

ARIZONA PUBLIC INTEGRITY ALLIANCE

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August 3, 2026

Via Electronic Mail and Hand Delivery

Thomas M. Collins, Executive Director
Citizens Clean Elections Commission
1110 W. Washington St., Suite 250
Phoenix, Arizona 85007

RE: Complaint Against Ralph Heap, Participating Candidate for Arizona Corporation Commission — Unreported Expenditures and Prohibited In-Kind Contributions (Campaign Sign and Signature-Gathering Programs); Request for Expedited Investigation, Compelled Disclosure, and Disqualification Pursuant to A.R.S. § 16-942(C)

Respondents: Ralph Heap and his candidate campaign committee, [exact registered committee name] (jointly, “Mr. Heap” or “the Heap campaign”).

Dear Director Collins and Members of the Commission:

Arizona Public Integrity Alliance (“AZPIA”) respectfully submits this complaint pursuant to A.R.S. § 16-957 and A.A.C. R2-20-201 et seq. against Ralph Heap, a certified participating candidate for the Arizona Corporation Commission in the 2026 election cycle. This complaint concerns what appears to be a substantial, statewide campaign sign program — hundreds of large-format signs purchased and professionally installed across multiple counties — that is almost entirely absent from Mr. Heap’s campaign finance reports, as well as a statewide signature-gathering operation whose reported cost appears well below prevailing market rates for the services rendered. We understand the Commission has already opened an investigation into related allegations raised in a complaint filed on June 26, 2026. AZPIA submits this complaint to supplement that matter, to raise additional violations and parties, and to request specific relief.

I. THE COMPLAINANT

AZPIA is an Arizona nonprofit organization dedicated to integrity and accountability in Arizona government and elections. Its interest in this matter is the even-handed enforcement of the Citizens Clean Elections Act (the “Act”), A.R.S. §§ 16-940 through 16-961, which Arizona voters enacted to “improve the integrity of Arizona state government” and diminish the influence of special-interest money in elections.

II. FACTUAL BACKGROUND

1. Ralph Heap is a certified participating candidate for the Arizona Corporation Commission under the Act. As a participating candidate, he agreed to accept only five-dollar qualifying contributions and limited early contributions, to make all campaign expenditures from a single campaign account, to observe the adjusted spending limits, and to file complete and

accurate campaign finance reports. In exchange, he became eligible for hundreds of thousands of dollars in public funding.

2. On July 21, 2026, Mr. Heap won one of the two Republican nominations for the Corporation Commission and will appear on the November 3, 2026 general election ballot.
3. Throughout the primary election period, large-format (approximately 4' × 4') Heap campaign signs appeared in very large numbers across the state, including by published accounts what appeared to be hundreds of signs in the West Valley alone, as well as signs observed in Pima County and elsewhere. Signs of this size and quantity, professionally printed and installed statewide, plainly cost tens of thousands of dollars or more when purchase, distribution, and installation are accounted for at fair market value.
4. Mr. Heap's campaign finance reports disclose a single sign-related expenditure of approximately \$644 to a Mesa sign vendor — a small fraction of what he reported spending on signs in his prior, single-district legislative race, and an amount facially irreconcilable with the number and quality of signs deployed statewide. Although Mr. Heap has since amended multiple reports, on information and belief — based on AZPIA's review of the reports available through the Secretary of State's campaign finance database and on published press accounts — none of the amendments discloses any additional sign spending, and no third party has filed independent expenditure reports accounting for the signs.
5. Mr. Heap's statewide candidacy also required a substantial signature-gathering operation. According to the Secretary of State's official 2026 candidate filing list, Republican statewide candidates were required to file a minimum of 7,588 nomination petition signatures; Mr. Heap filed 16,205 signatures on March 19, 2026, of which only 1,131 were collected electronically through E-Qual and 15,074 were paper signatures gathered by circulators. In addition, to qualify for Clean Elections funding, his campaign was required to collect 1,500 verified five-dollar qualifying contributions. Against that workload, Mr. Heap's campaign finance reports disclosed payments totaling approximately \$6,880 to Uncle Sam Petitions L.L.C., a Mesa-based paid petition circulation firm. Prevailing market rates for paid petition circulation during the relevant period ran from roughly \$3 per signature at the very low end to as much as \$8 per signature depending on timing and difficulty, and published reports and campaign finance filings show candidates in single-district and municipal races paying this same firm roughly \$2,800 to \$5,600 for petition drives a fraction of Mr. Heap's size. A simple illustration frames the question: if even 10,000 of Mr. Heap's 15,074 paper signatures were professionally gathered at the low-end rate of \$3 per signature, the cost would be approximately \$30,000 — more than four times the roughly \$6,880 his report discloses, before accounting for a single qualifying contribution. AZPIA does not assert that any particular signature was gathered for pay; Mr. Heap may contend that volunteers collected signatures without compensation, and if so, the reports may be accurate on this point. That is precisely why an investigation is required: only the Commission, with access to the campaign's records, the petition sheets and circulator registrations, and compulsory process, can accurately determine whether a violation occurred. The Secretary of State's filing list further shows that Mr. Heap's slate-mate for the Corporation Commission filed a nearly identical petition profile — 14,741

paper and 1,107 E-Qual signatures — on the same day, indicative of a common professional circulation operation. Published reporting additionally indicates that Uncle Sam Petitions' registered circulators for the 2026 cycle are paid circulators, that the firm also installs campaign signs, and that it is presently the subject of press accounts describing signature-gathering services rendered to other Clean Elections candidates this cycle that do not appear on those candidates' campaign finance reports.

6. Heap campaign signs have been observed installed at the same locations, in the same manner, and on a similar timeline as signs for other candidates associated with the slate organized by Senator Jake Hoffman. It is a matter of public record that Senator Hoffman recruited Mr. Heap to run for the Corporation Commission and personally announced his candidacy, and that Senator Hoffman operates a professional political consulting business that has handled substantial contracts for candidates and political organizations. On information and belief — based on published press reports describing Senator Hoffman as having recruited Mr. Heap and orchestrated his campaign, and on information provided to AZPIA by individuals familiar with the campaign's operations — the Heap campaign uses Senator Hoffman as a consultant. AZPIA has not independently verified that relationship, and Mr. Heap's campaign finance reports do not appear to disclose payments for any such services.
7. The pattern described above — a large, professionally executed statewide sign deployment, apparently coordinated with the sign programs of allied campaigns; a statewide signature-gathering operation whose reported cost appears well below market rates; and campaign finance reports that account for neither — raises the obvious questions this complaint asks the Commission to answer: who paid for the signs and the signature gathering, who decided to purchase and install the signs, and why does the full cost of these services not appear in Mr. Heap's filings? AZPIA does not have access to the underlying invoices, communications, and payment records; those records are uniquely within the possession of Mr. Heap, his campaign, and the persons who provided or financed these services, and are readily obtainable through the Commission's investigative tools.

III. VIOLATIONS OF THE ACT

The facts above, if confirmed, establish multiple violations of the Act by Mr. Heap, and potentially by the third-party purchaser of the signs:

1. **Acceptance of prohibited contributions — A.R.S. § 16-941(A)(1).** A participating candidate “shall not accept any contributions” other than five-dollar qualifying contributions (A.R.S. § 16-946) and limited early contributions (A.R.S. § 16-945). Goods or services provided to a campaign without charge or below fair market value are in-kind contributions, A.R.S. § 16-901(32), and an expenditure coordinated with a candidate “is deemed an in-kind contribution to the candidate,” A.R.S. § 16-922(E). If a third party purchased or installed signs for the Heap campaign — whether as a gift, an advance, or a loan — Mr. Heap accepted contributions the Act flatly prohibits. The same analysis applies to professional services: petition circulation, qualifying-contribution collection, or sign installation provided to the campaign without charge or below fair market value is an in-kind contribution under A.R.S. § 16-901(32), which a participating candidate may not

accept. Coordination is readily inferable here: the signs bear the campaign's branding, and A.R.S. § 16-922(C) recognizes overlapping agents and fundraising relationships as rebuttable evidence of coordination.

2. **Expenditures outside the campaign account and in excess of the spending limits — A.R.S. §§ 16-941(A)(3), (A)(5), 16-948; A.A.C. R2-20-702, -703.** All of a participating candidate's campaign spending must run through a single campaign account and must not exceed the adjusted primary election spending limit. To the extent the sign program was in substance the campaign's own spending — arranged by or at the direction of the candidate or his agents but paid off the books — it violated the campaign account requirements and, depending on its true cost, may have driven total expenditures over the applicable limit.
3. **False or incomplete campaign finance reports — A.R.S. § 16-926; A.R.S. § 16-942(B).** Campaign finance reports must itemize expenditures and contributions, including in-kind contributions valued at the usual and normal charge. A.R.S. § 16-926. Reports that omit a statewide sign program — and amended reports that perpetuate the omission — violate the Act's reporting requirements and accrue daily civil penalties under A.R.S. § 16-942(B) (\$300 per day for statewide candidates, doubled where the unreported amount exceeds ten percent of the adjusted spending limit).
4. **Unreported independent expenditures — A.R.S. § 16-941(D).** In the alternative: if the purchaser of the signs contends the spending was independent of the Heap campaign, then any person making independent expenditures cumulatively exceeding \$500 for a particular office was required to file reports so stating. On information and belief, no such reports exist. The signs themselves claim to be printed by Mr. Heap's campaign, so if they are actually an independent expenditure, this would be a falsehood. The sign program is therefore unlawful under either characterization — it is either a prohibited coordinated in-kind contribution accepted by a participating candidate, or an unreported independent expenditure by the purchaser.

IV. THE PURCHASER AND INSTALLER MUST ALSO BE HELD ACCOUNTABLE

AZPIA draws a sharp distinction between an ordinary vendor and whoever financed and directed this sign program. A print shop that sells signs at fair market value and is paid for them commits no violation; it has no duty to police a candidate's spending limits. But if the investigation shows that a professional political consultant or other sophisticated operator in Arizona campaign finance financed, directed, or deployed the sign program on the campaign's behalf, that person stands on entirely different footing: such a person knows precisely what the Act permits and prohibits. Neither professional status nor public office confers an exemption from the Act; if anything, they heighten the need for accountability. The Commission should identify the purchaser, funder, and installer of the signs through compulsory process, make findings as to their conduct, impose any civil penalties the facts warrant, and refer any knowing violations for criminal prosecution under A.R.S. § 16-943, under which knowing violations of the Act are a class 1 misdemeanor.

V. THE STAKES: ENFORCEMENT OR NULLIFICATION

Mr. Heap did not merely face questions about a stray reporting entry. If the allegations are confirmed, he took the benefits of the Clean Elections program — its qualifying framework, its ballot credibility, and eligibility for hundreds of thousands of public dollars — while campaign services his reports do not account for were rendered on his behalf, in a primary he then won. Timing is everything: general election ballots will be printed and public funds disbursed in the coming weeks. If the Commission does not investigate these alleged infractions immediately, the practical consequence is that Mr. Heap may stand for election, and may receive public funding, before any violation can be established or remedied — and a candidate who cheated will have gotten away with it. The lesson to every future candidate will be unmistakable: certify as “clean,” let others provide what the reports omit, disclose nothing, and enjoy the results, because by the time anyone looks closely the election will be over. That outcome would render the Act’s spending limits and disclosure requirements a dead letter. The voters who enacted the Act, and every candidate who has ever complied with its restrictions at real cost to their campaigns, are entitled to vigorous — and prompt — enforcement.

VI. RELIEF REQUESTED

AZPIA respectfully requests that the Commission:

1. Find reason to believe that violations of the Act have occurred and conduct an expedited investigation pursuant to A.R.S. § 16-957 and A.A.C. R2-20-209, resolving the matter on a timeline that permits meaningful remedies before general election ballots are printed and public funds are disbursed;
2. Use written questions under order (A.A.C. R2-20-210) and subpoenas and subpoenas duces tecum (A.A.C. R2-20-211) to compel Mr. Heap and his campaign to produce a complete accounting of the sign program and the campaign’s signature-gathering operation — including the source of funding for the signs, their installation, and all petition circulation and qualifying-contribution collection services; the full terms of the campaign’s engagement of Uncle Sam Petitions L.L.C. and any other circulation or installation firm, and whether any person other than the campaign paid or subsidized those services; the identity of every person who made or participated in the decisions to purchase, distribute, and install the signs; the identity of any consultant engaged by or working with the campaign; and all related invoices, contracts, communications, and payment records — and to examine the circulators identified on Mr. Heap’s filed nomination petitions against the Secretary of State’s paid circulator registrations to determine who employed and compensated them;
3. Determine the fair market value of the sign program and, if the unreported contributions or expenditures exceed ten percent of the sum of the adjusted primary and general election spending limits, order Mr. Heap’s disqualification as a candidate pursuant to A.R.S. § 16-942(C);
4. Impose civil penalties of ten times the amount by which contributions or expenditures exceed the applicable limits, A.R.S. § 16-942(A), and daily reporting penalties under A.R.S. § 16-942(B); and, upon a finding of a knowing violation, order repayment of all campaign account expenditures from Mr. Heap’s personal monies pursuant to A.R.S. § 16-942(D);

5. Make findings as to the purchaser and installer of the signs, impose all penalties available against them under the Act, and refer any knowing violations — by any person — to the appropriate prosecuting authority under A.R.S. § 16-943; and
6. Continue to withhold Clean Elections funding from the Heap campaign pending final resolution of this matter.

AZPIA stands ready to provide any further information the Commission may require and requests notice of all proceedings in this matter.

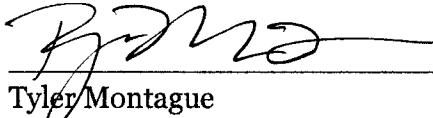
Respectfully submitted,


Tyler Montague
President, Arizona Public Integrity Alliance

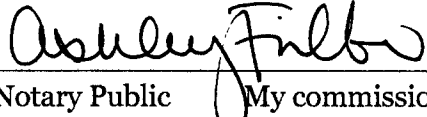
VERIFICATION

I, Tyler Montague, declare under penalty of perjury that I have read the foregoing complaint and that the facts stated in it are true and correct to the best of my knowledge, information, and belief, and that matters stated on information and belief are identified as such and I believe them to be true.

Executed on this 3 day of August, 2026, at Mesa, Arizona.


Tyler Montague

SUBSCRIBED AND SWORN to before me this 3 day of Aug., 2026.


Notary Public My commission expires: 2/1/29

