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COPY



SEP 10 2026
CLERK OF THE SUPERIOR COURT
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SUPERIOR COURT OF ARIZONA
MARICOPA COUNTY

8 RISA LOMBARDO, an individual, and
9 DUWAYNE COLLIER, an individual,

10 Plaintiffs,

11 v.

12 ARIZONA CITIZENS CLEAN
13 ELECTIONS COMMISSION,
14 a public entity; THE STATE OF
15 ARIZONA, a public entity, and THOMAS
16 COLLINS, in his official capacity,

17 Defendants.

No. CV 2026-037740

**VERIFIED COMPLAINT FOR
SPECIAL ACTION**

18 RISA LOMBARDO, and DUWAYNE COLLIER ("Plaintiffs"), by and through
19 attorneys undersigned, and for his Complaint for Special Action, state and allege as
20 follows:

PARTIES, JURISDICTION, AND VENUE

21 1. Plaintiff RISA LOMBARDO is a candidate for Governor of Arizona and is
22 the Green Party nominated candidate for that office.

23 2. Plaintiff DUWAYNE COLLIER is a candidate for Secretary of State of
24 Arizona and is the Green Party nominated candidate for that office.
25

1 3. Defendant ARIZONA CITIZENS CLEAN ELECTIONS COMMISSION
2 (“Commission”) is a governmental entity created by Arizona voters when they passed
3 Proposition 200 at the 1998 General Election. A.R.S. § 16-940 *et seq.* (“the Act”).

4 4. Defendant STATE OF ARIZONA is a governmental entity.

5 5. Defendant THOMAS COLLINS is an individual domiciled in Maricopa
6 County, Arizona and the Executive Director of the Arizona Citizens Clean Elections
7 Commission.

8 6. This Court has jurisdiction over this action pursuant to A.R.S. §§ 12-123,
9 12-1831 and 12-2021, the Arizona Constitution, Article VI, § 18, which empowers this
10 Court to enter, and persons to petition for, writs of mandamus and prohibition, and the
11 Arizona Rules of Procedure for Special Actions, which codify common law rights to seek
12 writs, including writs of mandamus and prohibition.

13 7. Defendants have caused events to occur in Cochise County, Arizona out of
14 which Plaintiffs’ claims arise.

15 8. Venue is proper in this Court under A.R.S. § 12-401.

16 **GENERAL ALLEGATIONS**

17 9. Both Lombardo and Collier elected, earlier in this election cycle, to
18 participate in the Arizona Citizens Clean Elections program (“Clean Elections”).
19 Candidates who elect to participate in Clean Elections are called “participating
20 candidates” under the Act.
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1 10. Clean Elections is purportedly a voluntary program wherein candidates can
2 receive funding for their campaigns through the Commission if they elect to forego other
3 funding sources. Participating candidates have very limited ability to raise "seed" money
4 from private individuals before they qualify for public funding but cannot raise money
5 once they qualify. A.R.S. § 16-945(A).
6

7 11. A participating candidate may not raise money from private sources unless
8 and until he withdraws from Clean Elections under Arizona Administrative Code R2-20-
9 108(a)("The candidate shall not accept any private monies until the withdrawal is
10 approved by the Commission.")
11

12 12. The Commission will not approve withdrawal of a candidate who has
13 received any funding from the Commission.

14 13. Under Clean Elections, participating candidates must secure a legally
15 prescribed number of \$5 contributions along with a form filled out by the elector, from
16 qualified electors of the relevant jurisdiction, in this instance, the entire state, and turn
17 both the money and the forms in to the Secretary of State under A.R.S. 16-950(B):
18

19 To receive any clean elections funding, the candidate must present to the
20 secretary of state no later than one week after the end of the qualifying
21 period a list of names of persons who have made qualifying contributions
22 pursuant to section 16-946 on behalf of the candidate. The list shall be
23 divided by county. At the same time, the candidate must tender to the
24 secretary of state the original reporting slips identified in section 16-946,
25 subsection C for persons on the list and an amount equal to the sum of the
qualifying contributions collected.

1 14. The Secretary of State coordinates the process for verifying that a sufficient
2 number of valid \$5 contributions and forms have been submitted. He does this by sending
3 the forms to the respective County Recorders for verification. A.R.S. § 16-950(C). In
4 turn, “[w]ithin ten days, the county recorders shall provide a report to the secretary of state
5 identifying as disqualified any slips that are unsigned or undated or that the recorder is
6 unable to verify as matching a person who is registered to vote in the electoral district of
7 the office the candidate is seeking on the date specified on the slip.”

9 15. Both Lombardo and Collier turned in the \$5 contribution forms and
10 contributions to the Secretary of State, in accordance with the Act’s requirements.

12 16. On May 18, 2026, Lombardo submitted a signed, sworn, and notarized
13 statement, as required for release of funds, stating:

14 I, Risa Lombardo, candidate for Governor submit this sworn, notarized
15 statement stating that under penalty of perjury: 1. All campaign finance
16 reports have been filed. 2. All campaign finance reports are complete and
17 accurate including all reporting requirements related to vendors and
18 subcontractors. 3. All conditions related to the use of consultants have been
19 met. I declare under penalty of perjury that the above statements are true and
20 accurate to the best of my knowledge.

21 (Exhibit A).

22 17. On May 19, 2026, the Arizona Secretary of State, after following the
23 process required by A.R.S. § 16-950 and sending all 4,300 \$5 contribution forms
24 submitted by Lombardo to the respective County Recorders for verification, indicated that
25

1 Lombardo had submitted sufficient \$5 contributions and forms to qualify for funding.
2 (Exhibit B).

3 18. A short time after, the Commission provided the funds that Lombardo was
4 legally entitled to.

5 19. On June 8, 2026, the Secretary of State, after following the process required
6 by A.R.S. § 16-950, sent Collier an email indicating that he had submitted sufficient \$5
7 contributions and forms to qualify for funding. (Exhibit C).

8 20. About that same time, Collier signed and had notarized the same form, and
9 submitted this to the Commission. The Commission proceeded to release Collier the
10 funds that his campaign was entitled to by law.

11 21. On August 25, 2026, over four months after certification of Lombardo, and
12 nearly four months after certification of Collier, Collins sent a lengthy letter to each of
13 the Plaintiffs. (Exhibits D and E respectively, included without attachments).

14 22. The letters relied heavily on a newspaper article citing six individuals who
15 claimed to not have made contributions to Lombardo or Collier even though the
16 signatures on those forms matched theirs. The letter to Lombardo stated:

17 Once my investigation is complete, I anticipate asking the Commission to
18 issue a repayment order and require you to either (1) repay \$2,853,320 based
19 on the incorrect certification of your qualification for clean elections funding
20 and what appear to be unlawfully acquired qualifying contributions, or (2)
21 repay \$1,017,889.27 and any additional funds paid to a third-party
22 consultant because of your failed reporting obligations. See A.R.S. § § 16-
23 948(A), (C); 16-947, 16-956(A)(7) . Please be advised: "Repayments may be
24 made only from the following sources: personal funds of the candidate, funds
25

1 in the candidate's current election campaign account, and any additional funds
2 raised subject to the limitations and prohibitions of the Act." AAC R2-20-
3 704(A)(4). I strongly encourage you to seek legal counsel for this
4 matter immediately and cease spending money from the Clean Elections
5 Fund.

6 (Exhibit D)(emphasis added).

7 23. The letter further stated that Collins would recommend that the Commission
8 issue a repayment order "[b]ecause the evidence suggests you did not receive sufficient
9 Qualifying Contributions..." (Exhibit D).

10 24. The letter to Collier stated:

11 Once my investigation is complete, I anticipate asking the Commission to issue a
12 repayment order and require you to repay \$739,358. See A.R.S. § § 16-948(A),
13 (C); 16-947, 16-956(A)(7). Please be advised: "Repayments may be made only
14 from the following sources: personal funds of the candidate, funds in the
15 candidate's current election campaign account, and any additional funds raised
16 subject to the limitations and prohibitions of the Act."

17 (Exhibit E).

18 25. The letters to both Lombardo and Collier indicated Collins' disapproval of
19 the candidacies of both, stating in both letters that "The Green Party ... leadership
20 expressly opposed your nomination" and referenced a statement calling the Plaintiffs both
21 "sham candidates."

22 26. On August 27, 2026, the Commission held a meeting. Collins had stated in
23 both candidates letters that: "I intend to ask the Commission to initiate proceedings to
24 impose a repayment order upon you. This will be on the agenda for the Commission's
25 virtual meeting on Thursday, August 27, 2026, at 10 a.m." (Exhibits D and E).

1 27. At the August 27, 2026, the Commission acceded to Collins' wishes and
2 directed Collins to conduct an investigation of Lombardo and Collier, and to report back
3 by no later than the Commission's October meeting. The October meeting was at the time
4 over two months away, and a mere five days before the General Election, on October 29,
5 2026.
6

7 **COUNT ONE: DECLARATORY AND MANDAMUS RELIEF: THE**
8 **PLAINTIFF IS ENTIELED TO A DECLARATION THAT THE**
9 **COMMISSION IS WITHOUT POWER TO "UNCERTIFY" A**
10 **CANDIDATE AND AN ORDER ENJOINING THE COMMISSION**
11 **FROM DOING OR ATTEMPTING TO DO THAT**

12 28. The previous allegations are incorporated by reference as if stated herein.

13 29. The Uniform Declaratory Judgments Act, A.R.S. § 12-1831 *et. seq.*, gives
14 Plaintiffs the right to seek declaratory relief from this Court.

15 30. A.R.S. § 12-2030 provides Plaintiff the right to seek mandamus relief
16 against the Defendants.
17

18 31. Rule 4(b) of Ariz. R. P. Spec. Act. states that a party may raise the issue of
19 whether the Defendant has "proceeded or threatened to proceed, without or in excess of,
20 jurisdiction or legal authority" via special action.

21 32. The Defendants here have acted and continue to act in excess of their
22 jurisdiction and legal authority.
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24
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1 33. Plaintiffs have no other remedy other than special action relief that is equally
2 plain, speedy and adequate.

3 34. The Commission has nothing to do with the process for certifying a
4 candidate's qualification for funding under the Act.

5 35. The Commission is without power to subsequently declare, months after the
6 Secretary of State's certification has been completed, that a candidate should not have
7 qualified for Clean Elections funding in the first instance and must repay their funds back
8 to the Commission.
9

10 36. Plaintiffs are entitled to declaratory and injunctive relief to this effect.
11

12 **COUNT TWO: DECLARATORY AND MANDAMUS RELIEF:**
13 **VIOLATION OF FREE SPEECH RIGHTS UNDER THE FIRST**
14 **AMENDMENT, UNITED STATES CONSTITUTION, AND ARTICLE II,**
15 **SECTION 6 OF THE ARIZONA CONSTITUTION**

16 37. The previous allegations are incorporated by reference as if stated herein.

17 38. Because campaign expenditures are treated as core political speech,
18 restrictions on political speech — whether candidate spending or independent spending
19 — are subject to strict scrutiny and must be justified by a compelling state interest and be
20 narrowly tailored to achieve that interest. *Arizona Free Enter. Club's Freedom Club PAC*
21 *v. Bennett*, 564 U.S. 721 (2011). Restrictions that burden spending for political speech,
22 whether candidate spending or independent spending, get strict scrutiny and usually fail.
23 *Wisconsin Right to Life State Pol. Action Comm. v. Barland*, 664 F.3d 139 (7th Cir. 2011).
24
25

39. The United States Supreme Court has more recently equated the ability to spend funds to advance political candidates in Nat'l Republican Senatorial Comm. v. Fed. Election Comm'n, 146 S. Ct. 2404, 225 L. Ed. 2d 998 (2026).

40. Defendants are trying to bully and intimidate Plaintiffs into effectively dropping their campaigns, campaigns the Commission disapproves of, by depriving them of Commission funding, or threatening to subject each to hundreds of thousands or even millions of dollars in repayment obligations.

41. At the same time, because of their participation in Clean Elections, the candidates cannot raise private funds.

42. The Defendants have violated, and continue to violate, Plaintiffs free speech rights, under the First Amendment, United States Constitution, and Article II, Section 6 of the Arizona Constitution, and Plaintiffs are entitled to a declaratory judgment to this effect and injunctive relief. Whatever the result of the investigation, the campaign will effectively be over by the time the “due date” for the investigation’s completion arrives on October 29, 2026.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs pray for a judgment against Defendant as follows:

A. For a declaration from this Court that:

1. The Defendants have no role in the candidate qualification process, as that process is administered by the Secretary of State and County Recordors.

1 2. The Defendants are without power to “uncertify” a candidate certified by
2 the Arizona Secretary of State.

3 3. The Defendants have violated the free speech rights of the Plaintiffs by
4 attempting to bully and intimidate the Plaintiffs into freezing their campaigns, and
5 all campaign spending, indefinitely, and until, at best, the conclusion of the
6 investigation, which is not due until five days before the election.

7
8 B. For preliminary and permanent mandamus and injunctive relief in the form
9 of an order from this Court;

10 1. Enjoining the Defendants from taking any steps to “decertify”
11 the Plaintiffs.

12 2. Enjoining the Defendants from continued violations of Plaintiffs’
13 free speech rights in the form of bullying and intimidation of the Plaintiffs’ into
14 silencing themselves and effectively suspending their campaigns.

15 C. For an award of taxable costs under A.R.S. § 12-341 and attorney’s fees
16 under A.R.S. §§ 12-348, 12-349, 12-2030, and any other applicable statute;

17 D. For any other such relief as this Court deems fair and just; and

18 E. For Findings of Fact and Conclusions of law.
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1 **RESPECTFULLY SUBMITTED** September 9, 2026.

2 TIMOTHY A. LA SOTA, PLC

3
4 By: /s/ Timothy A. La Sota
5 Timothy A. La Sota, SBN 020539
6 2198 East Camelback Road, Suite 305
7 Phoenix, Arizona 85016
8 Telephone: (602) 515-2649
9 Email: tim@timlasota.com
10 *Attorney for Plaintiffs*

Rule 80 Declaration

I declare under penalty of perjury of the laws of the State of Arizona that the foregoing Application for an Order to Show Cause and for Preliminary and Permanent Injunctive Relief is true and correct to the best of my knowledge and belief and that this Declaration is executed by me on the 9th day of September, 2026, in Maricopa County, Arizona.

Signed by:

Risa Lombardo

160F06F28D68401...

RISA LOMBARDO

EXHIBIT A

Dear Mr Becker:

I assume the sworn statement you are requiring is the one described in ARS 16-947 or in the Act Manual found on your website at

<https://storage.googleapis.com/usgovcloudapi.net/public/docs/747-ACTRulesManual-2022.pdf>.

I note that your version includes language related to campaign consultants that does not exist in the version found in either of those, but to the degree that our campaign has not yet employed any campaign consultants, that may not matter very much. So, the sworn statement below is as you required of us in your email.

Candidate Funding Statement

I, Risa Lombardo, candidate for Governor submit this sworn, notarized statement stating that under penalty of perjury:

- 1. All campaign finance reports have been filed.*
- 2. All campaign finance reports are complete and accurate including all reporting requirements related to vendors and subcontractors.*
- 3. All conditions related to the use of consultants have been met.*

I declare under penalty of perjury that the above statements are true and accurate to the best of my knowledge.



Risa Lombardo

State of Arizona

County of MARICOPA

Subscribed and sworn (or affirmed) before me this 18 day of MAY, 2026.

(seal)



Notary Public

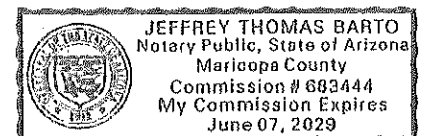


EXHIBIT B



Mike Becker <mike.becker@azcleaselections.gov>

Fw: Qualified for Funding - Risa Lombardo

1 message

Campaign Finance <campaignfinance@azsos.gov>

Tue, May 19, 2026 at 4:34 PM

To: Mike Becker <mike.becker@azcleaselections.gov>

Cc: Campaign Finance <campaignfinance@azsos.gov>, candidate <candidate@azsos.gov>, Adriana Guerra <aguerra@azsos.gov>

Hello Mike,

Please see below the notification sent to Risa Lombardo notifying her that she qualified for funding.

We have updated the tracker accordingly:  Tracker - QC Samplings Due Dates.xlsx

Please let me know if you need anything.

Thanks,

**Campaign Finance**Email: campaignfinance@azsos.govArizona Secretary of State | <https://azsos.gov>1700 W. Washington St., 7th Fl. | Phoenix, AZ 85007*This message and any messages in response to the sender of this message may be subject to a public records request.*

TP

We are not able to provide legal or financial advice specific to any situation. We will do our best to provide appropriate assistance, but if you have specific questions about how you should proceed, you may need to seek legal counsel.

From: Campaign Finance <campaignfinance@azsos.gov>**Sent:** Tuesday, May 19, 2026 4:32 PM**To:** lombardoforaz@gmail.com <lombardoforaz@gmail.com>**Cc:** Campaign Finance <campaignfinance@azsos.gov>; candidate <candidate@azsos.gov>**Subject:** Qualified for Funding - Risa Lombardo

Dear Ms. Lombardo,

The Secretary of State's Office received notification from the County Recorders' Office regarding the sample results for the Qualifying Contributions you submitted to qualify for funding under the Citizens Clean Elections Act.

The results met the threshold under A.R.S. § 16-950(D), which means you have met the statutory requirements to receive Clean Elections funding.

This message will serve as your official notification. Should you have further questions related to your participating status, please contact the Citizens Clean Elections Commission by email at ccec@azcleaselections.gov, or by phone at (602) 364-3477.

Thanks,



Campaign Finance

Email: campaignfinance@azsos.gov

Arizona Secretary of State | <https://azsos.gov>

1700 W. Washington St., 7th Fl. | Phoenix, AZ 85007

This message and any messages in response to the sender of this message may be subject to a public records request.

TP

We are not able to provide legal or financial advice specific to any situation. We will do our best to provide appropriate assistance, but if you have specific questions about how you should proceed, you may need to seek legal counsel.

EXHIBIT C

Fwd: Qualified for Funding - Duwayne Collier 📋 Summarize this email

DC

Duwayne Collier <duwayne87@gmail.com>

To: 📧 tim timlasota.com



Wed 9/9/2026 10:35 AM

----- Forwarded message -----

From: **Campaign Finance** <campaignfinance@azsos.gov>

Date: Mon, Jun 8, 2026, 11:02 AM

Subject: Qualified for Funding - Duwayne Collier

To: duwayne87@gmail.com <duwayne87@gmail.com>

Cc: candidate <candidate@azsos.gov>, Campaign Finance <campaignfinance@azsos.gov>

Dear Mr. Collier,

The Secretary of State's Office received notification from the County Records' Office regarding the sample results for the Qualifying Contributions you submitted to qualify for funding under the Citizens Clean Elections Act.

The results met the threshold under A.R.S. § 16-950(D), which means you have met the statutory requirements to receive Clean Elections funding.

This message will serve as your official notification. Should you have further questions related to your participating status, please contact the Citizens Clean Elections Commission by email at ccec@azcanelections.gov, or by phone at (602) 364-3477.

Thanks,



Campaign Finance

Email: campaignfinance@azsos.gov

Arizona Secretary of State | <https://azsos.gov>

1700 W. Washington St., 7th Fl. | Phoenix, AZ 85007

This message and any messages in response to the sender of this message may be subject to a public records request.

MRB

We are not able to provide legal or financial advice specific to any situation. We will do our best to provide appropriate assistance, but if you have specific questions about how you should proceed, you may need to seek legal counsel.

EXHIBIT D

Thomas M. Collins
Executive Director



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

Via E-Mail

August 25, 2026

Risa Lombardo
19203 N. 29th Ave. #314
Phoenix, Arizona 85027
E-Mail: lombardoforaz@gmail.com

Notice of Investigation Re: Recommendation for Repayment Order

Dear Ms. Lombardo:

I am writing you, in your capacity as participating candidate and treasurer of your campaign committee, to advise you that I am recommending the Commission order you to repay monies to the Clean Election Fund pursuant to A.R.S. § 16-956(A)(7), A.A.C. R2-20-222(A) and R2-20-704(B)(1).

I have been investigating the issue outlined herein for months. While there are some remaining matters that require further attention, my investigation is near an end, and I am compelled to alert you and the Commission of my findings thus far. Thus, I plan to bring these issues before the Commission at its virtual meeting at 10 a.m. Thursday August 27, 2026. I do not anticipate asking the Commission to take action at this meeting, but it may decide to do so based on my findings.

Once my investigation is complete, I anticipate asking the Commission to issue a repayment order and require you to either (1) repay \$2,853,320 based on the incorrect certification of your qualification for clean elections funding and what appear to be unlawfully acquired qualifying contributions, or (2) repay \$1,017,889.27 and any additional funds paid to a third-party consultant because of your failed reporting obligations. See A.R.S. § § 16-948(A), (C); 16-947, 16-956(A)(7) . Please be advised: "Repayments may be made only from the following sources: personal funds of the candidate, funds in the candidate's current election campaign account, and any additional funds raised subject to the limitations and prohibitions of the Act." AAC R2-20-704(A)(4).

I strongly encourage you to seek legal counsel for this matter immediately and cease spending money from the Clean Elections Fund, and contact any vendors you have and advise them to stop providing services utilizing clean elections funding.

For the reasons explained below, you face a potential repayment obligation of \$2,853,320. What follows is the analysis supporting my position and recommendation to the Commission.

1. I have identified suspicious activity in the procurement of qualifying contributions

The Commission is obligated to “enforce” the Clean Elections Act. A.R.S. § 16-956(A)(7). To that end, the Commission must and “ensure that money from the fund is placed in candidate campaign accounts or otherwise spent as specified in this article and not otherwise, monitor reports filed pursuant to this chapter and financial records of candidates as needed and ensure that money required by this article to be paid to the fund is deposited in the fund” A.R.S. § 16-956(A)(7). Thus, “[i]f the Commission determines that any portion of the payments made to the candidate was in excess of the aggregate payments to which such candidate was entitled, it will so notify the candidate, and such candidate shall pay to the Fund an amount equal to such portion.” A.A.C. R2-20-704(B). The Commission’s procedure for determining whether a repayment order is prudent are straight forward:

The Commission will send a repayment determination pursuant to Article 2, Compliance and Enforcement Procedures, and will set forth the legal and factual reasons for such determination, as well as the evidence upon which any such determination is based. The candidate shall repay, in accordance with sub section (D), the amount that the Commission has determined to be repayable

A.A.C. R2-20-704(C).

A staff analysis of your \$5 qualifying contributions shows that a substantial number of them were the first and only donations of the people who provided them and they were provided by the same people as two other candidates, Duwayne Collier and Scott Neely. Exhibit 2. Based on my experience as Executive Director, this represents a suspicious pattern of donations.

The Green Party is one of smallest political parties in Arizona and it’s leadership expressly opposed your nomination. *See Arizona Green Party Warns of ‘Sham’ Candidates Running Under Party Moniker*, Green Party of the United States (Apr. 15, 2026), https://www.gp.org/arizona_green_party_warns_of_sham_candidates. As a result, you enjoyed no party network support crucial to obtaining multiple QCs from the same set of voters. A sample of the donors listed on your campaign finance reports have never given another donation to any candidate other than you and a combination including Collier and Neely. Additionally, our analysis using data from seethemoney.az.gov, shows 64 people gave duplicate QCs to one of the three candidates, Collier, Neely, or you, while also giving to all 3. Exhibit 3. All of this, alone, is highly suspicious. However, this is not all that raises red flags with your campaign.

Your First Quarter Campaign Finance reports stated that you had not received any early or seed money contributions, A.R.S. § 16-945, nor made any expenditures even as your campaign accumulated qualifying contributions:

Summary of Activity

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	\$0.00	\$0.00	\$0.00	\$0.00
Individual Contributions	C2	\$0.00	\$0.00	\$0.00	\$0.00
Contributions from Political Committees	C3a,b,c	\$0.00	\$0.00	\$0.00	\$0.00
Business Contributions	C4a,b,c	\$0.00	\$0.00	\$0.00	\$0.00
Small Contributions	C5	\$0.00	\$0.00	\$0.00	\$0.00
CCEC Funding and Matching	C6	\$0.00	\$0.00	\$0.00	\$0.00
Qualifying Contributions	O7	\$13,485.00	\$0.00	\$13,485.00	\$21,485.00
Loans Made to this Committee	L1	\$0.00	\$0.00	\$0.00	\$0.00
Other Receipts, Including Interest and Dividends	R1	\$0.00	\$0.00	\$0.00	\$0.00
Transfers from Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Cash Surplus from Previous Committee	S1	\$0.00	\$0.00	\$0.00	\$0.00
Total Income		\$13,485.00	\$0.00	\$13,485.00	\$21,485.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$0.00	\$0.00	\$0.00	\$0.00
Independent & Ballot Measure Expenditures	E2a,b,c	\$0.00	\$0.00	\$0.00	\$0.00
Contributions to Committees/Businesses	E3a-E3f	\$0.00	\$0.00	\$0.00	\$0.00
Small Expenses	E4	\$0.00	\$0.00	\$0.00	\$0.00
Transfers to Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made by This Committee	L2	\$0.00	\$0.00	\$0.00	\$0.00
Disposal of Surplus Cash	S1	\$0.00	\$0.00	\$0.00	\$0.00
Total Expenditures		\$0.00	\$0.00	\$0.00	\$0.00
Bill Payments for Previous Expenditures	D1	\$0.00	\$0.00	\$0.00	\$0.00
Total Cash Disbursed		\$0.00			

At my request, you provided bank statements reflecting that you had a nominal balance at a time you should have had thousands in qualifying contributions:

LOMBARDO FOR AZ

Account summary

Beginning balance on March 1, 2026	\$72.70	# of deposits/credits: 1
Deposits and other credits	5.00	# of withdrawals/debits: 0
Withdrawals and other debits	-0.00	# of items-previous cycle ¹ : 0
Checks	-0.00	# of days in cycle: 31
Service fees	-0.00	Average ledger balance: \$75.28
Ending balance on March 31, 2026	\$77.70	¹ Includes checks paid, deposited items and other debits.

LOMBARDO FOR AZ

Account summary

Beginning balance on April 1, 2026	\$77.70	# of deposits/credits: 0
Deposits and other credits	0.00	# of withdrawals/debits: 1
Withdrawals and other debits	-0.00	# of items-previous cycle ¹ : 0
Checks	-0.00	# of days in cycle: 30
Service fees	-16.00	Average ledger balance: \$61.70
Ending balance on April 30, 2026	\$61.70	¹ Includes checks paid, deposited items and other debits.

But, the Qualifying Contribution Slips you signed state:

I, the undersigned, upon my oath and under penalty of perjury, certify that I received a \$5.00 contribution from the above contributor, who is to the best of my information and knowledge, a qualified elector of this state. Yo, el suscrito, bajo juramento y bajo pena de perjurio, certifico que recibí una contribución de \$5.00 del donante de arriba, quien es, a mi total saber y entender, un elector calificado de este estado.

These \$5 contributions you attested to having received *did not make it to your account during the period leading up to your application for funding.* See A.R.S. §16-948(A) (“A participating candidate shall conduct all financial activity through a single campaign account of the candidate’s campaign committee. A participating candidate shall not make any deposits into the campaign account other than those permitted under section 16-945 or 16-946.”).

Then, we recently obtained bank statements as part of our audit process. Your May, 2026, bank statements reflect a lump sum in-person deposit of \$21,485 at Bank of America the day you filed your application for funding. See Exhibit 4. This corresponds with your \$5 contribution amount. Related \$5 contribution forms reflect that they were signed over the course of months, but the cash never made it to your account before the lump sum deposit. By comparison, the Stripe transfer on the May, 2026, bank statement highlights the suspicious nature of the \$21,485 lump sum deposit, because a candidate using Stripe would have had a series of deposits as \$5 dollar qualifying donations came in, or a larger transfer from Stripe itself. You had neither. Presumably, if you had been collecting \$5 from individuals over the course of the qualifying period, there is no reason for those donations to arrive in the form of a single in person bank counter deposit. All of this activity is highly unusual and constitutes strong evidence that you, in fact, did not collect \$5 from each person who apparently signed a qualifying contribution form for your candidacy. And, in turn, this gives rise to an inference the source of the money was the deposit on May 4, not actual individual donors. See A.R.S. 16-948(A).

And on top of all this, just today, in an article titled “‘With 1,000% certainty’: Voters say candidates faked their donations to get public campaign cash”, the *Arizona Mirror* made blistering assertions that, frankly, corroborate my investigation thus far. See *Arizona Mirror*, Caitlin Sievers, ‘With 1,000% certainty’: Voters say candidates faked their donations to get public campaign cash (last accessed Aug. 26, 2026) (“‘I can tell you right now, with 1,000% certainty, that I did not make a single contribution, let alone three of them,’ Christopher Scott of Peoria told the Mirror when asked about forms filed by the candidates showing he had donated \$5 to each in order to help them qualify for Arizona’s public campaign finance program.”).

All of these facts together, which as you can see are largely substantiated, represent a level of suspicious activity well beyond what I have witnessed in 16 years as the Commission’s executive director.

2. You have failed in your reporting obligations

The Commission may order repayment if “Expenditures ... were not documented in accordance with campaign finance reporting requirements, expended in violation of state or federal law, or used to defray expenses resulting from a violation of state or federal law, such as the payment of fines or penalties.” A.A.C. R2-20-704(B)(3).

The burden is on you to show that expenses are for direct campaign purposes. R2-20-703(A)(1)(“All participating candidates shall have the burden of proving that expenditures made

by the candidate were for direct campaign purposes.”). Evidence shows that you have failed to properly identify sub-vendors on your reports. *See* A.R.S. § 16-948(C)(The candidate . . . shall pay monies from a participating candidate’s campaign account directly to the person providing goods or services to the campaign and shall identify, on a report filed pursuant to article 1.4 of this chapter, the full name and street address of the person and the nature of the goods and services and compensation for which payment has been made.”); *see also* A.A.C. R2-20-110(C)(3)(“In the event that a participating candidate purchases goods or services from a subcontractor or other vendor through an . . . the candidate’s campaign finance report shall include the same detail as required in A.R.S. § 16-948(C) for each such subcontractor or other vendor. Such detail is also required when petty cash funds are used for such expenditures.”).

Specifically, according to your Qualifying Period Recap report, you paid Bootstrap Campaigns \$1,017,869.27 since you were funded:

Schedule E1 - Operating expenses		Date	Amount	Cycle To Date
Name:	Bootstrap Campaigns	06/04/2026	\$202,425.00	\$1,017,869.27
Address:	732 S 6th St, #6869, Las Vegas, NV 89101		Cash	
Category:	Professional Services - Consultants			
Memo:	Campaign management, data purchase, sign printing and installation, canvassing, website build, text blast			
Name:	Bootstrap Campaigns	08/08/2026	\$12,000.00	\$1,017,869.27
Address:	732 S 6th St, #6869, Las Vegas, NV 89101		Cash	
Category:	Professional Services - Consultants			
Memo:	Campaign management			
Name:	Lombardo, Risa	06/09/2026	\$472.52	\$1,802.52
Address:	19203 N 29th Ave, Lot 314, Phoenix, AZ 85027		Cash	
Occupation:	retired, none			
Category:	Travel - Mileage			
Name:	Bootstrap Campaigns	06/10/2026	\$226,677.68	\$1,017,869.27
Address:	732 S 6th St, #6869, Las Vegas, NV 89101		Cash	
Category:	Professional Services - Consultants			
Memo:	Canvassing, video production, radio production, mailer, social media management			
Name:	Hunt On Consulting	06/10/2026	\$16,000.00	\$48,000.00
Address:	30 N Gould St, Suite 48168, Sheridan, WY 82801		Cash	
Category:	Professional Services - Consultants			
Memo:	Consulting, fieldwork, event support and voter engagement, logistics, photography and communications			
Name:	Bootstrap Campaigns	06/15/2026	\$287,322.29	\$1,017,869.27
Address:	732 S 6th St, #6869, Las Vegas, NV 89101		Cash	
Category:	Professional Services - Consultants			
Memo:	Mailier, texting, digital advertising			
Name:	Hunt On Consulting	06/17/2026	\$16,000.00	\$48,000.00
Address:	30 N Gould St, Suite 48168, Sheridan, WY 82801		Cash	
Category:	Professional Services - Consultants			
Memo:	Consulting, fieldwork, event support and voter engagement, logistics, photography and communications			
Name:	Bootstrap Campaigns	06/22/2026	\$35,615.10	\$1,017,869.27
Address:	732 S 6th St, #6869, Las Vegas, NV 89101		Cash	
Category:	Professional Services - Consultants			
Memo:	Text blast			
Name:	Gigs AZ, LLC	06/22/2026	\$50,000.00	\$50,000.00
Address:	3016 W Sun Ranch Trl, Tucson, AZ 85742		Cash	
Category:	Communications - Radio			
Name:	Bootstrap Campaigns	06/24/2026	\$97,965.74	\$1,017,869.27
Address:	732 S 6th St, #6869, Las Vegas, NV 89101		Cash	
Category:	Professional Services - Consultants			
Memo:	Signs, palm cards, flyers, mailers, digital management and photography			

Filed as 07/06/2026

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See also <https://seethemoney.az.gov/PublicReports/2026/51715568-B089-468A-B9C9-66FBAD833F50.pdf>. That company was formed in Las Vegas May 2026, just weeks before you paid them the first installment of \$202,425:

Entity Information Entity Name: BOOTSTRAP CHRYSLER INC Entity Type: Domestic Corporation (S) Formation Date: 05/12/2011 Incorporation State: Compliance Hold:		Entity Number: 0015019/0004 Entity Status: Active NY Business ID: NY0000000000 Annual Report Due Date: 03/12/2012	
Registered Agent Information Name of Individual or Legal Entity: CIT CORPORATION SYSTEM CRA Agent Entity Type: NY Business ID: NY0000000000 Jurisdiction: DELAWARE Agent Address: 701 S CARSON ST STE 200, Carson City, NV 89701, USA Mailing Address:		Subject: ACTION Registered Agent Type: Commercial Registered Agent Office or P.O. Box:	

Most campaign shops subcontract a significant amount of work, and a new, out-of-state company would naturally use sub-vendors, especially local companies, whose work would require documentation. And so it is with Bootstrap. For example, you attribute mailers to Bootstrap when records filed with our office show O'Neill Printing in Phoenix did those jobs:

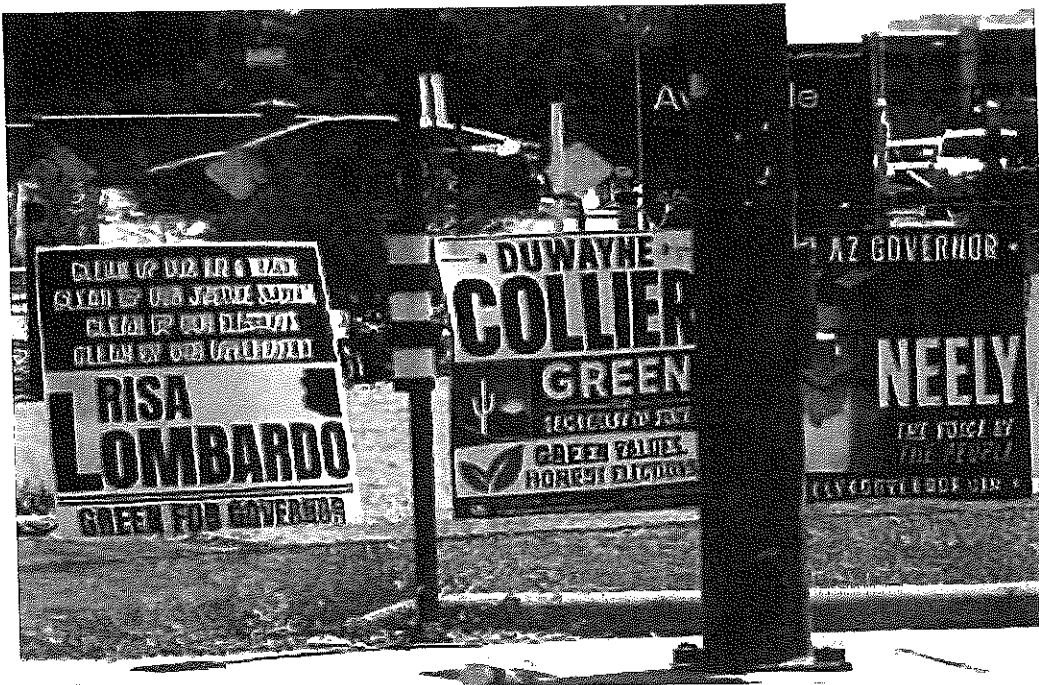
United States Postal Service

Postage Statement—USPS Marketing Mail

Post Office: Mesa Mail Arrival
Date & Time (Do Not Round Stamp)

Mailer Permit Holder Name, Address, Email, Telephone O'Neill Printing 4303 E Cotton Center Blvd #100 Phoenix AZ 85040	Mailing Agent (if other than permit holder) Name, Address, Telephone O'Neill Printing 4303 E Cotton Center Blvd #100 Phoenix AZ 85040		Mail Owner (if other than permit holder) Name, Address Lombardo for Governor PO BOX 6014 Tucson AZ 85703			
	EPS Cust. Ref. No. PO#18724 CRID N/A Post Office of Mailing PHOENIX AZ 85026-9672 Mailer's Mailing Date 06/16/2016		Federal Agency Code N/A Statement Seq. No. N/A CRID 3937751 CRID 58393394			
Mailing Type of Postage ☒ Permit Imprint ☐ Precanceled Stamps ☐ Metered Processing Category ☒ Letters ☐ CMM ☐ Flat ☐ Catalogs ☐ Marketing Parcels For Mail Enclosed Within Another Class ☐ Bound Printed Matter ☐ Library Mail ☐ Periodicals ☐ Media Mail Move Update Method ☐ Ancillary Service ☐ Endorsement ☒ MICR-4 ☐ ACS Alternative Method ☐ Multiple ☐ OneCode ACS ☐ via Alternative Address Format Combined Mailing/Discoun/Winevent ☐ First Class ☒ OCR Post Discount ☐ Single Class ☐ Delivery Sort Container ☐ Metered Mail ☐ Catalogs	Total # of Pieces in Mailing 70,246 Total Weight 1,601.1660 Weight of a Single Piece 0.0210 pounds		55F Transaction# 43 Permit # 43 Letter-size or flat mailpiece contains DVD/CD or other disk. ☐ Yes ☒ No Political Campaign Mailing ☐ Yes ☒ No Election Mail - Official Ballots ☐ Yes ☒ No Election Mail - Non-Ballot Material ☐ Yes ☒ No			
	For Carrier Route Piece, Enter Date of Address Matching and Copying N/A For Carrier Route Piece, Enter Date of Address Matching and Copying N/A For Pieces Having a Computer Address, Enter Date of Delivery Database File or Alternative Method N/A		No. & Type of Containers 4 - Pallets 118 - EMM Troys			
	Parts Completed (Select all that apply): ☒ A ☒ B ☐ C ☐ D ☐ E ☐ F ☐ G ☐ H ☐ I ☐ J ☐ K ☐ L ☐ M ☐ N ☐ O ☐ P ☐ Q ☐ R ☐ S ☐ T ☐ U ☐ V ☐ W ☐ X ☐ Y ☐ Z ☐ AA ☐ AB ☐ AC ☐ AD ☐ AE ☐ AF ☐ AG ☐ AH ☐ AI ☐ AJ ☐ AK ☐ AL ☐ AM ☐ AN ☐ AO ☐ AP ☐ AQ ☐ AR ☐ AS ☐ AT ☐ AU ☐ AV ☐ AW ☐ AX ☐ AY ☐ AZ ☐ BA ☐ BB ☐ BC ☐ BD ☐ BE ☐ BF ☐ BG ☐ BH ☐ BI ☐ BJ ☐ BK ☐ BL ☐ BM ☐ BN ☐ BO ☐ BP ☐ BQ ☐ BR ☐ BS ☐ BT ☐ BU ☐ BV ☐ BW ☐ BX ☐ BY ☐ BZ ☐ CA ☐ CB ☐ CC ☐ CD ☐ CE ☐ CF ☐ CG ☐ CH ☐ CI ☐ CJ ☐ CK ☐ CL ☐ CM ☐ CN ☐ CO ☐ CP ☐ CQ ☐ CR ☐ CS ☐ CT ☐ CU ☐ CV ☐ CW ☐ CX ☐ CY ☐ CZ ☐ DA ☐ DB ☐ DC ☐ DD ☐ DE ☐ DF ☐ DG ☐ DH ☐ DI ☐ DJ ☐ DK ☐ DL ☐ DM ☐ DN ☐ DO ☐ DP ☐ DQ ☐ DR ☐ DS ☐ DT ☐ DU ☐ DV ☐ DW ☐ DX ☐ DY ☐ DZ ☐ EA ☐ EB ☐ EC ☐ ED ☐ EE ☐ EF ☐ EG ☐ EH ☐ EI ☐ EJ ☐ EK ☐ EL ☐ EM ☐ EN ☐ EO ☐ EP ☐ EQ ☐ ER ☐ ES ☐ ET ☐ EU ☐ EV ☐ EW ☐ EX ☐ EY ☐ EZ ☐ FA ☐ FB ☐ FC ☐ FD ☐ FE ☐ FF ☐ FG ☐ FH ☐ FI ☐ FJ ☐ FK ☐ FL ☐ FM ☐ FN ☐ FO ☐ FP ☐ FQ ☐ FR ☐ FS ☐ FT ☐ FU ☐ FV ☐ FW ☐ FX ☐ FY ☐ FZ ☐ GA ☐ GB ☐ GC ☐ GD ☐ GE ☐ GF ☐ GG ☐ GH ☐ GI ☐ GJ ☐ GK ☐ GL ☐ GM ☐ GN ☐ GO ☐ GP ☐ GQ ☐ GR ☐ GS ☐ GT ☐ GU ☐ GV ☐ GW ☐ GX ☐ GY ☐ GZ ☐ HA ☐ HB ☐ HC ☐ HD ☐ HE ☐ HF ☐ HG ☐ HH ☐ HI ☐ HJ ☐ HK ☐ HL ☐ HM ☐ HN ☐ HO ☐ HP ☐ HQ ☐ HR ☐ HS ☐ HT ☐ HU ☐ HV ☐ HW ☐ HX ☐ HY ☐ HZ ☐ IA ☐ IB ☐ IC ☐ ID ☐ IE ☐ IF ☐ IG ☐ IH ☐ II ☐ IJ ☐ IK ☐ IL ☐ IM ☐ IN ☐ IO ☐ IP ☐ IQ ☐ IR ☐ IS ☐ IT ☐ IU ☐ IV ☐ IW ☐ IX ☐ IY ☐ IZ ☐ JA ☐ JB ☐ JC ☐ JD ☐ JE ☐ JF ☐ JG ☐ JH ☐ JI ☐ JJ ☐ JK ☐ JL ☐ JM ☐ JN ☐ JO ☐ JP ☐ JQ ☐ JR ☐ JS ☐ JT ☐ JU ☐ JV ☐ JW ☐ JX ☐ JY ☐ JZ ☐ KA ☐ KB ☐ KC ☐ KD ☐ KE ☐ KF ☐ KG ☐ KH ☐ KI ☐ KJ ☐ KK ☐ KL ☐ KM ☐ KN ☐ KO ☐ KP ☐ KQ ☐ KR ☐ KS ☐ KT ☐ KU ☐ KV ☐ KW ☐ KX ☐ KY ☐ KZ ☐ LA ☐ LB ☐ LC ☐ LD ☐ LE ☐ LF ☐ LG ☐ LH ☐ LI ☐ LJ ☐ LK ☐ LL ☐ LM ☐ LN ☐ LO ☐ LP ☐ LQ ☐ LR ☐ LS ☐ LT ☐ LU ☐ LV ☐ LW ☐ LX ☐ LY ☐ LZ ☐ MA ☐ MB ☐ MC ☐ MD ☐ ME ☐ MF ☐ MG ☐ MH ☐ MI ☐ MJ ☐ MK ☐ ML ☐ MN ☐ MO ☐ MP ☐ MQ ☐ MR ☐ MS ☐ MT ☐ MU ☐ MV ☐ MW ☐ MX ☐ MY ☐ MZ ☐ NA ☐ NB ☐ NC ☐ ND ☐ NE ☐ NF ☐ NG ☐ NH ☐ NI ☐ NJ ☐ NK ☐ NL ☐ NM ☐ NO ☐ NP ☐ NQ ☐ NR ☐ NS ☐ NT ☐ NU ☐ NV ☐ NW ☐ NX ☐ NY ☐ NZ ☐ OA ☐ OB ☐ OC ☐ OD ☐ OE ☐ OF ☐ OG ☐ OH ☐ OI ☐ OJ ☐ OK ☐ OL ☐ OM ☐ ON ☐ OO ☐ OP ☐ OQ ☐ OR ☐ OS ☐ OT ☐ OU ☐ OV ☐ OW ☐ OX ☐ OY ☐ OZ ☐ PA ☐ PB ☐ PC ☐ PD ☐ PE ☐ PF ☐ PG ☐ PH ☐ PI ☐ PJ ☐ PK ☐ PL ☐ PM ☐ PN ☐ PO ☐ PP ☐ PQ ☐ PR ☐ PS ☐ PT ☐ PU ☐ PV ☐ PW ☐ PX ☐ PY ☐ PZ ☐ QA ☐ QB ☐ QC ☐ QD ☐ QE ☐ QF ☐ QG ☐ QH ☐ QI ☐ QJ ☐ QK ☐ QL ☐ QM ☐ QN ☐ QO ☐ QP ☐ QQ ☐ QR ☐ QS ☐ QT ☐ QU ☐ QV ☐ QW ☐ QX ☐ QY ☐ QZ ☐ RA ☐ RB ☐ RC ☐ RD ☐ RE ☐ RF ☐ RG ☐ RH ☐ RI ☐ RJ ☐ RK ☐ RL ☐ RM ☐ RN ☐ RO ☐ RP ☐ RQ ☐ RR ☐ RS ☐ RT ☐ RU ☐ RV ☐ RW ☐ RX ☐ RY ☐ RZ ☐ SA ☐ SB ☐ SC ☐ SD ☐ SE ☐ SF ☐ SG ☐ SH ☐ SI ☐ SJ ☐ SK ☐ SL ☐ SM ☐ SN ☐ SO ☐ SP ☐ SQ ☐ SR ☐ SS ☐ ST ☐ SU ☐ SV ☐ SW ☐ SX ☐ SY ☐ SZ ☐ TA ☐ TB ☐ TC ☐ TD ☐ TE ☐ TF ☐ TG ☐ TH ☐ TI ☐ TJ ☐ TK ☐ TL ☐ TM ☐ TN ☐ TO ☐ TP ☐ TQ ☐ TR ☐ TS ☐ TU ☐ TV ☐ TW ☐ TX ☐ TY ☐ TZ ☐ UA ☐ UB ☐ UC ☐ UD ☐ UE ☐ UF ☐ UG ☐ UH ☐ UI ☐ UJ ☐ UK ☐ UL ☐ UM ☐ UN ☐ UO ☐ UP ☐ UQ ☐ UR ☐ US ☐ UT ☐ UU ☐ UV ☐ UW ☐ UX ☐ UY ☐ UZ ☐ VA ☐ VB ☐ VC ☐ VD ☐ VE ☐ VF ☐ VG ☐ VH ☐ VI ☐ VJ ☐ VK ☐ VL ☐ VM ☐ VN ☐ VO ☐ VP ☐ VQ ☐ VR ☐ VS ☐ VT ☐ VU ☐ VV ☐ VW ☐ VX ☐ VY ☐ VZ ☐ WA ☐ WB ☐ WC ☐ WD ☐ WE ☐ WF ☐ WG ☐ WH ☐ WI ☐ WJ ☐ WK ☐ WL ☐ WM ☐ WN ☐ WO ☐ WP ☐ WQ ☐ WR ☐ WS ☐ WT ☐ WU ☐ WV ☐ WW ☐ WX ☐ WY ☐ WZ ☐ XA ☐ XB ☐ XC ☐ XD ☐ XE ☐ XF ☐ XG ☐ XH ☐ XI ☐ XJ ☐ XK ☐ XL ☐ XM ☐ XN ☐ XO ☐ XP ☐ XQ ☐ XR ☐ XS ☐ XT ☐ XU ☐ XV ☐ XW ☐ XX ☐ XY ☐ XZ ☐ YA ☐ YB ☐ YC ☐ YD ☐ YE ☐ YF ☐ YG ☐ YH ☐ YI ☐ YJ ☐ YK ☐ YL ☐ YM ☐ YN ☐ YO ☐ YP ☐ YQ ☐ YR ☐ YS ☐ YT ☐ YU ☐ YV ☐ YW ☐ YX ☐ YY ☐ YZ ☐ ZA ☐ ZB ☐ ZC ☐ ZD ☐ ZE ☐ ZF ☐ ZG ☐ ZH ☐ ZI ☐ ZJ ☐ ZK ☐ ZL ☐ ZM ☐ ZN ☐ ZO ☐ ZP ☐ ZQ ☐ ZR ☐ ZS ☐ ZT ☐ ZU ☐ ZV ☐ ZW ☐ ZX ☐ ZY ☐ ZZ				Subtotal Postage (Add parts totals) \$27,536.07	
	Postage 1 Price at Which Postage Affixed (Check one): ☐ Correct ☐ Lowball ☐ Neither Complete if mailing includes pieces bearing metered/PC Postage or precanceled stamps. 0 per x 3 s - Postage Affixed	Incentive/Discount Flat Dollar Amount		Net Postage Due (Line 1 +/- Lines 2, 3, 4) \$27,536.07		
Permit #		Additional Postage Payment (State reason)				

Additionally, you ascribe sign printing and installation to Bootstrap. But evidence shows those signs were more likely than not printed and installed by Uncle Sam petitions. Indeed, your signs were seen placed at the same location as Collier's and Neely's:



Collier also reported that Bootstrap was responsible for his sign installation. But Collier's signs requested people contact Uncle Sam Petitions regarding his signs. Neely's signs urged people to contact Uncle Sam Petitions, but he identified that vendor on his reports:

102163 Duwayne Collier for Secretary of State
Jurisdiction: Arizona Secretary of State

Qualifying Period Recap Report
Covers 08/01/2025 to 07/14/2026

Schedule E1 - Operating expenses

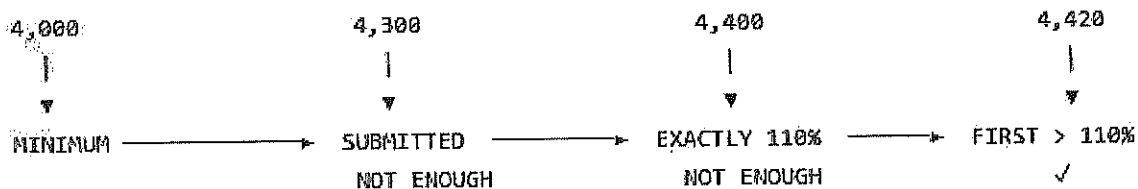
	Date	Amount	Cycle To Date
Name: Bootstrap Campaigns	06/15/2026	\$187,400.00	\$253,113.60
Address: 732 S 8th St, #6069, Las Vegas, NV 89101		Cash	
Category: Professional Services - Consultants			
Memo: Campaign management, data purchase, sign printing and installation, canvassing, website build, text blast			

This is strong circumstantial evidence that your campaign employed the same sign production and installer, which was not disclosed on campaign finance reports as required by law. Without the sub-vendor reports, your campaign finance reports fail to properly carry your burden regarding repayment. A.A.C. R2-20-704(B)(2) ("If the Commission determines that any amount of any payment to an eligible candidate from the Fund was used for purposes other than direct campaign purposes described in R2-20-702, it will notify the candidate of the amount so used, and such candidate shall pay to the Fund an amount equal to such amount."). Thus, it is reasonable to surmise that, contrary to the Clean Elections Act and rules, you have issued lump sum payments to a single vendor without permitting the public or commission staff to have access to the amount each sub-vendor received and the value paid.

3. Evidence demonstrates that you should not have been certified for funding.

On Tuesday May 19, 2026, the Secretary of State's office informed you that it has "received notification from the County Recorders' Office regarding the sample results for the Qualifying Contributions you submitted to qualify for funding under the Citizens Clean Elections Act." **Exhibit 1.** Your campaign submitted a check for \$21,500.00, which amounts to 4,300 qualifying contributions. *See id.*

Under A.R.S. § 16-950(C), when calculating the qualification for funding based on a sample, “[t]he secretary of state shall multiply the number of slips not disqualified by twenty for statewide candidates, ... and if the result is greater than one hundred ten per cent of the quantity required, shall approve the candidate for funds.” Candidates for Governor must therefore provide more than the minimum 4,000 QCs to qualify the sample. To meet the 110 percent projection, a candidate must submit at least 4,400 QCs. Consequently, the certification appears to have been in error:



Under R2-20-704(B)(1), “[i]f the Commission determines that any portion of the payments made to the candidate was in excess of the aggregate payments to which such candidate was entitled, it will so notify the candidate, and such candidate *shall* pay to the Fund an amount equal to such portion.” (Emphasis added).

In the end, this is all evidence that you should not have qualified for primary funding, and thus, you would not have been eligible for general funding based merely on your successful nomination. Because the evidence suggests you did not receive sufficient Qualifying Contributions, I will ask the Commission to consider repayment.

4. I will ask the Commission to initiate proceedings and seek a repayment order

I intend to ask the Commission to initiate proceedings to impose a repayment order upon you. This will be on the agenda for the Commission’s virtual meeting on Thursday, August 27, 2026, at 10 a.m.

At the conclusion of those proceedings, I will request the Commission order you to repay \$2,853,320 based on the incorrect certification of your qualification for clean elections funding and what appear to be unlawfully acquired qualifying contributions. I will alternatively request the Commission order you to repay \$1,017,889.27 and any additional funds paid to Bootstrap because of your failed reporting obligations.

5. Please preserve all relevant evidence and information

“The commission may subpoena witnesses, compel their attendance and testimony, administer oaths and affirmations, take evidence and require by subpoena the production of any books, papers, records or other items material to the performance of the commission’s duties or the exercise of its powers.” A.R.S. § 16-965(B). You or others may be subpoenaed or compelled to appear and provide testimony. Accordingly, I request that you preserve and not destroy all evidence or information relevant to the issues raised in this correspondence or your efforts to qualify for clean elections funding.

Should you retain legal counsel who desires to discuss these issues, please direct them to me, with a copy to my legal counsel in this matter, Craig A. Morgan, who can be reached at cmorgan@taftlaw.com.

Sincerely

Tom Collins

Executive Director

EXHIBIT E



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

Via E-Mail

August 25, 2026

Duwayne Collier, Candidate
Veronica Renee Sandoval, Treasurer
215 S Stardust Lane
Apache Junction AZ 85120
E-Mail: duwayne87@gmail.com
vrsndvl208@aol.com

Notice of Investigation Re: Recommendation for Repayment Order

Dear Mr. Collier & Ms. Sandoval:

I am writing you, in your capacity as participating candidate and treasurer of your campaign committee, to advise you that I am recommending the Commission order you to repay monies to the Clean Election Fund pursuant to A.R.S. § 16-956(A)(7), A.A.C. R2-20-222(A) and R2-20-704(B)(1).

I have been investigating the issue outlined herein for months. While there are some remaining matters that require further attention, my investigation is near an end, and I am compelled to alert you and the Commission of my findings thus far. Thus, I plan to bring these issues before the Commission at its virtual meeting at 10 a.m. Thursday August 27, 2026. I do not anticipate asking the Commission to take action at this meeting, but it may decide to do so based on my findings.

Once my investigation is complete, I anticipate asking the Commission to issue a repayment order and require you to repay \$739,358. See A.R.S. § § 16-948(A), (C); 16-947, 16-956(A)(7). Please be advised: "Repayments may be made only from the following sources: personal funds of the candidate, funds in the candidate's current election campaign account, and any additional funds raised subject to the limitations and prohibitions of the Act." AAC R2-20-704(A)(4).

1. I have identified suspicious activity in the procurement of qualifying contributions

The Commission is obligated to "enforce" the Clean Elections Act. A.R.S. § 16-956(A)(7). To that end, the Commission must and "ensure that money from the fund is placed in candidate campaign accounts or otherwise spent as specified in this article and not otherwise, monitor reports filed pursuant to this chapter and financial records of candidates as needed and ensure that money required by this article to be paid to the fund is deposited in the fund" A.R.S. § 16-956(A)(7). Thus, "[i]f the Commission determines that any portion of the payments made to the

candidate was in excess of the aggregate payments to which such candidate was entitled, it will so notify the candidate, and such candidate shall pay to the Fund an amount equal to such portion." A.A.C. R2-20-704(B). The Commission's procedure for determining whether a repayment order is prudent are straight forward:

The Commission will send a repayment determination pursuant to Article 2, Compliance and Enforcement Procedures, and will set forth the legal and factual reasons for such determination, as well as the evidence upon which any such determination is based. The candidate shall repay, in accordance with sub section (D), the amount that the Commission has determined to be repayable

A.A.C. R2-20-704(C).

A staff analysis of your \$5 qualifying contributions shows that a substantial number of them were the first and only donations of the people who provided them and they were provided by the same people as two other candidates, Risa Lombardo and Scott Neely. Exhibit 1. Based on my experience as Executive Director, this represents a suspicious pattern of donations.

The Green Party is one of smallest political parties in Arizona and its leadership expressly opposed your nomination. *See Arizona Green Party Warns of 'Sham' Candidates Running Under Party Moniker*, Green Party of the United States (Apr. 15, 2026), https://www.gp.org/arizona_green_party_warns_of_sham_candidates. As a result, you enjoyed no party network support crucial to obtaining multiple QCs from the same set of voters. A sample of the donors listed on your campaign finance reports have never given another donation to any candidate other than you and a combination including Collier and Neely. Additionally, our analysis using data from seethemoney.az.gov, shows 64 people gave duplicate QCs to one of the three candidates, Lombardo, Neely, or you, while also giving to all 3. Exhibit 2. All of this, alone, is highly suspicious. However, this is not all that raises red flags with your campaign.

We recently obtained bank statements as part of our audit process. Your May bank statements demonstrate suspicious activity. The lump sum cash deposit of \$18,060 on the day you filed your application for funding is strong evidence that in fact you had not collected \$5 from each person who apparently signed a qualifying contribution form for your candidacy. Exhibits 3, 4. Those forms were signed over the course of months, but the cash never reached your account. This gives rise to an inference that the source of the money was the deposit on May 29, 2026, not the individual donors. A.R.S. 16-948(A). In other words, if you had been collecting \$5 from individuals over the course of the qualifying period there is no reason for those donations to arrive in the form of a single in person cash deposit at a local bank.

Your qualifying period recap report show that you had no expenses prior to funding and raised only \$55 dollars in seed money:

Summary of Activity

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	\$0.00	\$0.00	\$0.00	\$0.00
Individual Contributions	C2	\$0.00	\$0.00	\$0.00	\$0.00
Contributions from Political Committees	C3a,b,c	\$0.00	\$0.00	\$0.00	\$0.00
Business Contributions	C4a,b,c	\$0.00	\$0.00	\$0.00	\$0.00
Small Contributions	C5	\$55.00	\$0.00	\$55.00	\$55.00
CCEC Funding and Matching	C6	\$205,743.00	\$0.00	\$205,743.00	\$205,743.00
Qualifying Contributions	C7	(\$40.00)	\$0.00	(\$40.00)	(\$40.00)
Loans Made to this Committee	L1	\$0.00	\$0.00	\$0.00	\$0.00
Other Receipts, including Interest and Dividends	R1	\$0.00	\$0.00	\$0.00	\$0.00
Transfers from Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Cash Surplus from Previous Committee	S1	\$0.00	\$0.00	\$0.00	\$0.00
Total Income		\$205,758.00	\$0.00	\$205,758.00	\$205,758.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$276,113.60	\$0.00	\$276,113.60	\$276,113.60
Independent & Ballot Measure Expenditures	E2a,b,c	\$0.00	\$0.00	\$0.00	\$0.00
Contributions to Committees/Businesses	E3a-E3f	\$0.00	\$0.00	\$0.00	\$0.00
Small Expenses	E4	\$134.00	\$0.00	\$134.00	\$134.00
Transfers to Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made by This Committee	L2	\$0.00	\$0.00	\$0.00	\$0.00
Disposal of Surplus Cash	S1	\$0.00	\$0.00	\$0.00	\$0.00
Total Expenditures		\$276,247.60	\$0.00	\$276,247.60	\$276,247.60
Bill Payments for Previous Expenditures	D1	\$0.00	\$0.00	\$0.00	\$0.00
Total Cash Disbursed		\$276,247.60			

With the exception of Risa Lombardo and Scott Neely, this makes your campaign finance reports an extreme outlier among candidates who qualified for funding in both major parties for state races. For example, statewide candidate Clara Pratte reported raising some \$20,000 in seed money:

Summary of Activity

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	\$0.00	\$0.00	\$0.00	\$0.00
Individual Contributions	C2	\$20,580.74	\$0.00	\$20,580.74	\$20,580.74
Contributions from Political Committees	C3a,b,c	\$0.00	\$0.00	\$0.00	\$0.00
Business Contributions	C4a,b,c	\$0.00	\$0.00	\$0.00	\$0.00
Small Contributions	C5	\$0.00	\$0.00	\$0.00	\$0.00
CCEC Funding and Matching	C6	\$147,836.00	\$0.00	\$147,836.00	\$147,836.00
Qualifying Contributions	C7	(\$4,970.00)	\$0.00	(\$4,970.00)	(\$4,970.00)
Loans Made to this Committee	L1	\$0.00	\$0.00	\$0.00	\$0.00
Other Receipts, including Interest and Dividends	R1	\$0.00	\$0.00	\$0.00	\$0.00
Transfers from Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Cash Surplus from Previous Committee	S1	\$0.00	\$0.00	\$0.00	\$0.00
Total Income		\$163,446.74	\$0.00	\$163,446.74	\$163,446.74

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$151,598.34	\$0.00	\$151,598.34	\$151,598.34
Independent & Ballot Measure Expenditures	E2a,b,c	\$0.00	\$0.00	\$0.00	\$0.00
Contributions to Committees/Businesses	E3a-E3f	\$0.00	\$0.00	\$0.00	\$0.00
Small Expenses	E4	\$0.00	\$0.00	\$0.00	\$0.00
Transfers to Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made by This Committee	L2	\$0.00	\$0.00	\$0.00	\$0.00
Disposal of Surplus Cash	S1	\$0.00	\$0.00	\$0.00	\$0.00
Total Expenditures		\$151,598.34	\$0.00	\$151,598.34	\$151,598.34
Bill Payments for Previous Expenditures	D1	\$0.00	\$0.00	\$0.00	\$0.00
Total Cash Disbursed		\$151,598.34			

Ms. Pratt spent about \$6,900 before qualifying on June 8 on such day-to-day operational items as bank fees and communications:

101905 Clara Pratte for Arizona

Jurisdiction: Arizona Secretary of State

Amended Qualifying Period Recap Report

Covers 08/01/2025 to 07/14/2026

Schedule E1 - Operating expenses

Name:	Date	Amount	Cycle To Date
Address: ActBlue Technical Services Category: PO Box 962017, Boston, MA 02195 Memo: Administration - Bank fees/service charge	02/28/2026	\$32.52 Cash	\$73.03
Address: Amalgamated Bank Category: 275 7th Ave, New York, NY 10001 Memo: Administration - Bank fees/service charge	03/27/2026	\$14.00 Cash	\$129.45
Address: ActBlue Technical Services Category: PO Box 962017, Boston, MA 02195 Memo: Administration - Bank fees/service charge	03/31/2026	\$11.01 Cash	\$73.03
Address: Stripe Category: 3180 18th St, San Francisco, CA 94110 Memo: Administration - Bank fees/service charge	03/31/2026	\$19.56 Cash	\$466.20
Address: Resident Strategies Category: 4540 N 11th Ave, Phoenix, AZ 85013 Memo: Communications - Other	04/09/2026	\$6,805.91 Cash	\$139,955.17
Address: Amalgamated Bank Category: 275 7th Ave, New York, NY 10001 Memo: Administration - Bank fees/service charge	04/20/2026	\$14.00 Cash	\$129.45
Address: ActBlue Technical Services Category: 14 Arrow St, Cambridge, MA 02138 Memo: Administration - Bank fees/service charge	04/30/2026	\$13.55 Cash	\$210.49
Address: Stripe Category: 3180 18th St, San Francisco, CA 94110 Memo: Administration - Bank fees/service charge	04/30/2026	\$26.16 Cash	\$466.20
Address: Amalgamated Bank Category: 275 7th Ave, New York, NY 10001 Memo: Administration - Bank fees/service charge	05/28/2026	\$14.00 Cash	\$129.45
Address: Stripe Category: 3180 18th St, San Francisco, CA 94110 Memo: Administration - Bank fees/service charge	05/29/2026	\$64.13 Cash	\$466.20

Filed on 08/05/2026

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101906 Clara Pratte for Arizona

Jurisdiction: Arizona Secretary of State

Amended Qualifying Period Recap Report

Covers 08/01/2025 to 07/14/2026

Schedule E1 - Operating expenses

Name:	Date	Amount	Cycle To Date
Address: ActBlue Technical Services Category: 14 Arrow St, Cambridge, MA 02138 Memo: Administration - Bank fees/service charge	05/31/2026	\$38.45 Cash	\$210.49

Republican Les Presmyk, a Republican candidate for mine inspector, raised \$16,180:

102016 Presmyk for Mine Inspector

Jurisdiction: Arizona Secretary of State

Amended Qualifying Period Recap Report

Covers 08/01/2025 to 07/14/2026

Filed on 08/21/2026

Summary of Activity

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	\$2,560.01	\$0.00	\$2,560.01	\$2,560.01
Individual Contributions	C2	\$16,180.00	\$0.00	\$16,180.00	\$16,180.00
Contributions from Political Committees	C3a,b,c	\$0.00	\$0.00	\$0.00	\$0.00
Business Contributions	C4a,b,c	\$0.00	\$0.00	\$0.00	\$0.00
Small Contributions	C5	\$1,550.00	\$0.00	\$1,550.00	\$1,550.00
CCEC Funding and Matching	C6	\$73,943.00	\$0.00	\$73,943.00	\$73,943.00
Qualifying Contributions	C7	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made to this Committee	L1	\$0.00	\$0.00	\$0.00	\$0.00
Other Receipts, Including Interest and Dividends	R1	\$0.00	\$0.00	\$0.00	\$0.00
Transfers from Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Cash Surplus from Previous Committee	S1	\$0.00	\$0.00	\$0.00	\$0.00
Total Income		\$94,233.01	\$0.00	\$94,233.01	\$94,233.01

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$87,654.06	\$0.00	\$87,654.06	\$87,654.06
Independent & Ballot Measure Expenditures	E2a,b,c	\$0.00	\$0.00	\$0.00	\$0.00
Contributions to Committees/Businesses	E3a-E3f	\$0.00	\$0.00	\$0.00	\$0.00
Small Expenses	E4	\$62.70	\$0.00	\$62.70	\$62.70
Transfers to Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made by This Committee	L2	\$0.00	\$0.00	\$0.00	\$0.00
Disposal of Surplus Cash	S1	\$0.00	\$0.00	\$0.00	\$0.00
Total Expenditures		\$87,716.76	\$0.00	\$87,716.76	\$87,716.76
Bill Payments for Previous Expenditures	D1	\$0.00	\$0.00	\$0.00	\$0.00
Total Cash Disbursed		\$87,716.76			

He spent around \$11,000 on professional services, petition signatures, and administration prior to qualifying for funding on April 9:

Schedule E1 - Operating expenses

Name:	Date	Amount	Cycle To Date
Shipley Strategies LLC	12/10/2025	\$598.69	\$64,440.36
Address: 2114 E Montebello Ave, Phoenix, AZ 85018		Cash	
Category: Professional Services - Consultants			
Name: Anedot	12/31/2025	\$127.40	\$564.20
Address: 1340 Poydras Street, New Orleans, LA 70122		Cash	
Category: Administration - Bank fees/service charge			
Name: Shipley Strategies LLC	01/23/2026	\$3,611.02	\$84,440.36
Address: 2114 E Montebello Ave, Phoenix, AZ 85018		Cash	
Category: Professional Services - Consultants			
Memo: Management and petition signatures			
Name: Shipley Strategies LLC	02/23/2026	\$3,675.70	\$84,440.36
Address: 2114 E Montebello Ave, Phoenix, AZ 85018		Cash	
Category: Professional Services - Consultants			
Memo: Management and petition signatures			
Name: Shipley Strategies LLC	03/18/2026	\$2,580.70	\$84,440.36
Address: 2114 E Montebello Ave, Phoenix, AZ 85018		Cash	
Category: Professional Services - Consultants			
Memo: Management and petition signatures			

A sample of legislative candidates demonstrates the similar results. Democrat Tiffany Byrne raised \$2614.92 in seed money:

Summary of Activity

Income	Schedule	Cash	Other	Total	Total to Date
Personal and Family Contributions	C1	\$485.00	\$0.00	\$485.00	\$485.00
Individual Contributions	C2	\$2,614.92	\$0.00	\$2,614.92	\$2,614.92
Contributions from Political Committees	C3a,b,c	\$0.00	\$0.00	\$0.00	\$0.00
Business Contributions	C4a,b,c	\$0.00	\$0.00	\$0.00	\$0.00
Small Contributions	C5	\$0.00	\$0.00	\$0.00	\$0.00
CCEC Funding and Matching	C6	\$23,099.00	\$0.00	\$23,099.00	\$23,099.00
Qualifying Contributions	C7	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made to this Committee	L1	\$400.00	\$0.00	\$400.00	\$400.00
Other Receipts, including Interest and Dividends	R1	\$0.00	\$0.00	\$0.00	\$0.00
Transfers from Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Cash Surplus from Previous Committee	S1	\$0.00	\$0.00	\$0.00	\$0.00
Total Income		\$26,678.92	\$0.00	\$26,678.92	\$26,678.92

Expenditures	Schedule	Cash	Other	Total	Total to Date
Operating Expenses	E1	\$25,907.36	\$0.00	\$25,907.36	\$25,907.36
Independent & Ballot Measure Expenditures	E2a,b,c	\$0.00	\$0.00	\$0.00	\$0.00
Contributions to Committees/Businesses	E3a-E3f	\$0.00	\$0.00	\$0.00	\$0.00
Small Expenses	E4	\$0.00	\$0.00	\$0.00	\$0.00
Transfers to Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made by This Committee	L2	\$0.00	\$0.00	\$0.00	\$0.00
Disposal of Surplus Cash	S1	\$0.00	\$0.00	\$0.00	\$0.00
Total Expenditures		\$25,907.36	\$0.00	\$25,907.36	\$25,907.36
Bill Payments for Previous Expenditures	D1	\$0.00	\$0.00	\$0.00	\$0.00
Total Cash Disbursed		\$25,907.36			

Republican David Richardson raised a little more than \$2,900:

Summary of Activity

Income	Schedule	Cash	Other	Total	Total to Date
Personal and Family Contributions	C1	\$0.00	\$444.00	\$444.00	\$444.00
Individual Contributions	C2	\$2,936.00	\$0.00	\$2,936.00	\$2,936.00
Contributions from Political Committees	C3a,b,c	\$0.00	\$0.00	\$0.00	\$0.00
Business Contributions	C4a,b,c	\$0.00	\$0.00	\$0.00	\$0.00
Small Contributions	C5	\$265.00	\$0.00	\$265.00	\$265.00
CCEC Funding and Matching	C6	\$23,099.00	\$0.00	\$23,099.00	\$23,099.00
Qualifying Contributions	C7	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made to this Committee	L1	\$0.00	\$0.00	\$0.00	\$0.00
Other Receipts, including Interest and Dividends	R1	\$0.00	\$0.00	\$0.00	\$0.00
Transfers from Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Cash Surplus from Previous Committee	S1	\$0.00	\$0.00	\$0.00	\$0.00
Total Income		\$26,299.00	\$444.00	\$26,743.00	\$26,743.00

Expenditures	Schedule	Cash	Other	Total	Total to Date
Operating Expenses	E1	\$21,282.61	\$0.00	\$21,282.61	\$21,282.61
Independent & Ballot Measure Expenditures	E2a,b,c	\$0.00	\$0.00	\$0.00	\$0.00
Contributions to Committees/Businesses	E3a-E3f	\$0.00	\$0.00	\$0.00	\$0.00
Small Expenses	E4	\$364.73	\$0.00	\$364.73	\$364.73
Transfers to Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made by This Committee	L2	\$0.00	\$0.00	\$0.00	\$0.00
Disposal of Surplus Cash	S1	\$0.00	\$0.00	\$0.00	\$0.00
Total Expenditures		\$21,647.34	\$0.00	\$21,647.34	\$21,647.34
Bill Payments for Previous Expenditures	D1	\$0.00	\$0.00	\$0.00	\$0.00
Total Cash Disbursed		\$21,647.34			

And Brian Callaway raised 5,400 for the legislature:

102070 Brian Calaway for State Representative - District 10
Jurisdiction: Arizona Secretary of State

Amended Qualifying Period Recap Report
Covers 08/01/2025 to 07/14/2026
Filed on 08/21/2026

Summary of Activity

Income	Schedule	This Period			Total to Date
		Cash	Other	Total	
Personal and Family Contributions	C1	\$375.00	\$0.00	\$375.00	\$375.00
Individual Contributions	C2	\$5,400.00	\$0.00	\$5,400.00	\$5,400.00
Contributions from Political Committees	C3a,b,c	\$0.00	\$0.00	\$0.00	\$0.00
Business Contributions	C4a,b,c	\$0.00	\$0.00	\$0.00	\$0.00
Small Contributions	C5	\$0.00	\$0.00	\$0.00	\$0.00
CCEC Funding and Matching	C6	\$23,099.00	\$0.00	\$23,099.00	\$23,099.00
Qualifying Contributions	C7	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made to this Committee	L1	\$0.00	\$0.00	\$0.00	\$0.00
Other Receipts, including Interest and Dividends	R1	\$0.00	\$0.00	\$0.00	\$0.00
Transfers from Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Cash Surplus from Previous Committee	S1	\$0.00	\$0.00	\$0.00	\$0.00
Total Income		\$28,874.00	\$0.00	\$28,874.00	\$28,874.00

Expenditures	Schedule	This Period			Total to Date
		Cash	Other	Total	
Operating Expenses	E1	\$24,468.96	\$0.00	\$24,468.96	\$24,468.96
Independent & Ballot Measure Expenditures	E2a,b,c	\$0.00	\$0.00	\$0.00	\$0.00
Contributions to Committees/Businesses	E3a-E3f	\$0.00	\$0.00	\$0.00	\$0.00
Small Expenses	E4	\$0.00	\$0.00	\$0.00	\$0.00
Transfers to Other Committees	T1	\$0.00	\$0.00	\$0.00	\$0.00
Loans Made by This Committee	L2	\$0.00	\$0.00	\$0.00	\$0.00
Disposal of Surplus Cash	S1	\$0.00	\$0.00	\$0.00	\$0.00
Total Expenditures		\$24,468.96	\$0.00	\$24,468.96	\$24,468.96
Bill Payments for Previous Expenditures	D1	\$0.00		\$0.00	\$0.00
Total Cash Disbursed		\$24,468.96			

Together, this shows a campaign that paid nothing for advice, nothing for paper, no bank fees, no nothing, yet raised some 3,606 qualifying contributions.

And then, just today, in an article titled “‘With 1,000% certainty’: Voters say candidates faked their donations to get public campaign cash”, the *Arizona Mirror* made blistering assertions that, frankly, corroborate my investigation thus far. See *Arizona Mirror*, Caitlin Sievers, ‘With 1,000% certainty’: Voters say candidates faked their donations to get public campaign cash (last accessed Aug. 26, 2026) (“‘I can tell you right now, with 1,000% certainty, that I did not make a single contribution, let alone three of them,’ Christopher Scott of Peoria told the Mirror when asked about forms filed by the candidates showing he had donated \$5 to each in order to help them qualify for Arizona’s public campaign finance program.””).

All of these facts together, which as you can see are largely substantiated, represent a level of suspicious activity well beyond what I have witnessed in 16 years as the Commission’s executive director

2. You have failed in your reporting obligations

The Commission may order repayment if “Expenditures ... were not documented in accordance with campaign finance reporting requirements, expended in violation of state or federal law, or used to defray expenses resulting from a violation of state or federal law, such as the payment of fines or penalties.” A.A.C. R2-20-704(B)(3).

The burden is on you to show that expenses are for direct campaign purposes. R2-20-703(A)(1)(“All participating candidates shall have the burden of proving that expenditures made by the candidate were for direct campaign purposes.”). Evidence shows that you have failed to properly identify sub-vendors on your reports. See A.R.S. § 16-948(C)(The candidate . . . shall pay monies from a participating candidate’s campaign account directly to the person providing

goods or services to the campaign and shall identify, on a report filed pursuant to article 1.4 of this chapter, the full name and street address of the person and the nature of the goods and services and compensation for which payment has been made.”); *see also* A.A.C. R2-20-110(C)(3)(“In the event that a participating candidate purchases goods or services from a subcontractor or other vendor through an . . . the candidate’s campaign finance report shall include the same detail as required in A.R.S. § 16-948(C) for each such subcontractor or other vendor. Such detail is also required when petty cash funds are used for such expenditures.”).

According to your Qualifying Period Recap report, you paid Bootstrap Campaigns \$253,113.60 since you were funded:

102163 Duwayne Collier for Secretary of State Jurisdiction: Arizona Secretary of State		Qualifying Period Recap Report Covers 08/01/2025 to 07/14/2026		
Schedule E1 - Operating expenses		Date	Amount	Cycle To Date
Name:	Bootstrap Campaigns	08/15/2026	\$187,400.00	\$253,113.60
Address:	732 S 6th St, #6069, Las Vegas, NV 89101		Cash	
Category:	Professional Services - Consultants			
Memo:	Campaign management, data purchase, sign printing and installation, canvassing, website build, text blast			
Name:	Sandoval, Veronica	08/17/2026	\$10,000.00	\$20,000.00
Address:	215 S Stardust Ln, Apache Junction, AZ 85120		Cash	
Occupation:	Home Caregiver, ABC Care			
Category:	Professional Services - Consultants			
Memo:	Campaign management			
Name:	Financial and Treasury Services, LLC	06/29/2026	\$3,000.00	\$3,000.00
Address:	6320 N 81st Pl, Scottsdale, AZ 85250		Cash	
Category:	Professional Services - Consultants			
Name:	Bootstrap Campaigns	08/30/2026	\$60,713.60	\$253,113.60
Address:	732 S 6th St, #6069, Las Vegas, NV 89101		Cash	
Category:	Professional Services - Consultants			
Memo:	Mallers, texting, social media management			
Name:	Sandoval, Veronica	07/02/2026	\$10,000.00	\$20,000.00
Address:	215 S Stardust Ln, Apache Junction, AZ 85120		Cash	
Occupation:	Home Caregiver, ABC Care			
Category:	Professional Services - Consultants			
Memo:	Campaign management			
Name:	Bootstrap Campaigns	07/08/2026	\$5,000.00	\$253,113.60
Address:	732 S 6th St, #6069, Las Vegas, NV 89101		Cash	
Category:	Professional Services - Consultants			
Memo:	Mail design			
Total of Operating Expenses			\$276,113.60	
Total of Refunds, Rebates, and Credits Received			\$0.00	
Net Total of Operating Expenses			\$276,113.60	

That company was formed in Las Vegas May 2026, just weeks before you paid them the first installment of \$187,400.00:



Entity Name

Bootstrap Campaigns

Entity Number

EST15122026-1

Entity Type

General Corporation

Entity Status

Active

Formation Date

05/12/2026

IN Business ID

IN20260510118

Renewal Date

Annual Report Due Date

05/31/2027

Compliance Note

Registered Agent Information

Name of Individual or Legal Entity

G-1 CORPORATION SYSTEM

CRAsent Entity Type

IN Business ID

IN20260510118

Jurisdiction

DELAWARE

Street Address

101 S GARDEN ST STE 200, CORONA, NV 89003, USA

State Address

Pub. Addr

Registered Agent Type

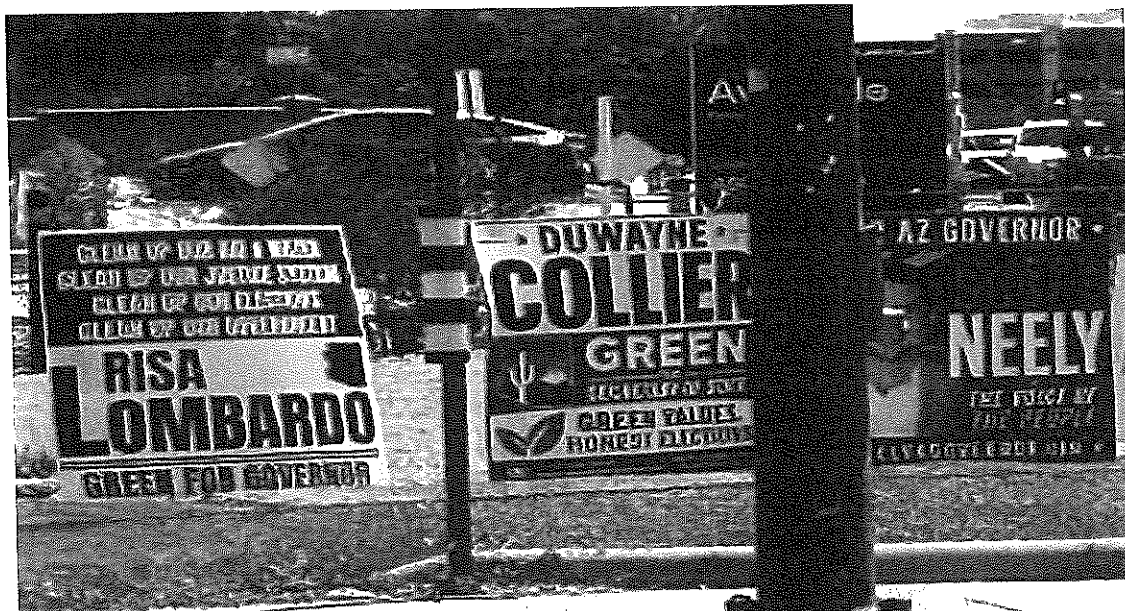
Commercial Registered Agent

Office in PA State

Most campaign shops subcontract a significant amount of work, and a new, out-of-state company would naturally use sub-vendors, especially local companies, whose work would require documentation. And so it is with Bootstrap. For example, you attribute mailers to Bootstrap when records filed with our office show O'Neill Printing in Phoenix did those jobs:

United States Postal Service				Post Office: Note Mail Arrival Date & Time (Do Not Round-Stamp)	
Postage Statement—USPS Marketing Mail					
Mailer	Permit Holder Name, Address, Email, Telephone O'Neill Printing 4303 E Cotton Center Blvd #100 Phoenix AZ 85040		Mailing Agent (If other than permit holder) Name, Address, Telephone O'Neill Printing 4303 E Cotton Center Blvd #100 Phoenix AZ 85040		Mail Owner (If other than permit holder) Name, Address COLLIER FOR AZ SECRETARY OF STATE PO BOX 6014 Tucson AZ 85703
	EPS Cust. Ref. No. PO#18771 CRID N/A		602-258-7789 CRID 3937751		CRID 58614967
Mailing	Post Office of Mailing PHOENIX AZ 85026-9672		Mailing Date 06/30/2026		Federal Agency Cost Code N/A
	Statement Seq. No. N/A		For Automation Pieces, Enter Date of Address Mailing and Coding 06/26/2026		No. & Type of Containers 2 - Pallets 7 - EMM Trays
	Type of Postage ☒ Permit Imprint ☐ Precanceled Stamps ☐ Metered	Processing Category ☒ Letters ☐ CRM ☐ Flats ☐ Catalogs ☐ Marketing Parcels	Total # of Pieces in Mailing 5,099	SSF Transaction#	
	For Mail Enclosed within Another Class ☐ Bound Periodical Matter ☐ Library Mail ☐ Periodicals ☐ Media Mail		Weight of a Single Piece 0.0210 pounds	Permit # 43	
	Move Update Method ☐ Ancillary Service Endorsement ☒ NCOA-1 ☐ ACS		Political Campaign Mailing ☒ Yes ☐ No Election Mail- Official Ballots ☐ Yes ☒ No Election Mail- Non-Ballot Material ☐ Yes ☒ No		For Carrier Route Pieces, Enter Date of Address Mailing and Coding N/A For Carrier Route Price Pieces, Enter Date of Carrier Route Sequencing N/A For Pieces Requiring a Simplified Address, Enter Date of Delivery N/A
Combined Mailing/Discount/Incentive ☐ Mixed Class ☒ Post Paid Discount ☐ Delivery Sort Container ☐ Single Class ☐ Delivery Sort Container		Manage Mail Incentive ☐ Catalogs			

Additionally, you ascribe sign printing and installation to Bootstrap. But evidence shows those signs were more likely than not printed and installed by Uncle Sam petitions. Indeed, your signs were seen placed at the same location as Lombardo's and Neely's:



Your signs requested people contact Uncle Sam Petitions about sign issues. Neely's signs urged people to contact Uncle Sam Petitions, but he identified that vendor on his reports. This is strong

circumstantial evidence that the same sign production and installer was employed by your campaign and not disclosed on campaign finance reports as required by law:

102163 Duwayne Collier for Secretary of State
Jurisdiction: Arizona Secretary of State

Qualifying Period Recap Report
Covers 08/01/2025 to 07/14/2028

Schedule E1 - Operating expenses

		Date	Amount	Cycle To Date
Name:	Bootstrap Campaigns	08/16/2026	\$187,400.00	\$263,113.60
Address:	732 S 6th St, #6669, Las Vegas, NV 89101		Cash	
Category:	Professional Services - Consultants			
Memo:	Campaign management, data purchase, sign printing and installation, canvassing, website build, text blast			

Without the sub-vendor reports, your campaign finance reports fail to properly carry you burden regarding repayment. A.A.C. R2-20-704(B)(2) ("If the Commission determines that any amount of any payment to an eligible candidate from the Fund was used for purposes other than direct campaign purposes described in R2-20-702, it will notify the candidate of the amount so used, and such candidate shall pay to the Fund an amount equal to such amount."). Thus, it is reasonable to surmise that, contrary to the Clean Elections Act and rules, you have issued lump sum payments to a single vendor without permitting the public or commission staff to have access to the amount each sub-vendor received and the value paid.

3. I will ask the Commission to initiate proceedings and seek a repayment order

I intend to ask the Commission to initiate proceedings to impose a repayment order upon you. This will be on the agenda for the Commission's virtual meeting on Thursday, August 27, 2026, at 10 a.m. At the conclusion of those proceedings, I will request the Commission order you to repay \$739,358.

4. Please preserve all relevant evidence and information

"The commission may subpoena witnesses, compel their attendance and testimony, administer oaths and affirmations, take evidence and require by subpoena the production of any books, papers, records or other items material to the performance of the commission's duties or the exercise of its powers." A.R.S. § 16-965(B). You or others may be subpoenaed or compelled to appear and provide testimony. Accordingly, I request that you preserve and not destroy all evidence or information relevant to the issues raised in this correspondence or your efforts to qualify for clean elections funding.

Should you retain legal counsel who desires to discuss these issues, please direct them to me, with a copy to my legal counsel in this matter, Craig A. Morgan, who can be reached at cmorgan@taftlaw.com.

Sincerely

Tom Collins

Executive Director

1 Timothy A. La Sota, SBN 020539
2 **TIMOTHY A. LA SOTA, PLC**
3 2198 East Camelback Road, Suite 305
4 Phoenix, Arizona 85016
5 Telephone: (602) 515-2649
6 Email: tim@timlasota.com
7 *Attorney for Plaintiffs*

8 **SUPERIOR COURT OF ARIZONA**
9 **MARICOPA COUNTY**

10 RISA LOMBARDO, an individual, and
11 DUWAYNE COLLIER, an individual,

12 Plaintiffs,

13 v.

14 ARIZONA CITIZENS CLEAN
15 ELECTIONS COMMISSION,
16 a public entity; THE STATE OF
17 ARIZONA, a public entity, and THOMAS
18 COLLINS, in his official capacity,

19 Defendants.

No. CV 2026-037740

ORDER TO APPEAR

DATE:

TIME:

**TYPE OF HEARING: ORDER
TO SHOW CAUSE HEARING**

20 This Court, having reviewed Plaintiff's Petition for Special Action and
21 Application for Preliminary and Permanent Injunctive Relief and Order to Show Cause,
22 and good cause appearing,

23 IT IS ORDERED, ADJUDGED AND DECREED that the above named
24 Defendants be and appear in Court before the Honorable _____ on the
25 ____ day of _____, 2026 at _____, at which time and place the Defendants
26 are ordered to show cause, if any why the relief requested by the Plaintiff should not be
27 granted by the Court.
28

1 IT IS FURTHER ORDERED that the Plaintiff shall immediately serve a copy of
2 this Order, the Summons, the Petition for Special Action, and the Application for
3 Injunctive Relief on the Defendants.

4 DONE IN OPEN COURT THIS _____ day of _____, 2026.
5
6
7
8

9 _____
Judge of the Superior Court
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28

1 Timothy A. La Sota, SBN 020539

2 **TIMOTHY A. LA SOTA, PLC**

3 2198 East Camelback Road, Suite 305

4 Phoenix, Arizona 85016

5 Telephone: (602) 515-2649

6 Email: tim@timlasota.com

7 *Attorney for Plaintiff*

COPY

SEP 10 2026



CLERK OF THE SUPERIOR COURT
M. PATTERSON
DEPUTY CLERK

8 **SUPERIOR COURT OF ARIZONA**

9 **MARICOPA COUNTY**

CV 2026-037740

No. - - - - -

10 RISA LOMBARDO, an individual, and
11 DUWAYNE COLLIER, an individual,

12 Plaintiffs,

13 v.

**CERTIFICATE OF
COMPULSORY
ARBITRATION**

14 ARIZONA CITIZENS CLEAN ELECTIONS
15 COMMISSION, a public entity; THE STATE OF
16 ARIZONA, a public entity, and THOMAS
17 COLLINS, in his official capacity,

18 Defendants.

19
20
21 The undersigned certifies that this matter is not subject to compulsory arbitration under
22 the applicable Local Rules and the Arizona Rules of Civil Procedure.

23 RESPECTFULLY SUBMITTED September 9, 2026.

24 **Timothy A. La Sota, PLC**

25 By: /s/ Timothy A. La Sota
Timothy A. La Sota
Attorney for Plaintiff

COPY



SEP 10 2026

CLERK OF THE SUPERIOR COURT
M. PATTERSON
DEPUTY CLERK

Timothy A. La Sota, SBN 020539
TIMOTHY A. LA SOTA, PLC
2198 East Camelback Road, Suite 305
Phoenix, Arizona 85016
Telephone: (602) 515-2649
Email: tim@timlasota.com
Attorney for Plaintiff

SUPERIOR COURT OF ARIZONA

MARICOPA COUNTY

RISA LOMBARDO, an individual, and
DUWAYNE COLLIER, an individual,

Plaintiffs,

v.

ARIZONA CITIZENS CLEAN
ELECTIONS COMMISSION, a public
entity; THE STATE OF ARIZONA, a
public entity, and THOMAS COLLINS, in
his official capacity,

Defendants.

No. CV 2026-037740

**APPLICATION FOR ORDER
TO SHOW CAUSE AND FOR
PRELIMINARY AND
PERMANENT INJUNCTIVE
RELIEF**

I. APPLICATION

Pursuant to Rule 65 of the Arizona Rules of Civil Procedure, Plaintiffs RISA LOMBARDO and DUWAYNE COLLIER ("Plaintiffs") respectfully move this Court for an Order (i) directing the Defendants to show cause why Plaintiffs should not be granted the relief sought in their Verified Complaint for Special Action and this Application, and (ii) setting a hearing as promptly as possible on the Order to Show Cause.

This matter is so urgent because the Defendant Arizona Citizens Clean Elections Commission, through its Director, Defendant Thomas Collins, is threatening to try to take

1 back the funding that the Plaintiffs have earned as participating, qualifying candidates in
2 Clean Elections. Relying largely on a media report that did not even allege any
3 wrongdoing on the part of the candidates, Defendant Collins has “strongly encouraged”
4 the Plaintiffs not to spend any of the campaign money in the candidates’ campaign
5 accounts. Collins has also stated that he will seek an order from the Commission
6 requiring repayment of all campaign funds that the candidates are legally entitled to and
7 that now sits in the Plaintiffs’ candidates campaign accounts, millions of dollars in
8 Plaintiff Lombardo’s case. The Commission has acceded to that request and begun the
9 process, and directed that the report be presented to them by October 29, 2026, five days
10 before the election.
11

12
13 These actions place the candidates in limbo and make it extraordinarily difficult to
14 run a campaign, and early ballots are mailed out in less than one month’s time. The
15 candidates have done nothing wrong, have no knowledge of any wrongdoing by others,
16 and deserve some level of clarity, which only the Court can provide.
17

18 The following memorandum of points and authorities supports this Application
19 and Motion.
20

21 **II. THE BASIS FOR RELIEF**

22 The merits of Plaintiffs’ arguments are set out in the Verified Complaint. But the
23 bottom line is that the Defendants are seeking to revisit the process whereby a candidate
24 qualifies for funding under the Clean Elections program. That process concluded in May
25 for Lombardo and June for Collier, with the Arizona Secretary of State certifying, after
26 a review of the \$5 qualifying forms, that the candidates met the legal requirements for
27 funding and were legally entitled to funding.
28

1 Now, months and months later and in the thick of the campaign, Defendant
2 Collins claims this determination was made in error and the Plaintiffs will have to repay
3 all these funds.

4 The reality is the Secretary of State and County Recorders conduct the review
5 process to determine if a candidate qualifies for funding—not the Clean Elections
6 Commission. The Defendants are violating Arizona law by trying to intrude on the duties
7 of other elections officials and revisit what was decided three or four months ago and are
8 violating Plaintiffs' free speech rights in the process.
9

10 **III. THE LAW ON PRELIMINARY INJUNCTIONS**

11 A Court should grant a preliminary injunction when the Plaintiff establishes: “(1)
12 there is a real threat of irreparable injury not remediable by damages; (2) the threatened
13 harm to the plaintiffs weighs more heavily in the balance than the actual injury to the
14 defendants; (3) the plaintiffs are likely to succeed in the trial on the merits and (4) public
15 policy favors the injunction.” *See, e.g., Burton v. Celentano*, 134 Ariz. 594, 595, 658
16 P.2d 247, 248 (Ct. App. 1982).
17

18 In our case, the four factors weigh in the Plaintiffs' favor.
19

20 There can be no real damages in a case such as this, so without damages to begin
21 with, there can be no remediation by them. This matter is very ill-suited for a traditional
22 civil action because all parties have an interest in seeing this matter resolved quickly.
23 The threat to Plaintiffs is losing the ability to spend their campaign funds and having their
24 free speech squelched at precisely the wrong time, during an election. The only threat to
25 Defendants is monetary.
26
27
28

1 The third factor also favors an injunction, because Plaintiffs are likely to prevail
2 on the merits. The Defendants have no business trying to undo the Secretary of State's
3 certification of the qualifying contributions months and months after that certification.
4 Elections require finality, and there is no room for this type of campaign manipulation at
5 the eleventh hour. Candidates cannot be required, on the flimsiest of evidence, not to
6 spend any of their campaign money in the heat of a campaign. That is what Defendants
7 have done.

9 Lastly, the fourth factor, the public interest and whether that supports injunctive
10 relief, is clearly met here. The public interest is best served by allowing candidates to
11 spend the funds they are legally entitled to and preventing government agencies from
12 interfering with this and squelching these candidates' free speech rights.
13

14 **V. CONCLUSION**

15 For the foregoing reasons, Plaintiffs ask that this Court enter the requested show
16 cause order, set a hearing on this matter as promptly as possible, and issue the requested
17 preliminary injunction.
18

19 RESPECTFULLY SUBMITTED this 9th day of September, 2026.
20

21
22 **TIMOTHY A. LA SOTA, PLC**

23 By: /s/ Timothy A. La Sota
24 Timothy A. La Sota, SBN 020539
25 2198 East Camelback Road, Suite 305
26 Phoenix, Arizona 85016
27 Telephone: (602) 515-2649
28 Email: tim@timlasota.com
Attorney for Plaintiff

Rule 80 Declaration

I declare under penalty of perjury of the laws of the State of Arizona that the foregoing Verified Complaint For Special Action is true and correct to the best of my knowledge and belief and that this Declaration is executed by me on the 9th day of September, 2026, in Maricopa County, AZ.

Signed by:

Risa Lombardo

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RISA LOMBARDO