



Campaign Finance

Candidate Committee Guide

www.azsos.gov/elections



1700 W. Washington St., 7th FL, Phoenix, AZ 85007



1-877-THE-VOTE (843-8683)



ABOUT THIS PUBLICATION

Published by the Arizona Department of State, Office of the Secretary of State, Secretary of State, Election Services Division

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CONTACT US

Mailing address for all correspondence or filings:

Office of the Secretary of State
Attention: Election Services Division
1700 W. Washington St., FL 7
Phoenix, AZ 85007-2808

Telephone: (602) 542-8683

Fax: (602) 542-6172

www.azsos.gov/elections

CONTENTS

1	Establishing a Candidate Committee.....	3
1.1	When to Form a Committee	3
1.2	Where to Register a Candidate Committee	4
1.3	Filing a Statement of Organization	5
1.3.1	Getting Started – Information for Statement of Organization	5
1.3.2	Committee Information	6
1.3.3	Chairperson and Treasurer Information.....	8
1.3.4	Finalizing a Statement of Organization.....	9
1.4	Qualification for Public Funding.....	9
1.5	Changes in Committee Information	10
1.6	Forming Multiple Committees.....	10
2	Recordkeeping and Financial Management.....	10
2.1	Collecting Contributor Information	11
2.1.1	Information Required by Contributor Type.....	11
2.1.2	Using Standard Disclaimers	14
2.1.3	Making “Best Efforts” to Seek Missing Information.....	14
2.1.4	Reporting and Amending Reports with Contributor Information.....	15
2.2	Treasurer Duties – Managing Financial Activity and Records.....	15
2.2.1	Activities Requiring Treasurer Approval	15
2.2.2	Methods of Accepting Contributions	15
2.2.3	Recording Contributions and Expenditures	16
2.2.4	Maintaining Separate Bank Accounts.....	17
2.2.5	Maintaining Financial Records.....	18
2.2.6	Record Keeping Requirements versus Reporting Requirements.....	19
2.2.7	Preserving Records Prior to Committee Formation	20
3	Receiving Contributions.....	20
3.1	What is a “Contribution”?.....	20
3.1.1	Monetary Contributions	21
3.1.2	Loans	21
3.1.3	In-Kind Contributions.....	23
3.2	Permissible Contributors to Candidate Committee.....	23

3.2.1	Individual Contributors	23
3.2.2	Mega PAC Contributors	25
3.2.3	Political Party Contributors.....	25
3.2.4	Partnership Contributors.....	25
3.2.5	Partnership Establishing a PAC.....	26
3.2.6	Contributions to Other Candidate Committees.....	27
3.2.7	Corporate, LLC, and Union Contributors.....	27
3.3	Contribution Limits	27
3.4	How Is an Election Cycle Defined for Contribution Purposes?	28
3.5	Remedying Excess and Unlawful Contributions	29
3.6	Joint Fundraising Events.....	30
3.7	Volunteer Activity.....	32
4	Special Rules for Candidate Committees.....	33
4.1	Transfers from Prior Committees	33
4.1.1	Running for the Same Office in a Subsequent Election Cycle.....	33
4.1.2	Running for a Different Office.....	33
4.1.3	Aggregating Contributions from Different Sources	34
4.2	Use of Personal Monies	34
4.2.1	Personal Monies Defined.....	35
4.3	Political Party Support	35
4.4	Legal and Accounting Services.....	36
4.5	Candidate Appearances at a Business Facility.....	36
4.6	Elected Official Tours and Conferences	36
4.7	Statewide and Legislative Officeholder Expense Accounts	37
4.7.1	Use of Officeholder Monies.....	37
4.7.2	Officeholder Account Source Restrictions.....	38
4.7.3	Officeholder Account Contribution Limits	38
4.7.4	Officeholder Account Spending Limits	39
4.7.5	Disposal of Officeholder Monies.....	40
4.7.6	Reporting Responsibilities.....	40
4.7.7	Enforcement Penalties	40
5	Limits on Contributions by Candidate Committees	41
6	Advertising and Fundraising Disclosures.....	41

6.1	Disclosure Requirements	42
6.2	When a Disclosure is NOT Required	42
7	Financing a Recall Election	43
8	Filing Campaign Finance Reports.....	44
8.1	Content of Campaign Finance Reports.....	44
8.2	Special Reporting.....	44
8.2.1	In-Kind Contributions.....	44
8.2.2	Processing Fees	44
8.3	Campaign Finance Reporting Periods and Deadlines	45
8.4	Penalty for Late or Incomplete Campaign Finance Reports	45
9	Winding Down and Terminating a Committee.....	46
9.1	Repayment of Debts	46
9.1.1	Fundraising to Retire Debt.....	46
9.1.2	Debt Forgiveness	46
9.2	Disposal of Surplus Monies	46
9.3	Terminating a Committee.....	47
10	Campaign Finance Enforcement	48
10.1.1	Grounds for Campaign Finance Complaints	48
10.1.2	Prohibited Contributions	49
10.1.3	Coordinated Expenditures.....	49
11	Frequently Asked Questions.....	52

1 Establishing a Candidate Committee

With few exceptions, a candidate generally needs to form a committee before commencing the candidate's election campaign in earnest.

1.1 When to Form a Committee

A candidate seeking election to state office, including a justice or judge seeking to be retained in office, is required to form a candidate committee upon reaching a certain level of financial activity. [A.R.S. § 16-901\(7\)](#); [A.R.S. § 16-905\(A\)](#). Arizona Supreme Court Justices and Court of Appeals judges seek retention in office pursuant to [Ariz. Const. Art. VI, § 38](#) after their initial appointment. Although they are required to form committees if they reach the requisite financial threshold, Arizona judicial ethics rules prohibit judges from personally soliciting contributions. [Ariz. Code of Judicial Conduct, Rule 4.1\(A\)\(6\)](#).

A **statewide or legislative candidate** who has received contributions or made expenditures (in any combination) of at least \$1,500 in connection with his or her candidacy during the 2026 election cycle is required to form a committee **within 10 days** of reaching that threshold.¹ [A.R.S. § 16-905\(A\)](#); [A.R.S. § 16-906\(A\)](#). For example, receiving a \$750 check from a family friend while spending \$750 on election supplies will trigger the registration requirement. Use of a candidate's own personal monies for electoral purposes counts towards the \$1,500 threshold. A candidate's "personal monies" include all sources of income or wealth available to the candidate or candidate's spouse. [A.R.S. § 16-901\(40\)](#). **If a 2026 election cycle candidate never reaches the \$1,500 threshold, committee registration and campaign finance reporting are *not required*.**

Beginning in April 2024, a **2028 statewide candidate** who has received contributions or made expenditures (in any combination) of at least **\$1,600** in connection with his or her candidacy during the election cycle is required to form a committee **within 10 days** of reaching that

¹ The registration threshold for statewide, legislative, and county candidates is increased by \$100 each odd-numbered year pursuant to [A.R.S. § 16-931\(A\)\(1\)](#).

threshold.² [A.R.S. § 16-905\(A\)](#); [A.R.S. § 16-906\(A\)](#). For example, receiving a \$800 check from a family friend while spending \$800 on election supplies will trigger the registration requirement. Use of a candidate's own personal monies for electoral purposes counts towards the \$1,600 threshold. A candidate's "personal monies" include all sources of income or wealth available to the candidate or candidate's spouse. [A.R.S. § 16-901\(40\)](#). **If a 2028 election cycle candidate never reaches the \$1,600 threshold, committee registration and campaign finance reporting are not required.**

Spending "in connection with" one's candidacy includes more than just the obvious indicators that someone is running for office, such as receiving contributions or purchasing campaign signs. [A.R.S. § 16-905\(A\)-\(B\)](#); [A.R.S. § 16-931\(A\)\(1\)](#). It also includes, but is not limited to, activities such as conducting polling, purchasing email lists, hiring attorneys or consultants, taking out a loan, incurring travel expenses, leasing facilities, purchasing supplies or equipment, or any other expense incurred for election purposes. All contributions received or expenditures incurred before committee registration are eventually reportable, so a candidate must keep track of all financial activity from dollar one. [A.R.S. § 16-907\(I\)](#); *see also* [A.R.S. § 16-927\(B\)](#) (specifying that the reporting period for a candidate's first campaign finance report of the election cycle must include activity from the entire election cycle to date).

Even if registration is not required, it nonetheless may be a good idea. At the state level, for example, doing so will enable the candidate to have access to the online campaign finance reporting system to begin inputting financial data.

Candidate committee registration thresholds for statewide and legislative offices are increased on a biennial basis. [A.R.S. § 16-931\(A\)\(1\)](#).

Financial Threshold for Registration	
2025-26 Election Cycle	2027-28 Election Cycle
\$1,500	\$1,600

1.2 Where to Register a Candidate Committee

A candidate committee is formed by filing a statement of organization with the appropriate filing officer within 10 days of qualifying as a committee. [A.R.S. § 16-901\(27\)](#); [A.R.S. § 16-906\(A\)](#); [A.R.S.](#)

² The registration threshold for statewide, legislative, and county candidates is increased by \$100 each odd-numbered year pursuant to [A.R.S. § 16-931\(A\)\(1\)](#).

§ 16-928(A). The table on the following page demonstrates the filing office for each office type.

Office Sought	Filing Office	Contact Information
Statewide & Legislative Office	Arizona Secretary of State	https://azsos.gov/elections CampaignFinance@azsos.gov (602) 542-8683
		https://beacon.arizona.vote Statewide and legislative candidates file a statement of organization via Beacon, the online campaign finance system.
County & Special Taxing Board	County Recorder's Office or Elections Department within that county.	Contact your county filing officer .
School Board	County School Superintendent's Office within that county.	Contact your county filing officer for further information.
City or Town	City or Town Clerk	Contact your city/town clerk for further information.

1.3 Filing a Statement of Organization

1.3.1 Getting Started – Information for Statement of Organization

All committees must designate a chairperson and treasurer to administer the committee. A chairperson may be assigned as many or as few duties as the candidate sees fit. Some chairpersons run the day-to-day operations of the committee, while other chairpersons merely serve as figureheads.

However, the committee treasurer should not be a figurehead. The treasurer is responsible for keeping the committee's books and records, must sign off on financial transactions, and remains legally and personally responsible for filing complete and

What do you need to get started?

- ✓ Committee Chairperson
- ✓ Committee Treasurer
- ✓ Designate Physical & Email Address that **will be checked often**
- ✓ Determine Banking Institution

accurate campaign finance reports. [A.R.S. § 16-907\(A\)](#); [A.R.S. § 16-926\(B\)\(5\)](#); [A.R.S. § 16-934\(B\)](#). Since many campaign finance violations stem from poor recordkeeping or inattention to legal requirements, picking the right treasurer is important.

Candidates oftentimes select the person they trust most to serve as chairperson and treasurer: *themselves*. ***Only candidate committees are permitted to have the candidate act as chairperson and treasurer.*** [A.R.S. § 16-906\(B\)\(3\)](#). Only the candidate may serve in both roles.

The committee needs to provide contact information for the committee to the filing officer. The candidate may use their own contact information, but some candidates establish a separate mailing address and/or email address for their committee. Whichever is used, the candidate must provide email and physical addresses that the treasurer will check often. Donors may send checks that must be timely reported, and election officials will send important announcements, filing reminders, and failure to file notifications by email. [A.R.S. § 16-906\(B\)\(6\)](#). ***In filing a Statement of Organization, the candidate agrees to accept all notices via email in lieu of certified mail or personal delivery. Failure to regularly check the email address accounts on file with the filing officer is not considered a valid defense against any enforcement action.***

A candidate committee must establish a separate bank account and disclose the name of its bank or other financial institution (*never provide bank account numbers in a Statement of Organization*). [A.R.S. § 16-906\(B\)\(5\)](#). In some cases, a committee might have to forecast in its Statement of Organization the bank where it *intends* to open an account because some banks might require a committee to have certain formalities already established prior to opening an account, such as filing a statement of organization, incorporating with the Arizona Corporation Commission, and/or obtaining a taxpayer identification number from the Internal Revenue Service. Committees are solely responsible for adhering to banking policies, and filing officers are unable to assist in establishing a bank account.

The committee may provide its *future* financial institution on a Statement of Organization if the committee ultimately opens an account with that institution. In that case, the committee should wait no longer than 30 days after opening the committee with the filing officer, creating the Statement of Organization, to open the account to avoid a campaign finance violation. ***The committee must open its own account and may not commingle other monies in the account.*** [A.R.S. § 16-907\(B\)\(1\)](#).

1.3.2 Committee Information

The following information must be provided about a candidate committee:

✓ **Committee name**

- The committee's name must include the candidate's first or last name and, if the candidate has a candidate committee open for more than one office, the office sought. If a candidate has multiple committees open, it is not necessary to identify the district with the "office sought" but legislative candidates must specify whether they are running for the Senate or House of Representatives. Abbreviations and shorthand phrases are permissible. For example, "Johnson 4 House" or "Smith Corp. Comm. Committee" are sufficiently descriptive committee names. In cases involving multiple committees, the committee names must include the office sought because it is necessary that any fundraising solicitations or advertising disclaimers properly disclose which committee actually paid for the expenditure. [A.R.S. § 16-906\(F\)](#); [A.R.S. § 16-925\(A\)\(1\)](#).

✓ **Committee mailing address**

- If the committee has its own mailing address separate from the candidate's, chairperson's, and treasurer's address, this mailing address should be listed.
- If the committee does not have its own mailing address, the committee may list the mailing address for the chairperson, treasurer, committee's political consultant, or any other person who speaks for the committee.
- A P.O. Box may serve as a mailing address.

✓ **Committee email address**

- If the committee has its own email address separate from the chairperson's or treasurer's email address, the committee's email address should be listed.
- If the committee does not have its own email address, the committee may list the email address for the candidate, chairperson, treasurer, committee's political consultant, or any other person who speaks for the committee.

✓ **Committee website** (if the committee has a website)

✓ **Committee telephone number**

- If the committee has its own telephone number separate from the chairperson's or treasurer's phone number, that number should be listed.
- If the committee does not have its own telephone number, the committee should list the telephone number for the candidate, chairperson, treasurer, committee's political consultant, or any other person who speaks for the committee.

- ✓ Name of any bank(s) or other financial institution(s) used by the committee. [A.R.S. § 16-906\(B\)\(5\)](#). *Bank account numbers should not be listed.*

1.3.3 Chairperson and Treasurer Information

The following information must be provided about the committee chairperson and treasurer:

- ✓ **Chairperson and Treasurer Names**
 - A candidate may serve as chairperson of his or her own committee (and may serve as the committee treasurer as well).
- ✓ **Physical Location or Street Address**
 - The chairperson and treasurer must provide a physical or street address. A P.O. Box is not permitted. [A.R.S. § 16-906 \(B\)\(3\)](#).
- ✓ **Email Addresses for Chairperson and Treasurer**
 - The chairperson (and treasurer, if not the candidate serving in both capacities) should list an email address that is separate from the committee's main email address. This is intended to ensure there are multiple ways to reach a committee via email.
- ✓ **Telephone Number**
 - The chairperson (and treasurer, if not the candidate serving in both capacities) should list a telephone number that is separate from the committee's telephone number. This is intended to ensure there are multiple ways to reach a committee via telephone.
- ✓ **Occupation**
 - The occupation should be sufficiently specific to identify the chairperson's (and treasurer, if not the candidate serving in both capacities) line of work.
 - "Attorney," "accountant," "doctor," "retired," "homemaker," "unemployed," "student," and the like are sufficiently descriptive. A "consultant" should be more specifically identified, such as "political consultant" or "management consultant."
 - If the chairperson (or treasurer, if not the candidate serving in both capacities) has multiple occupations, list the chairperson's primary occupation.
- ✓ **Employer**
 - If the chairperson (and treasurer, if not the candidate serving in both capacities) has multiple employers, list the primary employer.

- If the chairperson (or treasurer, if not the candidate serving in both capacities) is self-employed, list the name, company, or title through which the chairperson (or treasurer) does business.
- “Retired,” “homemaker,” “unemployed,” “student,” and the like are sufficient employer descriptions, if applicable.

1.3.4 Finalizing a Statement of Organization

After providing the required information outlined above, the candidate, chairperson, and treasurer must swear under penalty of perjury that they **(1)** have read this Guide, **(2)** agree to comply with Arizona campaign finance law, and **(3)** **agree to accept all notifications, statements, service of process, or other important documents via the committee’s email address.** [A.R.S. § 16-906\(B\)\(6\)](#).

****Please note, because official notifications are exclusively sent via email, the candidate and committee officers should list email addresses that will be routinely monitored. If email addresses change, the committee must update that information in [Beacon](#).*** In the event a campaign finance complaint is filed against the committee, for example, the filing officer cannot accept failure to monitor the email account(s) as a legitimate defense for failing to respond to the complaint or failure to file required campaign finance reports.

Original signatures are not required because a filing officer must provide an electronic filing option for all candidates. [A.R.S. § 16-928\(C\)](#). Local jurisdictions comply with this requirement by providing fillable PDFs and accepting any completed documents via email or direct upload to the filing officer’s website.

Once registration is complete, the filing officer will issue an identification number for the candidate committee. [A.R.S. § 16-906\(D\)](#). This identification number will be used to identify the committee in future correspondence.

1.4 Qualification for Public Funding

A statewide or legislative candidate who has filed a statement of organization is eligible to participate in the Arizona Citizens Clean Elections funding program. A participating candidate must comply with the provisions of the Citizens Clean Elections Act, including filing an Application for Certification as a Participating Candidate with the Secretary of State’s Office before the end of the applicable qualifying period. [A.R.S. § 16-947](#); [A.R.S. § 16-950](#). Please contact the [Clean Elections Commission](#) for further information.

1.5 Changes in Committee Information

If there is a change to any committee information contained in the Statement of Organization, a committee must file an amended statement of organization within ten days of the change. [A.R.S. § 16-906\(C\)](#).

1.6 Forming Multiple Committees

From a campaign finance perspective, a candidate may only have one committee in existence for the same office during the same election cycle. [A.R.S. § 16-906\(F\)](#). This prevents a candidate from subverting contribution limits by having donors contribute to multiple affiliated committees.

In the event a candidate seeks to open multiple committees for the same office, filing officers are authorized to reject the additional statement of organization. Even if the filing officer accepts the duplicate committee, the candidate would be subject to a campaign finance complaint for maintaining multiple committees for the same office in violation of [A.R.S. § 16-906\(F\)](#).

CAUTION:

If a candidate closes a committee and reopens another committee for the same office during the same election cycle, contribution limits will not reset for the new committee. Contributions to the original committee will be deemed to be contributions to the new committee, so both committees must keep accurate records to reconcile both committees' financial activities.

If a candidate runs for the same office in consecutive election cycles, it is not necessary to open a new committee for the next election cycle after terminating the previous committee. Rather, it is acceptable to continue using the previously existing committee, *amend* that committee's statement of organization to make any necessary changes, and update the committee's election cycle designation within the campaign finance reporting system.

A candidate may simultaneously maintain multiple committees *for different offices*; however, that does not mean the candidate is permitted to freely transfer money between these committees. If a candidate has a candidate committee open for **more than one office**, the committee's name **must include the office sought** (e.g. Jane Doe for State Representative; Jane Doe for State Senator).

2 Recordkeeping and Financial Management

A candidate committee is required to maintain financial records. The legal responsibility for compliance falls on the committee treasurer, but many candidates act as their own treasurer. Regardless of who serves as treasurer, it is imperative that candidates remain actively involved in financially managing their own committees. [A.R.S. § 16-907\(A\)](#).

2.1 Collecting Contributor Information

When a committee receives contributions, the committee must conduct its due diligence to properly document these contributions. Different rules apply depending on the source and the amount of the contribution.

2.1.1 Information Required by Contributor Type

2.1.1.1 In-State Individual Contributions of \$100 or Less

When an in-state individual contributor gives \$100 or less to a candidate's committee during the election cycle, the committee need *not* report the contributor's name, address, occupation and employer. [A.R.S. § 16-926\(B\)\(2\)\(a\)\(i\)](#). But the committee must keep *records* of this information. [A.R.S. § 16-907\(D\)\(1\)](#).

If an in-state individual contributor eventually exceeds the \$100 threshold during the election cycle, the contributor's identifying information – name, address, occupation and employer – will be required to be reported going forward. Generally, a candidate should err on the side of caution by collecting contributor information in the event a small dollar contributor ultimately exceeds \$100 in contributions during the election cycle. If the committee does not track a person's small-dollar contributions from the beginning, it will be difficult to know when a contributor's \$100 aggregate threshold has been reached.

Keep in mind that, even if identifying information is not required from small-dollar individual contributors, the candidate committee must report the **aggregate amount** of contributions from all in-state individuals whose individual contributions do not exceed \$100 for the election cycle. [A.R.S. § 16-926\(B\)\(2\)\(b\)](#).

2.1.1.2 In-State Individual Contributions that Exceed \$100

A candidate committee must fully IDENTIFY any individual who contributes more than \$100 during the election cycle. The committee receiving the contributions is required to record and report each contributor's **name, address, occupation, and employer**. [A.R.S. § 16-901\(29\)](#); [A.R.S. § 16-907\(C\)](#); [A.R.S. § 16-926\(B\)\(2\)\(a\)\(i\)](#). The following standards apply:

✓ **Contributor's Name**

- The contributor must provide a first and last name.
- If a joint contribution is made by a married couple, each spouse's first and last name must

be provided to the committee.

✓ **Contributor's Residential Location or Street Address**

- Only a residential address or location may be provided. A work address or P.O. Box is not permitted unless the contributor is a protected voter. [A.R.S. § 16-907\(C\)](#); [A.R.S. § 16-926\(B\)\(2\)\(a\)\(i\)](#).

✓ **Contributor's Occupation**

- The occupation should be sufficiently specific to identify the contributor's line of work.
- "Attorney," "accountant," "doctor," "retired," "homemaker," "unemployed," "student," and the like are sufficiently descriptive. A "consultant" should be more specifically identified, such as "political consultant" or "management consultant."
- If the contributor has multiple occupations, the contributor's primary occupation should be provided.

✓ **Contributor's Employer**

- If the contributor has multiple employers, the contributor's primary employer should be provided.
- If the contributor is self-employed, the contributor should list the name, company, or title through which he or she does business.
- "Retired," "homemaker," "unemployed," "student," and the like are sufficient employment descriptions, if applicable.

2.1.1.3 Out-of-State Individual Contributions

For all contributions from out-of-state individuals, regardless of amount, a committee is required to record and report each contributor's ***name, address, occupation, and employer***. [A.R.S. § 16-901\(29\)](#). The following standards apply:

✓ **Contributor's Name**

- The contributor must provide a first and last name.
- If a joint contribution is made by a married couple, each spouse's first and last name must be provided to the committee.

✓ **Contributor's Residential Location or Street Address**

- Only a residential address or location may be provided. A work address or P.O. Box is not permitted.

✓ **Contributor's Occupation**

- The occupation should be sufficiently specific to identify the contributor's line of work.
- "Attorney," "accountant," "doctor," "retired," "homemaker," "unemployed," "student," and the like are sufficiently descriptive. A "consultant" should be more specifically identified, such as "political consultant" or "management consultant."
- If the contributor has multiple occupations, the contributor's primary occupation should be provided.

✓ **Contributor's Employer**

- If the contributor has multiple employers, the contributor's primary employer should be provided.
- If the contributor is self-employed, the contributor should list the name, company, or title through which he or she does business.
- "Retired," "homemaker," "unemployed," "student," and the like are sufficient employment descriptions, if applicable.

2.1.1.4 Contributions from Other Committees

For contributions from political action committees (PACs), political parties, or other candidate committees *in any amount*, a candidate committee is required to record and report the contributor's name and address. [A.R.S. § 16-901\(29\)\(b\)](#). All committee contributors must be identified, as there is no \$100 reporting threshold like there is in the individual contributor context. [A.R.S. § 16-926\(B\)\(2\)\(a\)\(iii\)-\(v\)](#). A candidate committee may accept contributions from political parties and other candidate committees under limited circumstances. The following standards apply:

✓ **Committee's Name**

- A committee must provide its name as reflected in its statement of organization. [A.R.S. § 16-901\(29\)\(b\)](#).

✓ **Committee's Physical Location or Street Address**

- Only a physical address or street location may be provided. A P.O. Box is not permitted.

2.1.1.5 Partnership Contributions

For partnership contributions in any amount, a candidate committee is required to record and report the partnership's name and address, including identifying information about the individual partner contributors. [A.R.S. § 16-901\(29\)\(b\)](#). The following standards apply:

✓ **Partnership's Name**

- A partnership must provide its name as reflected in its articles of incorporation/organization, partnership agreement, or other official document filed with a government entity.

✓ **Partnership's Physical Location or Street Address**

- Only a physical address or street location may be provided. A P.O. Box is not permitted.

✓ **Individual Contributing Partners' Information**

- A partnership must provide the name, address, occupation and employer for each individual partner who has agreed to participate in the partnership's contribution, as well as the amount of the contribution attributed to each partner. [A.R.S. § 16-917\(C\)\(1\)](#).

2.1.2 Using Standard Disclaimers

Candidate committees must not only clearly ask for identifying information, but they must also inform prospective contributors that the committee is legally required to do so. [A.R.S. § 16-907\(C\)](#). Thus, when sending out a fundraising solicitation for a forthcoming fundraiser, a disclaimer similar to the following sample disclaimer would typically suffice. **Sample:** "This committee is legally required to seek identifying information from each contributor."

2.1.3 Making "Best Efforts" to Seek Missing Information

Committees must review all contributions upon receipt to ensure they meet the required standards for identifying contributors. Contributions found to be lacking are "incomplete contributions." [A.R.S. § 16-901\(30\)](#). When a committee discovers an incomplete contribution, it must affirmatively seek out the missing information in order to file a complete and accurate campaign finance report.

The committee must make its "best effort" to acquire the missing information. To qualify as a "best effort," the committee treasurer (or the treasurer's agent) must make at least one written attempt

at communication, such as by email, text message, private message through social media or other similar communication, or at least one attempted oral communication to the contributor that is documented in writing. [A.R.S. § 16-901\(5\)](#). In both cases, the treasurer must keep written records documenting these attempts to demonstrate compliance with these requirements. Each follow-up request for information must clearly identify the missing information sought and inform the contributor that the committee was legally required to seek that information.

2.1.4 Reporting and Amending Reports with Contributor Information

If a committee's best effort to contact a contributor ultimately fails in time for their next reporting deadline, it should file its campaign finance report in a timely manner with the incomplete contributor information.

If a contributor belatedly provides this information to the committee after the applicable campaign finance report is filed, the committee must amend that report with the updated contributor information within a reasonable period. [A.R.S. § 16-907\(C\)](#).

If a previously small dollar in-state individual donor reaches over \$100 in aggregate contributions during the election cycle, the committee will itemize the contribution that exceeded the \$100 aggregate amount in the next upcoming report and provide the in-state individual contributor's identifying information on that report.

2.2 Treasurer Duties – Managing Financial Activity and Records

The committee treasurer is charged with preserving the committee's financial records, managing the committee's financial affairs, and ensuring the accuracy of campaign finance reports. This section outlines in greater detail some of these basic responsibilities.

2.2.1 Activities Requiring Treasurer Approval

A candidate committee may not engage in any financial activity without the authorization of the treasurer or the treasurer's agent. [A.R.S. § 16-907\(A\)](#). **The treasurer is ultimately responsible for campaign finance reporting.**

2.2.2 Methods of Accepting Contributions

A candidate committee may accept a contribution made by cash, check, credit card, payroll deduction, wire transfer, or any other method of online or electronic payment, including contributions in the form of cryptocurrency. [A.R.S. § 16-907\(E\)-\(F\)](#).

The committee need not provide a receipt for cash contributions, although some contributors might request one. Most contributions likely will be by check or credit card, however. In those cases, the treasurer (or treasurer's agent) has a duty to **ensure that the contributor is the account holder** of the instrument. [A.R.S. § 16-907\(F\)](#). For example, the committee may not accept a check drawn from the account of "David Johnson" when the accompanying contribution form is from "Marcy Smith." In these cases, the committee must attempt to reconcile the discrepancy and be prepared to issue a refund. [A.R.S. § 16-918](#) and [A.R.S. § 16-1022\(B\)](#), which prohibit contributing in the name of another.

Special attribution rules apply to married couples. If a check has both spouses' names printed on it but only one spouse signs the check, the contribution is deemed to be from the signing spouse only. [A.R.S. § 16-907\(F\)](#). The same is true for credit card transactions: if a contribution is made from a joint account, only the spouse who authorized the transaction is deemed the contributor. A married couple seeking to make a joint contribution, therefore, must jointly sign the check or otherwise clearly indicate that the contribution should be attributed to both spouses. [A.R.S. § 16-907\(F\)](#). A joint contribution is normally assumed to be allocated 50/50 between spouses, but any other percentage chosen by joint contributors is permissible. Such contributions should indicate the allocation for each of the joint contributors. Joint contributions require identifying information for each contributor.

2.2.2.1 Cryptocurrency Contributions

While a candidate committee may accept an ***in-kind contribution*** in the form of cryptocurrency, the committee should consult legal counsel for advice regarding accepting, retaining, and valuing cryptocurrency for campaign finance reporting purposes. [A.R.S. § 16-901\(11\)](#).

2.2.3 Recording Contributions and Expenditures

Arizona law establishes methods for determining the date of a contribution. [A.R.S. § 16-926\(C\)\(1\)](#).

For contributions, the date of receipt is either:

- The date the committee knowingly takes possession of the contribution; or
- The date shown on the check or credit card payment.

"Knowingly takes possession" means that the committee is aware that it likely possesses a contribution. For example, the committee's most recent mail delivery contains several return envelopes issued by the committee to receive contributions.

For in-kind contributions, they are deemed made on either:

- The date services are performed; or
- The date the committee receives the services.

For committee expenditures and disbursements, there are specified rules:

- For a transaction by **check**, the expenditure or disbursement is deemed to have been made on the date the committee signs the check.
- For **credit card transactions on paper**, the expenditure or disbursement is made on the date that authorization slip is signed. For example, when a committee is presented with a paper slip that must be signed by the card holder to charge a credit card.
- For an **online transaction**, the expenditure or disbursement is deemed made on the date that the committee authorizes the transaction.
- For an **agreement to purchase goods or services**, the expenditure or disbursement is deemed made either:
 - On the date of the parties' agreement; or
 - The date that the committee was issued a purchase order/invoice.
 - *For Clean Elections participating candidates*, however, an agreement to purchase goods or services is deemed made on the date of the parties' agreement. [A.A.C. R2-20-110\(A\)3\(a\)](#).

[A.R.S. § 16-926\(C\)\(2\)](#) outlines that any expenditure or disbursement that does not fall into one of categories listed above, the committee is to treat the expenditure/disbursement as being made:

- On the date that the committee authorized the expenditure/disbursement; or
- The date that the money is withdrawn from the committee's account.

The reporting method is for the committee to decide; however, the method utilized must be applied consistently throughout the election cycle. [A.R.S. § 16-926\(C\)\(3\)](#). For example, a candidate may not selectively use the date of the check for some contributions while using date of possession for other contributions received at the same time.

2.2.4 Maintaining Separate Bank Accounts

An important aspect of campaign finance management is ensuring that monies are not commingled

in the same bank account. For candidate committees, this means that committee monies are not held in the same bank account as the candidate's or any other person's personal monies. [A.R.S. § 16-907\(B\)\(1\)](#). The committee's monies must be held in an account at the financial institution listed in the committee's statement of organization. Contributions from individuals, partnerships, candidate committees, political parties, and other PACs must be segregated in different bank accounts from contributions received from other donors. [A.R.S. § 16-907\(B\)\(1\)-\(2\)](#).

2.2.4.1 Recall Election Bank Accounts

Additional safeguards apply if the candidate is the subject of a recall election. In the event a recall petition serial number has been issued, the targeted officeholder is permitted to begin fundraising to defeat the recall effort. [A.R.S. § 16-901\(18\)](#) (creating a separate "election cycle" for a recall election, which commences with "the issuance of a recall petition serial number"). Since the officeholder operates under a brand-new election cycle for that purpose, any recall-related contributions, expenditures, or disbursements must be drawn from an account separate from the officeholder's principal committee account. The committee treasurer is not permitted to commingle or transfer money between these accounts. Thus, an officeholder should contact his or her financial institution to set up a separate bank account in the event a recall effort has been initiated. Once the recall election cycle has concluded, the recall committee may dispose of its monies in accordance with Arizona law and terminate the recall committee accordingly.

2.2.5 Maintaining Financial Records

The committee treasurer is responsible for maintaining records of **all** financial activity, even if the information is not required to be disclosed in a campaign finance report. [A.R.S. § 16-907\(A\)](#). This means keeping records of all the money flowing in and out of the committee, including:

- All contributions made or received by the committee;
- The identity of any contributor that contributed at least \$50 during the election cycle, including the name and address of all contributors, their occupation and employer, the date of each contribution, and the date the contribution was deposited into the committee's account ([A.R.S. § 16-907\(D\)\(2\)](#));
- The cumulative amount contributed by each donor during the election cycle ([A.R.S. § 16-907\(D\)\(3\)](#)); and
- The name and address of every person who receives any money from the committee, including the date, amount, and purpose of any expenditure or disbursement. [A.R.S. § 16-](#)

907(D)(4).

All the record keeping information must be maintained by the committee for a period of two years following the election cycle in which the activity occurred. [A.R.S. § 16-907\(G\)](#). Preservation of these records is imperative, as the filing officer or the enforcement officer may request these records from the committee at any time, regardless of whether a campaign finance report is pending. [A.R.S. § 16-907\(H\)](#). The “filing officer” for statewide and legislative campaign committees is the Secretary of State. The “enforcement officer” is the Attorney General. [A.R.S. § 16-901\(21\), \(27\)](#).

2.2.6 Record Keeping Requirements versus Reporting Requirements

These record keeping categories largely overlap with the information that must be disclosed in campaign finance reports, although not completely. For example, the record keeping statute requires a committee to preserve identifying records for donors who contribute at least \$50 in the aggregate during the election cycle, while the reporting statute requires a committee to report and identify any individual in-state donors that exceed \$100 in contributions, all out-of-state donors and all PAC donors regardless of how much money they contributed. Compare [A.R.S. § 16-907\(D\)\(2\)](#) (record keeping statute) with [A.R.S. § 16-926\(B\)\(2\)\(a\)](#) (reporting statute). Because identifying information is required for each contributor, no anonymous contributions are allowed, including raffles or passing the hat.

Record Keeping Requirement (A.R.S. § 16-907)	Reporting Requirement (A.R.S. § 16-926)
All contributions made or received by the committee.	Contributions from in-state individuals whose contributions exceed \$100 during the election cycle, including contributor identification (including occupation and employer).
The identity of any contributor that contributed at least \$50 in the aggregate during the election cycle regardless of amount and residency (in-state or out-of-state).	Contributions from out-of-state individuals regardless of contribution amount including contributor identification (including occupation and employer).

Disbursements are also recorded and reported differently as the graph on the following page demonstrates. Compare [A.R.S. § 16-907\(D\)\(4\)](#) (record keeping statute) with [A.R.S. § 16-926\(B\)\(3\)](#) (reporting statute).

Record Keeping Requirement (A.R.S. § 16-907)	Reporting Requirement (A.R.S. § 16-926)
The name and address of every person who receives any money from the committee, including the date, amount, and purpose of any expenditure or disbursement.	Itemized list of all disbursements in excess of \$250 during the reporting period including recipient name, address, description of the disbursement and date of disbursement.

2.2.7 Preserving Records Prior to Committee Formation

All contributions received and expenditures incurred before committee registration are eventually reportable, so a candidate must keep track of all financial activity from dollar one.

2026 election cycle statewide and legislative candidates are not required to form a committee and file campaign finance reports until it receives contributions and/or makes expenditures (in any combination) totaling at least \$1,500. 2028 election cycle candidates are required to form a committee and file campaign finance reports when they receive contributions and/or make expenditures (in any combination) totaling at least \$1,600. Once the registration requirement has been triggered, the committee's cumulative, pre-registration financial activity during that election cycle must be reported in the committee's first campaign finance report. [A.R.S. § 16-907\(I\)](#). This is why good recordkeeping is

important from day one of a candidate's committee.

Prior to officially forming a committee with the Secretary of State, the responsibility to maintain these early records falls upon the candidate since there is no treasurer until a formal committee has been organized and the statement of organization is accepted by the filing officer.

3 Receiving Contributions

3.1 What is a "Contribution"?

In general, a **contribution** is anything of value provided to a candidate committee for the purpose of influencing the candidate's election. [A.R.S. § 16-901\(11\)](#). Generally, the law assumes that **all** sources of money that flow into a candidate's committee account are contributions.

Under Arizona law, a candidate committee may only accept contributions from individuals, political action committees (PACs), political parties (only if the candidate is the **party's nominee**, having prevailed in the primary election), and partnerships. [A.R.S. § 16-913\(D\)](#). Any PAC or political party contributor must be registered with the appropriate filing officer in Arizona. **A candidate committee may not accept contributions from unions, corporations, LLCs, or any other organization, group or business entity (other than partnerships).** [A.R.S. § 16-913\(D\)](#); [A.R.S. § 16-916\(A\)](#). This means that a candidate committee must pay attention to the identity of its donors. Participating Clean Elections candidates may not accept any contribution except very limited early contributions. [A.R.S. § 16-941\(A\)\(1\)](#).

Contributions principally fall into three categories:

- Monetary
- Loans
- In-Kind

Allowed contributions are subject to contribution limits. Contribution limits vary according to the type of contributor (individual vs. Mega PAC), type of candidate (privately funded candidate vs. Clean Elections candidate), and office sought (statewide vs. legislative). [A.R.S. § 16-911](#) to [A.R.S. § 16-917](#).

Contributions must be reported; the candidate committee must gather identifying information about the contributor and file regular campaign finance reports. Contribution limits for participating candidates can be found [here](#), on the Arizona Clean Elections website. It is important to recognize what a contribution is and understand how it affects a committee.

3.1.1 Monetary Contributions

Monetary contributions are sources of payment directly received by your committee, in cash, by check, credit card, etc. These contributions are typically provided by third-party donors and are subject to contribution limits.

Monetary contributions also include **personal monies** supplied by the candidate or candidate's family to fund the candidate's committee. Personal monies are not subject to limits. [A.R.S. § 16-901\(40\)](#); [A.R.S. § 16-913\(F\)](#).

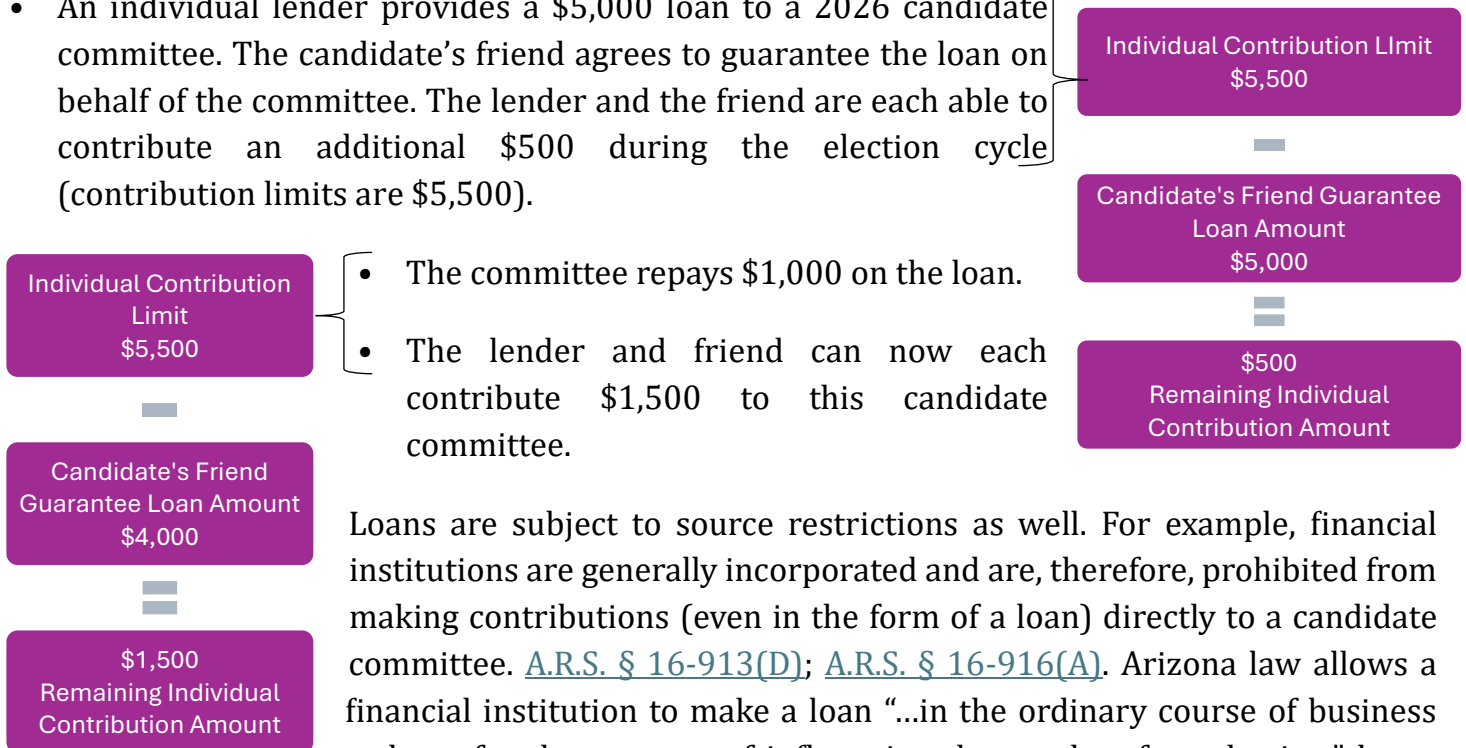
3.1.2 Loans

Loans are advances of money, or extensions of credit, provided to a candidate committee which the committee has agreed to pay back. Loans are considered contributions. [A.R.S. § 16-901\(11\)\(d\)](#). Loans are also subject to source restrictions; corporations, LLCs, and unions are not permitted to loan to candidate committees. [A.R.S. § 16-913\(D\)](#); [A.R.S. § 16-916\(A\)](#).

Any individual who endorses or guarantees a loan on a committee's behalf (*i.e.* agrees to be financially responsible for repaying the loan in the event the committee defaults) is considered to have contributed as well. [A.R.S. § 16-911\(B\)\(14\)](#). However, the candidate's spouse may guarantee the committee's loan without limitation.

As the candidate committee pays back a loan, the loan balance remains a contribution to the extent the loan remains outstanding. [A.R.S. § 16-901\(11\)\(d\)](#). Also, the lender's and guarantor's contribution limits free up as the loan is repaid. For example:

- An individual lender provides a \$5,000 loan to a 2026 candidate committee. The candidate's friend agrees to guarantee the loan on behalf of the committee. The lender and the friend are each able to contribute an additional \$500 during the election cycle (contribution limits are \$5,500).



Loans are subject to source restrictions as well. For example, financial institutions are generally incorporated and are, therefore, prohibited from making contributions (even in the form of a loan) directly to a candidate committee. [A.R.S. § 16-913\(D\)](#); [A.R.S. § 16-916\(A\)](#). Arizona law allows a financial institution to make a loan “...in the ordinary course of business and not for the purpose of influencing the results of an election,” but a candidate committee is deemed to be **exclusively** organized for the purpose of influencing the results of an election and, therefore, may not invoke the financial institution exception. [A.R.S. § 16-901\(11\)\(d\)](#).

A financial institution may, however, make a loan to the candidate **as an individual**, who may in turn loan or contribute that amount as **personal monies** to the candidate's own committee. The candidate's spouse may also endorse or guarantee a personal loan. [A.R.S. § 16-901\(40\)\(g\)](#); [A.R.S. § 16-911\(B\)\(14\)](#); [A.R.S. § 16-913\(F\)](#). This amount is reported as **personal monies** in a campaign finance report. [A.R.S. § 16-901\(40\)\(g\)](#); [A.R.S. § 16-911\(B\)\(14\)](#).

3.1.3 In-Kind Contributions

In-kind contributions are those of non-monetary value, including goods, services, items, or anything else provided to a candidate committee without charge or at less than the usual and normal charge. [A.R.S. § 16-901\(32\)](#). Donated or discounted goods and services are generally considered contributions and are subject to contribution limits and source restrictions.

Some examples of in-kind contributions are the donation of wood/rebar for yard signs, printing services, donor lists from other candidates, or the design of a candidate website. If a candidate receives a special discount on the purchase of these goods or services because he or she is a candidate, the amount of the discount is an in-kind contribution and subject to contribution limits and source restrictions. For example, if a committee received a discount for extra rebar from a friend, then the committee will report the discounted rate paid as an expenditure and the regular market-based value minus the discounted rate will be reported as an in-kind contribution.

In-kind contributions must be reported at fair market value – the price it would cost anyone else (such as an opponent) to purchase the same good or service. [A.R.S. § 16-926\(B\)\(2\)\(a\)\(xiii\)](#). Certain volunteer services are excluded from being considered an in-kind contribution or expenditure. [A.R.S. § 16-911\(B\)\(1\)](#); [A.R.S. § 16-921\(B\)\(1\)](#).

3.2 Permissible Contributors to Candidate Committee

A candidate committee may only accept contributions from individuals, PACs, political parties (limited cases), candidate committees (limited cases) or partnerships. [A.R.S. § 16-913\(D\)](#). PACs or political parties must be registered with the appropriate filing officer in Arizona in order to contribute to a candidate committee. A candidate committee may ***not*** accept contributions from **corporations, limited liability companies, or unions**.

3.2.1 Individual Contributors

This section outlines how to address several types of individual contributions.

3.2.1.1 Contributions from Foreign Nationals

An individual contributor must be an American citizen or lawful permanent resident of the United States. [52 U.S.C. § 30121](#); [11 C.F.R. § 110.20](#). Committees are not required to seek proof of citizenship or confirm immigration status, however checks drawn on a foreign bank account should trigger further inquiry by the committee to obtain reasonable assurance that the contributor is an American citizen or lawful permanent resident.

3.2.1.2 Joint Contributions from Spouses

Spouses each have their own contribution limit but are permitted to make a joint contribution. Special rules apply to such contributions.

First, a joint contribution from both spouses on the same instrument is deemed to be made from both spouses' personal monies as long as both spouses are account holders, even if only one spouse has an income.

Second, a contribution may be jointly attributed to both spouses as long as both spouses sign the instrument or otherwise clearly indicate the contribution should be treated jointly.

For example, notwithstanding that contribution limits are \$5,500 during a particular election cycle, spouses may jointly contribute \$11,000 if the contribution is drawn from a joint account and both spouses sign the check. The committee must report both spouse's identifying information for purposes of completing a campaign finance report. [A.R.S. § 16-907\(D\)\(2\), \(F\)](#); [A.R.S. § 16-926\(B\)\(2\)\(a\)\(i\)](#).

3.2.1.3 Contributions from Minors

Minors under 18 years old are permitted to make contributions. However, the contribution is treated as a contribution by the minor's custodial parent(s). [A.R.S. § 16-912\(C\)](#). Thus, the committee is required to obtain the parent's identifying information for reporting and contribution limit purposes.

3.2.1.4 Contributions from Lobbyists

People registered with the Secretary of State to lobby on behalf of a principal or public body may make and/or solicit committee contributions to a member of the legislature **only** when the Arizona Legislature is **not in regular session**. [A.R.S. § 41-1234.01\(A\)\(1\)](#). Similarly, those same people may not make and/or solicit committee contributions to the Governor when the Arizona Legislature is in regular session, or when the Legislature has adjourned *sine die* but regular session legislation remains pending the Governor's signature or veto. [A.R.S. § 41-1234.01\(A\)\(2\)](#). A contribution may be accepted by the Governor or a member of the Legislature within the first three calendar days of the regular session if the contribution was mailed and postmarked prior to the first day of the regular session. [A.R.S. § 41-1234.01\(C\)](#).

The Governor and legislative members who receive contributions during the regular legislative session are expected to verify whether the contributor is prohibited prior to depositing the

contribution. Lobbyist information is available by searching the Secretary of State's website at [Lobbyist Search](#).

3.2.2 Mega PAC Contributors

A Mega PAC that contributes more than the contribution limit for standard PACs must provide a copy of its Mega PAC certification to the recipient committee. [A.R.S. § 16-914\(B\)](#). A candidate committee is not permitted to accept or deposit an over-limit contribution unless it receives this certification from a PAC. [A.R.S. § 16-914\(B\)](#). If a candidate committee is unable to acquire the certification despite making best efforts, the candidate committee may verify Mega PAC status through the Secretary of State's website (or other filing officer's website) and make a written record documenting the committee's verification efforts.

3.2.3 Political Party Contributors

A nominee is a candidate who prevailed in the primary election and may accept a contribution from his or her political party. [A.R.S. § 16-901\(38\)](#); [A.R.S. § 16-915](#). This effectively means that a candidate may only accept political party contributions during the period between the primary and general election. The nominee need not wait until the primary election has been officially canvassed by the jurisdiction in question, but in the event the candidate loses a recount, election contest, or otherwise does not become the official nominee, the candidate must promptly return any political party contributions. [A.R.S. § 16-645](#); [A.R.S. § 16-661](#); [A.R.S. § 16-671](#). A nominee may only accept a political party contribution from the nominee's own political party.

Only candidates who run in partisan races (where political party is printed on the ballot) are permitted to accept political party contributions.

A political party must be registered with the appropriate filing officer prior to making a candidate contribution. Political parties include the state political party, county party, legislative district party, or a city/town political party. [A.R.S. § 16-801](#) to [A.R.S. § 16-804](#); [A.R.S. § 16-821](#) to [A.R.S. § 16-827](#).

A political party may only contribute to its nominees using funds contributed by an individual, partnership, candidate committee, PAC, or political party. [A.R.S. § 16-915\(B\)](#).

3.2.4 Partnership Contributors

A candidate committee may accept a contribution from a general partnership, limited partnership (LP), limited liability partnership (LLP), or limited liability limited partnership (LLLP). [A.R.S. § 16-917\(A\)](#). The partnership need not be registered with a government agency or domiciled in Arizona.

A partnership may contribute in its own name, but the contribution must be attributed to any participating individual partners. [A.R.S. § 16-917\(C\)\(1\)-\(2\)](#). The partnership may not attribute any portion of the contribution to a partner that is a corporation, limited liability company, or union. [A.R.S. § 16-917\(C\)\(3\)](#). The partnership must include a written notice with the contribution identifying the participating partners, along with instructions on how the contribution should be allocated between the partners. A partnership contribution need not be accompanied by the participating partners' signatures, but the committee must acquire identifying information for each partner. [A.R.S. § 16-917\(C\)\(4\)](#); *see also* [A.R.S. § 16-907\(C\) & \(D\)\(2\)](#); [A.R.S. § 16-926\(B\)\(2\)\(a\)\(i\) & \(vi\)](#).

The contribution affects the partnership's contribution limit along with the participating partners' individual contribution limits to the candidate.

Example

- The 2025-26 Individual & Partnership Contribution Limit for Statewide & Legislative Candidate Committees is \$5,500.

• A partnership contributes \$4,000 to a candidate committee.	Example 1 Individual/ Partner Contribution Amounts			Total Partnership Contribution		
	Partner 1 \$2,000	+	Partner 2 \$1,500		+	Partner 3 \$500

<ul style="list-style-type: none"> • The partnership allocates the contribution for each partner as: <ul style="list-style-type: none"> ▪ \$2,000 to Partner 1, ▪ \$1,500 to Partner 2, and ▪ \$500 to Partner 3. 	Remaining Individual Contribution Balance:				<div>Remaining Partnership Contribution Balance:</div> <div>\$1,500 (\$5,500 - \$4,000)</div>
	<div>Partner 1</div> <div>\$3,500 (\$5,500 - \$2,000)</div>	<div>Partner 2</div> <div>\$4,000 (\$5,500 - \$1,500)</div>	<div>Partner 3</div> <div>\$5,000 (\$5,500 - \$500)</div>	=	

- The candidate reports a \$4,000 contribution from the partnership and allocates \$2,000, \$1,500 and \$500 from the respective individual partners.

3.2.5 Partnership Establishing a PAC

A partnership may also establish a PAC and make contributions through that PAC. [A.R.S. § 16-917\(D\)](#). A partnership's PAC contributions to a candidate committee do not require allocation among any individual partners; these are treated like any other PAC contributions.

3.2.6 Contributions to Other Candidate Committees

Contributions from one candidate committee to another candidate committee are presumptively prohibited. [A.R.S. § 16-913\(A\)](#); *see also* [A.R.S. § 16-933A.\(A\)\(3\)](#). A candidate committee may only contribute to another candidate's committee under the following conditions:

- The contribution must be made after the candidate filing deadline, which is 120 days before the primary election;
- The contributing candidate must be in the last year of his or her term and not seeking reelection (or have already left office);
- If the recipient is a legislative candidate, the contributing candidate may not make the contribution while the Legislature is in regular session; and
- The contribution must be made in accordance with the contribution limit applicable to individuals.

[A.R.S. § 16-933](#). Only when disposing of surplus monies may a candidate committee contribute \$5,500 to a statewide or legislative candidate per election cycle, or \$6,750 to a local candidate. Otherwise, candidate-to-candidate contributions are prohibited under Arizona law.

3.2.7 Corporate, LLC, and Union Contributors

A candidate committee may not accept contributions from corporations, limited liability companies, or unions, including in kind contributions. [A.R.S. § 16-913\(D\)](#); [A.R.S. § 16-916\(A\)](#).

3.3 Contribution Limits

Candidate contribution limits for the 2025-26 election cycle are as follows, pursuant to [A.R.S. § 16-913](#):

Contributor	Recipient				
	Statewide Candidate	Legislative Candidate	Local Candidate	PAC	Political Party
Individual	\$5,500	\$5,500	\$6,750	Unlimited	Unlimited
Partnership	\$5,500	\$5,500	\$6,750	Unlimited	Unlimited
Candidate Committee	Generally prohibited	Generally prohibited	Generally prohibited	Unlimited	Unlimited
PAC	\$5,500	\$5,500	\$6,750	Unlimited	Unlimited
Mega PAC	\$11,000	\$11,000	\$13,500	Unlimited	Unlimited
Political Party	\$80,500	\$8,500	\$10,500	Unlimited	Unlimited
Corporation	Prohibited	Prohibited	Prohibited	Unlimited	Unlimited
LLC	Prohibited	Prohibited	Prohibited	Unlimited	Unlimited
Trust, Joint Venture, Cooperative, or other unincorporated organization or association	Prohibited	Prohibited	Prohibited	Unlimited	Unlimited
Union	Prohibited	Prohibited	Prohibited	Unlimited	Unlimited

3.4 How Is an Election Cycle Defined for Contribution Purposes?

Contribution limits apply over the course of an election cycle. [A.R.S. § 16-912\(A\)](#); [A.R.S. § 16-914\(A\)-\(B\)](#); [A.R.S. § 16-915\(A\)](#); [A.R.S. § 16-917\(A\)](#). For statewide and legislative races, the election cycle runs for the two-year period beginning on January 1 after a statewide general election and ending on December 31 in the year of the next statewide general election. [A.R.S. § 16-901\(18\)](#); *see also* [A.R.S. § 16-211](#). The 2026 election cycle for statewide and legislative candidates begins January 1, 2025 and ends December 31, 2026.

In addition, a separate election cycle is created in the event of a recall election or a special election. [A.R.S. § 16-901\(18\)\(a\)-\(b\)](#).

A donor's contribution limit resets every two years, even if a candidate's term of office exceeds the two-year period. For example, an incumbent serving a four-year term may accept the maximum

contribution from a particular donor in each of the two-year periods of the four-year term.

3.5 Remediating Excess and Unlawful Contributions

A candidate committee is prohibited from knowingly receiving a contribution in excess of contribution limits. [A.R.S. § 16-913\(C\)](#). An “excess contribution” is defined as a contribution that exceeds the applicable contribution limits for a particular election. [A.R.S. § 16-901\(23\)](#). Other prohibited contributions include those that are earmarked, anonymous, raffles or passing the hat, or from a non-United States citizen.

A candidate committee is given 60 days to remedy an excess contribution by refunding the amount of the excess contribution to the original donor. [A.R.S. § 16-913\(C\)](#). The 60-day clock begins to run from the date of receipt of the contribution. The standard on when a contribution is “received” should be the same standard used for campaign finance reporting purposes.

In the case of contributions from individuals, the committee alternatively may reattribute the amount of the excess contribution to another individual who was identified as a joint account holder in the original instrument used to make the contribution. [A.R.S. § 16-913\(C\)\(2\)](#). For example:

- Spouse makes a \$6,000 contribution to a statewide candidate using a check that shows both spouses as joint account holders. Only one spouse signed the check. The contributing spouse had not made any previous contributions during the election cycle. The contribution limit is \$5,500.
- Candidate committee contacts the contributing spouse to inform the spouse that the contribution exceeded applicable limits and inquires how to proceed. The spouse verbally authorizes the committee to reattribute the excess contribution to the other spouse.
- The committee documents the conversation in its records, and files a campaign finance report that shows a \$5,500 contribution from the first spouse and \$500 contribution from the second spouse.

A candidate committee is not provided any grace period for prohibited contributions. A candidate committee is not permitted to accept (and is strictly prohibited from depositing) a contribution from a corporation, LLC, union, or any other business, group, organization or association (with the exception of a partnership) that is not registered as a PAC. [A.R.S. § 16-913\(D\)](#). A PAC that incorporates only for limitation of liability purposes is not prohibited from making contributions to candidate committees solely because of the incorporation, and candidate committees may

accept otherwise lawful contributions within applicable contribution limits from such PACs. [A.R.S. § 16-916\(C\)\(5\)](#).

If a prohibited contribution nonetheless has been accepted by a candidate committee, the committee must refund the contribution immediately and, if possible, document the circumstances leading to the acceptance of the prohibited contribution and what actions were taken to remedy the mistake.

3.6 Joint Fundraising Events

Joint fundraising efforts are permissible among privately funded candidates if the candidates make a written agreement prior to the fundraising effort that outlines how the proceeds of the fundraising effort will be distributed or reimbursed. [A.R.S. § 16-911\(B\)\(6\)\(b\)](#); [A.R.S. § 16-921\(B\)\(4\)\(b\)](#). The agreement must be reached before the first fundraising solicitation has been issued. Moreover, after the fundraising effort has concluded, the participating candidates must make distributions or reimbursements that conform to the written agreement. For example, two House candidates and one Senate candidate from the same district could agree to split proceeds equally among them.

Fundraising solicitations should disclose the joint nature of the fundraiser by identifying the collaborating candidates who will benefit from the joint fundraising effort. Once the fundraising effort has concluded, the collaborating candidates must make distributions or reimbursements in accordance with the written agreement. [A.R.S. § 16-911\(B\)\(6\)\(b\)](#); [A.R.S. § 16-921\(B\)\(4\)\(b\)](#).

Checks can be made out to any of the collaborating candidates (even in amounts that exceed contribution limits for an individual candidate) as long as the recipient candidate deposits and promptly distributes the fundraising proceeds in accordance with the written fundraising agreement. Distributions and reimbursements made according to the joint fundraising agreement must be reported by the collaborating candidates. [A.R.S. § 16-926\(B\)\(4\)](#). The recipient candidate must provide contributors' identifying information to the other collaborating candidates in the joint fundraising agreement. Each collaborating candidate must identify each contributor along with the contributor's net contribution amount to the reporting committee.

Example

- Senate Candidate A and House Candidate B enter into a joint fundraising agreement to split the proceeds of a joint fundraiser equally. Candidate A agrees to be the recipient candidate to whom contributions will be made.

- Candidate A distributes fundraising solicitations that state “Paid for by Candidate A and B. Authorized by Candidate A and Candidate B. Proceeds to benefit Candidate A and Candidate B.”
- The fundraiser is held and contributors are asked to make a \$4,000 contribution to Candidate A. Candidate A accepts the contributions via check and online payment, and collects the required identifying information from each contributor. The fundraiser brings in \$20,000.
- Candidate A distributes \$10,000 to Candidate B pursuant to the parties’ agreement.
- The candidates file campaign finance reports as follows:
 - ✓ Candidate A reports receiving five \$2,000 contributions from individual contributors, including identifying information about each individual contributor, and, if possible, should indicate in the “memo” field that the contributions were received through a joint fundraising event with Candidate B.
 - ✓ Candidate A also reports receiving \$10,000 of joint fundraising proceeds on behalf of Candidate B and reports a \$10,000 joint fundraising transfer to Candidate B; and
 - ✓ Candidate B reports receiving five \$2,000 contributions from individual contributors, including identifying information about each individual contributor, and, if possible, should indicate in the “memo” field that the contributions were received through a joint fundraising event with Candidate A. In this example, Candidate A must collect contributors’ identifying information and provide that information to Candidate B for reporting purposes.

In [Beacon](#), the Secretary of State’s electronic campaign finance reporting system, the \$10,000 joint fundraising proceeds should be entered under “Income/Receipt of Proceeds from Joint Fundraiser” as an aggregate amount.

In [Beacon](#), the \$10,000 transfer should be entered under “Expenses/Distribute Proceeds from Joint Fundraising” as an aggregate amount.

If the candidates have not reached a prior agreement, any distributions or reimbursements of the joint fundraising proceeds could constitute prohibited candidate-to-candidate transfers. [A.R.S. § 16-911\(B\)\(6\)\(b\)](#); [A.R.S. § 16-921\(B\)\(4\)\(b\)](#); *see also* [A.R.S. § 16-913\(A\)](#).

3.7 Volunteer Activity

An individual's volunteer services, including any expenses the individual incurs in the course of volunteering, are not considered contributions to a committee. [A.R.S. § 16-911\(B\)\(1\)](#); [A.R.S. § 16-921\(B\)\(1\)](#). Since volunteer services are not considered contributions, this activity need not be reported or limited.

- ✓ Travel expenses incurred by the volunteer, such as placing candidate signs, traveling to campaign events, or canvassing door-to-door, are not considered contributions. [A.R.S. § 16-911\(B\)\(1\)\(a\)](#); [A.R.S. § 16-921\(B\)\(1\)\(a\)](#).
- ✓ Use of a volunteer's real or personal property, such as using a volunteer's vehicle in a parade or hosting a fundraiser at a volunteer's home, is not a contribution. [A.R.S. § 16-911\(B\)\(1\)\(b\)](#); [A.R.S. § 16-921\(B\)\(1\)\(b\)](#).
- ✓ The cost of invitations, food, or beverages purchased or provided by a volunteer for a campaign-related event is not considered a contribution. [A.R.S. § 16-911\(B\)\(1\)\(c\)](#); [A.R.S. § 16-921\(B\)\(1\)\(c\)](#).
- ✓ A volunteer's use of email, blogging, social media, or other internet activity on behalf of a committee do not constitute contributions, as long as: (1) the volunteer's use is not paid for by the volunteer or any other person (*i.e.*, neither the volunteer nor any other person paid to post or promote the message); (2) the volunteer is not paid or reimbursed for such activity; and (3) the emails, social media messages, or other internet activities do not contain or include transmittal of a paid advertisement or paid fundraising solicitation. [A.R.S. § 16-911\(B\)\(1\)\(d\)](#); [A.R.S. § 16-921\(B\)\(1\)\(d\)](#). "Social media messages" are defined as "forms of communication, including internet sites for social networking or blogging, through which users create a personal profile and participate in online communities to share information, ideas and personal messages." [A.R.S. § 16-901\(46\)](#). For example, an individual may freely share links to campaign videos found on YouTube, retweet a candidate advertisement, forward a fundraising invitation by email, post a campaign-related item on his or her Facebook/Meta timeline, or conduct any other similar internet activity and the profile owner or volunteer did not pay to advertise the social media post.

The expenses that a PAC incurs for staff time spent organizing a volunteer event and for the food, drinks, and facility rental for the event constitute in-kind contributions from the PAC to the candidate.

4 Special Rules for Candidate Committees

4.1 Transfers from Prior Committees

4.1.1 Running for the Same Office in a Subsequent Election Cycle

A candidate committee is permitted to use surplus funds raised during a prior election cycle for the same office. The candidate is not required to terminate and reorganize the committee or amend the committee's statement of organization to use the committee in a subsequent race for the same office. The only exception is if the filing officer requires an amendment for the purpose of properly operating the filing officer's electronic campaign finance filing system.

4.1.2 Running for a Different Office

A candidate may transfer funds to a new committee for a different office under certain circumstances and depending on the election jurisdiction. [A.R.S. § 16-913\(B\)](#). A resignation or vacancy in office does not necessarily have campaign finance implications. A candidate committee still must follow all laws applicable to contributions, expenditures, reporting, transfers, and termination.

Candidate transfers are also freely permitted to local jurisdictions. For example, a legislative committee may transfer funds to a county committee, while a county committee may freely transfer funds to a city or town committee. [A.R.S. § 16-913\(B\)](#).

Transfers toward the statewide level are more difficult, as candidates are only permitted to transfer funds one jurisdiction at a time due to variances in contribution limits. For example, a city or town committee may transfer funds to a county committee, while a county committee may transfer funds to a legislative or statewide committee. [A.R.S. § 16-913\(B\)\(1\)-\(2\)](#). But if a city or town committee seeks to transfer funds to a legislative or statewide committee for the same candidate, the candidate must transfer the funds to a county committee first and then wait at least 24 months before transferring funds to a legislative or statewide committee. [A.R.S. § 16-913\(B\)\(2\)](#). Violation of this "cooling off" period may serve as a basis for a campaign finance complaint before either filing officer.

Transfers from a candidate's state, legislative, or local committee to the candidate's federal committee are prohibited under federal law. [11 C.F.R. § 110.3\(d\)](#).

4.1.3 Aggregating Contributions from Different Sources

A candidate who transfers funds between his or her own committees during an election cycle must aggregate contributions made by the same donor to both committees during that election cycle. [A.R.S. § 16-913\(B\)\(3\)](#). This ensures a candidate does not circumvent contribution limits by allowing donors to max out to both committees. If a particular donor's aggregated contributions would exceed the applicable contribution limit for the election cycle, the transferring committee must refrain from transferring the excess amount to the receiving committee.

Example

- After the first regular legislative session concludes in 2025, a candidate decides to forego reelection to the Legislature and run for statewide office instead in 2026. The candidate opens a statewide committee and seeks to transfer funds from the legislative committee.
- A donor made a \$5,500 contribution to the candidate in September 2025 (the maximum contribution during the 2025-26 cycle) and a \$5,500 contribution to the newly formed statewide committee in December 2026 (the maximum contribution during the 2025-26 cycle).
- The candidate may freely transfer funds to the statewide committee because the donor's aggregate contributions in any particular election cycle did not exceed contribution limits.

The committees' transfers must be disclosed in the next campaign finance reports.

4.2 Use of Personal Monies

A privately funded candidate may contribute unlimited "personal monies" to the candidate's own committee. [A.R.S. § 16-901\(40\)](#); [A.R.S. § 16-913\(F\)](#). Personal monies donated to one's own committee are contributions, but they are not subject to contribution limits. [A.R.S. § 16-913\(F\)](#). Contributions of personal monies must be disclosed in campaign finance reports. [A.R.S. § 16-926\(B\)\(2\)\(viii\)](#).

Keep in mind that participating statewide and legislative candidates are limited in how much personal money may be spent by a candidate committee. [A.R.S. § 16-941\(A\)\(2\)](#) ("[A] participating candidate...[s]hall not make expenditures of more than a total of five hundred dollars of the candidate's personal monies for a candidate for the legislature or more than one thousand dollars for a candidate for statewide office[.]"); *see also* [A.R.S. § 16-945\(B\)](#) ("[A] candidate's personal monies...may be spent only during the exploratory period and the qualifying period. Any early

contributions not spent by the end of the qualifying period shall be paid to the [Clean Elections] fund.”); [A.R.S. § 16-945\(C\)](#) (“If a participating candidate has a debt from an election campaign in this state during a previous election cycle in which the candidate was not a participating candidate, then, during the exploratory period only, the candidate may accept, in addition to early contributions..., [private] contributions...or may exceed the limit on personal monies..., provided that such contributions and monies are used solely to retire such debt.”); [A.R.S. § 16-961\(A\)](#) (clarifying that the term “personal monies” is defined in [A.R.S. § 16-901](#)).

4.2.1 Personal Monies Defined

Personal monies include categories defined by statute. [A.R.S. §16-901\(40\)](#). They include the following:

- ✓ Assets
- ✓ Earned Income/Salary
- ✓ Dividends and Proceeds from the Sale of Investments
- ✓ Bequests
- ✓ Income from Revocable Trusts
- ✓ Certain Gifts
- ✓ Loans Obtained by the Candidate or Candidate’s Spouse
- ✓ Family contributions

4.3 Political Party Support

If a candidate becomes a political party nominee and is running in a partisan general election (*i.e.* the candidate’s political party affiliation appears next to his or her name on the ballot. [A.R.S. § 16-911\(B\)\(4\)\(a\)](#)). As a result, this type of political party support is only available during the period between the primary election and general election. The party is permitted to directly pay for certain expenses that will benefit the candidate committee. The party may print, distribute and pay for items that promote its nominees, such as voter guides, sample ballots, pins, bumper stickers, pamphlets, brochures, posters, yard signs, and other similar items. [A.R.S. § 16-911\(B\)\(4\)\(a\)](#). Similarly, the law exempts “coordinated political party expenditures” from the definition of “contribution.” [A.R.S. § 16-911\(B\)\(4\)\(b\)](#). “Coordinated political party expenditure” is defined as “expenditures that are made by a political party to directly pay for goods or services on behalf of its nominee.” [A.R.S. § 16-901\(14\)](#).

While these expenditures must be reported by the political party, they do not constitute in-kind contributions and therefore need not be reported by the nominee. [A.R.S. § 16-911\(B\)\(4\)\(a\)](#); [A.R.S.](#)

[§ 16-926\(B\)\(3\)\(o\).](#)

Although a political party may not use monies contributed by corporations, limited liability companies, or unions to directly make contributions to its nominees, this restriction does not apply to direct payments for items to promote the nominee or coordinated political party expenditures as described above. [A.R.S. § 16-915\(B\).](#)

4.4 Legal and Accounting Services

A committee is permitted to pay for its legal and accounting services using committee funds. Candidates may not use committee funds for personal use. Therefore, the payment of legal expenses unrelated to one's candidacy constitutes a prohibited use of committee funds. In addition, [A.R.S. § 16-911\(B\)\(6\)\(c\)](#), [A.R.S. § 16-921\(B\)\(4\)\(c\)](#), and [A.R.S. § 16-921\(B\)\(7\)](#) exempt the payment of a committee's legal or accounting expenses by any person from the definition of contribution and expenditure.

4.5 Candidate Appearances at a Business Facility

A candidate is permitted to make campaign-related appearances at outside organizations' facilities without the "value" of that appearance being deemed an in-kind contribution. [A.R.S. § 16-911\(B\)\(11\)](#). This exemption applies as long as:

- ✓ The venue is furnished by the venue's owner;
- ✓ Usage of the venue is not paid for by a third-party; and
- ✓ The venue is not a sports stadium, coliseum, convention center, hotel ballroom, concert hall or other similar arena that is generally open to the public.

For example, a candidate is permitted to appear at the headquarters of ABC Corporation to address the company's employees and invited guests. However, ABC Corporation may not host a candidate fundraiser at the corporation's suite during a professional sports game. A fundraiser could be held at a stadium, coliseum, convention center, hotel ballroom, concert hall or other similar arena if the committee pays for the facility rental at fair market value.

4.6 Elected Official Tours and Conferences

For elected officials acting in the course of their official duties, it is not necessary to use committee funds to meet with constituents or attend an informational tour, conference, seminar or presentation. [A.R.S. § 16-911\(B\)\(3\)](#). The exemption likewise applies to public officials who were

appointed to a position normally filed by an elected official. A third party may provide this support without creating an in-kind contribution. For example, a timber company or conservationist organization may provide a helicopter ride to an elected official to tour wildfire devastation from the air. A private school may provide its facilities for the purpose of allowing an elected official to conduct a town hall on education policy. An event held at a public school may be subject to more stringent conditions. [A.R.S. § 15-511](#) (prohibiting the use of public school resources to influence the outcome of an election).

For this exemption to apply, neither the candidate nor the host may engage in any electioneering or committee-related activity. [A.R.S. § 16-911\(B\)\(3\)](#). Additionally, if the benefit triggers a reporting responsibility under the financial disclosure or lobbying statutes, that benefit must be properly reported under those statutes; otherwise an in-kind contribution may result. [A.R.S. § 16-911\(B\)\(3\)](#). For example, if a legislator received the benefit of at least \$1,000 in travel expenses from a corporation, the elected official must report the travel expenses in his or her next financial disclosure statement in order to avoid the travel expenses from being potentially deemed an illegal in-kind contribution. [A.R.S. § 16-911\(B\)\(3\)](#); [A.R.S. § 18-444](#).

4.7 Statewide and Legislative Officeholder Expense Accounts

Statewide and legislative elected officials may establish officeholder accounts (also known as constituent services accounts) for the purpose of defraying the expenses of performing official duties. [A.R.S. § 41-133\(A\) & \(K\)](#). Persons appointed to an elected office are likewise eligible to establish an officeholder account. An officeholder account must register with the Secretary of State's Office and file campaign finance reports the same way as a committee, but the monies must be kept separate from committee funds. [A.R.S. § 41-133\(C\)](#).

4.7.1 Use of Officeholder Monies

A statewide/legislative officeholder account may be used to fund office equipment and supplies, official travel, communicating and meeting with constituents, or incurring expenses for informational and education purposes, including:

- ✓ Newspaper, magazine, or other informational subscriptions;
- ✓ Participation in community, professional or fraternal organizations; and
- ✓ Participation in conferences and seminars.

No campaign or electioneering activity may take place in the course of using officeholder account monies. [A.R.S. § 41-133\(D\)](#).

4.7.2 Officeholder Account Source Restrictions

4.7.2.1 Non-Individual Contributors

Only individuals are permitted to contribute to a statewide/legislative officeholder account. [A.R.S. § 41-133\(A\)\(1\)](#). Contributions to an officeholder account do not affect an individual's contribution limit to the same officeholder's separate committee account. [A.R.S. § 41-133\(B\)](#). If an elected official fails to properly accept or report monies contributed to his or her officeholder account, the improperly received/reported monies are deemed contributions to the official's candidate committee. [A.R.S. § 41-133\(B\)](#). PAC, political party, partnership, corporate, and union contributions to officeholder accounts are not permitted.

4.7.2.2 Lobbyist Prohibition

Just like with candidate committees, individuals who are registered lobbyists or principals are prohibited from making contributions to a Governor's or legislator's officeholder account while the Legislature is in regular session. [A.R.S. § 41-133\(G\)](#). As applied to the Governor, this prohibition extends past *sine die* and through the time period when all regular session legislation has been signed or vetoed. [A.R.S. § 41-1234.01\(A\)\(2\)](#).

4.7.3 Officeholder Account Contribution Limits

The contribution limit to a statewide/legislative officeholder account is \$150 per election cycle and is not subject to biennial increases. [A.R.S. § 41-133\(A\)\(1\)](#).

4.7.3.1 Limitation on Personal Money Contributions

A statewide/legislative official may contribute limited personal monies to his or her own officeholder account during an election cycle. [A.R.S. § 41-133\(A\)\(3\)](#). "Personal monies" are defined in [A.R.S. § 16-901\(40\)](#). These personal money caps are increased on a biennial basis. [A.R.S. § 16-931\(A\)\(2\)](#); [A.R.S. § 41-133\(A\)\(2\)](#).

Personal money contribution limits for the 2025-26 election cycle are as follows:

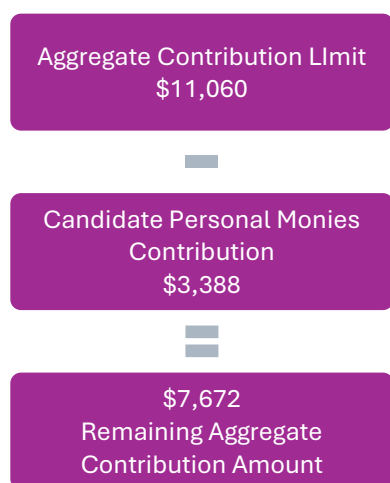
Governor	Secretary of State	Attorney General	Treasurer	Superintendent of Public Instruction	Mine Inspector	Corporation Commissioner	Legislator
\$31,825	\$16,828	\$8,533	\$8,533	\$8,533	\$8,533	\$8,533	\$3,388

4.7.3.2 Aggregate Contribution Limits

Aggregate contribution limits for the 2025-26 election cycle are as follows:

Governor	Secretary of State	Attorney General	Treasurer	Superintendent of Public Instruction	Mine Inspector	Corporation Commissioner	Legislator
\$105,850	\$55,860	\$28,210	\$28,210	\$28,210	\$28,210	\$28,210	\$11,060

Unlike candidate committees, a statewide/legislative officeholder account is subject to an aggregate cap on all contributions received during an election cycle. [A.R.S. § 41-133\(A\)\(2\)](#). Aggregate limits have been increased by \$100 every odd-numbered year pursuant to [A.R.S. § 16-931\(A\)\(2\)](#) and [A.R.S. § 41-133\(A\)\(2\)](#).



Aggregate contribution limits are inclusive of officeholder's personal monies. [A.R.S. § 41-133\(A\)\(2\)](#). For example, 2025 aggregate contribution limits, a legislator who contributes the maximum \$3,388 in personal monies to his or her officeholder account may only accept \$7,672 in aggregate contributions from other individuals.

If an elected statewide/legislative official is winding down his or her committee, the official may transfer excess committee funds into his or her officeholder account. [A.R.S. § 16-933\(A\)\(5\)](#). These funds may be transferred in any amount, as long as the officeholder account does not exceed its aggregate cap. Aggregate contribution limits are increased on a biennial basis. [A.R.S. § 16-931\(A\)\(2\)](#); [A.R.S. § 41-133\(A\)\(2\)](#).

4.7.4 Officeholder Account Spending Limits

4.7.4.1 Aggregate Spending Limit

A statewide/legislative official may not spend more than the aggregate contribution limit from his or her officeholder account during an election cycle. [A.R.S. § 41-133\(A\)\(2\)](#). Like aggregate contribution limits, aggregate spending limits are increased on a biennial basis. [A.R.S. § 16-931\(A\)\(2\)](#); [A.R.S. § 41-133\(A\)\(2\)](#).

4.7.4.2 Permissible Spending Timeframe

A statewide/legislative official may only receive or spend officeholder account monies during what is deemed the non-election period for that officeholder: from the day after the previous general

election until April 30 of the year when the officeholder is up for reelection. [A.R.S. § 41-133\(E\)](#). For example:

- ✓ Legislators elected in 2024 may spend officeholder account monies between November 6, 2024 and April 30, 2026;
- ✓ Statewide officials elected in 2026 may spend officeholder account monies between November 4, 2026 and April 30, 2030.

4.7.5 Disposal of Officeholder Monies

After April 30 of an election year, a statewide/legislative official may dispose of officeholder account monies in the following ways:

- ✓ Roll the money over to the elected official's officeholder account for the next election cycle (as long as the elected official will hold office during the next election cycle);
- ✓ Contribute the money to a PAC or political party (as long as the elected official will not hold office during the next election cycle);
- ✓ Donate the money to a social welfare organization recognized under [Section 501\(c\)\(4\)](#) of the Internal Revenue Code (as long as the elected official will not hold office during the next election cycle); or
- ✓ Donate the money to the general fund of the State of Arizona.

4.7.6 Reporting Responsibilities

A statewide/legislative official must file officeholder account reports in the same manner and under the same schedule as campaign finance reports for candidate committees. [A.R.S. § 41-133\(C\)](#). An elected official may use the same methods used for campaign contributions to determine when a contribution is "received" or expenditure is "made."

4.7.7 Enforcement Penalties

Violations with respect to officeholder accounts are enforced in the same manner as campaign finance violations. [A.R.S. § 41-133\(I\)](#).

5 Limits on Contributions by Candidate Committees

Contributions by candidate committees to other candidates are presumptively prohibited. [A.R.S. § 16-913\(A\)](#); *see also* [A.R.S. § 16-933\(A\)\(3\)](#). A candidate committee may contribute to another candidate committee only under the following conditions:

- The contribution must be made after the candidate filing deadline, which is 120 days before the primary election (or first election in a city or town). [A.R.S. § 16-933\(A\)\(3\)\(a\)](#). *See also* [A.R.S. § 16-311\(A\)](#). The contribution need not be made before the contributing candidate finishes the candidate's term of office.
- The contributing candidate must be in the last year of his or her term and not seeking reelection (or have already left office). [A.R.S. § 16-933\(A\)\(3\)\(b\)](#). The contributing candidate must not have filed a nomination paper with any filing officer at the 120-day deadline to seek reelection. *See also* [A.R.S. § 16-311\(A\)](#).
- If the recipient is a legislative candidate, the contributing candidate may not make the contribution while the Legislature is in regular session. [A.R.S. § 16-933\(A\)\(3\)\(c\)](#).
- The contribution must be made in accordance with the contribution limit applicable to individuals. [A.R.S. § 16-933\(A\)\(3\)\(d\)](#); *see also* [A.R.S. § 16-912\(A\)](#). The individual contribution limit to a statewide or legislative candidate this election cycle is \$5,500 and \$6,750 for a local candidate.

If the conditions listed do not exist, then candidate-to-candidate contributions are prohibited under Arizona law.

6 Advertising and Fundraising Disclosures

Any candidate advertisement or fundraising solicitation must include a disclosure that indicates it was paid for and authorized by the candidate's committee. A candidate "advertisement" means information or materials, other than nonpaid social media messages, that are mailed, emailed, posted, distributed, published, displayed, delivered, broadcasted or placed in a communication medium and that are for the purpose of influencing an election. [A.R.S. § 16-901\(1\)](#); [A.R.S. § 16-925\(A\)](#). For example, a proper disclosure would read:

Paid for by Doe for House

Authorized by Doe for House

If a disclosure contains any acronym or nickname that is not commonly known, the disclosure must spell out the acronym or provide the full name. [A.R.S. § 16-925\(C\)](#).

6.1 Disclosure Requirements

The disclosure on a fundraising solicitation should be clearly readable. How the disclosure must be presented depends upon the medium in which the advertisement appears. [A.R.S. § 16-925](#). For example, if the advertisement is:

- Broadcast on radio, the disclosure must be clearly spoken at the beginning or end of the advertisement;
- Delivered by hand, by mail, or electronically, the disclosure must be clearly readable;
- Displayed on a sign or billboard, the disclosure must be displayed in a height that is at least four percent of the vertical height of the sign or billboard;
- Broadcast on television or in a video, both of the following requirements must be met:
 - The disclosure must be both written and spoken at the beginning or end of the advertisement, except that if the written disclosure is displayed for the greater of at least one-sixth of the broadcast duration or four seconds, a spoken disclosure is *not* required; and
 - The written disclosure statement must be printed in letters that are displayed in a height that is at least four percent of the vertical picture height. [A.R.S. § 16-925\(D\)\(5\)](#).

6.2 When a Disclosure is NOT Required

A committee is not required to include a disclosure in the following situations:

- Advertisements or fundraising solicitations made via social media messages, text messages, or messages sent by a short message service. [A.R.S. § 16-925\(E\)\(1\)](#). However, pre-recorded audio messages distributed directly to the voicemail boxes of recipients do not qualify as “messages sent by a short message service” and, therefore, are not exempted from the disclaimer requirement.);
- Advertisements that are placed as a paid link on a website, as long as the message is not more than two hundred characters in length and the link directs the user to another website that contains the required disclosure statement;

- Advertisements that are placed as a graphic or picture link where the disclosure cannot be conveniently printed due to the size of the graphic or picture and the link directs the user to another website that contains the required disclosure statement;
- Bumper stickers, pins, buttons, pens and similar small items on which a disclosure statement cannot be conveniently printed; or
- A published book or a documentary film or video.

[A.R.S. § 16-925.](#)

7 Financing a Recall Election

If a statewide or legislative officeholder is targeted for a recall election, the following special campaign finance rules apply:

- A new and separate election cycle is triggered at the time the filing officer issues a recall petition serial number. [A.R.S. § 16-901\(18\)\(a\)](#). The creation of the “recall election cycle” allows the targeted officeholder to solicit and receive committee contributions to defeat the recall effort.
- A recall election cycle will end when one of the following occur:
 - ✓ The filing officer determines there are not sufficient valid recall petition signatures to call a recall election;
 - ✓ The recall petition signatures submitted are valid and sufficient to call a recall election and the targeted officeholder resigns before the election is called; or
 - ✓ The recall election takes place. [A.R.S. § 16-901\(18\)](#).
- A targeted officeholder must create a separate candidate committee for the recall election.
 - ✓ The name of the officeholder’s recall committee must be unambiguously distinguishable from the officeholder’s regular candidate committee. [A.R.S. § 16-906\(B\)\(1\)\(a\)](#).
 - ✓ The officeholder’s recall committee must establish a different bank account than the account used for the officeholder’s regular candidate committee. [A.R.S. § 16-907\(B\)\(5\)](#).
 - ✓ The officeholder may not transfer money between the recall committee and the regular candidate committee. [A.R.S. § 16-907\(B\)\(5\)](#).

- ✓ Otherwise, the officeholder's recall committee must abide by the same restrictions applicable to his or her regular candidate committee, which includes a prohibition on accepting contributions from corporations, limited liability companies, and unions.
- For campaign finance reporting purposes, the targeted officeholder and other candidates running in the recall election must continue to report all disbursements and expenditures as "operating expenses," much the same way as the candidate's regular candidate committee. [A.R.S. § 16-926\(B\)\(3\)\(a\)](#). However, any **other** committees or entities that spend money on the recall effort must report their expenditures as "recall expenditures" in the campaign finance reporting system. [A.R.S. § 16-926\(B\)\(3\)\(n\)](#).
- Candidates running in a recall election may apply for Clean Elections funding. [A.R.S. § 16-961\(B\)\(6\)](#).

8 Filing Campaign Finance Reports

8.1 Content of Campaign Finance Reports

Arizona law specifies the components of campaign finance reports. [A.R.S. § 16-926\(B\)](#). The Secretary of State's online filing system, [Beacon](#), publishes reports consistent with statutory requirements from data input by each committee.

All campaign finance reports are deemed to be filed by the committee treasurer under penalty of perjury, notwithstanding that the committee treasurer does not personally sign a campaign finance report. Accordingly, it is no defense to a campaign finance complaint that someone other than the treasurer filed an incomplete or inaccurate campaign finance report.

8.2 Special Reporting

8.2.1 In-Kind Contributions

An in-kind contribution must be valued at its usual and normal charge on the date received. [A.R.S. § 16-926\(D\)](#). The committee must make the determination of what that usual and normal charge is, generally by asking the contributor or by consulting an authoritative third-party source.

8.2.2 Processing Fees

Sometimes a contribution is made through a payment processor that deducts a small fee from the contribution. For example, a contributor might make a \$100 contribution, but the committee might

only receive \$97 after a \$3.00 service is deducted by the payment processor.

For consistent reporting, the committee should report receiving the full amount of the contribution and simultaneously report the value of the service fee as an operating expense. See e.g. [FEC AO 1995-09](#).

8.3 Campaign Finance Reporting Periods and Deadlines

Campaign finance reports cover the applicable “reporting period.” Reporting periods and deadlines are available at the Secretary’s website.

A committee is required to file campaign finance reports until formally terminated, regardless of the level of political or financial activity during a reporting period.

Additional campaign finance reports are required for Clean Elections participating candidates. Please visit www.azcleelections.gov/run-for-office/campaign-finance-reporting-periods and/or contact the Clean Elections Commission for further information.

8.4 Penalty for Late or Incomplete Campaign Finance Reports

A candidate committee must file timely and complete campaign finance reports. [A.R.S. § 16-926\(A\)](#); [A.R.S. § 16-937\(A\)](#). If a candidate committee fails to file a campaign finance report by the applicable deadline, the Secretary of State’s Office (or other appropriate filing officer) must send a written notice of the failure to file to the committee by email within five calendar days after the filing deadline.

Financial penalties accrue daily until the late report is filed. A filing officer must accept a campaign finance report regardless of whether past-due financial penalties have been paid.

If the candidate committee does not file its campaign finance report within 30 days after the filing deadline, the filing officer may refer the committee to the applicable enforcement officer. The Attorney General is the enforcement officer for matters within the Secretary of State’s jurisdiction.

[A.R.S. § 16-901\(21\)](#); [A.R.S. § 16-937](#); [A.R.S. § 16-938](#). The Citizens Clean Elections Commission may also impose penalties against participating and nonparticipating candidates for statewide and legislative office for failure to comply with campaign finance reporting requirements. For additional information on these penalties, please refer to [A.R.S. § 16-942](#) and the [rules adopted by the Clean Elections Commission](#).

9 Winding Down and Terminating a Committee

The process of winding down a committee entails ceasing all committee activity, zeroing out the committee's bank account (in accordance with Arizona law), and filing a termination statement with the filing officer.

9.1 Repayment of Debts

A candidate committee must repay its debts to creditors before terminating. If the committee has sufficient cash on hand at the conclusion of a committee to pay all outstanding creditors, this process is routine.

9.1.1 Fundraising to Retire Debt

A committee may continue to fundraise in order to retire debt, even if the candidate's election has passed. However, source restrictions and the contribution limits from the prior election still apply. [A.R.S. § 16-901\(11\)\(a\)](#).

9.1.2 Debt Forgiveness

Another way to retire debt is through debt forgiveness, although forgiveness generally has the same effect as making a contribution. [A.R.S. § 16-913\(F\)](#).

A debt may be settled or forgiven in its entirety only if the candidate committee has been unable to repay the debt after 5 years, the creditor has agreed to discharge the debt, and the creditor consents to committee termination. [A.R.S. § 16-934\(B\)\(2\)\(b\)](#).

9.2 Disposal of Surplus Monies

If a terminating candidate committee has surplus monies remaining after payment of all debts, the committee may dispose of those surplus monies only in specified ways. [A.R.S. § 16-901\(50\)](#); [A.R.S. § 16-933](#).

- Transfer the surplus to a candidate committee organized by the same candidate;
- Return surplus monies to the original contributor;
- Contribute surplus monies to a PAC or political party within the contribution limits;

- Contribute surplus monies to another candidate under the following conditions:
 - ✓ The contribution must be made after the candidate filing deadline, which is 90 days before the primary election (or first election in a city or town);
 - ✓ The contributing candidate must be in the last year of his or her term and not seeking reelection (or have already left office);
 - ✓ If the recipient is a legislative candidate, the contributing candidate may not make the contribution while the Legislature is in regular session; and
 - ✓ The contribution must be made in accordance with the contribution limit applicable to individuals.
- Donate surplus monies to a nonprofit organization that has tax exempt status under [Section 501\(c\)\(3\)](#) of the Internal Revenue Code; or
- In the case of a statewide or legislative candidate committee, transfer surplus monies to the candidate's officeholder expense account.

Surplus monies must not be converted for personal use.

9.3 Terminating a Committee

Candidate committee termination requirements:

- ✓ Have no outstanding debt.
- ✓ Properly dispose of surplus funds (\$0.00 cash balance).
- ✓ File all outstanding campaign finance reports.
- ✓ Have no outstanding late filing fines.

Once a candidate committee has wound down its financial affairs, the committee may file a termination statement with the Secretary of State's Office (or other applicable filing officer) with whom the committee's statement of organization was filed. **This is the final step to discontinue filing obligations as a committee; failing to file termination paperwork will result in ongoing obligations to file campaign finance reports.** A committee terminates in [Beacon](#) by selecting "Settings/Account Management" and selecting "Terminate Committee" at the bottom of the page.

After a termination statement is filed and accepted, a candidate committee is not required to file any further campaign finance reports for that committee.

10 Campaign Finance Enforcement

Campaign finance enforcement is generally carried out through a bifurcated enforcement structure, relying on an initial determination by the Secretary of State (or other applicable local filing officer) followed by the final decision of the Attorney General (or other local enforcement officer). The overall process is summarized as follows:

- The filing officer will make a preliminary determination whether a campaign finance violation has occurred, known as a “reasonable cause” finding.
- If the filing officer makes a reasonable cause finding, the filing officer may refer the matter to the appropriate enforcement officer.
- The enforcement officer makes the final determination whether a legal violation occurred, which may require an additional investigation beyond the information provided by the filing officer.
- If the enforcement officer concludes that a campaign finance violation occurred, the enforcement officer may issue a notice of violation to the alleged violator. If the violation has not been timely remedied, the enforcement officer may initiate legal action to secure compliance with campaign finance law.

In addition, any person may file a complaint with the Clean Elections Commission if they believe a violation of the Clean Elections Act or Clean Elections Commission rules has occurred. Clean Elections Commission staff may also initiate an internally generated complaint against a person for violation of the Clean Elections Act. [A.R.S. § 16-957](#).

10.1.1 Grounds for Campaign Finance Complaints

These are some examples of possible grounds for campaign finance complaints against a candidate committee:

10.1.1.1 Missing or Late Campaign Finance Reports

If a committee fails to timely file a complete campaign finance report, the Secretary of State’s Office (or other local filing officer) will notify the committee by email within 5 calendar days after the reporting deadline. The notice must identify the late report(s), describe how fines accrue, and identify permissible methods of payment for the late fee. [A.R.S. § 16-937](#).

Fines accrue at the rate of \$10.00 per day for the first 15 days after the filing deadline, and \$25.00

per day thereafter. **Fines continue to accrue until the late report is filed.**

Unpaid fines may have electoral consequences as well. A filing officer may not accept a candidate's nomination paper to run for office if the candidate is subject to an appealable order for \$1,000 or more in unpaid fines. [A.R.S. § 16-311\(J\)](#). The \$1,000 threshold is inclusive of all "fines, penalties, late fees or administrative or civil judgments, including any interest or costs, in any combination, that have not been fully satisfied at the time." [A.R.S. § 16-311\(J\)](#). These must have been assessed in the candidate's political or electoral capacity, not personal capacity. For example, a judgment over \$1,000 resulting from a candidate's student loan default does not constitute grounds to refuse a nomination paper. Additionally, they must be reflected in an *Order* issued by an enforcement or judicial officer—the filing officer is not required to calculate these amounts based on unsubstantiated documentation.

10.1.2 Prohibited Contributions

A candidate committee is prohibited from:

- Accepting a contribution from a prohibited source, such a corporation or a foreign national;
- Knowingly accepting a contribution in excess of applicable contribution limits; and
- With respect to the Governor or a legislative member, accepting a contribution from a lobbyist or principal during the regular session of the Legislature.

Violations are enforced through civil penalties, based on amount of money improperly spent or accepted. [A.R.S. § 16-938\(E\)\(2\)](#). The Clean Elections Commission may also impose penalties against privately financed candidates for statewide and legislative office for failure to comply with campaign finance reporting requirements. For additional information on these penalties, please refer to [A.R.S. § 16-942](#) and rules adopted by the Clean Elections Commission.

On the criminal side, a candidate committee may not knowingly accept a contribution in the name of another person. [A.R.S. § 16-1022\(B\)](#). For example, a donor may have reached his or her contribution limit to the candidate and seek to give additional money through someone else. If the candidate knows that a contribution is from a straw donor, the candidate could be charged with a class 6 felony.

10.1.3 Coordinated Expenditures

If a candidate coordinates with an outside group that makes an expenditure on the candidate's behalf, the value of the expenditure is deemed an in-kind contribution to the candidate's

committee. [A.R.S. § 16-922\(E\)](#). If the candidate did not report the expenditure as a contribution, the candidate may be subject to a campaign finance complaint for failure to report. Worse, if the outside group was a corporation, LLC or union, the candidate committee is deemed to have accepted a contribution from a prohibited source.

10.1.3.1 Definition of an Independent Expenditure

An “independent expenditure” is defined by [A.R.S. § 16-901\(31\)](#) as an expenditure that:

- Expressly advocates the election or defeat of a clearly identified candidate; and
- Is not made in cooperation or consultation with (or at the request or suggestion of) the candidate or the candidate’s agent.

An expenditure is not independent if:

- There is any actual coordination between the candidate (or candidate’s agent) and the person making the expenditure; or
- Both of the following apply:
 - ✓ The expenditure is based on nonpublic information about the candidate’s plans that candidate (or candidate’s agent) provided to the person; and
 - ✓ The candidate (or candidate’s agent) provided the nonpublic information with an intent towards having the expenditure made.

[A.R.S. § 16-922\(B\)](#). If either condition exists, the expenditure is conclusively deemed to be coordinated and thus likely to result in an in-kind contribution.

Certain factors create a presumption of coordination:

- An agent of the person making the expenditure is also an agent of the candidate whose election or whose opponent’s defeat is being advocated by the expenditure. For example, a political consultant should not advise a candidate and an outside group that conducts expenditures in the candidate’s race.
- In the same election cycle, the person making the expenditure or that person’s agent is or has been authorized to raise or spend monies on the candidate’s behalf. For example, the executive director of a trade association that conducts independent expenditures in a particular race should not serve as finance chairman for that candidate.

- In the same election cycle, the candidate is or has been authorized to raise money or solicit contributions on behalf of the person making the expenditure. For example, a candidate should not emcee a fundraising event for a PAC that later conducts expenditures on behalf of the candidate during the election cycle.

[A.R.S. § 16-922\(C\)](#). These factors constitute rebuttable evidence of coordination. If a person files a campaign finance complaint and cites one or more of the above factors, the burden of persuasion shifts, and the responding candidate must put forth contrary evidence that proves the lack of coordination.

10.1.3.2 Firewalls

Coordination can be avoided if the outside group making the expenditure maintains a firewall, which is a written policy that precludes one person from sharing information with another. [A.R.S. § 16-901\(28\)](#); [A.R.S. § 16-922\(D\)](#). If properly established, a firewall permits the agent to work with the benefitted candidate without undermining the independence of the group's expenditures.

In order to be effective, a firewall must meet the following criteria:

- The agent may not participate in deciding to make the expenditure or in deciding the content, timing or targeting of the expenditure to benefit a particular candidate;
- The group making the expenditure must have a written policy establishing the firewall and its requirements; and
- Both the agent and group must follow the written firewall policy.

10.1.3.3 Service on Host Committees

Fundraising events typically have a host committee, but this does not by itself create a risk of coordination. Host committee members typically play very minor roles. Members are principally expected to make contributions themselves. The existence of a host committee is usually intended to show popular and broad-based support for the candidate. No person should be deterred from serving on a host committee due to possible perception of coordination. So long as the host committee member does nothing more than attend the fundraiser or make a contribution, and is not substantially involved in candidate committee strategy or operations, serving on a host committee does not risk turning an independent expenditure into an in-kind contribution.

11 Frequently Asked Questions

Why can't I terminate my committee in Beacon?

A candidate committee may only terminate when all campaign activity is ceased, the committee has no outstanding debt (including outstanding campaign finance penalties), the committee's bank account balance is zero, surplus funds were properly disposed, and all campaign finance reports are filed. Before submitting a termination statement with the appropriate filing officer, a committee ***must pay*** any outstanding penalties/fees, if applicable. **Committee officers will not have access to the committee's Beacon account after terminating.**

I am running for a statewide, state legislative or county office, when should I register my candidate committee?

A statewide, legislative, or county candidate who has received contributions or made expenditures (in any combination) of at least \$1,500 in connection with their candidacy during the election cycle is required to form a committee within 10 days of reaching that threshold. For example, receiving a \$750 check from a family friend while spending \$750 on election supplies will trigger the registration requirement. Use of a candidate's own personal monies for electoral purposes counts towards the \$1,500 threshold.

I am running for statewide or legislative office and I have not reached the registration threshold in contributions, expenses, or both. Do I still need to register a candidate committee?

If a candidate never reaches the \$1,500 threshold, committee registration and reporting are not required.

I am running for statewide or state legislative office, how do I submit a Statement of Organization?

Candidates for statewide or state legislative office complete and submit their statement of organization when creating their candidate committee in [Beacon](#), the Secretary's online campaign finance filing system. Chapter 1 and 2 of the [Beacon User Guide](#) provides instructions on how to create a user account and committee account.

How do I obtain a copy of the committee's statement of organization?

To obtain a copy of the candidate committee's statement of organization in [Beacon](#), select the "Settings" option on the left menu panel then select "Account Management." At the bottom of the webpage, select "Print a Statement of Organization."

Is there a requirement for the committee chairperson and/or treasurer to reside in-state?

There is no prohibition on out-of-state individuals serving as committee chairperson or treasurer. The statement of organization requires the following information for the committee chairperson and treasurer: their street address or residence address, email address (separate from the committee's general email address), telephone number, occupation and employer. Providing this information will ensure the committee officers will receive all correspondence from the filing officer.

How can I submit a statement of organization if I have not opened a bank account for my committee?

It is permissible to list the committee's future financial institution on a statement of organization if the committee ultimately opens an account with that institution. In that case, the committee should wait no longer than 30 days after filing the statement of organization to open the account to avoid a campaign finance violation.

What do I need to open a bank account for my committee?

Committees are solely responsible for adhering to banking policies, and filing officers are unable to assist in establishing a bank account. Some banks might require a committee to have certain formalities already established prior to opening an account, such as filing a statement of organization, incorporating with the [Arizona Corporation Commission](#), and/or obtaining a taxpayer ID number from the [Internal Revenue Service](#). Filing officers can only provide the committee's statement of organization.

My candidate committee has a cash balance or surplus funds. How do I dispose of surplus funds?

If a terminating candidate committee has surplus monies remaining after payment of all debts, the committee may dispose of those surplus monies only in specified ways. [A.R.S. § 16-901\(50\)](#); [A.R.S. § 16-933](#).

- Transfer the surplus to a candidate committee organized by the same candidate;
- Return surplus monies to the original contributor;
- Contribute surplus monies to a PAC or political party within the contribution limits;
- Contribute surplus monies to another candidate under certain conditions;
- Donate surplus monies to a nonprofit organization that has tax exempt status under Section 501(c)(3) of the Internal Revenue Code; or
- In the case of a statewide or legislative candidate committee, transfer surplus monies to the candidate's officeholder expense account.

****Surplus monies may not be used or converted for personal use.****

