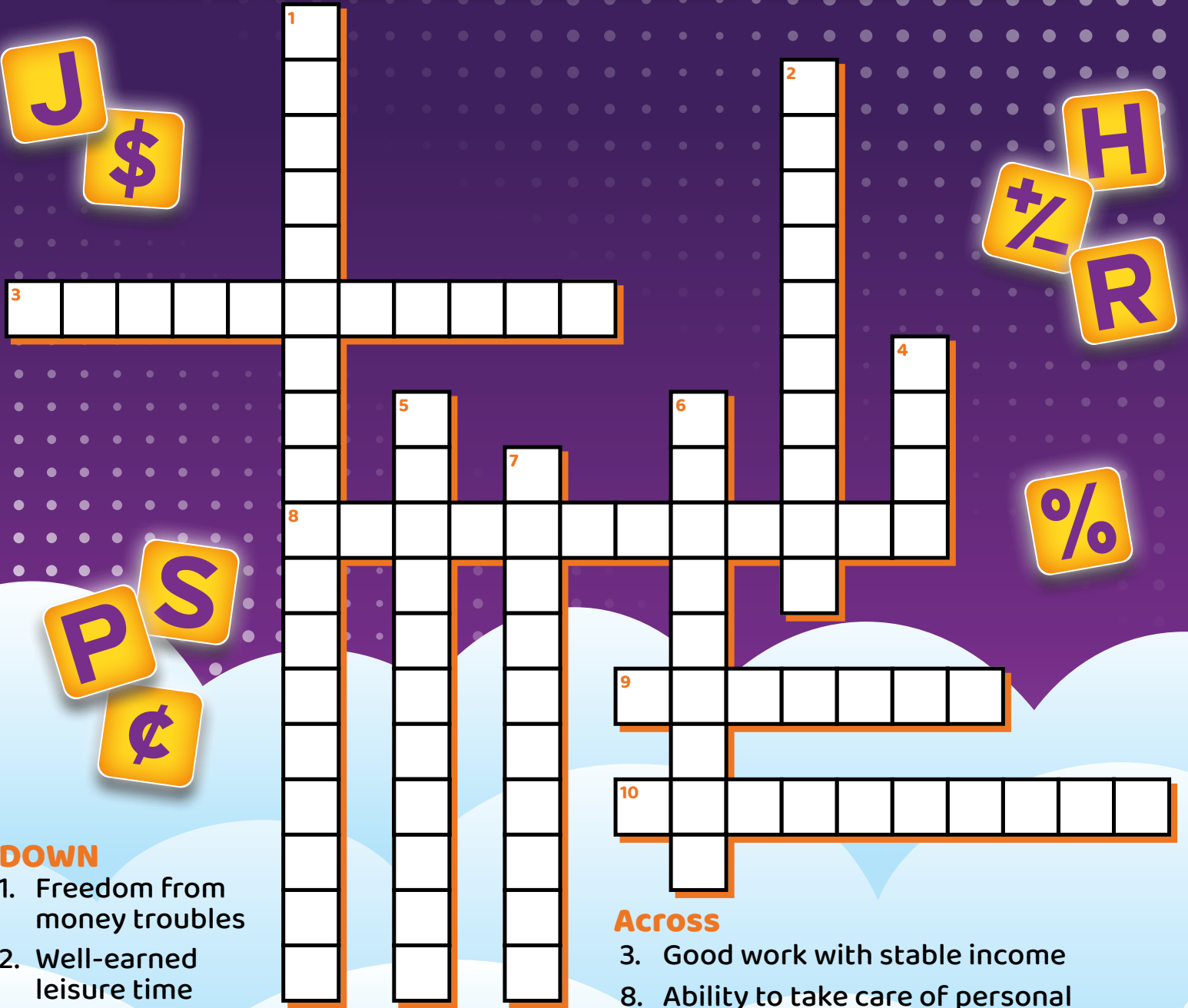
**Former Rep. Tony Rivero is  
*WEIRDLY EXTREME***

**El exrepresentante  
Tony Rivero es un  
*EXTREMISTA RARO***

- X** Voted for extreme abortion bans<sup>1</sup>  
Votó a favor de prohibiciones extremas del aborto<sup>1</sup>
- X** Voted to restrict I.V.F. access<sup>2</sup>  
Votó para restringir el acceso a la fecundación in vitro (FIV)<sup>2</sup>
- X** Voted to make it easier to overturn citizen ballot initiatives<sup>3</sup>  
Votó para facilitar la anulación de las iniciativas ciudadanas<sup>3</sup>

**You Decide. *VOTE.***

# ECONOMIC SECURITY DOESN'T HAVE TO BE A PUZZLE



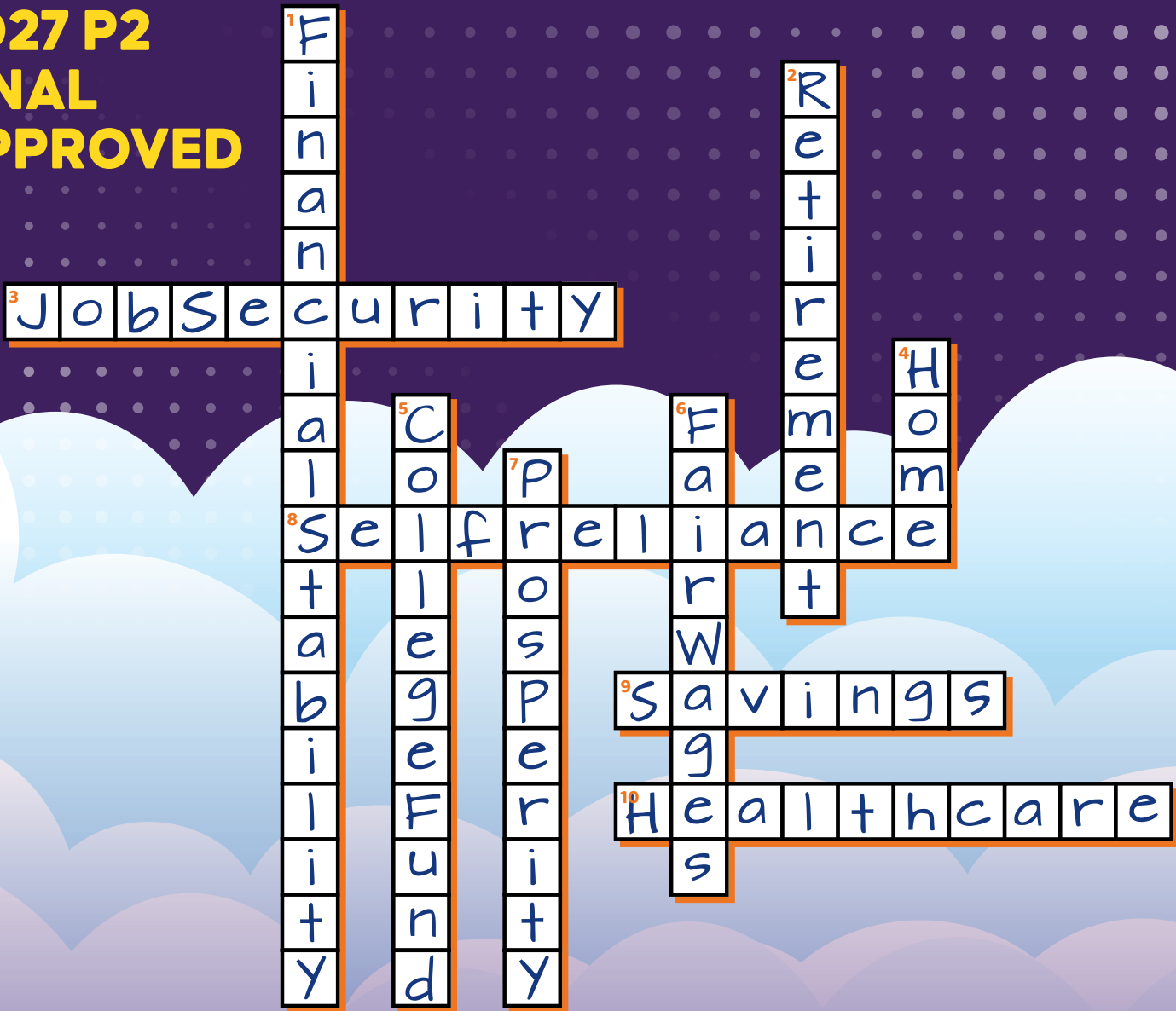
**DOWN**

- 1. Freedom from money troubles
- 2. Well-earned leisure time
- 4. A safe place for families
- 5. Money set aside for your child's future education
- 6. Reasonable compensation for hard work
- 7. Strong personal finances

**Across**

- 3. Good work with stable income
- 8. Ability to take care of personal responsibilities without interference from government
- 9. An interest-bearing account with accumulated earnings
- 10. Affordable medical attention and prescription drugs

LD27 P2  
FINAL  
APPROVED



PEOPLE WHO WORK HARD AND PLAY BY  
THE RULES SHOULDN'T BE ONE PAYCHECK  
AWAY FROM FINANCIAL HARDSHIP

That's why **Deborah Howard** is focused on lowering prescription drug costs<sup>1</sup>, ensuring affordable housing<sup>2</sup>, and getting rid of predatory, hidden junk fees<sup>3</sup> that hold families back.



VOTE DEBORAH HOWARD FOR STATE HOUSE

ELECTION DAY IS TUESDAY NOVEMBER 5<sup>TH</sup> | EARLY VOTING BEGINS OCTOBER 9<sup>TH</sup>

<sup>1</sup>SB 1532 & HB 2559, 2024 | <sup>2</sup>HB 2813, 2024 | <sup>3</sup>HB 2122, 2024



# Arizona's Republican Inaction Figure

## This Box Includes:

- **Adjustable Corporate Leash:** Easily pulled by any corporate donor!
- **Pockets Full of Promises:** Ready to hand out kickbacks to anyone who can pay.
- **Rubber Stamp Hand:** Perfect for approving tax loopholes for the super-rich.



# SAY NO TO OUR DISTRICT'S CORPORATE TOY!

Paid for by Opportunity Arizona.  
Not Authorized by Any Candidate  
or Any Candidate's Agent.

OPPORTUNITY  
**ARIZONA**

Opportunity Arizona  
530 E McDowell Rd #107-138  
Phoenix, AZ 85004



NONPROFIT ORG  
U.S. POSTAGE  
**PAID**  
PERMIT # 1417  
PHOENIX, AZ

## REP. MICHELE PEÑA

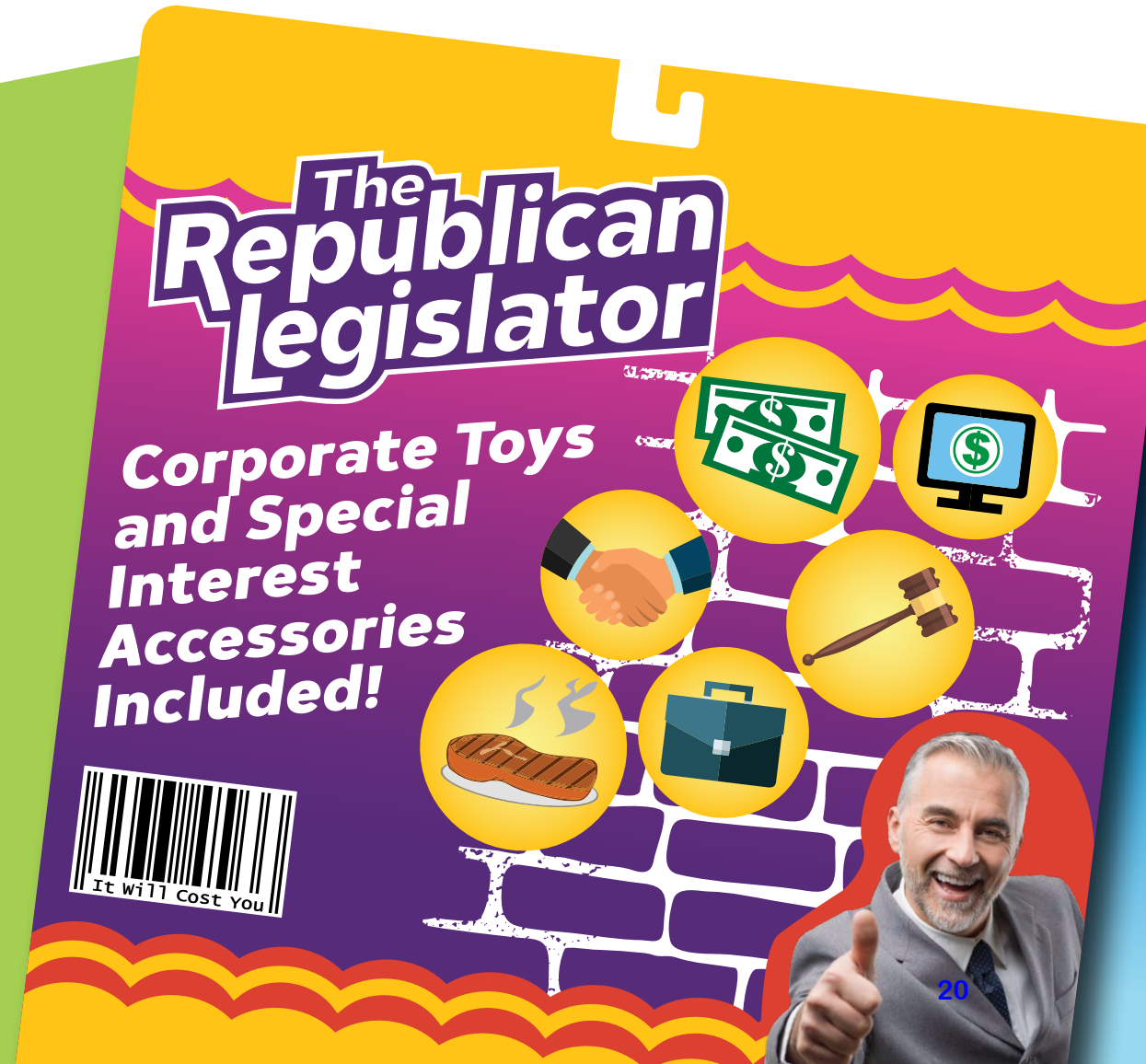


- Campaign under investigation by the Attorney General for signature forgery<sup>1</sup>
- Voted to cut the minimum wage<sup>2</sup>
- Voted for tax loopholes for the wealthy and big corporations<sup>3</sup>
- Took money from special interests and then voted to hide campaign contributions<sup>4</sup>

**Don't let special interests choose your next State Rep. Early voting begins October 9.**

<sup>1</sup>"13 allegations of candidate petition signature forgery forwarded for possible criminal charges" *Arizona Mirror* 4/25/24 |

<sup>2</sup>SCR1040, 2024 | <sup>3</sup>HB2003, 2023 & SB1184, 2023 | <sup>4</sup>SB1048, 2023



January 17, 2025

*Via Email* (ccec@azcleelections.gov)

Thomas M. Collins  
Citizens Clean Elections Commission  
1110 W. Washington Street, Suite 250  
Phoenix, AZ 85007

RE: MUR 24-08 – Response to Complaint

Dear Mr. Collins:

This firm represents Opportunity Arizona and writes in response to the notice of MUR 24-08, received December 19, 2024, and its accompanying complaint (the “Complaint”). The contents of this response are verified by Ben Scheel, Executive Director of Opportunity Arizona.

The Commission should take no further action on the Complaint, which alleges that Opportunity Arizona failed to report original source donors as required by the Voters’ Right to Know Act (“VRKA”) and to include the appropriate disclaimer on printed materials. The Complaint is wrong on both counts—Opportunity Arizona’s reports and disclaimers complied with the requirements of the VRKA and the Commission’s rules and guidance.

**I. Opportunity Arizona Had No Original Source Donors to Report.**

The Complaint alleges that Opportunity Arizona failed “to disclose the original source of funding through mandated VRKA reports.” In fact, Opportunity Arizona filed various VRKA reports that are publicly available and contain the required donor information. Ariz. Sec. of State, *Voters Right to Know Act (VRKA) Reporting* <https://azsos.gov/elections/campaign-finance/vrka-reporting>.

In its reports, Opportunity Arizona was required to disclose intermediary donors and “each donor of original monies who contributed, directly or indirectly, more than \$5,000 of traceable monies . . . for campaign media spending during the election cycle” to Opportunity Arizona. A.R.S. § 16-973(A)(6). But Opportunity



Arizona’s donors (all intermediary entities)<sup>1</sup> informed Opportunity Arizona that their contributions were not comprised of any original source donors over the \$5,000 disclosure threshold. Therefore, Opportunity Arizona was not required to report any original source donors. *See* R2-20-813(A) (“A person . . . may rely on records provided to the person as documentation of a transaction related to campaign media spending if the records are provided by an independent person who controls the monies involved in the transaction”).

## **II. The Disclaimer on Opportunity Arizona’s Mailers Complies with the Commission’s Guidance.**

Opportunity Arizona formatted the disclaimers on the mailers at issue in the Complaint in accordance with the Commission’s rules, which require “[p]ublic communications by covered persons shall state the names of the top three donors who directly or indirectly made the three largest contributions of original monies in excess of \$5,000 for the election cycle and who have not opted out.” R2-20-805(B).

The Commission interpreted this rule in its Advisory Opinion 2024-06 and instructed Covered Persons to require *only* the names of original donors, even in the case where there are none that qualify for disclosure. AO 2024-06 explains that “the best reading [of] A.R.S. § 16-974(C) is that the disclosure reaches the original source of donations over the threshold of the VRKA even if that leaves intermediaries undisclosed on public communications.” Thus, in a situation where an intermediary entity has no original donors over \$5,000, neither the intermediary nor any original donor will appear on the disclaimer. *See* AO 2024-06 at 10.

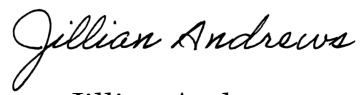
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<sup>1</sup> While Opportunity Arizona’s initial VRKA filing inadvertently lists League of Conservation Voters (“LCV”) as a donor of original monies, LCV should be listed as an intermediary donor because the reported contribution was not business income or other original monies of LCV.

Thomas M. Collins  
January 17, 2025  
Page 3

Please let me know if I can provide any further information regarding Opportunity Arizona or the allegations in the Complaint.

Sincerely,

A handwritten signature in black ink that reads "Jillian Andrews". The script is cursive and fluid, with the first name "Jillian" being more prominent than the last name "Andrews".

Jillian Andrews

## VERIFICATION

State of Arizona

County of Maricopa

I, Ben Scheel, state that I am Executive Director of Opportunity Arizona. I have read the foregoing response and know the contents thereof to be true and correct to the best of my knowledge.

I declare under penalty of perjury that the foregoing is true and correct.

Ben Scheel  
Ben Scheel

Subscribed and sworn to before me this 17 day of January, 2025.

Malachi Rodriguez  
Notary Public Name

Malachi Rodriguez  
Notary Public Signature



My Commission Expires: 03/09/2025

# 2025 Legislative Update

## HB2004 - Voter registration cards; mailing limitation

### Sponsor

Rep. John Gillette (R)

### Summary

Prohibits the county recorders from providing an initial or updated voter registration card to a person whose mailing address is outside the state of Arizona, except for absent uniformed services voters or overseas voters as defined in the Uniformed and Overseas Citizens Absentee Voting Act, and persons who are residents of Arizona and who are not served by a United States Post Office.

### Action Taken

Passed House Federalism, Military Affairs, and Elections 5-2

Passed the House 32-27 and was sent to the Senate

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## HB2005 - Voter registrations; recorder; inactive status

### Sponsor

Rep. John Gillette (R)

### Summary

Permits the county recorders to place a person's voter registration information in inactive status and provide the person with notice of the action, if the County Recorder believes the person provided fraudulent or incorrect voter registration information

### Action Taken

Passed House Federalism, Military Affairs, and Elections 4-3

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## HB2006 - Election mailings; third-party disclosures

### Sponsor

Rep. John Gillette (R)

### Summary

Requires a nongovernmental person or entity that mails or delivers by hand an official election-related document or a document that resembles an official election-related document from the county recorder, county officer in charge of elections, or the Secretary of State, including a voter registration application or an early ballot request to include the words "not from a government agency" in boldfaced, clearly legible print on the outside of the envelope.

### Action Taken

Passed House Federalism, Military Affairs, & Elections 5-2

Passed the House 37-19 and was sent to the Senate

---

## **HB2007 - Voter registrations; payment prohibited**

### **Sponsor**

Rep. John Gillette (R)

### **Summary**

Prohibits a person from paying or receiving money or any other thing of value based on the number of voter registrations or voter registration forms collected, completed or submitted.

### **Action Taken**

Passed House Federalism, Military Affairs, & Elections 5-2

Passed the House 34-23 and was sent to the Senate

---

## **HB2017 - Voting centers ban; precinct size**

### **Sponsor**

Rep. Rachel Jones (R)

### **Summary**

Prohibits a designated election precinct from containing more than 1,000 registered voters at the time County Board of Supervisors designate precincts. Prohibits the Board from authorizing the use of voting centers in place of or in addition to specifically designated polling places and repeals all other associated mandates and prohibitions.

### **Action Taken**

Passed House Federalism, Military Affairs, & Elections 4-3

Passed the House 32-26 and was sent to the Senate

---

## **HB2021 - Early ballots; early voting; identification**

### **Sponsor**

Rep. Selina Bliss (R)

### **Summary**

Prohibits early ballot distribution from beginning more than 30 days before an election and stipulates that if an early ballot request is received on or before the 34th day before the election, the early ballot may not be distributed earlier than the 30th day before the election. Requires the county recorder to mail an early ballot within 48 hours of the receipt of an early ballot request, if the request is complete

and correct, and made within 30 days of an election. Modifies the required wording that must be printed on the backside of an official early ballot return envelope, and the official instructions included with the early ballot. Defines the criteria an early ballot submission must meet, beginning in 2026, to be counted as an official vote. Requires that a county recorder or other officer in charge of elections provide to a qualified elector who appears at the electors designated polling location, an on-site early voting location, or any other voting location after 7:00 PM on the Friday before Election Day proof that their ballot has been tabulated, provided that elector provide identification pursuant to state law.

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## **HB2045 - Ballot order; names; parties; rotation**

### **Sponsor**

Rep. Alexander Kolodin (R)

### **Summary**

Removes the exclusion for alternating the names of candidates on ballots in listed elections and during listed election related activities. Requires that beginning in 2027, the parties are to be alternated on the ballots used in each election precinct so that each party appears substantially in equal number of times at the top, bottom, and in each intermediate place of the list or group of parties in which they belong.

### **Action Taken**

Passed House Federalism, Military Affairs, & Elections 7-0

Passed the House 59-0 and was sent to the Senate

---

## **HB2046 - Audits; precincts; voting centers**

### **Sponsor**

Rep. Alexander Kolodin (R)

### **Summary**

Adds voting centers in with precincts for hand counts and defines when hand counts are to begin in listed election scenarios.

### **Action Taken**

Passed House Federalism, Military Affairs, & Elections 7-0

Passed the House 59-0 and was sent to the Senate

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## **HB2050 - Provisional ballots; cure data**

### **Sponsor**

Rep. Alexander Kolodin (R)

### **Summary**

Adds electors that voted with a provisional ballot to the list of voter signatures that are to be sent to political parties after specified elections by the county recorder or other officer in charge of elections.

### **Action Taken**

Passed House Federalism, Military Affairs, & Elections 6-1

Passed the House 36-23 and was sent to the Senate

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## **HB2051 - Governor; question time**

### **Sponsor**

Rep. Alexander Kolodin (R)

### **Summary**

Requires the Governor to appear before the legislature to answer questions posed by members of the legislature on the third Wednesday of every month the legislature is in session and lists the criteria for holding this special session. Stipulates that if the Governor is not present in the state, the Lieutenant Governor shall pose as a substitute and permits the Governor to designate that person, with approval from the presiding officer of the body to be attended, to appear for them. Presents the legislative intent that the Arizona legislature would like to emulate question and answer sessions that occur in the United Kingdom between Parliament and the Prime Minister.

### **Action Taken**

Passed House Government 4-3

---

## **HB2060 - State sovereign authority; elections**

### **Sponsor**

Rep. Lisa Fink (R)

### **Summary**

Requires that elections held in Arizona for federal offices adhere to the same rules and laws as elections held in Arizona for state and local offices, including statutes that cover voter registration and proof of citizenship, residency and identification.

### **Action Taken**

Passed House Federalism, Military Affairs, and Elections 4-3

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## **HB2072 - Voter registration; same day**

### **Sponsor**

Rep. Stacey Travers (D)

### **Summary**

A person who is otherwise qualified to register to vote may register during the 28 days immediately preceding an election and is eligible to vote in that election if the person has been a resident of the county and the precinct in which the person resides for at least 29 days immediately preceding the election. A person who is otherwise qualified to register to vote may register on election day by appearing at the polling place, completing a registration form, and providing proof of residence. A person registering in this manner may vote using a provisional ballot per state law. Registration under these circumstances does not qualify a person to vote in a partisan primary election.

---

## **HB2096 - Permanent early voting list**

### **Sponsor**

Rep. Seth Blattman (D)

### **Summary**

Replaces "Active" early voter list with "Permanent" Early Voter list. Except in a special taxing district that is authorized to conduct its own election and a special district mail ballot election, a voter is no longer removed automatically from being sent an early ballot if the voter fails to vote an early ballot in all "elections" (formerly defined) for two consecutive election cycles. Removes several exceptions to removing a voter from the permanent early voter list. Removes the definition of "election cycle" for this section.

---

## **HB2097 - Voting rights; restoration**

### **Sponsor**

Rep. Seth Blattman (D)

### **Summary**

A person's right to vote is automatically restored on the person's completion of probation or the receipt of an absolute discharge from imprisonment.

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## **HB2129 - Write-in candidates; filings; ballots**

### **Sponsor**

Rep. Selina Bliss (R)

### **Summary**

Changes the deadline for a write-in candidate to file nomination paperwork to the 70th day before an election. Modifies the ballot format to accommodate as many blank lines as there are qualified write-in candidates, plus one additional blank line for each office, up to the total number of offices to be filled. Requires that there be one blank line for write-in candidates if no write-in candidates have qualified for an office and that each blank line will have a space for an elector to put a mark.

### **Action Taken**

Passed House Federalism, Military Affairs, and Federalism 7-0

Passed the House 53-0 and was sent to the Senate

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## **HB2153 - Voting locations; political party observers**

### **Sponsor**

Rep. Rachel Keshel (R)

### **Summary**

Permits the county chairman of each political party to designate for each precinct or voting location a party representative and alternate for polling places including on site early voting locations, emergency early voting locations, or any other early voting location. Prohibits party challengers from entering a voting booth except to mark the challenger's ballot.

### **Action Taken**

Passed House Federalism, Military Affairs, & Elections 4-3

Passed the House 32-26 and was sent to the Senate

---

## **HB2154 - Early voting list; undeliverable ballots**

### **Sponsor**

Rep. Rachel Keshel (R)

### **Summary**

Requires the county recorder or other election officer in charge to move a voter whose election notice is returned as undeliverable to inactive status, pursuant to state law, and from the active early voting list. Removes the requirement for follow up to determine the voter's new residence address.

### **Action Taken**

Passed Federalism, Military Affairs, and Elections 4-3

---

## **HB2205 - Election procedures manual; authority**

### **Sponsor**

Rep. James Taylor (R)

### **Summary**

States that the use of the Elections Procedures Manual does not constitute a delegation of the Legislature's power.

### **Action Taken**

Passed House Federalism, Military Affairs, and Elections 4-3

Passed the House 33-26 and was sent to the Senate

---

## **HB2206 - Multistate voter registration system; prohibition**

### **Sponsor**

Rep. James Taylor (R)

### **Summary**

Prohibits Arizona from entering or being a member of any multi state voter registration, or voter registration lists maintenance organization, that requires Arizona to provide the organization with information derived from voter registration records.

### **Action Taken**

Passed House Federalism, Military Affairs, and Elections 4-3

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## **HB2368 - Auditor general; records; financial institutions**

### **Sponsor**

Rep. Matt Gress (R)

### **Summary**

Requires the Auditor General or their authorized representative, in the performance of official duties, to have access to specific, listed information of financial institutions or financial enterprises, or any other information relating to any state agency, board, Commission, department, institution, program, Advisory Council, or committee or political subdivision of Arizona. Requires the affected financial institutions to provide requested information from the Auditor General, or their official representative, in a thorough and timely manner. Requires an authorized representative of the financial institution or enterprise to certify all information provided. Stipulates that the cost of complying with an Auditor General's request is to be covered by the state agency, board, Commission, department, institution, program, Advisory Council, or committee or political subdivision the Auditor General is reviewing. Stipulates that a financial institution or enterprise is not liable to the entity whose information it is turning over to the Auditor General, pursuant to state law.

### **Action Taken**

Passed House Government 4-0

Passed the House 60-0 and was sent to the Senate

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## **HB2376 - County candidates; clean elections pamphlet**

### **Sponsor**

Rep. Pamela Carter (R)

### **Summary**

Includes candidate names for county wide offices in the document that is delivered to eligible voters before the primary and general election, whether the candidate is participating or not participating. Stipulates that this legislation is effective only on the affirmative vote of at least three-fourths of the members of each House of the legislature.

### **Action Taken**

Passed House Federalism, Military Affairs, and Elections 7-0

Passed the House 55-0 and was sent to the Senate

---

## **HB2390 - Justices of the peace; online signature**

### **Sponsor**

Rep. Neal Carter (R)

### **Summary**

Allows Justice of the Peace candidates to use the Equal system to collect nomination petition signatures

### **Action Taken**

Passed House Federalism, Military Affairs, and Elections 7-0

Passed the House 59-0 and was sent to the Senate

---

## **HB2391 - JPs; constables; signatures**

### **Sponsor**

Rep. Neal Carter (R)

### **Summary**

Adds that to run for Justice of the Peace, or constable, in a county with a population of one million or more people, petition requirements are that at least 1%, but not more than 10% of the number of qualified signers in a precinct. Adds that in a county of less than one million people, for the position of Justice of the Peace, a candidate qualifies if they produce 300 signatures from a precinct.

**Action Taken**

Passed House Federalism, Military Affairs, & Elections 4-2

Passed the House 33-25 and was sent to the Senate

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**HB2425 - Voter registration information; registers; violations****Sponsor**

Rep. Alexander Kolodin (R)

**Summary**

Repeals the classification as a Class 6 Felony any person who allows a precinct list of registered voters, or any other list of registered voters to be used in any other manner than for officially approved purposes.

**Action Taken**

Passed House Federalism, Military Affairs, Elections 4-3

Passed the House 33-26 and was sent to the Senate

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**HB2448 - Voting locations; emergency designation; electioneering****Sponsor**

Rep. Michael Carbone (R)

**Summary**

Removes the following requirements that delineate that the county recorder or election officer must post a public list of any sites designated as emergency polling places—along with the reasons for that designation and attempts made to secure alternatives—at least two weeks before election day, and that if a site is not on the emergency-designation list, the facility must allow political activity outside the seventy-five-foot zone, and that should an emergency arise after the initial posting, the county recorder or election officer is required to update the list promptly with the relevant details.

**Action Taken**

Passed House Federalism, Military Affairs, Elections 4-1

Passed the House 39-19 and was sent to the Senate

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## **HB2521 - Elections; foreign money**

### **Sponsor**

Rep. Michael Way (R)

### **Summary**

Prohibits any Arizona government entity from using monies or in-kind goods or services that are donated, directly or indirectly, by a foreign government, or any "foreign nongovernmental source" (defined) for election administration. Requires any "person" (defined) or vendor that provides services to an Arizona government entity to provide a dated and sworn statement, under penalty of perjury, that they are not knowingly the recipient, directly or indirectly, of donations from a foreign source. This certification is to be updated annually and the person signing the statement shall update and amend their certification upon learning any new information pertaining to the above prohibitions. Lists the reports and records that must be submitted by government entities pertaining to verifying that no foreign influences have provided donations, directly or indirectly, from the individuals or vendors those agencies maintain a relationship with. Prescribes specific penalties for an individual for vendor who provides false information to the Arizona Secretary of State. Stipulates that for this legislation federally recognized sovereign tribal nations are not considered to be foreign governments. Prohibits any foreign government from aiding an individual or organization to help influence the outcome of an election or ballot measure. Requires any person, entity, or committee that is required to file campaign finance reports pursuant to state law, to certify under penalty of perjury in those reports that the person, entity or committee has not accepted or used monies or in-kind goods or services in violation of this legislation.

### **Action Taken**

Passed House Federalism, Military Affairs, and Elections 4-3

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## **HB2623 - Campaign finance; candidate committee transfers**

### **Sponsor**

Rep. Jeff Weninger (R)

### **Summary**

Permits a candidate committee for a city or town candidate to transfer contributions to that same candidate's statewide or legislative campaign, provided the aggregate amount of contributions from any individual that are transferred do not exceed the legal contribution limitations of the office for which the candidate is running. Requires that any ordinance, rule, resolution or regulation a county, city or town adopts that mandates a candidate's financial disclosure also require the candidate or campaign disclosure also be accessible to the public on the county, city or town website.

### **Action Taken**

Passed House Federalism, Military Affairs, and Elections 4-0

Passed the House 37-21 and was sent to the Senate

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## **HB2630 - Governor nominations; agency position; eligibility**

### **Sponsor**

Rep. Alexander Kolodin (R)

### **Summary**

Modifies a reference to “his” to “the incumbent’s.” Stipulates that if the Senate rejects the nomination of a director made by the Governor pursuant to this legislation, the nominee is not eligible for any position within the same state agency for which the nominee was nominated.

### **Action Taken**

Passed House Regulatory Oversight 3-2

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## **HB2632 - Regulatory costs; rulemaking; legislative ratification**

### **Sponsor**

Rep. Alexander Kolodin (R)

### **Summary**

Requires an Arizona agency to submit to the Arizona Office of Economic Opportunity (AOEO) any proposed “rule” (defined) that is projected to increase regulatory costs in Arizona by more than \$100,000 within five years of implementation. Prohibits a submitted proposed rule from becoming effective unless approved by the legislature, if the AOEO, finds that the rule will likely cost more than \$500,000 within five years after implementation. Requires the AOEO to submit the proposed rule to the Administrative Rules Oversight Committee (Committee) no later than 30 days before the next regular legislative session and requires the Committee to submit the proposed rule to the legislature as soon as practicable. Permits any member of the legislature to submit legislation to ratify the proposed rule and exempts it from any statutes regarding the time and manner of rulemaking. Prohibits an agency from filing the final rule with the Arizona Secretary of State without legislative approval and stipulates that if the legislature does not ratify the proposed rule during the current legislative session, the agency shall terminate the proposed rule by publishing a notice of termination in the register. Allows a person that is regulated by an agency that is proposing a rule, to request the AOEO review the proposed rule, and the legislature to be able to request the AOEO to review any proposed rule. Stipulates that this legislation does not apply to emergency rules, or the Arizona Corporation Commission. Provides for severability.

### **Action Taken**

Passed House Regulatory Oversight 3-2

Passed the House 32-26 and was sent to the Senate

---

## **HB2649 - Electoral college; support**

### **Sponsor**

Rep. Steve B. Montenegro (R)

### **Summary**

Affirms that the legislature recognizes the importance of the electoral college and provides the reasoning behind that support.

#### **Action Taken**

Passed House Federalism, Military Affairs, & Elections 4-2

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## **HB2651 - Voting equipment; requirements; origin**

#### **Sponsor**

Rep. Steve B. Montenegro (R)

#### **Summary**

Beginning January 1, 2029, the Secretary of State is prohibited from certifying a vote recording and vote tabulating machine or device used for elections for federal, state or county offices unless 100% of all the machine's or device's parts and components were sourced from the United States, and 100% of all the machine's or device's manufacturing and assembly was performed in the United States. Vote recording and vote tabulating machines and devices that were acquired before January 1, 2029 would have been exempt.

#### **Action Taken**

Passed House Federalism, Military Affairs, & Elections 4-3

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## **HB2673 - Early ballots; deadlines; foreign money**

#### **Sponsor**

Rep. Alexander Kolodin (R)

#### **Summary**

Prohibits any Arizona government entity from using monies or in-kind goods or services that are donated, directly or indirectly, by a foreign government, or any "foreign nongovernmental source" (defined) for election administration. Requires any "person" (defined) or vendor that provides services to an Arizona government entity to provide a dated and sworn statement, under penalty of perjury, that they are not knowingly the recipient, directly or indirectly, of donations from a foreign source. Prescribes specific penalties for an individual for vendor who provides false information to the Arizona Secretary of State. Permits a qualified elector to bring an action pertaining to specific, listed law and violations and outlines what they are entitled to if they prevail. Requires a unique early voter ID number to be issued to each voter on the early voter list and stipulates that the early voter record does not constitute a public record and enjoys protections of personally identifying information. Defines the process for verifying early voter identifications and the process for handling voters whose identity or address cannot be identified. Permits a voter to remain on the early voter list if they confirm their address once every election cycle by telephone, in writing, or online, and they provide at least 2 methods of confirmation. Outlines the process and requirements for a mailed ballot to be counted, and the process by which submitted ballots shall be handled prior to, on, and after Election Day.

#### **Action Taken**

Passed House Federalism, Military Affairs, and Elections 4-3

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## HB2703 - Early voting; tabulation; ballot deadlines

### Sponsor

Rep. Laurin Hendrix (R)

### Summary

Strikes the ability of a county Board of Supervisors to authorize by specific resolution the County Recorder or other election official to use emergency voting centers, and the ability of a principal of a school to deny a request to provide space for polling stations. Shifts the deadline for an early voter to cast a vote at an early voting location from Friday before an election to the Monday before an election. Strikes the ability of a qualified elector to request an emergency voting accommodation and a County Recorder or election official to grant an emergency accommodation. Outlines instructions that must be given to early voters up to 2026, and from 2026 forward. Defines ways an early voter can deliver their ballot to the County Recorder or Officer in Charge of elections, including identification requirements, locations and methods of delivery. Strikes the requirement of a County Recorder or election official to count and report early voting totals. Exempts early voters who show up in person from having their mail affidavit verified. Eliminates the ability of an elector that does not present identification to put their ballot in a drop box.

### Action Taken

Passed House Federalism, Military Affairs, and Elections 4-3

Passed the House 32-27 and was sent to the Senate

Passed the Senate 16-10 and was sent to the Governor

Vetoed by Governor

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## HB2705 - Nomination petitions; counties; strict compliance

### Sponsor

Rep. Alma Hernandez (D)

### Summary

Provides wording for partisan and nonpartisan nominations for elected public office. Permits signatures from multiple counties in a specific district, if the office they are running for spans multiple counties. Requires a nominee for elected public office to comply with all statutory requirements for seeking office.

### Action Taken

Failed House Federalism, Military Affairs, and Elections 3-4

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## **HB2722 - Public resources; expenditures; prohibition**

### **Sponsor**

Rep. Neal Carter (R)

### **Summary**

Requires that all use of public monies by a “public entity” (defined) must benefit the public by intent and be for a “public purpose” (defined), is supported by “consideration” (defined), and the public entity must retain continuing control over the funds. Allows the Arizona Attorney General or a taxpayer in Arizona to file an action in a court of general jurisdiction to challenge an expenditure, loan or use of “public resources” (defined). Outlines how a plaintiff in that situation would prevail in court. Entitles this legislation the “Taxpayers Protection Act.” Modifies the chapter heading of Title 1, Chapter 5, ARS, from “Public Programs” to “Public Resources”.

### **Action Taken**

Passed House Ways and Means 5-4

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## **HB2735 - Ballot receptacles; electioneering limits**

### **Sponsor**

Rep. Brian Garcia (D)

### **Summary**

Prohibits a person from staying inside the 75-foot limit for each voting location except for the purposes of voting. Requires the Board of Supervisors to provide for each 75-foot zone for a designated ballot receptacle three notices expressing the 75-foot limit. Prohibits interfering with a voter, or electioneering, within the 75-foot limit for a designated ballot receptacle.

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## **HB2767 - Voter registrations; transportation department; recorders**

### **Sponsor**

Rep. Rachel Keshel (R)

### **Summary**

Requires the Arizona Department of Transportation (ADOT) to transmit simultaneously and directly any voter registration information received pursuant to state law, to the Arizona Secretary of State, and other listed, appropriate parties. Effective January 1, 2026. Provides for severability.

### **Action Taken**

Passed House Federalism, Military Affairs, and Elections 3-2

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## **HB2794 - Polling places; accessible equipment**

### **Sponsor**

Rep. Brian Garcia (D)

### **Summary**

Requires that any accessible device placed at a precinct-based polling place or voting center be programmed and prepared so that all ballot styles for that jurisdiction or county are available from each device without regard to precinct or other locations in which the device is used.

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## **HB2796 - Politically engaged persons; criminal charges**

### **Sponsor**

Rep. Alexander Kolodin (R)

### **Summary**

Requires that criminal charges against a “politically engaged person” (defined) be pre-approved by a majority of the Attorney General and all county attorneys using standard prosecutorial criteria. Requires, if the approval of all required parties is not given, a court to dismiss charges unless prosecutors prove they were unaware of the defendant’s political status. Extends to prosecutors three months to refile charges after securing approval. Requires a motion to dismiss to be filed within 30 days of the charges.

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## **HB2804 - Sample ballots; mailing date**

### **Sponsor**

Rep. Nick Kupper (R)

### **Summary**

Requires a county Board of Supervisors print mailers of sample ballots 14 days before a primary or general election.

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## HB2844 - Multiple nonpartisan candidates; primary

### Sponsor

Rep. Lupe Diaz (R)

### Summary

Defines how nonpartisan candidates may appear on the ballot. Covers how to handle multiple nonpartisan candidates in an election and their assigned position on a nonpartisan ballot for consideration in the primary election. Stipulates that for the nonpartisan ballot, the candidate who receives the most votes advances to the general election as the nonpartisan nominee for that office. Addresses placement of nonpartisan candidates on the general election ballot. Requires the Legislative Council to prepare proposed legislation conforming the ARS to the provisions of this legislation, if needed.

### Action Taken

Failed House Federalism, Military Affairs, and Elections 0-5

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## HCR2002 - Voting centers; precinct voting

### Sponsor

Rep. Rachel Jones (R)

### Summary

The 2026 general election ballot is to carry the question of whether to amend Arizona State law to require that election precincts not contain more than 1,000 registered voters at the time precincts are designated, and to prohibit the use of voting centers in place of or in addition to specifically designated polling places.

### Action Taken

Passed House Federalism, Military Affairs, & Elections 4-3

Passed the House 32-26 and was sent to the Senate

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## HCR2013 - Early ballots; deadlines; foreign money

### Sponsor

Rep. Alexander Kolodin (R)

### Summary

The 2026 general election ballot is to carry the question of whether to amend Arizona state statute to prohibit a government entity in Arizona from using money or in-kind goods or services that are donated, directly or indirectly, by foreign government, or any foreign nongovernmental source, for election administration. Asks voters to approve the issuance have a unique early voter ID number to each voter on the early voting list, defines the information that must be on an early voter ballot request, as well as rules to require a county recorder or other election officer to reject a voter's early ballot application if all required information is not submitted, and the process and wording that must be included on the issuance of early voting materials. Asks voters to approve the process and evaluator must follow to verify the information submitted by an early voter.

**Action Taken**

Passed House Federalism, Military Affairs, and Elections 4-3

Passed the House 33-26 and was sent to the Senate

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**HCR2014 - House of representatives; designated seats****Sponsor**

Rep. Rachel Jones (R)

**Summary**

The 2024 general election ballot is to carry the question of whether to amend the Arizona Constitution to require the seats for the House of Representatives be designated "A" and "B" in the alphabetic order of the surnames, then first names of elected members of each district and thereafter candidates shall run for and be elected from either seat "A" or "B" in a legislative district, beginning with the Inauguration of the Members of the fifty-seventh legislature in 2027.

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**HCR2038 - Rulemaking; legislative ratification; regulatory costs****Sponsor**

Rep. Alexander Kolodin (R)

**Summary**

The 2024 general election ballot is to carry the question of whether to amend the Arizona Revised Statutes related to rule making that would require an Arizona agency to submit to the Arizona Office of Economic Opportunity (AOEO) any proposed "rule" (defined) that is projected to increase regulatory costs in Arizona by more than \$100,000 within five years of implementation. The measure would prohibit a submitted proposed rule from becoming effective unless approved by the legislature if the AOEO finds that the rule will likely cost more than \$500,000 within five years after implementation. Sets a deadline for submitting the rule for review to the Administrative Rules Oversight Committee (Committee) and requires the Committee to submit the proposed rule to the legislature as soon as practicable. Permits any member of the legislature to submit legislation to ratify the proposed rule and exempts it from any statutes regarding the time and manner of rulemaking. Prohibits an agency from filing the final rule with the Arizona Secretary of State without legislative approval and stipulates that if the legislature does not ratify the proposed rule during the current legislative session, the agency shall terminate the proposed rule by publishing a notice of termination in the register. Allows a person that is regulated by an agency that is proposing a rule, to request the AOEO review the proposed rule, and the legislature to be able to request the AOEO to review any proposed rule. Stipulates that this legislation does not apply to emergency rules, or the Arizona Corporation Commission. Provides for severability.

**Action Taken**

Passed House Regulatory Oversight 3-2

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## **SB1001 - Early ballots; identification; tabulation**

### **Sponsor**

Sen. J.D. Mesnard (R)

### **Summary**

Prohibits a County Recorder or other Officer in Charge of Elections from operating an on-site early voting location after 7:00 P.M. on the Friday preceding an election if the official in question is not able to revise precinct registrations and other election materials for use on election day to help identify which voters have requested and early ballot, voted, or are on the inactive voter list. Revises the effective date of this legislation to be upon enactment and defines early voting procedures, including voter identification, roll signature, ballot mailing, delivery, ballot handling, processing, and security requirements, and timeframes for accepting early ballots.

### **Action Taken**

Passed Senate Judiciary and Elections 4-3

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## **SB1011 - Early voting; ballot deadlines; certificates**

### **Sponsor**

Sen. Warren Petersen (R)

### **Summary**

Repeals provisions for a County Board of Supervisors to set up Emergency Voting Centers, for electors to request Emergency Voting Centers in the event of an emergency between 7 p.m. on the Friday and 5 p.m. on the Monday preceding an election, and for electors to deliver ballots to polling places on election day. Mandates that any early voting locations be open and available for use on the Saturday and Monday before an election, and details the requirements for an early voting elector to vote up until 7 p.m. the Monday before an election. Requires voters showing up at an early voting location to be given a ballot upon verification of their identification and provides wording for the early voting certification form and procedures for processing that elector and his or her ballot.

### **Action Taken**

Passed Senate Judiciary and Elections 4-3

Failed in the Senate 10-16 – was replaced by HB 2703.

HB 2703 was vetoed by the Governor.

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## **SB1013 - Municipalities; counties; fee increases; vote**

### **Sponsor**

Sen. Warren Petersen (R)

### **Summary**

Prohibits a Common Council or County Board of Supervisors from imposing or increasing any assessment, tax or fee without a two-thirds vote of the governing body. Stipulates a municipality's or

county's ability to do such, provided the two-thirds vote authorizes the imposition or increase in any assessment, tax or fee, is not subject to further regulation by the applicable municipality or county.

**Action Taken**

Passed Senate Government 4-3

Passed the Senate 17-12 and was sent to the House

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## **SB1019 - Photo enforcement systems; prohibition**

**Sponsor**

Sen. Wendy Rogers (R)

**Summary**

Prohibits the use of "photo enforcement systems" (defined) by law enforcement and local authorities to enforce traffic laws. Contains a legislative intent clause.

**Action Taken**

Passed Senate Public Safety 4-3

Passed the Senate 16-13 and was sent to the House

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## **SB1024 - State agencies; payments; cryptocurrency**

**Sponsor**

Sen. Wendy Rogers (R)

**Summary**

State agencies are authorized to accept "cryptocurrency" (defined) as a payment method for taxes, fees, fines, civil penalties, financial obligations, and special assessments by entering into an agreement with a "cryptocurrency service provider" (defined) to provide a method to accept cryptocurrency as a payment for any amount due to that agency or the state. Requirements for the agreement are listed. Effective January 1, 2026.

**Action Taken**

Passed Senate Finance 4-3

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## **SB1036 - Public resources; influencing elections; penalties**

### **Sponsor**

Sen. John Kavanagh (R)

### **Summary**

Establishes penalties for a municipality or county found to be guilty of using municipal resources to influence an election and provides that the penalties be paid to the Arizona Attorney General, County Attorney or resident, as is appropriate based on the entity that brought the complaint and the entity or entities found guilty of violating the prohibition. Permits a resident to file an action in Superior Court pertaining to a violation of this prohibition.

### **Action Taken**

Passed Senate Government 4-3

Passed the Senate 17-12 and was sent to the House

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## **SB1040 - Recall elections; procedures; timeline**

### **Sponsor**

Sen. John Kavanagh (R)

### **Summary**

Increases to 75 days after receiving the front and back of recall signature sheets the time the county recorder must determine the number of signatures or affidavits of individuals whose names were included on the sheets that must be disqualified. Increases to 120 days, or more, the time frame between when a recall election order is issued and the recall election held. Requires any person who desires to be a candidate for the office associated with the recall election to file a Statement of Interest with the appropriate filing officer in the form prescribed by state law. Stipulates that any nomination petition signatures that are collected before the Statement of Interest and the recall application are filed are invalid and subject to challenge.

### **Action Taken**

Passed Senate Judiciary and Elections 6-0

Passed the Senate 28-0 and was sent to the House

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## **SB1052 - Voter registration; temporary absence**

### **Sponsor**

Sen. Wendy Rogers (R)

### **Summary**

Repeals the ability of a United States citizen who has never resided in the United States and whose parent is a United States citizen who is registered to vote in Arizona, to register to vote and vote in Arizona using a federal write-in early ballot.

### **Action Taken**

Passed Senate Judiciary and Elections 4-3

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## **SB1064 - Voting; equipment; internet; custody; violation**

### **Sponsor**

Sen. Mark Finchem (R)

### **Summary**

Requires the Arizona Secretary of State verify vote recording and tabulating machines approved for use pursuant to state law, have the appropriate level security, per industry best practices, not have hardware installed that supports any form of remote access, or software that allows any change to results in files or database, support the usage and tracking of users based on unique credentials that are changed at least once per election cycle, log deletions of ballot information, and maintain election data for 22 months after the election. Prohibits voting equipment used in a polling place or voting center from having Internet access and access by any means to any data or results, and if the equipment has an accessible port, the port must be locked with tamper proof sealing and logged in a chain of custody document when broken or accessed. Requires the same security, logging and management for tabulation equipment and permits only authorized personnel, including political party observers, to be present at the tabulation of votes. Requires two observers who are not members of the same political party be present when a removable storage device is employed, including during the insertion, removal, and transportation of the device. Requires activities at the counting center be included in a nonstop video, pursuant to state law, that is posted to the county's website. Stipulates that a person who violates this legislation is guilty of a Class 1 misdemeanor.

### **Action Taken**

Passed Senate Judiciary and Elections 4-3

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## **SB1097 - Elections; voting centers; polling places**

### **Sponsor**

Sen. Jake Hoffman (R)

### **Summary**

Requires district schools to close on a primary election day and a general election day but requires teachers and staff to receive in-service training or development and prohibits them from using personal, vacation or other leave excepting a school district from allowing an employee time off to vote. Allows voting centers to be created on a specific resolution of the Board of Supervisors. Requires a state, county, city, town or school district office to provide sufficient space for use as a polling place upon request of the Officer in charge of elections for any state, county, city or town elections and exempts district schools with a "gymnasium" (defined) from any state, local or school district requirements that would otherwise prevent or limit the use of the school or its gymnasium as a polling place. Removes the ability of the principal of a district or charter school to deny a request to provide space for use as a polling place for an election by providing a written statement indicating that space is not available at the school; or the safety or welfare of the children would be jeopardized.

### **Action Taken**

Passed Senate Judiciary and Elections 4-3



## **SB1098 - Early ballot drop off; identification**

### **Sponsor**

Sen. Jake Hoffman (R)

### **Summary**

For any voter or voter's agent who delivers one or more voted early ballots in affidavit envelopes at any polling place or voting center, the election board must require the person to present valid identification that meets statutory requirements for his/her own early ballot or for another person's ballot, and to attest in writing that he/she is the voter's family member, household member or caregiver for another person's early ballot. Knowing violations are a class 5 (second-lowest) felony.

### **Action Taken**

Passed Senate Judiciary and Elections 4-3

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## **SB1100 - Maricopa county; division; new counties**

### **Sponsor**

Sen. Jake Hoffman (R)

### **Summary**

Defines the boundaries of Gila, Maricopa, Pinal, Yavapai, Yuma, and La Paz Counties. Requires legislative council staff to prepare proposed legislation to conform Arizona State Statutes to this legislation for the 57th legislature, second regular session. Effective date is January 1, 2026.

### **Action Taken**

Passed Senate Government 4-3

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## **SB1101 - Maricopa county; new counties; division**

### **Sponsor**

Sen. Jake Hoffman (R)

### **Summary**

Divides Maricopa County into four counties by modifying the Maricopa County boundaries and adding three new counties: Hohokam County, Mogollon County, and O'odham County. Maricopa County operations will continue in their existing form through a transition period of up to three years after the effective date of this legislation. The boards of supervisors of Hohokam, Mogollon, and O'odham Counties will be elected at a special election held within 120 days after the effective date of this legislation. Currently elected Maricopa County Supervisors continue in their capacity for the remainder of their term in whichever county their supervisory district is located. The elected boards of supervisors in the three new counties will determine an application process for municipalities to apply to be the county seat, which will be determined at a special election to be held within 120 days from the election of the boards of supervisors. The four counties are authorized to enter into a ten-year shared use agreement for the use of existing shared capital assets. The four counties are required to

enter into an intergovernmental agreement for the continued operation of community colleges for at least ten years after the effective date of this legislation. Effective January 1, 2026.

**Action Taken**

Passed Senate Government 4-3

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## **SB1142 - Elections; foreign contributions; prohibition**

**Sponsor**

Sen. Mark Finchem (R)

**Summary**

Prohibits monetary contributions or in-kind donations of any type from any foreign corporation or person and for any the person, entity, or committee to accept either. Requires any person, entity or committee that is required to file campaign finance reports pursuant to state law to certify under penalty of perjury that no prohibited form of contribution has been accepted by the person, entity or committee. Exempts federally recognized sovereign tribal nations.

**Action Taken**

Passed Senate Judiciary and Elections 5-2

Passed the Senate 19-7 and was sent to the House

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## **SB1243 - Open meetings; call to public**

**Sponsor**

Sen. John Kavanaugh (R)

**Summary**

Outlines the process, permissions, mandatory schedule, Prohibitions, and management of open calls that a public body makes at a public meeting. Stipulates that official business does not include a prayer, pledge, or recognition of a person or organization.

**Action Taken**

Passed Senate Government 4-3

Passed the Senate 17-12 and was sent to the House

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## **SB1289 - Elections; canvass; certification; acknowledgment**

**Sponsor**

Sen. John Kavanaugh (R)

**Summary**

Requires that various governing bodies acknowledge without prejudice certain actions pertaining to an election, pursuant to state law.

**Action Taken**

Passed Senate Judiciary and Elections 4-3

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## **SB1334 - Voting locations; emergency designation; electioneering.**

**Sponsor**

Sen. Janae Shamp (R)

**Summary**

Removes the following requirements that delineate that the county recorder or election officer must post a public list of any sites designated as emergency polling places—along with the reasons for that designation and attempts made to secure alternatives—at least two weeks before election day, and that if a site is not on the emergency-designation list, the facility must allow political activity outside the seventy-five-foot zone, and that should an emergency arise after the initial posting, the county recorder or election officer is required to update the list promptly with the relevant details.

**Action Taken**

Passed Senate Judiciary and Elections 4-2

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## **SB1375 - Voter registration rolls; internet access**

**Sponsor**

Sen. Mark Finchem (R)

**Summary**

Strikes previous management arrangements to receive voter registration rolls and requires that the County Recorder provide free access to voter rolls via an internet portal that is accessible to the public and allows data to be downloaded. Requires any voter or precinct lists to be used as authorized.

**Action Taken**

Passed Senate Judiciary and Elections 4-3

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## **SB1376 - State elections; contest; technical correction**

**Sponsor**

Sen. J.D. Mesnard (R)

**Summary**

Minor change in Title 16 (Elections and Electors) related to the conduct of elections. Apparent striker bus.

#### **Action Taken**

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## **SB1378 - Political signs; homeowners' associations**

#### **Sponsor**

Sen. J.D. Mesnard (R)

#### **Summary**

Adds to the definition of “political sign” for condominium and homeowner’s associations that a sign can be a flag and that except for a candidate prescribed in this legislation, without regard to whether the person supported or opposed is on the ballot at the next upcoming election.

#### **Action Taken**

Passed Senate Government 5-2

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## **SCR1002 - Photo enforcement systems; prohibition**

#### **Sponsor**

Sen. Wendy Rogers (R)

#### **Summary**

Bans local authorities and state agencies from using automated photo enforcement systems (defined) to identify excessive speed violations or failures to obey traffic control devices.

#### **Action Taken**

Passed Senate Public Safety 4-3

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## **SCR1022 - Legislative districts; population; census; citizenship**

#### **Sponsor**

Sen. Jake Hoffman (R)

#### **Summary**

The 2026 general election ballot is to carry the question of whether to amend Article 4, Part 2, Section 1 of the Constitution of Arizona to require that during each year that ends in zero, the Independent Redistricting Commission, or other office or body as designated by the legislature, to take a census to adjust its federal and state legislative districts. The language in the proposed amendment outlines how the census is to work and creates the State Census Fund for the purposes of taking the census required by this amendment modification. Stipulates that state legislative districts must have equal citizenship population apportionment. Grants any member of the legislature standing to initiate an action or proceedings to enforce this change. **Takes \$5,000,000 from the Clean Elections Fund yearly and places it in the Census Fund.**

**Action Taken**

Passed Senate Government 4-3



**ARIZONA SUPREME COURT  
ORAL ARGUMENT CASE SUMMARY**



**BEN TOMA, et al. v. ADRIAN FONTES, et al./  
KRISTIN MAYES, et al.  
CV-24-0166-PR**

**PARTIES:**

*Petitioners/Plaintiffs:* Steve Montenegro (in his official capacity as Speaker of the Arizona House of Representatives)<sup>1</sup> and Warren Petersen (in his official capacity as President of the Arizona Senate) (collectively, “Legislative Leaders”)

*Respondents/Defendants:* Arizona Citizens Clean Elections Commission (“Commission”) and Adrian Fontes (in his official capacity as Arizona Secretary of State)

*Respondents/Intervenors:* Arizona Attorney General Kristin Mayes and Voters’ Right to Know

**FACTS:**

In November 2022, Arizona voters approved Proposition 211, also known as the Voters’ Right to Know Act (the “Act”), codified at A.R.S. §§ 16-971 to 16-979. Under the Act, “covered persons” who surpass a set amount of “campaign media spending” are required to disclose to the Secretary of State particular information about certain donors. “Covered persons” also must notify donors that their funds may be used for “campaign media spending” and let them elect not to have their funds used for that purpose. Absent consent, a donor’s funds may not be used or transferred for “campaign media spending” for 21 days.

Section 16-974(A) designates the Commission as “the primary agency authorized to implement and enforce” the Act. It also gives the Commission authority to “do any of the following”:

1. Adopt and enforce rules.
2. Issue and enforce civil subpoenas, including third-party subpoenas.
3. Initiate enforcement actions.
4. Conduct fact-finding hearings and investigations.
5. Impose civil penalties for noncompliance, including penalties for late or incomplete disclosures and for any other violations of this chapter.
6. Seek legal and equitable relief in court as necessary.
7. Establish the records persons must maintain to support their disclosures.
8. Perform any other act that may assist in implementing this chapter.

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<sup>1</sup> At the time litigation began in this case, the Speaker of the Arizona House of Representatives was Ben Toma. The first regular session of the Fifty-Seventh Arizona Legislature commenced on January 13, 2025, and Steve Montenegro was elected the Speaker of the Arizona House of Representatives. As a result, Mr. Montenegro has been substituted for Mr. Toma as a Petitioner/Plaintiff in this action.

Section 16-974(D) insulates the Commission by providing that the Commission's rules and any Commission enforcement actions "are not subject to the approval of or any prohibition or limit imposed by any other executive or legislative governmental body or official."

After the Act went into effect, the Commission adopted several implementing rules. *See* Ariz. Admin. Code R2-20-801 to R2-20-813. The Legislative Leaders then filed a complaint against the Secretary of State and the Commission, claiming that the Act violates the separation of powers, the nondelegation doctrine, and the Voter Protection Act ("VPA"), and seeking declaratory and injunctive relief. The Legislative Leaders sought a preliminary injunction and moved to consolidate the hearing on that motion with the trial on the merits. The Arizona Attorney General and Voters' Right to Know (the Act's sponsoring organization) intervened to defend the Act and moved to dismiss. The superior court declined to consolidate the preliminary injunction hearing with a trial on the merits. It also denied the preliminary injunction and the motions to dismiss. The Legislative Leaders appealed.

The court of appeals found that the Legislative Leaders lack standing to challenge § 16-974(A)(8) because that statutory provision is not causing a direct injury to the Legislature's authority to make and amend laws. The court of appeals also found that the Legislative Leaders lack standing to challenge R2-20-801, R2-20-803, and R2-20-808 because those rules do not regulate the Legislature as an entity and cannot be understood as nullifying legislative power. Moreover, any institutional injury the Legislature is suffering from those rules is traceable to the limits in § 16-974(D), not to § 16-974(A)(8).

The court of appeals then found that § 16-974(D) is unconstitutional and severable from the rest of the Act. Applying the severability test for initiatives, the court of appeals found that the Act would still be workable without § 16-974(D) because: (1) the Act's disclosure requirements will still be enforceable; (2) the Act will still remain subject to the VPA's restrictions on lawmaking; (3) the Commission will be in the same situation as other agencies delegated authority through a VPA-protected measure; and (4) through the severability clause contained in the Act, the People expressed their desire to have the unchallenged provisions remain.

## **ISSUES:**

The Arizona Supreme Court requested that the parties address the following issues:

1. Do the Legislative Leaders have standing to challenge § 16-974(A) and the rules flowing from that delegation?
2. Is § 16-974(D) severable from Prop 211?

*This Summary was prepared by the Arizona Supreme Court Staff Attorneys' Office solely for educational purposes. It should not be considered official commentary by the Court or any member thereof or part of any brief, memorandum, or other pleading filed in this case.*

**Katie Hobbs**  
Governor

**Thomas M. Collins**  
Executive Director



**Mark S. Kimble**  
Chair

**Steve M. Titla**  
**Amy B. Chan**  
**Galen D. Paton**  
**Christina Werther**  
Commissioners

**State of Arizona**  
**Citizens Clean Elections Commission**

**1110 W. Washington St. - Suite 250 - Phoenix, Arizona 85007 - Tel (602) 364-3477**  
**Fax (602) 364-3487 - [www.azcleanelections.gov](http://www.azcleanelections.gov)**

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***MEMORANDUM***

**To:** Commissioners

**From:** Mike Becker, Policy Director

**Date:** 2/27/25

**Subject:** 2024 Primary Candidate Audits

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The following primary candidate audits have been completed and no issues were raised. They have been placed on the Commission agenda for your approval.

1. Betsy Munoz – State House, District 22
2. Rene Lopez – Corporation Commission
3. James Holmes – State House, District 23



**Katie Hobbs**  
Governor

**Thomas M. Collins**  
Executive Director



**Mark S. Kimble**  
Chair

**Steve M. Titla**  
**Amy B. Chan**  
**Galen D. Paton**  
**Christina Werther**  
Commissioners

**State of Arizona**  
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**1110 W. Washington St. - Suite 250 - Phoenix, Arizona 85007 - Tel (602) 364-3477**  
**Fax (602) 364-3487 - [www.azcleanelections.gov](http://www.azcleanelections.gov)**

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***MEMORANDUM***

**To:** Commissioners

**From:** Mike Becker, Policy Director

**Date:** 2/27/2025

**Subject:** 2024 General Candidate Audits

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The following general candidate audits have been completed and no issues were raised. They have been placed on the Commission agenda for your approval.

1. Alan Smith – State Senate, District 15
2. Barbara Beneitone – State House, District 15
3. Bill Olear – State House, District 25
4. Bob Karp – State Senate, District 19
5. Brian Garcia – State House, District 8
6. Cara Vicini – State Senate, District 12
7. Cesar Aleman – State House, District 11
8. Eric Stafford – State Senate, District 29
9. Helen Hunter – State House, District 10
10. J'aime Morgaine – State Senate, District 30
11. Jay Ruby – State House, District 1
12. Jonathon Hill – Corporation Commission
13. Lawrence Hudson – State House, District 12
14. Lea Marquez Peterson – Corporation Commission
15. Leonard Rosenblum – State House, District 18
16. Lisa Fink – State House, District 27
17. Rachel Walden – Corporation Commission
18. Rene Lopez - Corporation Commission

19. Richard Corles – State House, District 3
20. Tom Tzitzura – State House, District 29
21. Victor Harris – State Senate, District 26
22. Marcia Smith – State House, District 1
23. Mike Fogel – State Senate, District 1
24. Ylenia Aguilar - Corporation Commission
25. Gregg Frostrom – State Senate, District 19

**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Betsy Munoz  
Participating Candidate for  
State Representative - District 22  
Primary Election 2024**



Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Betsy Munoz's (the Candidate)'s 2024 Qualifying Period Recap (QPR) Report which covers the period from August 1, 2023 through July 30, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Betsy Munoz. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

December 3, 2024

## **Summary of Procedures and Findings**

### **1. Preliminary Procedures**

- a) Contractor will obtain a copy of the candidate's campaign finance report for the reporting period.

**Finding**

We obtained the Candidate's QPR report from the Arizona Secretary of State's Website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance report to identify any unusual items requiring follow-up during fieldwork.

**Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

**Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### **2. Fieldwork Procedures**

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 4th Quarter Report.

**Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

**Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

**Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements one month prior to the election date (beginning on the first of the month), the month including the election day, and one month after the election day (ending on the last of the month) in the reporting period and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance report.

**Finding**

We selected five deposits and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance report.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the July 2024 bank statement and the 2024 Qualifying Period Recap Report.

**Finding**

The Candidate's 2024 Qualifying Period Recap Report campaign finance report listed a balance of \$50.00 at July 30, 2024. The Candidate's campaign bank account statement listed a balance of \$2,516.11 at July 31, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

We reviewed the supporting documentation for five early contributions reported in the Candidate's Campaign finance report and determined the name of the contributors for the contributions was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance report, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's Campaign finance report during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's Campaign finance report during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance report and perform the following:
  - (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance report.

**Finding**

For 1 out of 5 expenditures tested, the Candidate was unable to provide supporting documentation; therefore, we were unable to agree the amount to the Candidate's Campaign finance report. The amount of the unsupported expenditure was \$20.76.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance report.

**Finding**

We reviewed five expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance report.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed five expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed five expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate did not report any debt on the 2024 Qualifying Period Recap Report.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.



**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**James Holmes  
Participating Candidate for  
State Representative - District 23  
Primary Election 2024**



Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether James Holmes's (the Candidate)'s 2024 Qualifying Period Recap (QPR) Report which covers the period from August 1, 2023 through July 30, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of James Holmes. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

December 4, 2024

## **Summary of Procedures and Findings**

### **1. Preliminary Procedures**

- a) Contractor will obtain a copy of the candidate's campaign finance report for the reporting period.

**Finding**

We obtained the Candidate's QPR report from the Arizona Secretary of State's Website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance report to identify any unusual items requiring follow-up during fieldwork.

**Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

**Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### **2. Fieldwork Procedures**

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 4th Quarter Report.

**Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

**Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

**Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements one month prior to the election date (beginning on the first of the month), the month including the election day, and one month after the election day (ending on the last of the month) in the reporting period and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance report.

**Finding**

We selected two deposits (total population) and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance report.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the July 2024 bank statement and the 2024 Qualifying Period Recap Report.

**Finding**

The Candidate's 2024 Qualifying Period Recap Report campaign finance report listed a balance of \$7,197.43 at July 30, 2024. The Candidate's campaign bank account statement listed a balance of \$1,665.66 at July 31, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

We reviewed the supporting documentation for five early contributions reported in the Candidate's Campaign finance report and determined the name of the contributors for the contributions was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance report, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's Campaign finance report during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's Campaign finance report during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance report and perform the following:
  - (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance report.

**Finding**

We reviewed five expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance report.

**Finding**

We reviewed five expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance report.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed five expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed five expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate did not report any debt on the 2024 Qualifying Period Recap Report.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Rene Lopez  
Participating Candidate for  
Corporation Commissioner  
Primary Election 2024**



Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Rene Lopez's (the Candidate)'s 2024 Qualifying Period Recap (QPR) Report which covers the period from August 1, 2023 through July 30, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Rene Lopez. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

December 13, 2024



## **Summary of Procedures and Findings**

### 1. Preliminary Procedures

- a) Contractor will obtain a copy of the candidate's campaign finance report for the reporting period.

#### **Finding**

We obtained the Candidate's QPR report from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance report to identify any unusual items requiring follow-up during fieldwork.

#### **Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

#### **Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### 2. Fieldwork Procedures

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 4th Quarter Report.

#### **Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

#### **Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

#### **Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements one month prior to the election date (beginning on the first of the month), the month including the election day, and one month after the election day (ending on the last of the month) in the reporting period and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance report.

**Finding**

We selected five deposits and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance report.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the July 2024 bank statement and the 2024 Qualifying Period Recap Report.

**Finding**

The Candidate's 2024 Qualifying Period Recap Report campaign finance report listed a balance of negative (\$1,019.54) at July 30, 2024. The Candidate's campaign bank account statement listed a balance of \$5,864.46 at July 31, 2024. The Candidate is continuing on to the General Election.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$33,884 limit for a Corporation Commission candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$1,800 limit for a Corporation Commission candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

We reviewed the supporting documentation for ten early contributions reported in the Candidate's Campaign finance report and determined the name of the contributors for the contributions was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance report, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's Campaign finance report during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

We selected the two items reported on the Candidate's QPR and reviewed the supporting documentation, noting that the methodology utilized and the value of the contributions both appeared reasonable.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance report and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance report.

**Finding**

We reviewed eight expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance report.

**Finding**

We reviewed eight expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance report.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed eight expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed eight expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate did not report any debt on the 2024 Qualifying Period Recap Report.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

ANNUAL REPORT 2024



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## **VISION STATEMENT**

**Through the successful implementation of the Arizona Citizens Clean Elections Act, the Commission seeks to improve the integrity of Arizona state government and promote public confidence in the Arizona political process.**

2024 ANNUAL REPORT

Presented By The Citizens Clean Elections Commission

The Annual Report will be submitted to the Governor, the President of the Arizona State Senate and the Speaker of the Arizona State House of Representatives. This report will be made available online at [www.azcleaselections.gov](http://www.azcleaselections.gov).

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**Katie Hobbs**  
Governor

**Thomas M. Collins**  
Executive Director



**Mark S. Kimble**  
Chair

**Steve M. Titla**  
**Amy B. Chan**  
**Galen D. Paton**  
**Christina Werther**  
Commissioners

**State of Arizona**  
**Citizens Clean Elections Commission**

1110 W. Washington - Suite 250 - Phoenix, Arizona 85007 - Tel (602) 364-3477 - Fax (602) 364-3487 - [www.azcleanelections.gov](http://www.azcleanelections.gov)

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February 28, 2025

The Honorable Katie Hobbs  
Governor of the State of Arizona  
1700 West Washington  
Phoenix, AZ 85007

Dear Governor Hobbs:

The Citizens Clean Elections Commission is pleased to submit for your information the 2024 Annual Report, pursuant to Arizona Revised Statutes §16-956(A)(5). The Annual Report describes the activities performed by the Commission in the last calendar year.

In 1998, the voters of Arizona passed the Citizens Clean Elections Act. Over two decades later, the Commission continues its commitment of upholding the letter and spirit of the Act. The Commission accomplished its goals set forth and looks forward to the same success in 2025.

Respectfully,

Mark Kimble, Chairman  
Citizens Clean Elections Commission

## **Voter Education Budget**

**The Commission spends 10% of the expenditure cap on voter education in accordance with its statutory requirements.**

**See page 12 of this report for more financial information.**

# Voter & Public Education

The Commission provides information to the public regarding participation in the political process and the functions and purposes of the Clean Elections Act. This is accomplished through education campaigns throughout 2024, along with grassroots and social media outreach. The Commission consistently provides election information on how, where, and when to vote.

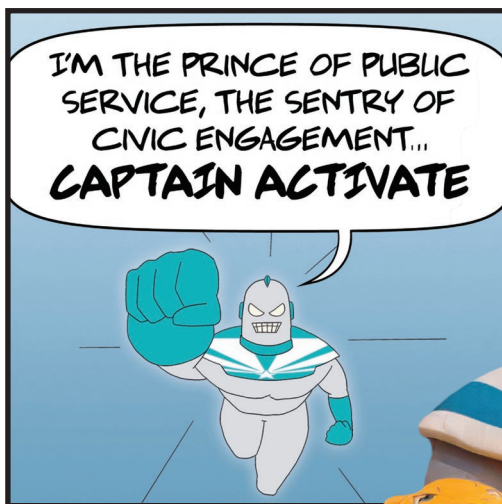
The Commission's education and outreach efforts for 2024 included:

- **Voter Education Campaigns**
- **U.S. Senate & State Debates**
- **Voter Education Guides**
- **Voter Issue Surveys and Subject Matter Expert**
- **Comprehensive Election Information**
- **Grassroots Outreach**
- **Website & Social Media**



## Voter Education Campaigns

Voters continue to have questions on how to participate, how to get information on voting, and who to trust for election information. In 2024, the Commission's voter education campaigns explained to voters Clean Elections purpose to provide straight-forward information on how to participate and where the candidates stand. In addition, the Commission launched a successful youth voter outreach campaign, with its first comic book *Captain Activate and the Future Voters*. This outreach effort was launched at Phoenix Fan Fusion with over 80,000 attending the three-day long event. Information campaigns also featured such crucial tools as the Voter Education Guide and debates.



# Election Information

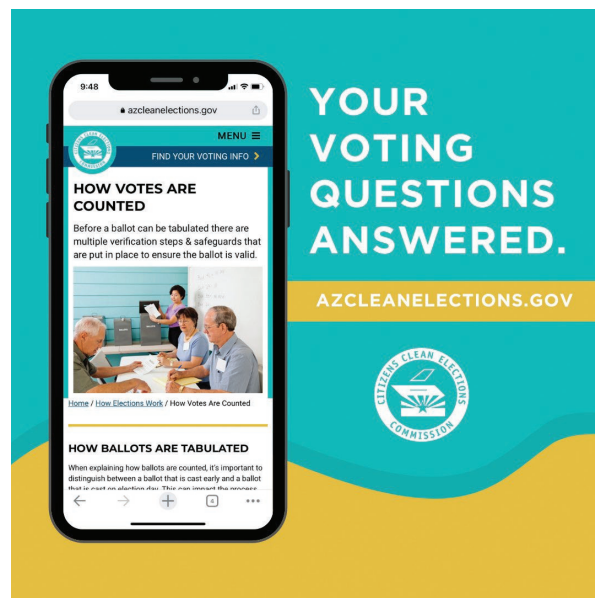
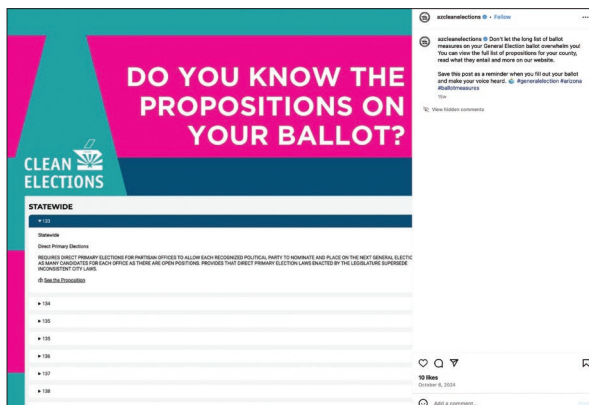
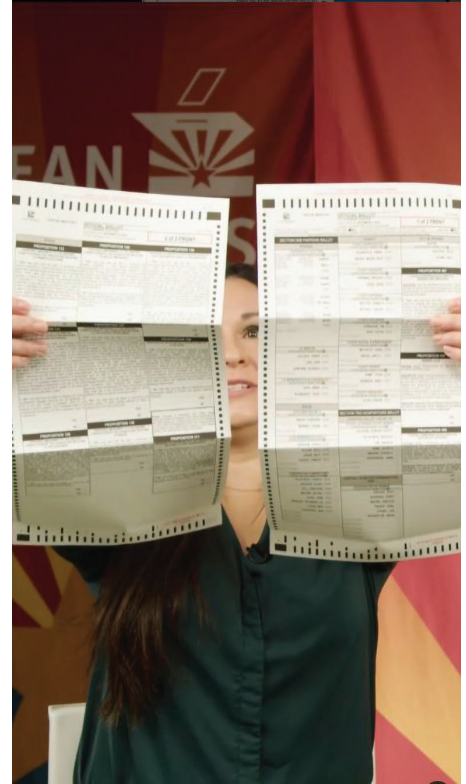
Every year, before each election, the Commission reaches out to all 15 counties within Arizona to identify what jurisdictions are having an election. The Commission updates its website with:

- Information on each election
- Highlight key deadlines
- How to get your ballot
- Voter education tools, such as videos and infographics

This information provides a quick point of reference for voters to access all necessary voting information. Voters learn how to access information through a comprehensive outreach campaign.

It's worth noting that the November 5, 2024, election was eventful with it being a Presidential election year in addition to having a Senate seat and all the Congressional seats up. For most, the ballot was two pages which included all of the propositions.

The Commission supplements election information web pages with voter education tools, such as videos and infographics, discussing everything from bond elections to the propositions.

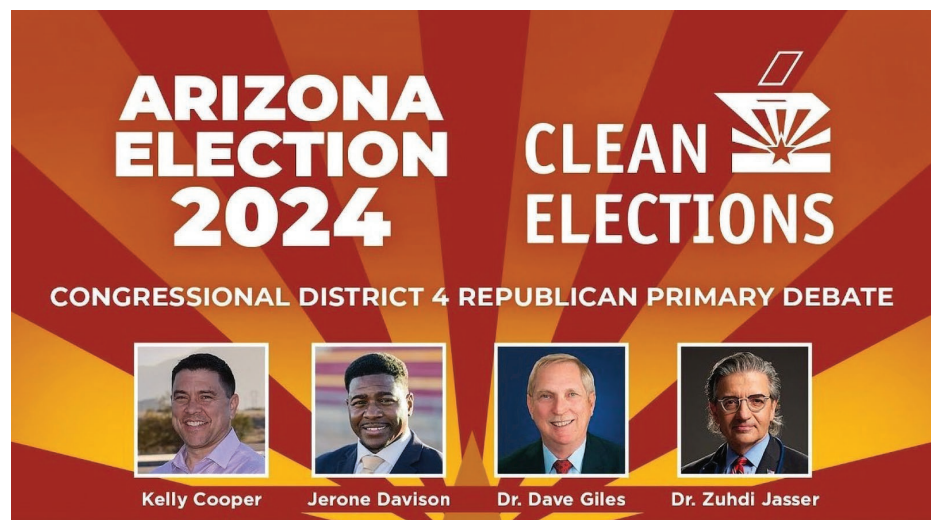




## U.S. Senate, State, and Local Debates

### 2024

The Commission hosted state legislative debates throughout the state. Whether a candidate was using the Clean Elections system or running traditionally, the debates provided voters with more information on the candidates and allowed the candidates the ability to speak directly with the voters. In addition, the Commission hosted statewide Corporation Commission candidate debates, a U.S. Senate debate, Congressional debates, along with local office debates.



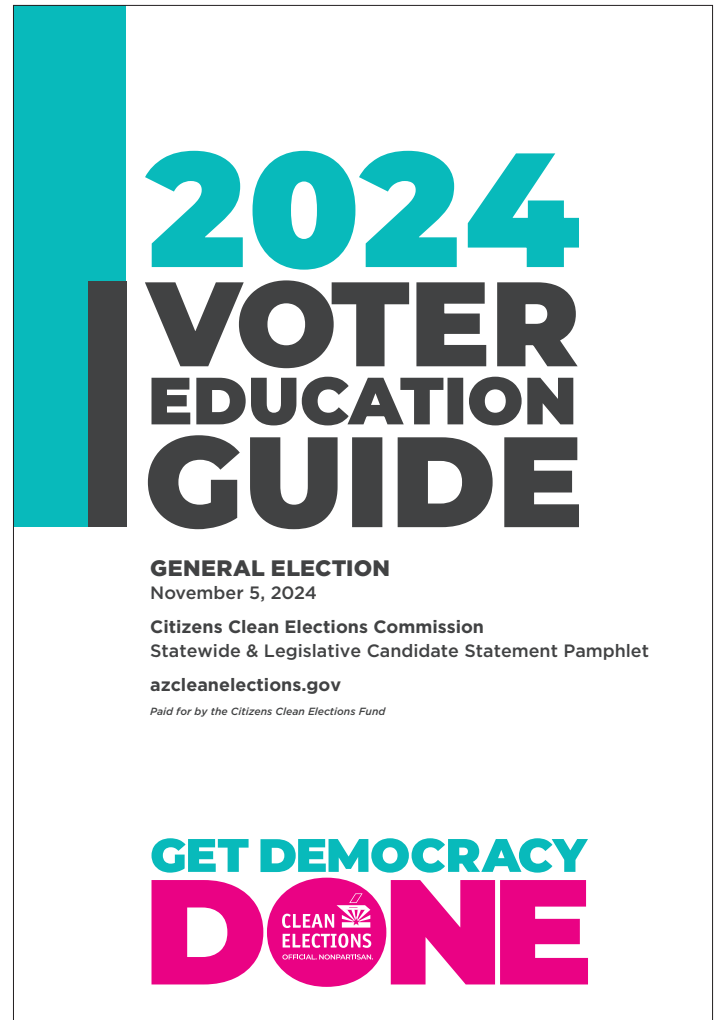
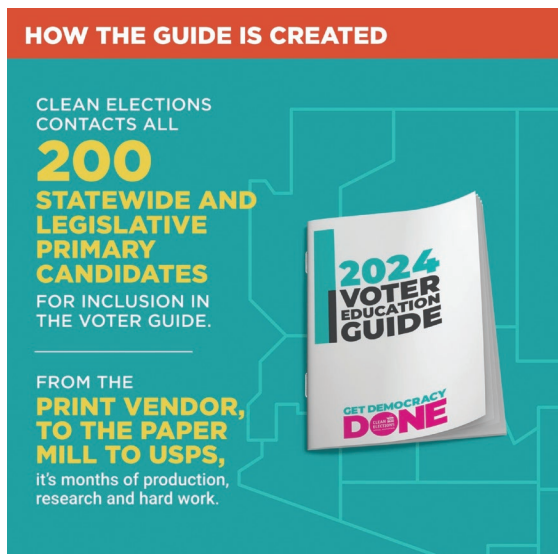


### Voter Education Guide

The Commission provides the public with a Voter Education Guide. The Guide is designed to be district-specific, so voters can see candidates running in their state legislative district as well as statewide offices.

The guide:

- Presents candidates by district.
- Includes a 200-word statement and an image from each candidate.
- Is provided in English, Spanish, American Sign Language, and in a spoken form for those with impaired vision.
- Is available in print and electronic formats.



### Grassroots Outreach

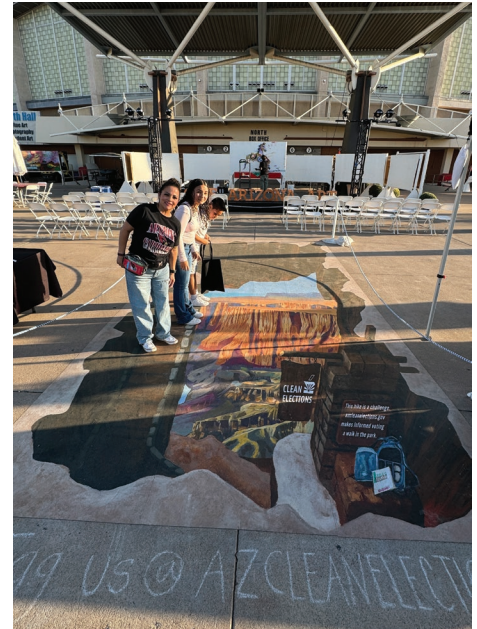
In an ongoing effort to increase outreach to Arizona Voters, the Commission participated in many events over the course of 2024. Some outings included National Voter Registration Day and Registration Drives across the county where the Commission helped register voters and provided voting fundamentals and how to stay up to date on local, state and federal elections. Below is a list of the top 2024 voter education and outreach events.

- **Gina met with Arizona’s U.S. Senators and Congressional staff** to provide updates on Clean Elections’ voter education efforts, ensuring federal representatives remained informed on outreach initiatives.
- **Tom, Avery, and Gina launched Captain Activate at Phoenix Fan Fusion (Comic Con)**, engaging over 80,000 attendees with civic education and voter awareness through an innovative comic book initiative.
- **Avery facilitated voter registration training for the Phoenix Indian Center** in collaboration with the Maricopa County Deputy Registrar, expanding registration accessibility within Indigenous communities.
- **Avery was a panelist at ASU’s “Defending Democracy in the Disinformation Age” conference**, discussing Arizona’s role in national democracy alongside Maricopa County Supervisor Bill Gates and Don Henninger of the Carter Center.
- **Gina participated in a tele-town hall with the Maricopa County Recorder**, providing over 4,000 independent voters with critical information on the upcoming primary election and ballot selection.
- **Gina and Tom presented on the U.S. electoral system and the Clean Elections Act** to a visiting European delegation through the Global Ties program, showcasing Arizona’s election integrity and transparency.
- **Gina was a contributing author to the Arizona Town Hall report, *Voting and Elections in Arizona***, and served as a panelist at its report launch, providing expert insights into voter education challenges and solutions.



## VOTER & PUBLIC EDUCATION

- **Gina and Tom met with the Arizona Republican and Democratic Party chairwomen** to discuss voter education efforts and facilitate bipartisan engagement on Clean Elections' debate initiatives.
- **Avery served as the keynote speaker at the Flinn Scholars Life Hack Day event**, inspiring Arizona's top students to engage in civic leadership and voter participation.
- **Avery led civic leadership workshops at the African American Affairs 22nd Annual Legislative Conference Youth Day**, empowering young leaders with the knowledge to become active participants in democracy.
- **Tom, Gina, and Avery participated in the Arizona Civics Coalition's Civics Night at the Museum**, distributing voter education resources to valley educators and strengthening civic literacy in schools.
- **Gina hosted an international delegation through Global Ties Arizona**, sharing best practices in voter outreach and Clean Elections' commitment to nonpartisan voter education.
- **Avery tabled at the 30th Arizona Aloha Festival alongside the Arizona Secretary of State**, engaging diverse communities and providing direct voter education resources.
- **Gina moderated a discussion on veterans and civic engagement with the Ed Pastor Center**, highlighting the importance of voter participation among military and veteran communities.
- **Avery attended and presented at the 2024 Civic Learning & Democratic Engagement Meeting**, where *Captain Activate* and the Commission's youth voter outreach initiatives were featured as a model for civic engagement programs nationwide.





# Clean Elections

## TRAINING & GUIDES

Education is a core component of the Commission. In 2024, the Commission continued to provide information to interested groups and potential candidates through speaking engagements, training workshops, as well as through publications on our enhanced agency website.

Each election cycle the Commission develops a guide to assist participating candidates as they navigate the political campaign process and to inform non-participating candidates, and other groups involved in elections, about the Clean Elections Act and rules. The guide covers important topics such as requirements of the Clean Elections Act and Rules, filing and reporting deadlines, how to become a Clean Elections participating candidate, and how to qualify for funding.

Participating candidates are required to attend one Clean Elections Candidate Training Workshop during the election cycle. The workshops are open to the public and designed to provide information to prospective candidates, or those who are assisting participating candidates, about the requirements of the Clean Elections Act. The workshops began in July of 2023 and ran through July of 2024.

The collage features several screenshots of the Citizens Clean Elections Commission website. The top row shows the 'CANDIDATE TRAINING VIDEOS' section with a grid of video thumbnails. Below this, there are three main content areas: 'CLEAN FUNDING', 'QUALIFY FOR THE BALLOT', and '2024 OFFICES TO BE ELECTED'. The 'CLEAN FUNDING' page details funding options, qualifying requirements, and the process for applying for funding. The 'QUALIFY FOR THE BALLOT' page outlines the steps for creating a campaign committee, gathering nomination petition signatures, and filing nomination paperwork. The '2024 OFFICES TO BE ELECTED' section lists the upcoming elections and the offices to be filled.

**CANDIDATE TRAINING VIDEOS**

WHAT IS CLEAN ELECTIONS? | VOTER EDUCATION, CAMPAIGN FINANCE & FREEDOM OF SPEECH

VOTER EDUCATION | PARTICIPATING CANDIDATES AND DEBATES

QUALIFYING CONTRIBUTIONS | WHAT THEY ARE AND HOW TO COLLECT

EXPENDITURES | WHAT THEY ARE AND HOW TO USE THEM AS A CANDIDATE

**CLEAN FUNDING**

**FUNDING OPTIONS**

The Clean Elections Act provides a clean funding program for statewide and legislative candidates who agree to forgo special interest and high dollar contributions. This allows participating candidates to directly connect with the voters in their district so they may raise a minimum number of qualifying contributions to receive clean campaign funding.

Candidates can choose to run as a traditional candidate or a participating Clean Elections candidate. Candidates who choose to raise private campaign funds, subject to [contribution limits](#), are known as non-participating/traditional candidates.

Candidates who opt into the Clean Funding program are known as participating candidates. Participating candidates agree to adhere to the Act and Commission rules in return for receiving funding from the Citizens Clean Elections Fund.

**QUALIFYING FOR CLEAN FUNDING**

**STEP 1. APPLYING TO BE A PARTICIPATING CANDIDATE**

Candidates who wish to participate in the Clean Funding program must file an Application (qualifying period). The application is generated in the Secretary of State's Campaign original, notarized application directly with the Secretary of State. The Clean Elections application is approved.

**VIEW PARTICIPATING CANDIDATES**

**STEP 2. COLLECTING \$5 QUALIFYING CONTRIBUTIONS**

Candidates can collect \$5 Qualifying Contributions during the qualifying period (Aug. properly registered to vote in the district of the office a candidate is seeking, may give Qualifying Contribution from a qualified elector regardless of the contributor's party; qualifying contributions, depending on the office they are seeking. The Commission amount.

\$5 Qualifying Contribution forms will be disqualified if:

- they are unsigned
- they are undated or incorrectly dated
- the contributor is not registered to vote on the date the form is signed
- the contributor is not registered to vote in the district on the date the form is signed
- the original signature is not submitted to the Secretary of State's Office

County Recorder Offices may have public terminals available for candidates to verify system to collect contributions electronically.

**STEP 3. APPLYING FOR CLEAN FUNDING**

Candidates apply for funding at the Secretary of State's Office. When applying, they must:

- Application for Funding (found in the SOS campaign finance reporting system);
- List of All \$5 Qualifying Contributors (make sure you have entered the \$5 qualifying system);
- Original \$5 Qualifying Contribution Forms (sorted by county if your district has multiple counties);
- A single check made payable to the Clean Elections Fund for the total amount of \$1,300 to fill in the check until the SOS staff gives you the official number of \$5-qual.

Note: Candidates may apply for funding prior to the filing period of March 7th, if they:

- Nomination Paper (A.R.S. 16-311)\*\*
- Nomination Petitions and Signatures\*\*
- Financial Disclosure Statement.\*\*

**CONTACT INFORMATION**

Office of the Secretary of State  
Elections Division  
1705 W Washington St R17  
Phoenix AZ 85007-2808  
602-542-5883  
1-877-THE VOTE  
elections@azsos.gov

**STEP 4. W-9 FORM**

The only paper you need to file with the Clean Elections Commission is the W-9. You must file it as soon as possible. The state cannot issue a check to a candidate without this form.

**STEP 5. VERIFICATION PROCESS**

Candidates will usually be notified within 10 business days if their submission passes. Clean Elections will contact the candidate when their funding check is ready. If the submission failed the random sample, and the candidate goes to a full set review of their original submission.

**QUALIFY FOR THE BALLOT**

Candidates must qualify to have their name printed on the official ballot. The steps outlined below are specific to statewide and legislative candidates. Local candidates should contact their filing office for the process.

**STEP 1. CREATE YOUR CAMPAIGN COMMITTEE**

Create a Statement of Organization electronically through the Secretary of State's Campaign Finance Reporting System. A Statement of Organization must be created within 10 days once an individual has received contributions or made expenditures totaling \$1,300. The Commission recommends individuals who are considering running as a participating Clean Elections candidate file a Statement of Organization before:

- Making any expenditures;
- Accepting any contributions;
- Distributing any campaign literature; or
- Circulating any petitions

**STEP 2. GATHER NOMINATION PETITION SIGNATURES**

Candidates are required to file nomination petitions that contain a minimum number of signatures from eligible voters. Each office requires a specific amount of signatures to qualify for the ballot. Official signature requirements are available on the Secretary of State's website and can be accessed below.

[View the Legislative Signature Requirements](#)

[View the State Signature Requirements](#)

**STEP 3. FILING YOUR NOMINATION PAPERWORK**

The filing period to qualify for the ballot is \*March 7, 2026 through \*April 06, 2026 at 5:00 p.m. During this time, candidates must file the following documents with the Secretary of State:

- a nomination paper;
- nomination petitions; and
- a financial disclosure statement (relative to the candidate's personal wealth, not a campaign finance report).

\*The dates above reflect the law as amended by SB1154.

**INDEPENDENT CANDIDATES**

Candidates that are running as an independent do not appear on the primary election ballot; they only appear on the general election ballot. Primary elections are for the purposes of nominating a political party nominee to proceed to the general election ballot.

Independent candidates are still required to file a nomination paper, nomination petitions and a financial disclosure statement during the filing period. Please refer to the Secretary of State's website for the appropriate forms and signature requirements for independent candidates.

**WRITE-IN CANDIDATES**

Write-in candidates do not have their name printed on the ballot. Write-in candidates must file a nomination paper and financial disclosure form during a separate filing period in order to have their name on the official write-in list, which is posted at every voting location. Votes will not be tallied for write-in candidates that have not filed the appropriate paperwork.

Please refer to the Secretary of State's website for the appropriate forms and filing periods for write-in candidates.

Helpful Links:

- 2024 Citizens Clean Elections Guide
- Secretary of State's Campaign Finance Reporting System
- Secretary of State's website

**2024 OFFICES TO BE ELECTED**

- U.S. Senator (elect 1)
- U.S. Representative in Congress (elect 1 in each of the 9 Congressional Districts)
- Corporation Commission (elect 3)
- State Senator (elect 1)
- State Representative (elect 2)




Click [here](#) to find out more about these offices!

Website & Social Media

The Commission had an increase in its engagement with voters online. Utilizing social media channels has allowed the Commission to instantly connect with voters on timely and important election-related issues.

Voters and candidates alike can follow the Commission on social media for more information about elections and running for office.

Social media sites such as X(Twitter), YouTube, and Facebook were used. The chart below displays the amount of followers/likes throughout the recent year. Even numbered years represent statewide election years.

	2020	2021	2022	2023	2024
	34,084 Followers	33,481 Followers	33,185 Followers	33,000 Followers	32,821 Followers
	2,098 Followers	2,197 Followers	2,820 Followers	2,784 Followers	2,697 Followers
	1,712,089 Views	532,334 Views	7,290,966 Views	3,149,061 Views	5,599,567 Views



**FOLLOW US ON TIK TOK!**

@azcleelections






**ARE YOU VOTING BY MAIL?**



Last day to request a ballot-by-mail

**OCTOBER 25TH**




**AZ Clean Elections** @AZCCEC · Feb 14, 2024

What better way to celebrate Arizona's birthday than by voting in the local election! The Cities of Litchfield Park & Tempe are having ballot-by-mail elections on March 12th and today marks the first day of voting. Learn more at [bit.ly/3OqNatT](https://bit.ly/3OqNatT) #arizona #elections

LITCHFIELD PARK & TEMPE

**VOTING BEGINS TODAY**

March 12th Local Election



### YOUR DISTRICT INFORMATION

Showing information for: 894 West Aloe Place, Chandler, AZ, USA [Change](#)

Federal

**Congressional District: 5**

[U.S. Senators](#) ⓘ  
[U.S. Representatives](#) ⓘ

State

**Legislative District: 13**

[State Senators](#) ⓘ  
[State Representatives](#) ⓘ

County

**Board of Supervisors District: Maricopa 1**

[County Supervisors](#) ⓘ

City

**City & City Council District: Chandler 0**

[Mayor](#) ⓘ  
[City/Town Council Members](#) ⓘ

Scroll down to view [ballot measures](#) and [candidate information](#).

### DATES YOU NEED TO KNOW

[See All Dates](#)

←

OCTOBER

07

Voter Registration Deadline

OCTOBER

09

Early Voting Begins

OCTOBER

25

Last Day to Request a Ballot by Mail

OCTOBER

29

Mail Back Your Ballot By

NOVEMBER

01

Last Day to Vote Early In-Person

→

Additionally, the Commission revamped the website, making it more user friendly and providing even more information than in previous years. The public enjoyed the revamp, as shown in the numbers below:

**Presidential Preference Election**

121,000 active users with an average engagement time of 1 minute, 12 seconds

**March and May Local Elections**

198,000 active users with an average engagement time of roughly 1 minute, 13 seconds

**Primary Election**

377,000 active users with an average engagement time of 58 seconds




**General Election**


902,000 active users with an average engagement time of 45 seconds

YEAR	SESSIONS	USERS	PAGE VIEWS
2024	1,700,000	1,400,000	2,400,000
2023	399,000	300,000	570,000
2022	1,000,000	796,000	1,700,000
2021	360,595	301,443	533,898
2020	1,514,415	1,196,474	2,881,496
2020	1,514,415	1,196,474	2,881,496

10 | ANNUAL REPORT 2024 | CITIZENS CLEAN ELECTIONS COMMISSION



 **2024 - General Election Ba...**  





PLEASE NOTE: All vote center locations are open from 6AM to 7PM election day November 05, while drop box hours vary.


651,963 views



















Published on November 5, 2024

[SHARE](#)



 **Drop Off Locations**



-  Cochise County Recorder (Bisbee)
-  Drop Box - Benson County Service Center
-  Drop Box - Douglas County Service Center
-  Drop Box - Sierra Vista County Service Center
-  Drop Box - Willcox County Service Center
-  Drop Box - Yuma County Recorder's Office
-  Drop Box - Foothills Library
-  Drop Box - San Luis Library
-  Drop Box - Wellton Library
-  Drop Box - Bagdad Justice Court
-  Drop Box - Black Canyon City Library
-  Drop Box - Yavapai-Apache Nation Communi...
-  Drop Box - Chino Valley Town Hall
-  Drop Box - Clarkdale Town Hall
-  Drop Box - Congress Library
-  Drop Box - Dewey Humboldt Town Hall
-  Drop Box - Jerome Town Hall
-  Drop Box - Paulden Public Library

# Financial Information

## REVENUE SOURCES

Citizens Clean Elections Commission revenue comes from the following sources:

- 10% surcharge on all civil penalties and criminal fines
- Civil penalties paid by candidates.
- \$5 qualifying contributions collected from participating candidates.

CY 2024** REVENUES	
Court Assessments	\$6,161,068**
Commission Assessments	\$399,211**
\$5 Tax Check-off (late tax filings)*	\$0*
Miscellaneous	\$61,780**
\$5 Qualifying Contributions	\$85,695**

\*Previously, Arizona citizens could contribute voluntarily through a \$5 check-off box on Arizona state income tax return forms and through dollar for dollar tax credits. This portion of the Act was removed in 2012; however, late tax filers may still contribute.

\*\*The Citizens Clean Elections Commission operates on a calendar year budget rather than the State's fiscal year budget.

## CONTROLS ON SPENDING

The Commission's total expenditures cannot exceed eight times the number of Arizona residents personal income tax returns filed during the previous calendar year. Up to 10% of the total expenditure cap for administration and enforcement purposes may be used. The Commission may make public education paid media expenditures up to 10% of the total expenditure cap as well. (A.R.S. §16-949)

The 2024 expenditure caps were as follows:

- Total Expenditure Cap: \$24,087,966
- Administration & Enforcement Cap: \$2,408,797
- Public Education Expenditure Cap: \$2,408,797

Clean Elections is funded by voluntary contributions and surcharges on criminal penalties and violations, such as traffic tickets.

## **Not a single dollar of Clean Elections funding comes from the State's General Fund.**

In fact, Clean Elections has donated \$74 million to the State's General Fund since the Commission's inception.

The removal of the \$5 check-off box on Arizona state income tax return forms and dollar-for-dollar tax credits caused a decrease in revenue to the Clean Elections Fund, and as a result the Commission was unable to transfer excess monies to the General Fund in 2024.

# Enforcement, Audits & Litigation

The Commission enforces the Citizens Clean Elections Act and Commission rules which are a part of the Arizona Administrative Code. The Act and Commission rules contain specific campaign finance provisions and limitations.

Commission staff monitor campaign finance reports to ensure campaign spending occurs as specified by the Act and Rules. The Commission has the authority to subpoena witnesses, take evidence, and require, by subpoena, the production of any books, papers, records or other material relevant to an enforcement matter.

Potential penalties for violations of the Act range from monetary penalties, the disqualification of a candidate or forfeiture of office. Most enforcement matters are settled amicably.

The Commission also conducts audits to ensure compliance with the Act and Commission rules. The audits are completed by an independent auditing agency. Candidate audits are conducted during election years after the Commission has disbursed funds to qualified candidates.

In 2024, the Commission conducted 43 audits: 9 primary election audits and 34 general election audits.

## ENFORCEMENT

**The Commission acts on both external and internally filed complaints.**

**During 2024, the Commission resolved 8 complaints arising from the 2024 election cycle.**

# Rulemaking & Legislation

## COMMISSION RULEMAKING AUTHORITY

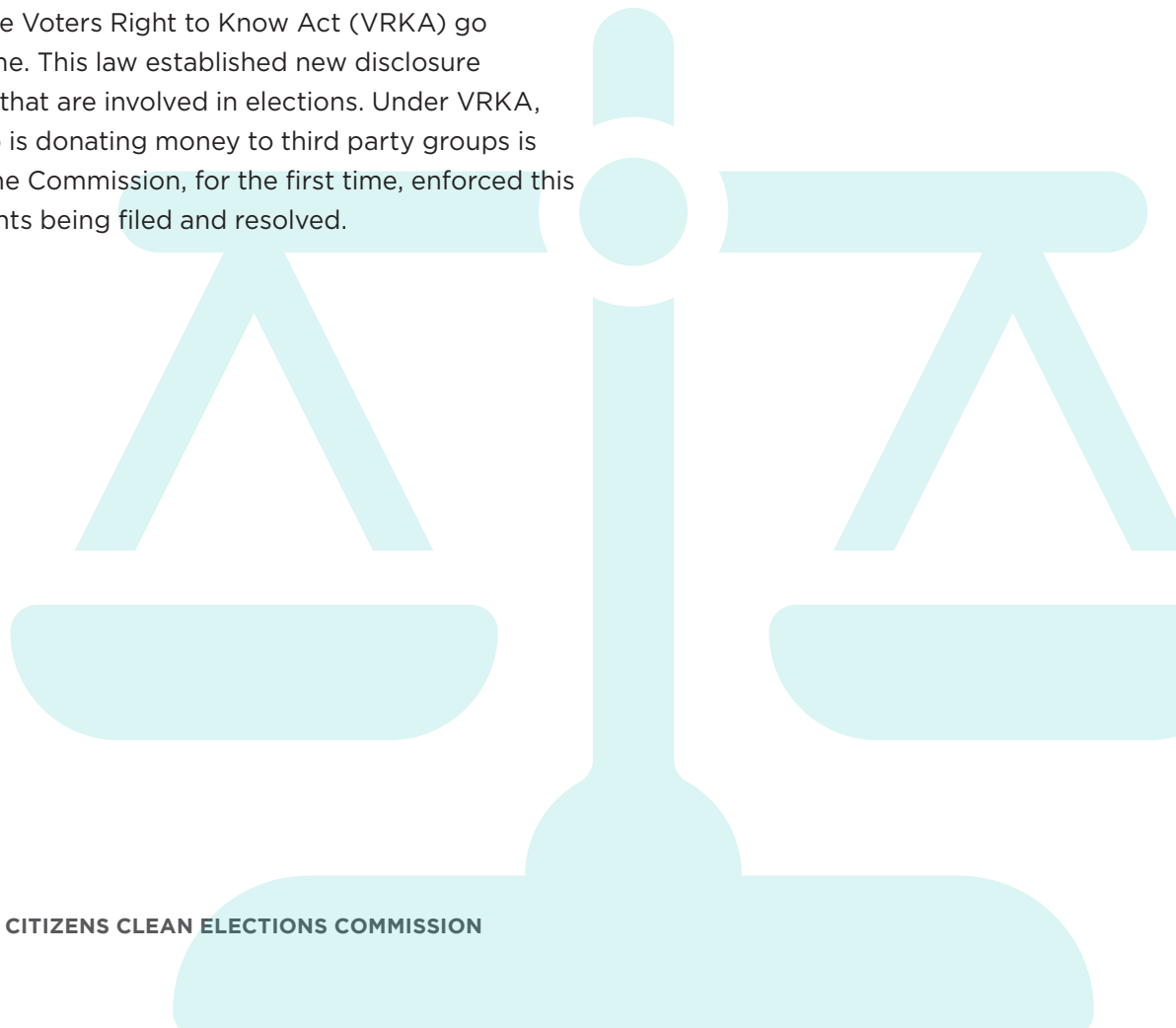
In accordance with A.R.S. §16-956(C), the Commission may adopt rules to carry out the purposes of the Citizens Clean Elections Act.

The Commission proposes and adopts rules in public meetings, with at least sixty days allowed for interested parties to comment after the rules are proposed. After consideration of the comments received in the sixty-day comment period, the Commission may adopt the rule in an open meeting.

The Commission diligently makes changes to its rules and procedures to address concerns and improve the functions of the program. Rules adopted by the Commission are not effective until January 1 in the year following the adoption of the rule. However, rules adopted by unanimous vote may be immediately effective and are enforceable.

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The 2024 election saw the Voters Right to Know Act (VRKA) go into effect for the first time. This law established new disclosure requirements for entities that are involved in elections. Under VRKA, more information on who is donating money to third party groups is available to the public. The Commission, for the first time, enforced this law, leading to 5 complaints being filed and resolved.





# 2024 Legislation

The Commission adopted the following legislative principles and priorities in an effort to improve the Act and Commission procedures:

**Oppose efforts to defund, eliminate or limit the Citizens Clean Elections Act and/or the Commission.** Over several sessions, members of the legislature have proposed measures that seek to defund, limit, or eliminate the authority of the Act or the Commission itself. The Commission has historically opposed these efforts on the grounds that they are typically poorly constructed, misleading, or otherwise ill-considered. The Commission works to maintain the letter and spirit of the law and supports efforts that further the purpose of the Act. The Commission opposes the following:

- **Amending, superseding the Clean Elections Act and/or diverting funds from the Clean Elections fund without furthering the purpose of the act or the required supermajority vote.**
- **Attempts to limit the power the Commission must enforce the Act**

**Additionally, the Commission monitors proposed legislation regarding current campaign and elections laws and supports election law reforms.** Election issues continue to percolate through both the political and legal process. The Commission continues to support reforms including improving the public financing program; improving the campaign finance code to ensure that voters are receiving information about the identity and contributions of campaign contributors and expenditures, including independent expenditures; ensuring that changes improve the State's anti-corruption, anti-circumvention, and informational interests, the Clean Elections Act and the Commission's independence; and improving voter access to information, voter involvement and voting.

**Support improvements to voter education and access.** The Commission continues to support efforts to enhance voter education and participation through legislation that advances the anti-corruption and public participation values that undergird the Act.

# Looking Forward to 2025

Here is a preview of what the Commission is looking forward to in 2025.

## 2025 EDUCATION PLAN PREVIEW

The 2025 Voter Education Plan will provide voters many opportunities to become engaged in the political process. From focus groups and surveys, to voter registration drives and partnering with nonprofits, the Commission is preparing for an eventful 2025. The following are just a few of the areas the Commission is involved with in 2025:

- CRM/Texting Campaign
- Civics Curriculum
- Civic Engagement and Voting education Comic Book
- Voter education and outreach materials
- Social Media Videos

## 2025 ELECTION CYCLE ~ CANDIDATE INFORMATION

Candidates may begin collecting \$5 qualifying contributions on August 1, 2025, the start of the qualifying period. Candidates must collect a minimum number of qualifying contributions, as referenced below:

**Governor - 4000**

**Secretary of State, Attorney General - 2500**

**Treasurer, Sup. of Public Instruction,  
Corp. Com. - 1500**

**Mine Inspector - 500**

**Legislator - 200**

# Commissioners & Staff

## COMMISSION STRUCTURE & MISSION

The Citizens Clean Elections Commission was established by the enactment of the Citizens Clean Elections Act, A.R.S., Title 16, Chapter 6, Article 2. In addition to administering the provisions of Article 2, the Commission promulgates rules and enforces A.R.S. §§ 16-940 through 16-961.

The Commission's mission is to fairly, faithfully and fully implement and administer the Citizens Clean Elections Act.

The Citizens Clean Elections Commission consists of five members. All members must be registered to vote in the State of Arizona. No more than two members of the commission may be members of the same political party. No more than two members of the commission may be residents of the same county.

## COMMISSIONERS\*

### **Steve M. Titla (D)**

Gila County, AZ

### **Mark Kimble (I)**

Pima County, AZ

### **Christina Werther (I)**

Maricopa County, AZ

### **Galen D. Paton (R)**

Pima County, AZ

### **Amy B. Chan (R)**

Maricopa County, AZ

## COMMISSION STAFF

### **Thomas M. Collins**

Executive Director

### **Paula Thomas**

Executive Officer

### **Mike Becker**

Policy Director

### **Gina Roberts**

Voter Education Director

### **Alec Shaffer**

Web Content Manager

### **Avery Xola**

Voter Education Manager

\*Commissioners listed are for the 2024 calendar year.

## Commissioner Biographies

### MARK KIMBLE

Independent – Pima County

Governor Katie Hobbs appointed Mark Kimble, an Independent, to the Citizens Clean Elections Commission in July 2015, while she served as Senate Democratic Leader. Mark was a longtime journalist in Southern Arizona. After graduating from the University of Arizona with a bachelor's degree in journalism, Mark worked for the Associated Press and then for the Tucson Citizen newspaper. During a 35-year career at the Citizen, he was a reporter, city editor, assistant managing editor and associate editor-columnist in charge of the editorial page. When the Citizen closed in 2009, Mark went to work as senior press advisor and later as communications director for Congresswoman Gabrielle Giffords. When she resigned in 2012, Mark became communications director for her successor, Congressman Ron Barber. Mark and his wife, Jennifer Boice, live in Tucson.

### CHRISTINA WERTHER

Independent – Maricopa County

Christina Werther is a Partner at Pierce Coleman PLLC and has extensive state and local government experience, specifically in election law. A former State Elections Director for the State of Arizona and a current certified election officer, Christina has represented local governments in election lawsuits and advised state officials and local governments on policy, election administration, and campaign finance matters. Christina serves as primary legal counsel for municipalities. She is a frequent speaker on election issues and local government topics and has presented at numerous trainings and conferences for attorneys, clerks, and elected officials. She previously worked at the State Senate, Governor's Office, and Secretary of State's Office and was the General Counsel for the League of Arizona Cities and Towns. She served on the Governor's Bi-Partisan Elections Task Force and was appointed by Governor Hobbs to the Citizens Clean Election Commission.

### STEVE M. TITLA

Democrat - Gila County

Former Senate Democratic Leader Leah Landrum Taylor appointed Steve M. Titla in July 2013 to the Citizens Clean Elections Commission. Mr. Titla is a partner in the Titla & Parsi law firm and is admitted to practice law both in Arizona and on the San Carlos Apache Reservation. The firm represents the San Carlos Apache Tribe as special counsel and has also served as legal counsel for the election boards of the San Carlos Apache and San Juan Southern Paiute Tribes. Previously, Mr. Titla was an attorney with the Navajo Nation Department of Justice and has served as president of the National Native American Bar Association. In addition to a B.S. and J.D. from Arizona State University, Mr. Titla earned an M.B.A. from the University of Phoenix. From 1974-76 Mr. Titla served in the U.S. Marine Corps, leaving with an honorable discharge. He also served in the Arizona National Guard until his honorable discharge in 1980. Mr. Titla's term on the Citizens Clean Elections Commission expires in January of 2018.

## Commissioner Biographies

### GALEN D. PATON

Republican – Pima County

Former Governor Doug Ducey appointed Galen D. Paton, a Republican, to the Citizens Clean Elections Commission in 2016. Commissioner Paton obtained his Master of Arts in Physical Education from the Southern Methodist University in Dallas, Texas. He has had a long and rewarding career coaching high school and college softball, volleyball and basketball teams in the southwest. In 2005, he led Sabino High School to the Arizona 4A State Championship and a No. 4 ranking in the country. The Arizona Coaches Association along with the National Fastpitch Coaches Association crowned Mr. Paton 2005 coach of the year. Mr. Paton retired from coaching in 2010 and is a current member of the Realty Executives Tucson Elite group. He resides in Tucson with his wife.

### AMY B. CHAN

Republican – Maricopa County

Governor Katie Hobbs appointed Amy B. Chan, a Republican, to the Citizens Clean Elections Commission in 2017, while she served as Senate Democratic Leader.

Commissioner Chan was admitted to the State Bar in 1999. Initially she worked as an immigration attorney, helping people obtain immigration benefits through the administrative and immigration court process. In 2001 she began work as a legislative research analyst for the House Judiciary Committee. She was an Administrative Law Judge for the Corporation Commission from 2005-2006 and then returned to the legislature as Policy Advisor and Counsel to the Majority for the State Senate. In 2009 Secretary of State Ken Bennett appointed her State Election Director. She served in that capacity until 2013, when she left to spend more time with her growing family. She returned to the Arizona Secretary of State's office as General Counsel in 2022 and currently serves in that capacity. She and her husband Keith have two sons and live in Phoenix.



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**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Alan Smith  
Participating Candidate for  
State Senator - District 15  
General Election 2024**





Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Alan Smith's (the Candidate)'s 2024 Post-Primary Election (Q3), 2024 Pre-General Election, and 2024 General Recap Report (the Reports) which covers the period from July 14, 2024 through November 5, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Alan Smith. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

January 22, 2025

## **Summary of Procedures and Findings**

### 1. Preliminary Procedures

- a) Contractor will obtain a copy of the candidate's campaign finance reports for the reporting period.

#### **Finding**

We obtained the Candidate's Reports from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance reports to identify any unusual items requiring follow-up during fieldwork.

#### **Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

#### **Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### 2. Fieldwork Procedures

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 2024 General Recap Report.

#### **Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

#### **Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

#### **Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements from July 2024 through November 2024 (the reporting period) and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance reports.

**Finding**

We selected 3 deposits (total population tested) and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance reports.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the November 2024 bank statement and the 2024 General Recap Report.

**Finding**

The Candidate's 2024 General Recap Report campaign finance report listed a balance of \$3,852.92 at November 5, 2024. The Candidate's campaign bank account statement listed a balance of \$1,899.53 at November 29, 2024 (statement went through the 29th).

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

No contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- (i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's Campaign finance reports during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance reports and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

**Finding**

We reviewed six expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

**Finding**

We reviewed six expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance reports.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed six expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed six expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate reported an outstanding loan balance of \$200.00 on the Campaign Reports.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Barbara Beneitone  
Participating Candidate for  
State Representative - District 15  
General Election 2024**



Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Barbara Beneitone's (the Candidate)'s 2024 Post-Primary Election (Q3), 2024 Pre-General Election, and 2024 General Recap Report (the Reports) which covers the period from July 14, 2024 through November 5, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Barbara Beneitone. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

January 31, 2025



## **Summary of Procedures and Findings**

### 1. Preliminary Procedures

- a) Contractor will obtain a copy of the candidate's campaign finance reports for the reporting period.

#### **Finding**

We obtained the Candidate's Reports from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance reports to identify any unusual items requiring follow-up during fieldwork.

#### **Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

#### **Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### 2. Fieldwork Procedures

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 2024 General Recap Report.

#### **Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

#### **Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

#### **Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements from July 2024 through November 2024 (the reporting period) and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance reports.

**Finding**

We selected two deposits (total population tested) and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance reports.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the November 2024 bank statement and the 2024 General Recap Report.

**Finding**

The Candidate's 2024 General Recap Report campaign finance report listed a balance of \$3,321.89 at November 5, 2024. The Candidate's campaign bank account statement listed a balance of \$962.14 at November 30, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

No contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- (i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's Campaign finance reports during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance reports and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

**Finding**

We reviewed five expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

**Finding**

We reviewed five expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance reports.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed five expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed five expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate did not report any debt on the Campaign Reports.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Bill Olear  
Participating Candidate for  
State Representative - District 25  
General Election 2024**



Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Bill Olear's (the Candidate)'s 2024 Post-Primary Election (Q3), 2024 Pre-General Election, and 2024 General Recap Report (the Reports) which covers the period from July 14, 2024 through November 5, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Bill Olear. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

January 15, 2025



## **Summary of Procedures and Findings**

### **1. Preliminary Procedures**

- a) Contractor will obtain a copy of the candidate's campaign finance reports for the reporting period.

#### **Finding**

We obtained the Candidate's Reports from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance reports to identify any unusual items requiring follow-up during fieldwork.

#### **Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

#### **Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### **2. Fieldwork Procedures**

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 2024 General Recap Report.

#### **Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

#### **Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

#### **Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements from July 2024 through November 2024 (the reporting period) and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance reports.

**Finding**

We selected five deposits and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance reports.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the November 2024 bank statement and the 2024 General Recap Report.

**Finding**

The Candidate's 2024 General Recap Report campaign finance report listed a balance of \$798.05 at November 5, 2024. The Candidate's campaign bank account statement listed a balance of \$710.20 at November 30, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

We reviewed the supporting documentation for four contributions (total population tested) reported in the Candidate's Campaign finance reports and determined the name of the contributors for the contributions was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's Campaign finance reports during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance reports and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

**Finding**

We reviewed five expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

**Finding**

We reviewed five expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance reports.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed five expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed five expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate did not report any debt on the Campaign Reports.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Bob Karp  
Participating Candidate for  
State Representative - District 19  
General Election 2024**



Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Bob Karp's (the Candidate)'s 2024 Post-Primary Election (Q3), 2024 Pre-General Election, and 2024 General Recap Report (the Reports) which covers the period from July 14, 2024 through November 5, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Bob Karp. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

January 13, 2025

## **Summary of Procedures and Findings**

### **1. Preliminary Procedures**

- a) Contractor will obtain a copy of the candidate's campaign finance reports for the reporting period.

**Finding**

We obtained the Candidate's Reports from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance reports to identify any unusual items requiring follow-up during fieldwork.

**Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

**Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### **2. Fieldwork Procedures**

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 2024 General Recap Report.

**Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

**Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

**Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.



- (i) Review bank statements from July 2024 through November 2024 (the reporting period) and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance reports.

**Finding**

We selected two deposits (total population tested) and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance reports.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the November 2024 bank statement and the 2024 General Recap Report.

**Finding**

The Candidate's 2024 General Recap Report campaign finance report listed a balance of \$210.94 at November 5, 2024. The Candidate's campaign bank account statement listed a balance of \$0.00 at November 30, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

We reviewed the supporting documentation for one contribution (total population tested) reported in the Candidate's Campaign finance reports and determined the name of the contributor for the contribution was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's Campaign finance reports during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance reports and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

**Finding**

We reviewed five expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

**Finding**

We reviewed five expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance reports.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed five expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed five expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate did not report any debt on the Campaign Reports.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Brian Garcia  
Participating Candidate for  
State Representative - District 8  
General Election 2024**



Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Brian Garcia's (the Candidate)'s 2024 Post-Primary Election (Q3), 2024 Pre-General Election, and 2024 General Recap Report (the Reports) which covers the period from July 14, 2024 through November 5, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Brian Garcia. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

January 31, 2025

## **Summary of Procedures and Findings**

### **1. Preliminary Procedures**

- a) Contractor will obtain a copy of the candidate's campaign finance reports for the reporting period.

**Finding**

We obtained the Candidate's Reports from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance reports to identify any unusual items requiring follow-up during fieldwork.

**Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

**Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### **2. Fieldwork Procedures**

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 2024 General Recap Report.

**Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

**Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

**Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements from July 2024 through November 2024 (the reporting period) and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance reports.

**Finding**

We selected one deposit (total population tested) and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance reports.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the November 2024 bank statement and the 2024 General Recap Report.

**Finding**

The Candidate's 2024 General Recap Report campaign finance report listed a balance of \$0.00 at November 5, 2024. The Candidate's campaign bank account statement listed a balance of \$11,624.64 at November 30, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.



- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

We reviewed the supporting documentation for one contribution (total population tested) reported in the Candidate's Campaign finance reports and determined the name of the contributor for the contribution was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

There were a total of six non-contribution receipts listed on the Candidate's Campaign finance reports. All items appeared to be for reimbursements of joint expenditures, appeared to be in compliance with regulatory rules and laws, and was included in the Campaign account bank statements.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance reports and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

**Finding**

We reviewed seven expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

**Finding**

We reviewed seven expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance reports.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed seven expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed seven expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

Two out of the seven expenditures tested appeared to be a joint expenditure, and the amount paid represented the Candidate's proportionate share of the total cost.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate did not report any debt on the Campaign Reports.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Cara Vicini  
Participating Candidate for  
State Senator - District 12  
General Election 2024**



Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Cara Vicini's (the Candidate)'s 2024 Post-Primary Election (Q3), 2024 Pre-General Election, and 2024 General Recap Report (the Reports) which covers the period from July 14, 2024 through November 5, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Cara Vicini. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

January 30, 2025

## **Summary of Procedures and Findings**

### **1. Preliminary Procedures**

- a) Contractor will obtain a copy of the candidate's campaign finance reports for the reporting period.

**Finding**

We obtained the Candidate's Reports from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance reports to identify any unusual items requiring follow-up during fieldwork.

**Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

**Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### **2. Fieldwork Procedures**

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 2024 General Recap Report.

**Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

**Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

**Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements from July 2024 through November 2024 (the reporting period) and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance reports.

**Finding**

We selected two deposits (total population tested) and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance reports.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the November 2024 bank statement and the 2024 General Recap Report.

**Finding**

The Candidate's 2024 General Recap Report campaign finance report listed a balance of \$369.20 at November 5, 2024. The Candidate's campaign bank account statement listed a balance of \$0.00 at November 30, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

No contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- (i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's Campaign finance reports during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance reports and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

**Finding**

We reviewed five expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

**Finding**

We reviewed five expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance reports.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed five expenditures and agreed amounts to the Campaign account bank statements without exception.



- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed five expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

One of the expenditures we tested appeared to be for joint expenditures, and the amount paid represented the Candidate's proportionate share of the total cost.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate did not report any debt on the Campaign Reports.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Cesar Aleman  
Participating Candidate for  
State Representative - District 11  
General Election 2024**



Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Cesar Aleman's (the Candidate)'s 2024 Post-Primary Election (Q3), 2024 Pre-General Election, and 2024 General Recap Report (the Reports) which covers the period from July 14, 2024 through November 5, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Cesar Aleman. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

January 31, 2025

## **Summary of Procedures and Findings**

### **1. Preliminary Procedures**

- a) Contractor will obtain a copy of the candidate's campaign finance reports for the reporting period.

#### **Finding**

We obtained the Candidate's Reports from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance reports to identify any unusual items requiring follow-up during fieldwork.

#### **Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

#### **Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### **2. Fieldwork Procedures**

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 2024 General Recap Report.

#### **Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

#### **Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

#### **Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements from July 2024 through November 2024 (the reporting period) and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance reports.

**Finding**

We selected one deposit (total population tested) and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance reports.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the November 2024 bank statement and the 2024 General Recap Report.

**Finding**

The Candidate's 2024 General Recap Report campaign finance report listed a balance of \$68.42 at November 5, 2024. The Candidate's campaign bank account statement listed a balance of \$21.64 at November 30, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

No contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- (i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's Campaign finance reports during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance reports and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

**Finding**

We reviewed five expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

**Finding**

We reviewed five expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance reports.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed five expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed five expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate did not report any debt on the Campaign Reports.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.



**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Eric Stafford  
Participating Candidate for  
State Senator - District 29  
General Election 2024**



Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Eric Stafford's (the Candidate)'s 2024 Post-Primary Election (Q3), 2024 Pre-General Election, and 2024 General Recap Report (the Reports) which covers the period from July 14, 2024 through November 5, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Eric Stafford. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

January 31, 2025

## **Summary of Procedures and Findings**

### **1. Preliminary Procedures**

- a) Contractor will obtain a copy of the candidate's campaign finance reports for the reporting period.

**Finding**

We obtained the Candidate's Reports from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance reports to identify any unusual items requiring follow-up during fieldwork.

**Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

**Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### **2. Fieldwork Procedures**

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 2024 General Recap Report.

**Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

**Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

**Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements from July 2024 through November 2024 (the reporting period) and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance reports.

**Finding**

We selected three deposits (total population tested) and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance reports.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the November 2024 bank statement and the 2024 General Recap Report.

**Finding**

The Candidate's 2024 General Recap Report campaign finance report listed a balance of \$463.03 at November 5, 2024. The Candidate's campaign bank account statement listed a balance of \$0.00 at November 30, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

No contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- (i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's Campaign finance reports during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance reports and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

**Finding**

We reviewed five expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

**Finding**

We reviewed five expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance reports.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed five expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed five expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate did not report any debt on the Campaign Reports.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Gregg Frostrom  
Participating Candidate for  
State Senator - District 19  
General Election 2024**



Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Gregg Frostrom's (the Candidate)'s 2024 Post-Primary Election (Q3), 2024 Pre-General Election, and 2024 General Recap Report (the Reports) which covers the period from July 14, 2024 through November 5, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Gregg Frostrom. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

February 21, 2025



## **Summary of Procedures and Findings**

### **1. Preliminary Procedures**

- a) Contractor will obtain a copy of the candidate's campaign finance reports for the reporting period.

**Finding**

We obtained the Candidate's Reports from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance reports to identify any unusual items requiring follow-up during fieldwork.

**Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

**Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### **2. Fieldwork Procedures**

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 2024 General Recap Report.

**Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

**Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

**Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements from July 2024 through November 2024 (the reporting period) and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance reports.

**Finding**

We selected three deposits (total population tested) and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance reports.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the November 2024 bank statement and the 2024 General Recap Report.

**Finding**

The Candidate's 2024 General Recap Report campaign finance report listed a balance of \$25,945.02 at November 5, 2024. The Candidate's campaign bank account statement listed a balance of \$486.17 at November 30, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

We reviewed the supporting documentation for five contributions reported in the Candidate's Campaign finance reports and determined the name of the contributors for the contributions was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's Campaign finance reports during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance reports and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

**Finding**

We reviewed five expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

**Finding**

We reviewed five expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance reports.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed five expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed five expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate did not report any debt on the Campaign Reports.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Helen Hunter  
Participating Candidate for  
State Representative - District 10  
General Election 2024**



Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Helen Hunter's (the Candidate)'s 2024 Post-Primary Election (Q3), 2024 Pre-General Election, and 2024 General Recap Report (the Reports) which covers the period from July 14, 2024 through November 5, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Helen Hunter. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

January 22, 2025

## **Summary of Procedures and Findings**

### **1. Preliminary Procedures**

- a) Contractor will obtain a copy of the candidate's campaign finance reports for the reporting period.

**Finding**

We obtained the Candidate's Reports from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance reports to identify any unusual items requiring follow-up during fieldwork.

**Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

**Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### **2. Fieldwork Procedures**

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 2024 General Recap Report.

**Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

**Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

**Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements from July 2024 through November 2024 (the reporting period) and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance reports.

**Finding**

We selected five deposits and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance reports.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the November 2024 bank statement and the 2024 General Recap Report.

**Finding**

The Candidate's 2024 General Recap Report campaign finance report listed a balance of \$8,667.41 at November 5, 2024. The Candidate's campaign bank account statement listed a balance of \$5,651.89 at November 30, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.



- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

We reviewed the supporting documentation for three contributions (total population tested) reported in the Candidate's Campaign finance reports and determined the name of the contributors for the contributions was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's Campaign finance reports during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance reports and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

**Finding**

We reviewed six expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

**Finding**

We reviewed six expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance reports.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed six expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed six expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate reported a net outstanding loan balance of negative (\$200.00) on the 2024 General Recap Report.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**J'aime Morgaine  
Participating Candidate for  
State Senator - District 30  
General Election 2024**



Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether J'aime Morgaine's (the Candidate)'s 2024 Post-Primary Election (Q3), 2024 Pre-General Election, and 2024 General Recap Report (the Reports) which covers the period from July 14, 2024 through November 5, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of J'aime Morgaine. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

February 14, 2025

## **Summary of Procedures and Findings**

### **1. Preliminary Procedures**

- a) Contractor will obtain a copy of the candidate's campaign finance reports for the reporting period.

**Finding**

We obtained the Candidate's Reports from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance reports to identify any unusual items requiring follow-up during fieldwork.

**Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

**Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### **2. Fieldwork Procedures**

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 2024 General Recap Report.

**Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

**Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

**Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements from July 2024 through November 2024 (the reporting period) and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance reports.

**Finding**

We selected two deposits (total population tested) and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance reports.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the November 2024 bank statement and the 2024 General Recap Report.

**Finding**

The Candidate's 2024 General Recap Report campaign finance report listed a balance of \$15,669.94 at November 5, 2024. The Candidate's campaign bank account statement listed a balance of \$16,166.48 at November 30, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

We reviewed the supporting documentation for one contribution (total population tested) reported in the Candidate's Campaign finance reports and determined the name of the contributor for the contribution was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's Campaign finance reports during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance reports and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

**Finding**

We reviewed twenty expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

**Finding**

We reviewed twenty expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance reports.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed twenty expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed twenty expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate did not report any debt on the Campaign Reports.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.



**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Jay Ruby  
Participating Candidate for  
State Representative - District 1  
General Election 2024**



Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Jay Ruby's (the Candidate)'s 2024 Post-Primary Election (Q3), 2024 Pre-General Election, and 2024 General Recap Report (the Reports) which covers the period from July 14, 2024 through November 5, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Jay Ruby. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

February 17, 2025

## **Summary of Procedures and Findings**

### **1. Preliminary Procedures**

- a) Contractor will obtain a copy of the candidate's campaign finance reports for the reporting period.

#### **Finding**

We obtained the Candidate's Reports from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance reports to identify any unusual items requiring follow-up during fieldwork.

#### **Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

#### **Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### **2. Fieldwork Procedures**

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 2024 General Recap Report.

#### **Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

#### **Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

#### **Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements from July 2024 through November 2024 (the reporting period) and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance reports.

**Finding**

We selected five deposits and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance reports.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the November 2024 bank statement and the 2024 General Recap Report.

**Finding**

The Candidate's 2024 General Recap Report campaign finance report listed a balance of negative (\$309.49) at November 5, 2024. The Candidate's campaign bank account statement listed a balance of \$0.00 at November 30, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

No contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- (i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's Campaign finance reports during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance reports and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

**Finding**

We reviewed eight expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

**Finding**

We reviewed eight expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance reports.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed eight expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed eight expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

Eight of the expenditures we tested appeared to be for joint expenditures made in conjunction with other candidates, and it appeared that the amount paid represented the Candidate's proportionate share of the total cost.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate's 2024 General Recap Report lists an outstanding committee debt balance at the end of the reporting period of negative (\$10.07).

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate responded with an acceptance of the report as presented.

**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Jonathon Hill  
Participating Candidate for  
Corporation Commissioner  
General Election 2024**



Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Jonathon Hill's (the Candidate)'s 2024 Post-Primary Election (Q3), 2024 Pre-General Election, and 2024 General Recap Report (the Reports) which covers the period from July 14, 2024 through November 5, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Jonathon Hill. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

January 16, 2025



## **Summary of Procedures and Findings**

### **1. Preliminary Procedures**

- a) Contractor will obtain a copy of the candidate's campaign finance reports for the reporting period.

**Finding**

We obtained the Candidate's Reports from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance reports to identify any unusual items requiring follow-up during fieldwork.

**Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

**Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### **2. Fieldwork Procedures**

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 2024 General Recap Report.

**Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

**Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

**Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements from July 2024 through November 2024 (the reporting period) and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance reports.

**Finding**

We selected five deposits and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance reports.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the November 2024 bank statement and the 2024 General Recap Report.

**Finding**

The Candidate's 2024 General Recap Report campaign finance report listed a balance of \$484.08 at November 5, 2024. The Candidate's campaign bank account statement listed a balance of \$290.00 at November 30, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$33,884 limit for a Corporation Commission candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$1,800 limit for a Corporation Commission candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

We reviewed the supporting documentation for five contributions reported in the Candidate's Campaign finance reports and determined the name of the contributors for the contributions was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's Campaign finance reports during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance reports and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

**Finding**

We reviewed five expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

**Finding**

We reviewed five expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance reports.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed five expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed five expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate did not report any debt on the Campaign Reports.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Lawrence Hudson  
Participating Candidate for  
State Representative - District 12  
General Election 2024**



Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Lawrence Hudson's (the Candidate)'s 2024 Post-Primary Election (Q3), 2024 Pre-General Election, and 2024 General Recap Report (the Reports) which covers the period from July 14, 2024 through November 5, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Lawrence Hudson. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

January 14, 2025

## **Summary of Procedures and Findings**

### **1. Preliminary Procedures**

- a) Contractor will obtain a copy of the candidate's campaign finance reports for the reporting period.

**Finding**

We obtained the Candidate's Reports from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance reports to identify any unusual items requiring follow-up during fieldwork.

**Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

**Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### **2. Fieldwork Procedures**

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 2024 General Recap Report.

**Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

**Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

**Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements from July 2024 through November 2024 (the reporting period) and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance reports.

**Finding**

We selected one deposit (total population tested) and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance reports.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the November 2024 bank statement and the 2024 General Recap Report.

**Finding**

The Candidate's 2024 General Recap Report campaign finance report listed a balance of \$52.13 at November 5, 2024. The Candidate's campaign bank account statement listed a balance of \$403.58 at November 30, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.



- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

We reviewed the supporting documentation for one contribution (total population tested) reported in the Candidate's Campaign finance reports and determined the name of the contributor for the contribution was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

There was a total of one non-contribution receipt listed on the Candidate's Campaign finance reports. The item appeared to be a refund of unused materials, appeared to be in compliance with regulatory rules and laws, and was included in the Campaign account bank statements.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance reports and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

**Finding**

We reviewed five expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

**Finding**

We reviewed five expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance reports.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed five expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed five expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate did not report any debt on the Campaign Reports.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Lea Marquez Peterson  
Participating Candidate for  
Corporation Commissioner  
General Election 2024**



Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Lea Marquez Peterson's (the Candidate)'s 2024 Post-Primary Election (Q3), 2024 Pre-General Election, and 2024 General Recap Report (the Reports) which covers the period from July 14, 2024 through November 5, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Lea Marquez Peterson. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

February 17, 2025

## **Summary of Procedures and Findings**

### **1. Preliminary Procedures**

- a) Contractor will obtain a copy of the candidate's campaign finance reports for the reporting period.

**Finding**

We obtained the Candidate's Reports from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance reports to identify any unusual items requiring follow-up during fieldwork.

**Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

**Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### **2. Fieldwork Procedures**

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 2024 General Recap Report.

**Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

**Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

**Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements from July 2024 through November 2024 (the reporting period) and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance reports.

**Finding**

We selected three deposits (total population tested) and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance reports.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the November 2024 bank statement and the 2024 General Recap Report.

**Finding**

The Candidate's 2024 General Recap Report campaign finance report listed a balance of \$338.05 at November 5, 2024. The Candidate's campaign bank account statement listed a balance of \$210.00 at November 30, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$33,884 limit for a Corporation Commission candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$1,800 limit for a Corporation Commission candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

We reviewed the supporting documentation for four (total population tested) contributions reported in the Candidate's Campaign finance reports and determined the name of the contributors for the contributions was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's Campaign finance reports during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance reports and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

**Finding**

We reviewed five expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

**Finding**

We reviewed five expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance reports.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed five expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed five expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate did not report any debt on the Campaign Reports.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate responded with an acceptance of the report as presented.



**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Leonard Rosenblum  
Participating Candidate for  
State Representative - District 18  
General Election 2024**



Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Leonard Rosenblum's (the Candidate)'s 2024 Post-Primary Election (Q3), 2024 Pre-General Election, and 2024 General Recap Report (the Reports) which covers the period from July 14, 2024 through November 5, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Leonard Rosenblum. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

January 15, 2025

## **Summary of Procedures and Findings**

### **1. Preliminary Procedures**

- a) Contractor will obtain a copy of the candidate's campaign finance reports for the reporting period.

#### **Finding**

We obtained the Candidate's Reports from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance reports to identify any unusual items requiring follow-up during fieldwork.

#### **Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

#### **Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### **2. Fieldwork Procedures**

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 2024 General Recap Report.

#### **Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

#### **Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

#### **Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements from July 2024 through November 2024 (the reporting period) and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance reports.

**Finding**

We selected one deposit (total population tested) and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance reports.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the November 2024 bank statement and the 2024 General Recap Report.

**Finding**

The Candidate's 2024 General Recap Report campaign finance report listed a balance of \$0.82 at November 5, 2024. The Candidate's campaign bank account statement listed a balance of \$0.82 at November 30, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

No contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- (i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's Campaign finance reports during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance reports and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

**Finding**

We reviewed fourteen expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

**Finding**

We reviewed fourteen expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance reports.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed fourteen expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed fourteen expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate did not report any debt on the Campaign Reports.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate agreed to our representations and findings.

**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Lisa Fink  
Participating Candidate for  
State Representative - District 27  
General Election 2024**



Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Lisa Fink's (the Candidate)'s 2024 Post-Primary Election (Q3), 2024 Pre-General Election, and 2024 General Recap Report (the Reports) which covers the period from July 14, 2024 through November 5, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Lisa Fink. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

January 22, 2025



## **Summary of Procedures and Findings**

### **1. Preliminary Procedures**

- a) Contractor will obtain a copy of the candidate's campaign finance reports for the reporting period.

**Finding**

We obtained the Candidate's Reports from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance reports to identify any unusual items requiring follow-up during fieldwork.

**Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

**Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### **2. Fieldwork Procedures**

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 2024 General Recap Report.

**Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

**Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

**Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements from July 2024 through November 2024 (the reporting period) and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance reports.

**Finding**

We selected four deposits (total population tested) and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance reports.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the November 2024 bank statement and the 2024 General Recap Report.

**Finding**

The Candidate's 2024 General Recap Report campaign finance report listed a balance of \$20.34 at November 5, 2024. The Candidate's campaign bank account statement listed a balance of \$0.00 at November 30, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

We reviewed the supporting documentation for two contributions (total population tested) reported in the Candidate's Campaign finance reports and determined the name of the contributors for the contributions was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's Campaign finance reports during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance reports and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

**Finding**

We reviewed five expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

**Finding**

We reviewed five expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance reports.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed five expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed five expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate did not report any debt on the Campaign Reports.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Marcia Smith  
Participating Candidate for  
State Representative - District 1  
General Election 2024**



Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Marcia Smith's (the Candidate)'s 2024 Post-Primary Election (Q3), 2024 Pre-General Election, and 2024 General Recap Report (the Reports) which covers the period from July 14, 2024 through November 5, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Marcia Smith. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

February 17, 2025

## **Summary of Procedures and Findings**

### **1. Preliminary Procedures**

- a) Contractor will obtain a copy of the candidate's campaign finance reports for the reporting period.

**Finding**

We obtained the Candidate's Reports from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance reports to identify any unusual items requiring follow-up during fieldwork.

**Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

**Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### **2. Fieldwork Procedures**

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 2024 General Recap Report.

**Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

**Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

**Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements from July 2024 through November 2024 (the reporting period) and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance reports.

**Finding**

We selected five deposits and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance reports.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the November 2024 bank statement and the 2024 General Recap Report.

**Finding**

The Candidate's 2024 General Recap Report campaign finance report listed a balance of \$244.79 at November 5, 2024. The Candidate's campaign bank account statement listed a balance of \$100.00 at November 30, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.



- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

No contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- (i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's Campaign finance reports during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance reports and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

**Finding**

We reviewed ten expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

**Finding**

We reviewed ten expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance reports.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed ten expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed ten expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

Nine of the expenditures we tested appeared to be for joint expenditures made in conjunction with other candidates, and it appeared that the amount paid represented the Candidate's proportionate share of the total cost.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate did not report any debt on the Campaign Reports.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate provided responses to our findings, which were subsequently addressed and updated. The Candidate then responded with an acceptance of the modified report as presented.

**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Mike Fogel  
Participating Candidate for  
State Senator - District 1  
General Election 2024**



Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Mike Fogel's (the Candidate)'s 2024 Post-Primary Election (Q3), 2024 Pre-General Election, and 2024 General Recap Report (the Reports) which covers the period from July 14, 2024 through November 5, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Mike Fogel. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

February 24, 2025

## **Summary of Procedures and Findings**

### **1. Preliminary Procedures**

- a) Contractor will obtain a copy of the candidate's campaign finance reports for the reporting period.

**Finding**

We obtained the Candidate's Reports from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance reports to identify any unusual items requiring follow-up during fieldwork.

**Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

**Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### **2. Fieldwork Procedures**

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 2024 General Recap Report.

**Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

**Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

**Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements from July 2024 through November 2024 (the reporting period) and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance reports.

**Finding**

We selected two deposits (total population tested) and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance reports.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the November 2024 bank statement and the 2024 General Recap Report.

**Finding**

The Candidate's 2024 General Recap Report campaign finance report listed a balance of \$86.40 at November 5, 2024. The Candidate's campaign bank account statement listed a balance of \$133.99 at November 30, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

No contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- (i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's Campaign finance reports during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance reports and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

**Finding**

We reviewed ten expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

**Finding**

We reviewed ten expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance reports.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed ten expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed ten expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

Eight of the expenditures we tested appeared to be for joint expenditures made in conjunction with other candidates, and it appeared that the amount paid represented the Candidate's proportionate share of the total cost.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate's 2024 General Recap Report lists an outstanding loan balance at the end of the reporting period of \$100.00.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.



**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Rachel Walden  
Participating Candidate for  
Corporation Commissioner  
General Election 2024**



Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Rachel Walden's (the Candidate)'s 2024 Post-Primary Election (Q3), 2024 Pre-General Election, and 2024 General Recap Report (the Reports) which covers the period from July 14, 2024 through November 5, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Rachel Walden. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

January 22, 2025

## **Summary of Procedures and Findings**

### 1. Preliminary Procedures

- a) Contractor will obtain a copy of the candidate's campaign finance reports for the reporting period.

#### **Finding**

We obtained the Candidate's Reports from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance reports to identify any unusual items requiring follow-up during fieldwork.

#### **Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

#### **Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### 2. Fieldwork Procedures

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 2024 General Recap Report.

#### **Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

#### **Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

#### **Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements from July 2024 through November 2024 (the reporting period) and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance reports.

**Finding**

We selected two deposits (total population tested) and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance reports.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the November 2024 bank statement and the 2024 General Recap Report.

**Finding**

The Candidate's 2024 General Recap Report campaign finance report listed a balance of \$0.00 at November 5, 2024. The Candidate's campaign bank account statement listed a balance of \$210.00 at November 30, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$33,884 limit for a Corporation Commission candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$1,800 limit for a Corporation Commission candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

We reviewed the supporting documentation for one contribution (total population tested) reported in the Candidate's Campaign finance reports and determined the name of the contributors for the contributions was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's Campaign finance reports during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance reports and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

**Finding**

We reviewed five expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

**Finding**

We reviewed five expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance reports.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed five expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed five expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate did not report any debt on the Campaign Reports.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Rene Lopez  
Participating Candidate for  
Corporation Commissioner  
General Election 2024**



Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Rene Lopez's (the Candidate)'s 2024 Post-Primary Election (Q3), 2024 Pre-General Election, and 2024 General Recap Report (the Reports) which covers the period from July 14, 2024 through November 5, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Rene Lopez. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

January 28, 2025



## **Summary of Procedures and Findings**

### **1. Preliminary Procedures**

- a) Contractor will obtain a copy of the candidate's campaign finance reports for the reporting period.

**Finding**

We obtained the Candidate's Reports from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance reports to identify any unusual items requiring follow-up during fieldwork.

**Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

**Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### **2. Fieldwork Procedures**

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 2024 General Recap Report.

**Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

**Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

**Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements from July 2024 through November 2024 (the reporting period) and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance reports.

**Finding**

We selected five deposits and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance reports.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the November 2024 bank statement and the 2024 General Recap Report.

**Finding**

The Candidate's 2024 General Recap Report campaign finance report listed a balance of \$7,930.78 at November 5, 2024. The Candidate's campaign bank account statement listed a balance of \$8,155.77 at November 30, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$33,884 limit for a Corporation Commission candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$1,800 limit for a Corporation Commission candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

We reviewed the supporting documentation for four contributions (total population tested) reported in the Candidate's Campaign finance reports and determined the name of the contributors for the contributions was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's Campaign finance reports during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance reports and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

**Finding**

We reviewed ten expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

**Finding**

We reviewed ten expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance reports.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed ten expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed ten expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate did not report any debt on the Campaign Reports.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Richard Corles  
Participating Candidate for  
State Representative - District 3  
General Election 2024**



Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Richard Corles's (the Candidate)'s 2024 Post-Primary Election (Q3), 2024 Pre-General Election, and 2024 General Recap Report (the Reports) which covers the period from July 14, 2024 through November 5, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Richard Corles. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

January 13, 2025

## **Summary of Procedures and Findings**

### **1. Preliminary Procedures**

- a) Contractor will obtain a copy of the candidate's campaign finance reports for the reporting period.

#### **Finding**

We obtained the Candidate's Reports from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance reports to identify any unusual items requiring follow-up during fieldwork.

#### **Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

#### **Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### **2. Fieldwork Procedures**

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 2024 General Recap Report.

#### **Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

#### **Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

#### **Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements from July 2024 through November 2024 (the reporting period) and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance reports.

**Finding**

We selected one deposit (total population tested) and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance reports.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the November 2024 bank statement and the 2024 General Recap Report.

**Finding**

The Candidate's 2024 General Recap Report campaign finance report listed a balance of \$5,662.46 at November 5, 2024. The Candidate's campaign bank account statement listed a balance of \$8,063.50 at November 30, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.



- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

No contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- (i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's Campaign finance reports during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance reports and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

**Finding**

We reviewed ten expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

**Finding**

We reviewed ten expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance reports.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed ten expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed ten expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate did not report any debt on the Campaign Reports.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Tom Tzitzura  
Participating Candidate for  
State Representative - District 29  
General Election 2024**



Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Tom Tzitzura's (the Candidate)'s 2024 Post-Primary Election (Q3), 2024 Pre-General Election, and 2024 General Recap Report (the Reports) which covers the period from July 14, 2024 through November 5, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Tom Tzitzura. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

January 28, 2025

## **Summary of Procedures and Findings**

### **1. Preliminary Procedures**

- a) Contractor will obtain a copy of the candidate's campaign finance reports for the reporting period.

**Finding**

We obtained the Candidate's Reports from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance reports to identify any unusual items requiring follow-up during fieldwork.

**Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

**Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### **2. Fieldwork Procedures**

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 2024 General Recap Report.

**Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

**Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

**Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements from July 2024 through November 2024 (the reporting period) and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance reports.

**Finding**

We selected four deposits (total population tested) and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance reports.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the November 2024 bank statement and the 2024 General Recap Report.

**Finding**

The Candidate's 2024 General Recap Report campaign finance report listed a balance of \$2,385.67 at November 5, 2024. The Candidate's campaign bank account statement listed a balance of \$2,198.54 at November 30, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

We reviewed the supporting documentation for one contribution (total population tested) reported in the Candidate's Campaign finance reports and determined the name of the contributor for the contribution was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's Campaign finance reports during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance reports and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

**Finding**

We reviewed five expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

**Finding**

We reviewed five expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance reports.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed five expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed five expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate' reported an outstanding loan balance of \$310.00 during the reporting period.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.



**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Victor Harris  
Participating Candidate for  
State Senator - District 26  
General Election 2024**



Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Victor Harris's (the Candidate)'s 2024 Post-Primary Election (Q3), 2024 Pre-General Election, and 2024 General Recap Report (the Reports) which covers the period from July 14, 2024 through November 5, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Victor Harris. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

February 17, 2025

## **Summary of Procedures and Findings**

### **1. Preliminary Procedures**

- a) Contractor will obtain a copy of the candidate's campaign finance reports for the reporting period.

**Finding**

We obtained the Candidate's Reports from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance reports to identify any unusual items requiring follow-up during fieldwork.

**Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

**Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### **2. Fieldwork Procedures**

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 2024 General Recap Report.

**Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

**Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

**Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements from July 2024 through November 2024 (the reporting period) and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance reports.

**Finding**

We selected one deposit (total population tested) and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance reports.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the November 2024 bank statement and the 2024 General Recap Report.

**Finding**

The Candidate's 2024 General Recap Report campaign finance report listed a balance of \$2,079.59 at November 5, 2024. The Candidate's campaign bank account statement listed a balance of \$0.00 at November 30, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

We reviewed the supporting documentation for two contributions (total population) reported in the Candidate's Campaign finance reports and determined the name of the contributors for the contributions was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's Campaign finance reports during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance reports and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

**Finding**

We reviewed five expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

**Finding**

We reviewed five expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance reports.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed five expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed five expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

Two of the expenditures we tested appeared to be for joint expenditures made in conjunction with other candidates, and it appeared that the amount paid represented the Candidate's proportionate share of the total cost.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate did not report any debt on the Campaign Reports.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate responded with an acceptance of the report as presented.

**CITIZENS CLEAN ELECTIONS COMMISSION**

**Report on Agreed-Upon Procedures**

**Ylenia Aguilar  
Participating Candidate for  
Corporation Commissioner  
General Election 2024**



Independent Accountants' Report on  
Applying Agreed-Upon Procedures

To the Chairman and Members of the  
Citizens Clean Elections Commission  
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Ylenia Aguilar's (the Candidate)'s 2024 Post-Primary Election (Q3), 2024 Pre-General Election, and 2024 General Recap Report (the Reports) which covers the period from July 14, 2024 through November 5, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Ylenia Aguilar. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

*Fester & Chapman, PLLC*

February 21, 2025



## **Summary of Procedures and Findings**

### **1. Preliminary Procedures**

- a) Contractor will obtain a copy of the candidate's campaign finance reports for the reporting period.

**Finding**

We obtained the Candidate's Reports from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance reports to identify any unusual items requiring follow-up during fieldwork.

**Finding**

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

**Finding**

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

### **2. Fieldwork Procedures**

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 2024 General Recap Report.

**Finding**

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

**Finding**

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

**Finding**

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements from July 2024 through November 2024 (the reporting period) and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance reports.

**Finding**

We selected five deposits and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance reports.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the November 2024 bank statement and the 2024 General Recap Report.

**Finding**

The Candidate's 2024 General Recap Report campaign finance report listed a balance of \$7,919.64 at November 5, 2024. The Candidate's campaign bank account statement listed a balance of \$255.96 at November 30, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

**Finding**

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

**Finding**

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

**Finding**

Early contributions received during the reporting period did not exceed the \$33,884 limit for a Corporation Commission candidate.

- (iv) Check compliance with the maximum personal contribution limits.

**Finding**

Personal contributions received during the reporting period did not exceed the \$1,800 limit for a Corporation Commission candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

**Finding**

We reviewed the supporting documentation for five contributions reported in the Candidate's Campaign finance reports and determined the name of the contributors for the contributions was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance reports, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

**Finding**

No other types of cash receipts were reported in the Candidate's Campaign finance reports during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

**Finding**

No in-kind contributions were reported in the Candidate's Campaign finance reports during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance reports and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance reports.

**Finding**

We reviewed twenty-eight expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance reports.

**Finding**

We reviewed twenty-eight expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance reports.

- Agree the amount of the expenditure to the campaign account bank statement.

**Finding**

We reviewed twenty-eight expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

**Finding**

We reviewed twenty-eight expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

**Finding**

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

**Finding**

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

**Finding**

The Candidate did not report any debt on the Campaign Reports.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

**Finding**

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.