

TIMOTHY EDWARD SIFERT



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by Kathryn Ross
Date: 2018.04.26
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April 25, 2018

Federal Election Commission
Office of Complaints Examination
& Legal Administration
Attn: Kathryn Ross, Paralegal
999 E Street, NW
Washington, DC 20463

RE: MUR 7337 and 7344

Dear Ms. Ross,

Thank you for the opportunity to respond and for the extension of time.

I have attached a copy of my sworn declaration regarding the facts as I know them. This is the declaration I also submitted in response to MUR 7327. I am certain that the Debbie Lesko for Congress campaign will also address these or other facts as well as relevant legal issues.

I join in the Lesko response and would like to incorporate her committee's responses to all three matters as a complement to my declaration in this matter.

As treasurer of Conservative Leadership for Arizona (CLA), I am not represented by counsel.

Regarding the matters referred to solely in MUR 7344, despite what the complainant alleges as reasonable and her estimate of the number of road signs, the cost was well under \$10,000 and based on the amount and the date, was reported properly and did not trigger either a 24 or 48 hour notice.

The disclosure on the mail and the signs reads "Paid for by Conservative Leadership for Arizona. Not authorized by a candidate or a committee controlled by a candidate." On both items the type is clearly visible and set off by a box.

I understand the advertising disclaimer rules for federal political committees are not uniform, and that the type of committee determines what needs to be disclosed. Our committee followed the traditional disclaimer guidance but inadvertently omitted the web address of the committee (www.conservativeaz.org), a requirement not in place for other kinds of committees, and part of additional regulations affecting Independent Expenditure committees like CLA.

I have received only this single complaint about the disclaimers and reporting the cost of the signs. Please understand that the complaint was notarized by Constantin Querard,

who was a paid consultant to one of Lesko's primary opponents, Steve Montenegro. Querard's company is Grassroots Partners, LLC and substantial payments to his company appear on Montenegro's FEC reports.

I identify the source of the MUR 7344 complaint not to make an ad hominem attack, but to simply point out the public was not measurably affected by the omission.

Lastly, this was an isolated occurrence and going forward our committee will be much more cognizant of the regulations and reporting requirements.

Sincerely,

A handwritten signature in black ink, appearing to read 'Tim Sifert', with a stylized, cursive script.

Timothy Edward Sifert
Treasurer, Conservative Leadership for Arizona

Declaration of Timothy Edward Sifert

in the matter of FEC MUR 7327

I, Timothy Edward Sifert, Treasurer of Conservative Leadership for Arizona (FEC ID C00665489, do upon oath declare as follows:

1. I am over 18 years of age, and am competent to testify in this matter.
2. I make this declaration based upon my own personal knowledge.
3. I am the Treasurer of Conservative Leadership for Arizona (CLA), a federal independent expenditure-only committee created January 10, 2018.
4. This CLA, the federal committee, should not be confused with an unrelated non-federal committee in Arizona with the same name, which was created in 2014 and terminated in 2016.
5. In the 2018 Special Election in Arizona's Congressional District 8 primary election, CLA engaged in independent expenditures advocating the election of former Arizona State Senator Debbie Lesko as the Republican nominee.
6. I have not been an agent of Senator Lesko, or attached in any way to either her state or congressional committees as an officer, director, member, employee or contractor.
7. In my capacity as Treasurer of CLA, I would almost certainly know if any agent of CLA had ever served as an agent of Senator Lesko or as an officer, director, member, employee, contractor, or agent of her campaign. To the best of my knowledge, none have ever done so.
8. In my capacity as Treasurer of CLA, I would almost certainly know if any agent of CLA had ever been authorized to raise or expend funds on behalf of, or received compensation from, Senator Lesko, her campaign or any of its agents. To the best of my knowledge, none have ever done so.
9. In my capacity as Treasurer of CLA, I would almost certainly know if any agent of CLA had ever communicated directly or indirectly before any expenditure was made with Senator Lesko or any officer, director, member, employee, agent or consultant of the Lesko Campaign regarding any plans, projects, or needs of her campaign, or any communications or expenditures by CLA. To the best of my knowledge, none have ever done so.
10. I have never communicated directly or indirectly with Senator Lesko or any officer, director, member, employee, agent or consultant of the Lesko Campaign regarding any plans, projects, or needs of her campaign, or any communications or expenditures by CLA.
11. In my capacity as Treasurer of CLA, I never attempted to illegally hide or "cover up" the source of funds received by CLA.

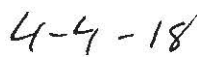
12. Our original 12-day pre-election report did not identify the source of a contribution from Lesko's state senate committee because I entered the contribution from the state committee in the category of "other federal receipts" on Line 17. I believed at the time it was the correct way to report a permissible contribution from a non-federal committee. I also apparently did not check the "aggregate" box in the FECfile software.

13. Four days after the report was filed, a news reporter asked me about the missing information. I then reviewed the FEC's published guidelines again, moved the contribution to "Line 11(c) Other Political Committees (such as PACS)" and marked the "aggregate" box in FECfile. I then immediately filed the amended report which identified the source of the contribution.

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



Timothy Edward Sifert



April 4, 2018