#### Turning Point PAC Inc. 4930 E. Beverley Road, Suite 2000 Phoenix, AZ 85044

#### RECEIVED

VIA CERTIFIED MAIL AND EMAIL

FEDERAL ELECTION COMMISSION NOVEMBER 6, 2024 5:19 PM

November 6, 2024

OFFICE OF GENERAL COUNSEL

Federal Election Commission
Attn: Office of General Counsel
1050 First Street, NE
Washington, DC 20463
EnfComplaint@fec.gov

**MUR 8344** 

Re: Complaint under 52 U.S.C. § 30120(c) and 11 C.F.R. 110.11(c) for Unlawful "Paid For"

Advertising Disclaimers

Respondent: Arizona Republicans Who Believe In Treating Others With Respect

FEC Committee ID: C00752089

Committee Address: 1930 E. Brown Rd. Suite 103, Mesa, AZ 85203

Dear Office of General Counsel:

On behalf of Turning Point PAC Inc. ("TPPAC"), I submit the following complaint alleging violations of 52 U.S.C. § 30120(c) and 11 C.F.R. 110.11(c) against Arizona Republicans Who Believe In Treating Others With Respect (the "Arizona Republicans"). I swear under penalty of perjury that I serve as the executive director or TPPAC and am an authorized officer/agent of TPPAC.

Arizona Republicans' various digital billboards expressly advocating for Kamala Harris' election in the Phoenix metropolitan area violate federal law and render this unlawful advertising campaign subject to a Commission enforcement action.

#### Factual Background

Arizona Republicans launched various digital billboards around the Phoenix metropolitan area beginning on August 26, 2024. According to its website, Arizona Republicans erected nearly 50 digital billboard advertisements along various Phoenix freeways during the August primary election, including along Interstate 10, Interstate 17, Loop 202, Loop 303, and other highly trafficked areas.<sup>1</sup>

The number of billboards dropped to 20 for the following 5 weeks, between September 2 and October 6, 2024. The deployment increased to 35 billboards for the next 3 weeks between October 7 and October 27, 2024— now known as "Phase II" of Arizona Republicans' plan.<sup>2</sup>

The current phase of the plan, "Phase III," consists of 50 billboards deployed between October 28 and November 5, 2024.<sup>3</sup>

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<sup>&</sup>lt;sup>1</sup> See Exhibit A (screenshot of Arizona Republicans' website, <a href="https://www.arizonarepublicanswhobelieve.org/">https://www.arizonarepublicanswhobelieve.org/</a>, as of October 10, 2024).

<sup>&</sup>lt;sup>2</sup> See Exhibit B (screenshot of Arizona Republicans' website as of November 1, 2024).

<sup>&</sup>lt;sup>3</sup> See Exhibits A and B.

Arizona Republicans' website contains a map with all billboard locations:4



Each billboard expressly advocates for Kamala Harris' election for President, phrased as either "Arizona Republicans for Harris" or "Arizona Independents for Harris":<sup>5</sup>





Upon information and belief, these digital billboards display the "FOR HARRIS" message for approximately 15 seconds, until another commercial advertisement appears. Upon information and belief, the "FOR HARRIS" message reappears approximately every 1-2 minutes on each digital billboard.

Even when standing stationary below a billboard (or at least, the billboards erected at freeway height), the "paid for" disclaimer is unreadable due to the small font size and the viewer's distance below the billboard. The disclaimer is even further unreadable when accounting for digital pixelation and drivers' inability to see the disclaimer at high rates of speed.

<sup>&</sup>lt;sup>4</sup> See Exhibit C (screenshot of Arizona Republicans' website, <a href="https://www.arizonarepublicanswhobelieve.org/billboard-locations">https://www.arizonarepublicanswhobelieve.org/billboard-locations</a>, as of November 1, 2024).

<sup>&</sup>lt;sup>5</sup> See Exhibits A and B. Arizona Republicans' website also sells "Arizona Moderates for Harris" merchandise, but there is no evidence (yet) this phrase is being used for billboard advertisements.

Upon information and belief, Arizona Republicans also placed yard signs on various Phoenix-area public streets:





Yard signs are among the merchandise for sale on Arizona Republicans' website, including T-shirts, posters, bumper stickers, and tote bags—all with express advocacy for Harris' election.<sup>6</sup>

#### **Legal Argument**

#### 1. Violation of 52 U.S.C. § 30120(c) and 11 C.F.R. 110.11(c)

Any person or political committee that makes a disbursement for the purpose of financing public communications expressly advocating the election or defeat of a clearly identified federal candidate must include a disclaimer on any such communication. 52 U.S.C. § 30120(a); 11 C.F.R. 110.11(a)(2).

Section 100.26 defines a public communication to include an "outdoor advertising facility" and "any other form of general public political advertising," like billboards and yard signs. See MUR 7355 (Heller for Senate), First General Counsel's Report at 5 ("The electronic billboard required a disclaimer. First, the billboard is a public communication because it is both an outdoor advertising facility and a general form of public political advertising. Second, the billboard contains express advocacy."); MUR 6861 (Williams, et al.), Factual and Legal Analysis at 7 ("billboards [and] yard signs . . . expressly advocated the election of clearly identified federal candidates and therefore qualified as public communications that required proper disclaimers"); MUR 6658 (Unknown Respondents), Second General Counsel's Report at 3 ("Signs, including yard signs, are encompassed within the phrase, 'any other form of general public political advertising[.]'").

Regardless of which medium the public communication is transmitted, all disclaimers must be "of sufficient type size to be clearly readable by the recipient of the communication," 52 U.S.C. § 30120(c), and "must be presented in a clear and conspicuous manner." 11 C.F.R. 110.11(c). A disclaimer is "clear and conspicuous" if it gives adequate notice of the identity of persons who paid for the communication, and the disclaimer's placement is not easily overlooked. 11 C.F.R. 110.11(c); see also MUR 6861 (billboards and yard signs violated disclaimer requirements because they did not "comply with the specifically enumerated size, type, and font requirements set forth in the regulations").

<sup>&</sup>lt;sup>6</sup> See Exhibit D (screenshot of Arizona Republicans' website, <a href="https://www.arizonarepublicanswhobelieve.org/category/all-products">https://www.arizonarepublicanswhobelieve.org/category/all-products</a>, as of November 1, 2024).

Arizona Republicans' billboards do not meet these advertising standards. Taking into consideration the geographic distance between the billboard and its observers—mostly individuals driving approximately 65 miles per hour (or over) on the freeway—the font size of the disclaimer does not give members of the electorate adequate notice of the organization paying for such communication. And, given the billboard height and digital pixelation effect, the disclaimer on most or all billboards is not even readable by a stationary observer looking up at the sign at a 45-degree angle.

Moreover, the small font size of the disclaimer—in contrast to the large all capital lettering "FOR HARRIS"—diminishes the disclaimer's readability. It is considerably smaller than the rest of the billboards' lettering and covers only a small portion of the advertisements' surface area, leading to the disclaimer being easily overlooked.

For these reasons, Arizona Republicans' billboards fail the clear and conspicuous standards under 52 U.S.C. § 30120(c) and 11 C.F.R. 110.11(c).

#### 2. The Commission Should Initiate An Enforcement Action

The costs are significant. Arizona Republicans' 48-hour campaign finance report dated September 26, 2024, disclosed spending \$57,134 on digital billboards.<sup>7</sup>

Arizona Republicans' subsequent 24-hour reports disclosed further spending, which likely included substantial spending on the billboards as well:

- \$127,821 for "advertising" on October 18, 2024.8
- \$257,226.62 (in total) for "advertising" on October 26, 2024.9
- \$10,588.99 for "advertising" on October 30, 2024. 10
- \$123,972.77 for "advertising" on October 31, 2024. 11

Arizona Republicans therefore spent at least \$576,743.38 on its independent expenditure campaign, excluding recognizable costs for yard signs. Upon information and belief, the billboards constituted the core component of Arizona Republicans' spending.

These costs far exceed *de minimis* levels and are significant enough to warrant the Commission's enforcement resources in this matter.<sup>12</sup>

<sup>&</sup>lt;sup>7</sup> See <a href="https://docquery.fec.gov/pdf/208/202409269684730208/202409269684730208.pdf">https://docquery.fec.gov/pdf/208/202409269684730208/202409269684730208.pdf</a> (Exhibit E). Costs for creating T-shirts, posters, bumper stickers, tote bags, and the committee's website are not expressly disclosed in the 48-hour report.

<sup>&</sup>lt;sup>8</sup> See <a href="https://docquery.fec.gov/pdf/387/202410189698708387/202410189698708387.pdf">https://docquery.fec.gov/pdf/387/202410189698708387/202410189698708387.pdf</a> (Exhibit F).

<sup>&</sup>lt;sup>9</sup> See https://docquery.fec.gov/pdf/631/202410269719660631/202410269719660631.pdf (Exhibit G).

<sup>&</sup>lt;sup>10</sup> See https://docquery.fec.gov/pdf/253/202410309719844253/202410309719844253.pdf (Exhibit H).

<sup>&</sup>lt;sup>11</sup> See https://docquery.fec.gov/pdf/706/202410319719900706/202410319719900706.pdf (Exhibit I).

<sup>&</sup>lt;sup>12</sup> The Commission generally only declines to pursue billboard and yard sign disclaimer cases when the value of the advertising is *de minimis*. See e.g. MUR 6642 (Kauffman), Second General Counsel's Report

#### Request for Relief

TTPAC urges the Commission to investigate these clear advertising violations and, to deter such misconduct in presidential elections, assess the maximum administrative fines allowable under law.

Sincerely,

Tyler Bowyer Executive Director Turning Point PAC Inc.

<sup>(</sup>missing "paid for" disclaimer on billboard violated 52 U.S.C. § 30120, but total cost of \$3,000 did not warrant use of Commission resources to further pursue).

## Exhibit A



# Arizona Republicans Who Believe in Treating Others with Respect

We are current or former Republicans, Moderates, Independents, and Conservatives who are supporting Kamala Harris this November because we believe the foundation of our democracy may be unalterably damaged if Donald Trump is re-elected.

### Billboards for Harris







Map of Billboard Locations throughout the Phoenix Area.

We did it! Thanks so much to everyone! We finished raising the amount needed to fulfill our billboard plan. We started the campaign with a 50 billboard blast, before going to 20 billboards for a 5-week period.

As the map shows, we launched 50 digital billboards on Phoenix Metropolitan freeways on August 26, 2024. We hope you have seen some. Our goal is to let fellow Republicans, Independents, Moderates, and Conservatives know that you can (and should!) vote for Harris. There is a sign for each group.

Early voting starts October 9, so we will go to 35 billboards starting October 7 for a period of three weeks. We will then kick it up a notch and return to that 50-billboard blast the final nine days prior to the election day on Nov. 5.

Thanks to all for making this possible! We have received great feedback from so many. We would love to post more pics of the billboards, so if there is one you see frequently, tag us on Facebook, Instagram, or Twitter!

#### CHRISTINE TODD WHITMAN

Christine Todd Whitman, former governor of New Jersey, speaks to members of Arizona Republicans Who Believe in Treating Others with Respect. She gives reasons why a Republican or Former Republican should vote for Kamala Harris rather than Donald Trump.

## Treating Others with Respect

As our name suggests (okay, as our name flat out says) respect is big for us. The following is our approach, whether we convince you to vote for Kamala Harris. We hope we all adopt this method, regardless of our differing political views.



#### **TELLING THE TRUTH**

Respecting someone means telling them the truth. We should not be afraid to let people know that something, for instance, the assertion that the 2020 election was rigged, is false. People need to know the truth.



#### **BUILDING BRIDGES**

Let's try to genuinely understand why someone believes the way they do. Then, if possible, see if we can engage in a meaningful conversation.



#### BEING PEACEMAKERS

For those with whom we will never agree, let's at least seek consensus that the way we solve things in a functioning democracy is by discussion and voting, not threats and violence.

### You Are Not Alone

If you feel you have been disenfranchised by the Republican Party or are an independent or political moderate without a political home, you are not alone. We hope you will join with us in electing Kamala Harris.

#### MAKE A DONATION

\$6 pays for a yard sign. \$60 pays for 10 \$600 lets us put up 100!

#### JOIN OUR CONTACT LIST

Hear about our events and opportunities.

## SUBMIT A TESTIMONIAL

Tell us why you have joined our cause.

CLICK HERE CLICK HERE CLICK HERE

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www.arizonarepublicanswhobelieve.org

# Exhibit B

ARIZONA REPUBLICANS
WHO BELIEVE IN
TREATING OTHERS
WITH RESPECT

Home

About Us

RSVP for Party

LDS RSVP

More



# Arizona Republicans Who Believe in Treating Others with Respect

We are current or former Republicans, Moderates, Independents, and Conservatives who are supporting Kamala Harris this November because we believe the foundation of our democracy may be unalterably damaged if Donald Trump is re-elected.



Promoting Peacemaking and Bridgebuilding

SUNDAY, NOVEMBER 3, 2024 AT 7:00 P.M.

Join us for special musical performances by Peter Breinholt and Cherie Call and a webinar panel discussion moderated by retired judge Dan Barker with Q&A from the audience!



DAN BARKER Moderator



PETER BREINHOLT Musical Guest



CHERIE CALL Musical Guest

We have been getting so many questions about the LDS vote that we decided to address it head on. Because some of the PAC are members of the Church of Jesus Christ of Latter-day Saints, we explain that there is no such thing as the "LDS vote": each Church member votes how he or she determines best. But the questions keep coming!

So, we felt it would be productive to have an event that directly addresses the question. Go to AZ4H.org/LDS to register for the webinar happening SUNDAY, NOV 3, @7PM. Don't be shy if you're not LDS. It will be a great event for all!

Join us for special musical performances by Peter Breinholt and Cherie Call and a webinar panel discussion moderated by retired judge Dan Barker with Q&A from the audience.

**RSVP** Here

### SIGN UP AT AZ4H.ORG/LDS

## PANELISTS



JULIE SPILSBURY Mesa Councilmember



HAYDEN DILLE BYU Economics Graduate





Songwriter







SAGE MILLET ASU Political Science Major

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NOVEMBER 5, 2024 LET'S CHEER ON KAMALA TOGETHER!





RSVP for exact location.

RSVP Here

### Billboards for Harris







Map of Billboard Locations throughout the Phoenix Area.

Phase II of our digital billboard campaign will run on Phoenix Metropolitan freeways October 7-27. Early voting starts October 9, so we will go to 35 billboards starting October 7 for a period of three weeks.

Phase III of our digital billboard campaign will run on Phoenix Metropolitan freeways October 28 - Nov 5.

Thanks to all for making this possible! We have received great feedback from so many. We would love to post more pics of the billboards, so if there is one you see frequently, tag us on Facebook, Instagram, or Twitter! To see exact locations for these phases, please click here: Billboard Locations.

Governor Christine Todd Whitman - Arizona Repu...



#### CHRISTINE TODD WHITMAN

Christine Todd Whitman, former governor of New Jersey, speaks to members of Arizona Republicans Who Believe in Treating Others with Respect. She gives reasons why a Republican or Former Republican should vote for Kamala Harris rather than Donald Trump.

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Tell us why you have joined our cause.

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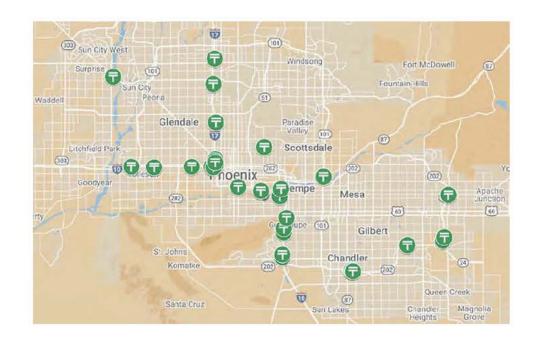
www.arizonarepublicanswhobelieve.org

# Exhibit C



## **BILLBOARD LOCATIONS**

Phase II: Oct 7-Oct 27



Location Description	Facing
Grand Ave s/o Greenway Rd F/W	w
I-10 2,000' w/o I-17 Intersection F/W	W
I-17 1,000' n/o Bell Rd F/S	s
I-17 2,500' n/o Cactus Rd F/N	N
I-10 1,000' n/o Elliot Rd F/N	N
I-10 2,100' w/o 101 Freeway F/E	E
I-10 e/o 51st Avenue F/W	w
I-17 & Grand Ave F/S	s
I-10 1,000' e/o 83rd Avenue F/E	E
I-10 1,000' e/o 83rd Avenue F/W	w

oop 101 2.000' s/o McKellips F/N	N
-17 s/o Glendale Ave F/S	S
I-17 n/o McDowell Rd F/N	N
-17 & Jomax F/S	S
-10 e/o 27th Ave F/E	Е
-10 500' w/o 143 Freeway F/E	Е
1-10 2,000' n/o Elliot Rd F/N	Ν
-10 1,000' e/o 24th Street F/W	W
-10 1,000' e/o 24th Street F/E	E
202 Freeway @ Higley Road F/E	Е
202 Freeway e/o Arizona Avenue F/W	W
2O2 Freeway e/o Arizona Avenue F/E	E
202 San Tan Freeway 750' w/o McQueen Rd. F/W	W
202 San Tan Freeway 750' w/o McQueen Rd. F/E	E
Loop 202 n/o Gateway Freeway F/N	N
202 Freeway 1,000 s/o Elliot Rd F/S	s
1-17 150' w/o 7th Street F/W	W
-10 4,000' s/o US 60 Freeway F/N	Ν
202 Freeway s/o Main St. F/S	S
143 Freeway 1,000' n/o University Dr F/N	N
-10 & Chandler F/S	s
-10 & Chandler F/N	Ν
Indian School 200' e/o 32nd Street F/W	w
I-17 half mile n/o I-10 F/N	Ν
I-17 half mile n/o I-10 F/S	s

Phase III: Oct 28-Nov 5



Location Description	Facing
Grand Ave s/o Greenway Rd F/W	w
I-10 2,000' w/o I-17 Intersection F/W	w
I-17 1,000' n/o Bell Rd F/S	s
I-17 1,000' n/o Bell Rd F/N	N
I-17 2,500' n/o Cactus Rd F/N	N
I-17 2,500' n/o Cactus Rd F/S	S
I-10 1,000' n/o Elliot Rd F/N	N
I-10 2,100' w/o 101 Freeway F/E	E
I-10 e/o 51st Avenue F/W	W
I-17 & Grand Ave F/S	s
I-10 1,500' e/o 83rd Avenue F/E	E
I-10 1,000' e/o 83rd Avenue F/E	E
I-10 1,000' e/o 83rd Avenue F/W	w
Loop 101 2,000' s/o McKellips F/N	N
Loop 202 s/o Van Buren F/N	N
Loop 202 s/o Van Buren F/S	s
I-17 s/o Glendale Ave F/S	S
I-17 n/o McDowell Rd F/N	N
I-17 s/o Thomas Rd F/N	N
I-17 & Jomax F/S	s
I-10 e/o 27th Ave F/E	E
I-10 500' w/o 143 Freeway F/E	Е
I-10 2,000' n/o Elliot Rd F/N	N
I-10 2,000' n/o Elliot Rd F/S	S
I-10 1,000' e/o 24th Street F/W	w
I-10 1,000' e/o 24th Street F/E	Е

Loop 202 Freeway 500' n/o Baseline F/N	N
202 Freeway @ Higley Road F/E	E
202 Freeway e/o Arizona Avenue F/W	W
202 Freeway e/o Arizona Avenue F/E	E
202 San Tan Freeway 750' w/o McQueen Rd. F/W	W
202 San Tan Freeway 750' w/o McQueen Rd. F/E	Е
I-17 500' w/o 19th Avenue F/W	W
I-10 w/o Avondale Blvd F/E	Е
Loop 2O2 n/o Gateway Freeway F/N	N
202 Freeway 1,000 s/o Elliot Rd F/S	s
I-10 w/o Avondale Blvd F/E	E
-17 150' w/o 7th Street F/W	W
-10 4,000' s/o US 60 Freeway F/N	N
Loop 303 Freeway 250' s/o Glendale F/N	N
202 Freeway s/o Main St. F/N	N
202 Freeway s/o Main St. F/S	S
202 Freeway 50' n/o Main Street F/N	N
143 Freeway 1,000' n/o University Dr F/S	s
143 Freeway 1,000' n/o University Dr F/N	N
-10 & Chandler F/S	s
-10 & Chandler F/N	N
Indian School 200' e/o 32nd Street F/W	W
I-17 half mile n/o I-10 F/N	N
I-17 half mile n/o I-10 F/S	S

#### MAKE A DONATION

#### FIND US ON SOCIAL MEDIA

\$6 pays for a yard sign. \$60 pays for 10 \$600lets us put up 100!

Like our pages and posts. Comment and re-post if you feel inclined.

**CLICK HERE** 







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www.arizonarepublicanswhobelieve.org

CLICK HERE CLICK HERE CLICK HERE

#### **VOLUNTEER**

Suggest any way you think we can best get the word out.

#### GATHER FRIENDS AT YOUR HOME

We'll come with a slide show and help you make a plan.

CLICK HERE CLICK HERE

# Exhibit D



# Exhibit E

## 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

Schedule E)		FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)		FEC IDENTIFICATION NUMBER ▼
ARIZONA REPUBLICANS WHO BELIEVE IN T	REATING OTHERS WITH RE	SPECT
		C C00752089
Check if 24-hour report 48-hour report	New report Amends report	filed on M / D - D / Y - Y - Y - Y
Full Name of Payee		Date of Public Distribution/Dissemination
Becker Boards		M = M / D = D / Y = Y = Y = Y = 10
Mailing Address 4234 E Indian School Rd		
		Amount
City	tate Zip Code	35437.00
Phoenix	AZ 85018	Transaction ID : SE.5677 Date of Disbursement or Obligation
Purpose of Expenditure Billboards	Category/ Type 004	M = M / D = D / Y = Y = Y = Y = Y = Y = Y = Y = Y = Y
Name of Federal Candidate	<b>∑</b> Support	Office Sought: House District:
HARRIS, KAMALA, , ,	Oppose	President Senate State:
Calendar Year-To-Date		Disbursement For: Primary General
Per Election for Office Sought	55550.25	Other (specify) -
Full Name of Payee  Becker Boards		Date of Public Distribution/Dissemination
Becker Boards		10 / D = D / Y = Y = Y = Y = Y = Y = Y = Y = Y = Y
Mailing Address 4234 E Indian School Rd		Amount
		Amount
	State Zip Code	21697.00
Phoenix	AZ 85018	Transaction ID : SE.5678  Date of Disbursement or Obligation
Purpose of Expenditure	Category/ 004	M = M / D = D / Y = Y = Y = Y
Billboards	Type 504	09 24 2024
Name of Federal Candidate	X Support	Office Sought: House District:
HARRIS, KAMALA, , ,	Oppose	President Senate State:
Calendar Year-To-Date		Disbursement For: Primary General
Per Election for Office Sought		Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Expenditures		57134.00
21 SUPTOTAL A Helitanianal Indonesiant Europeitius		
(b) SUBTOTAL of Uniternized Independent Expenditures	S	·
(c) TOTAL Independent Expenditures		
(4)		
*** *** *** *** *** *** *** *** *** **	7.5 6 6	
Under penalty of perjury I certify that the independent with, or at the request or suggestion of, any candidate of party committee) any political party committee or its age	or authorized committee or agent of	
W 1 7.1		M = M / D = D / Y = Y = Y = Y
Webster, John, , ,	Date	09 26 2024
Signature		- 1. 5 1

### 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES

Schedule E)	JILO	PAGE 2 OF 2 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) ARIZONA REPUBLICANS WHO BELIEVE IN TREATING OT	THERS WITH RE	SPECT C C00752089 FEC IDENTIFICATION NUMBER ▼
Check if 24-hour report X 48-hour report New report	Amends report	filed on M=M / D=D / Y=Y=Y=Y
Full Name of Payee Mesa Sign Shop		Date of Public Distribution/Dissemination
Mailing Address 756 W Main St		18 2024 Amount
		Amount
City State Zip	p Code	2599.20
	5201	Transaction ID : SE.5676  Date of Disbursement or Obligation
Purpose of Expenditure Signs	Category/ Type 004	09 18 2024
Name of Federal Candidate	Support (	Office Sought: House District:
HARRIS, KAMALA, , ,	Oppose	President Senate State:
Calendar Year-To-Date Per Election for Office Sought		Disbursement For:  Primary  General   024  Other (specify) ▶
Full Name of Payee	**	Date of Public Distribution/Dissemination
		M = M / D = D / Y = Y = Y
Mailing Address		Amount
City State Zip	p Code	
Side 24	p 0000	9
Purpose of Expenditure		Date of Disbursement or Obligation
The state of the s	Category/ Type	M = M / D = D / Y = Y = Y
Name of Federal Candidate	Support	Office Sought: House District:
	Oppose	President Senate State:
Calendar Year-To-Date Per Election for Office Sought		Disbursement For: Primary General
Tot Elocation for Small Sought		Other (specify) -
(a) SUBTOTAL of Itemized Independent Expenditures		2599.20
(b) SUBTOTAL of Unitemized Independent Expenditures		
(c) TOTAL Independent Expenditures		59733.20
Under penalty of perjury I certify that the independent expenditures rep with, or at the request or suggestion of, any candidate or authorized co party committee) any political party committee or its agent.		
Webster, John, , ,	Date	09 / D D / Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y

## Exhibit F

### 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES

Schedule E)	PAGE 1 OF 2 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) ARIZONA REPUBLICANS WHO BELIEVE IN TREATING OTHERS W	/ITH RESPECT FEC IDENTIFICATION NUMBER ▼  C C00752089
Check if 24-hour report 48-hour report New report Amen	ids report filed on 10 18 2024
Full Name of Payee Mesa Sign Shop	Date of Public Distribution/Dissemination
Mailing Address 756 W Main St	Amount
City State Zip Code Mesa AZ 85201	2696.67  Transaction ID : SE.6359  Date of Disbursement or Obligation
Purpose of Expenditure Signs  Category/ Type	004 10 17 Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y
HADDIS KAMALA	pose
Calendar Year-To-Date Per Election for Office Sought 62429.87	Disbursement For: ☐ Primary ☐ General 2024 ☐ Other (specify) ▶
Full Name of Payee Resilent Strategies, LLC	Date of Public Distribution/Dissemination
Mailing Address 4540 N 11th Ave	Amount
City State Zip Code Phoenix AZ 85013	3250.00  Transaction ID : SE.6361  Date of Disbursement or Obligation
Purpose of Expenditure Signs  Category/ Type	004
Name of Federal Candidate  HARRIS, KAMALA, , ,  Op	pose President Senate State:
Calendar Year-To-Date Per Election for Office Sought 65679.87	Disbursement For: ☐ Primary ☐ General ☐ Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Expenditures	5946.67
(b) SUBTOTAL of Unitemized Independent Expenditures	
(c) TOTAL Independent Expenditures	· · · · · · · · · · · · · · · · · · ·
Under penalty of perjury I certify that the independent expenditures reported herei with, or at the request or suggestion of, any candidate or authorized committee or party committee) any political party committee or its agent.	
Barker, Dan, , , Signature	Date 10 18 2024

## 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

ochedule L)		FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)		FEC IDENTIFICATION NUMBER ▼
ARIZONA REPUBLICANS WHO BELIEVE IN TREATING O	THERS WITH RESPE	C C00752089
Check if 24-hour report 48-hour report New report	Amends report filed	on 10 / 18 / 2024
Full Name of Payee	ैं	Date of Public Distribution/Dissemination
Resilent Strategies, LLC		10 18 2024
Mailing Address 4540 N 11th Ave		Amount
City State Zip	o Code	127821.00
Phoenix AZ 85	5013	Transaction ID : SE.6360 Date of Disbursement or Obligation
Purpose of Expenditure Advertising	Category/ Type 004	M 10 / D 18 / Y 2024
Name of Federal Candidate	Support Office	Sought: House District:
HARRIS, KAMALA, , ,		President Senate State:
Calendar Year-To-Date Per Election for Office Sought	93500.87 Disbu 2024	rsement For: Primary ☐ General  Other (specify) ▶
Full Name of Payer		
Full Name of Payee		Date of Public Distribution/Dissemination
Mailing Address		Amount
City State Zip	p Code	
Purpose of Expenditure	Category/	Date of Disbursement or Obligation
	Type	
Name of Federal Candidate	Support Office	Sought: House District:
	Oppose	President Senate State:
Calendar Year-To-Date	Disbu	rsement For: Primary General
Per Election for Office Sought		Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Expenditures	······	127821.00
(b) SUBTOTAL of Unitemized Independent Expenditures		
(c) TOTAL Independent Expenditures	F	133767.67
Under penalty of perjury I certify that the independent expenditures repwith, or at the request or suggestion of, any candidate or authorized coparty committee) any political party committee or its agent.		
Barker, Dan, , , Signature	Date 1	0 18 / Y = Y = Y = Y = Y
8		

PAGE 2

OF

# Exhibit G

#### MUR834400030 10/26/2024 20:09 Image# 202410269719660631 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES PAGE OF 2 (Schedule E) FOR SE OF FORM 24/48 NAME OF COMMITTEE (In Full) FEC IDENTIFICATION NUMBER ▼ ARIZONA REPUBLICANS WHO BELIEVE IN TREATING OTHERS WITH RESPECT C00752089 X New report Check if X 24-hour report 48-hour report Amends report filed on Full Name of Payee Date of Public Distribution/Dissemination Mesa Sign Shop 10 26 2024 Mailing Address 756 W Main St Amount State Zip Code 389.88 City AZ 85201 Transaction ID: SE.6467 Mesa Date of Disbursement or Obligation Purpose of Expenditure Category/ 004 10 2024 Advertising Type Name of Federal Candidate Office Sought: House District: HARRIS, KAMALA,,, AZ Oppose President Senate State: Disbursement For: Primary X General Calendar Year-To-Date 2024 58173.06 Per Election for Office Sought Other (specify) Full Name of Payee Date of Public Distribution/Dissemination Resilent Strategies, LLC 2024 10 27 Mailing Address

4540 N 11th Ave

City

Phoenix

Advertising

Purpose of Expenditure

HARRIS, KAMALA, , ,

Name of Federal Candidate

Calendar Year-To-Date

Per Election for Office Sought

(a) SUBTOTAL of Itemized Independent Expenditures	<b>&gt;</b>	-		-		× 3	-2		76	16.5	0	
(b) SUBTOTAL of Uniternized Independent Expenditures	<b>&gt;</b>	2		,	N N	8	-70	7.8	-	7	F	
(c) TOTAL Independent Expenditures	١	T.	-	2			121	nego mellen	_	- Ch	-	]

Zip Code

85013

Category/

65399.68

Type

X Support

Oppose

004

State

AZ

Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.

Webster, John, , ,	Date	10 ×	26	2024
Signature				

7226 62

2024

AZ

X General

District:

State:

Amount

Office Sought:

2024

X President

Disbursement For:

Transaction ID: SE.6466

Other (specify) ▶

Date of Disbursement or Obligation

24

House

Senate

Primary

## 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES (Schedule E)

ochedule L)		FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full)		FEC IDENTIFICATION NUMBER ▼
ARIZONA REPUBLICANS WHO BELIEVE IN TREATING OT	THERS WITH RESPE	CT C00752089
Check if 24-hour report 48-hour report New report	Amends report filed	on M = M / D = D / Y = Y = Y
Full Name of Payee		Date of Public Distribution/Dissemination
Resilent Strategies, LLC		10 27 Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y
Mailing Address 4540 N 11th Ave		Amount
City State Zip	Code	25000.00
Phoenix AZ 85	013	Transaction ID : SE.6465 Date of Disbursement or Obligation
Purpose of Expenditure Advertising	ategory/ Type 004	M 10 / D D / Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y
Name of Federal Candidate	Support Office	Sought: House District:
HARRIS, KAMALA, , ,		President Senate State: AZ
Calendar Year-To-Date Per Election for Office Sought	Disbur 2024	rsement For: Primary General  Other (specify)
Full Name of Payee		Date of Public Distribution/Dissemination
Tuli Name of Layee		M = M / D = D / Y = Y = Y = Y
Mailing Address		Amount
City State Zip	Code	
		Date of Disbursement or Obligation
Purpose of Expenditure C	ategory/ Type	M = M / D = D / Y = Y = Y
Name of Federal Candidate	Support Office	Sought: House District:
		President Senate State:
Calendar Year-To-Date		rsement For: Primary General
Per Election for Office Sought		Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Expenditures	·····	25000.00
(b) SUBTOTAL of Uniternized Independent Expenditures	<b>&gt;</b>	
(c) TOTAL Independent Expenditures	<b>&gt;</b>	32616.50
Under penalty of perjury I certify that the independent expenditures rep with, or at the request or suggestion of, any candidate or authorized corparty committee) any political party committee or its agent.		
Webster, John, , ,	Date 10	0 26 7 2024
8		

PAGE 2

OF

# Exhibit H

### 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES

Schedule E)	SHONES	PAGE 1 OF 1 FOR SE OF FORM 24/48
NAME OF COMMITTEE (IN Full) ARIZONA REPUBLICANS WHO BELIEVE IN TREATING	G OTHERS WITH RI	ESPECT C C00752089 FEC IDENTIFICATION NUMBER ▼
Check if 24-hour report 48-hour report New re	port Amends repor	rt filed on
Full Name of Payee Resilent Strategies, LLC		Date of Public Distribution/Dissemination
Mailing Address 4540 N 11th Ave		10 30 2024 Amount
City State	Zip Code	10588.99
Phoenix AZ	85013	Transaction ID : SE.6470 Date of Disbursement or Obligation
Purpose of Expenditure	Category/ 004	10 D D / Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y
Advertising	Type 004	10 20 2027
Name of Federal Candidate	Support	Office Sought: House District:
HARRIS, KAMALA, , ,	Oppose	President Senate State: AZ
Calendar Year-To-Date Per Election for Office Sought	100988.67	Disbursement For: ☐ Primary ☐ General 2024 ☐ Other (specify) ▶
Full Name of Payee	*	Date of Public Distribution/Dissemination
		M = M / D = D / Y = Y = Y
Mailing Address		Amount
City State	Zip Code	
		Date of Disbursement or Obligation
Purpose of Expenditure	Category/ Type	M = M / D = D / Y = Y = Y
Name of Federal Candidate	Cupport	Office Sought: House District:
Control State Control	Support Oppose	President Senate State:
Calendar Year-To-Date Per Election for Office Sought		Disbursement For: Primary General
		Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Expenditures		10588.99
(b) SUBTOTAL of Unitemized Independent Expenditures		•
(c) TOTAL Independent Expenditures		10588.99
Under penalty of perjury I certify that the independent expenditure with, or at the request or suggestion of, any candidate or authorize party committee) any political party committee or its agent.		
Webster, John, , , Signature	Date	10 30 / Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y Y

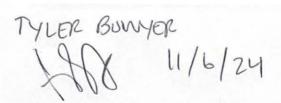
# Exhibit I

### 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES

Schedule E)	I ENDITORES	PAGE 1 OF 2 FOR SE OF FORM 24/48	
IAME OF COMMITTEE (In Full) ARIZONA REPUBLICANS WHO BELIEVE IN TRE	EATING OTHERS WITH RESP	ECT C C00752089 FEC IDENTIFICATION NUMBER ▼	
check if 24-hour report 48-hour report New report Amends report filed on Amends report filed on			
Full Name of Payee Convergence Targeted Communications		Date of Public Distribution/Dissemination	
Mailing Address 1250 Connecticut Ave NW		Amount	
City State Washington DC	Zip Code 20036	7000.00  Transaction ID : SE.6479	
Purpose of Expenditure Advertising	Category/ Type 004	Date of Disbursement or Obligation  M 10	
Name of Federal Candidate HARRIS, KAMALA, , ,		ce Sought: House District:  President Senate State: AZ	
Calendar Year-To-Date Per Election for Office Sought		oursement For: Primary X General	
Full Name of Payee Resilent Strategies, LLC		Date of Public Distribution/Dissemination	
Mailing Address 4540 N 11th Ave		Amount	
City State Phoenix AZ		46972.77  Transaction ID : SE.6478  Date of Disbursement or Obligation	
Purpose of Expenditure Advertising	Category/ Type 004	10 / D = D / Y = Y = Y = Y = Y = Y	
Name of Federal Candidate HARRIS, KAMALA, , ,	Support Office Oppose	ce Sought: House District:  President Senate State: AZ	
Calendar Year-To-Date Per Election for Office Sought	147961.44 Disk 202	oursement For: Primary ☐ General  Other (specify) ▶	
(a) SUBTOTAL of Itemized Independent Expenditures		53972.77	
(b) SUBTOTAL of Unitemized Independent Expenditures	·····		
(c) TOTAL Independent Expenditures	<b>•</b>		
Under penalty of perjury I certify that the independent expenditures reported herein were not made in cooperation, consultation, or concert with, or at the request or suggestion of, any candidate or authorized committee or agent of either, or (if the reporting entity is not a political party committee) any political party committee or its agent.			
Webster, John, , ,	Date	10 31 Y Y Y Y Y	

### 24/48 HOUR REPORT OF INDEPENDENT EXPENDITURES

Schedule E)	JAL 3	PAGE 2 OF 2 FOR SE OF FORM 24/48
NAME OF COMMITTEE (In Full) ARIZONA REPUBLICANS WHO BELIEVE IN TREATING OT	THERS WITH RESP	ECT C C00752089 FEC IDENTIFICATION NUMBER ▼
Check if 24-hour report 48-hour report New report Amends report filed on		
Full Name of Payee Uplift  Mailing Address 2120 University Ave		Date of Public Distribution/Dissemination  10  31  Amount
2000000 KNOWN	Code	70000.00  Transaction ID : SE.6477
Durage of Exampliture	ategory/ 004	Date of Disbursement or Obligation
Name of Federal Candidate HARRIS, KAMALA, , ,		ee Sought: House District: President Senate State: AZ
Calendar Year-To-Date Per Election for Office Sought 21	Dist 2024	oursement For: Primary General  Other (specify)
Full Name of Payee		Date of Public Distribution/Dissemination
Mailing Address		Amount
City State Zip	) Code	Date of Disbursement or Obligation
Purpose of Expenditure C	ategory/ Type	M = M / D = D / Y = Y = Y = Y
Name of Federal Candidate	Support Office Oppose	ce Sought: House District:  President Senate State:
Calendar Year-To-Date Per Election for Office Sought	Disk	oursement For: Primary General Other (specify) ▶
(a) SUBTOTAL of Itemized Independent Expenditures		70000.00
(b) SUBTOTAL of Unitemized Independent Expenditures		
(c) TOTAL Independent Expenditures	<b>&gt;</b>	123972.77
Under penalty of perjury I certify that the independent expenditures rep with, or at the request or suggestion of, any candidate or authorized corparty committee) any political party committee or its agent.		
Webster, John, , , Signature	Date	10 31 7 2024



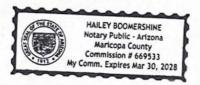
**NOTARY CERTIFICATE** 

State of Arizona

County of Maricopa

Subscribed, signed, and sworn to me under the penalty of perjury on this 6th day of November, 2024, by Tyler Bowyer, the Executive Director of Turning Point PAC, Inc., who personally appeared before me, affirmed the complaint under penalty of perjury, and whose identity was proved to me on the basis of satisfactory evidence to be the person whose name is subscribed to this document.

Seal:



Notary Public

My Commission Expires:

March, 30, 2028