

June 11, 2018

Paul Ahler
Criminal Division Chief, Office of the Attorney General
2005 North Central Avenue
Phoenix, Arizona 85004
Paul.Ahler@azag.gov

Re: Potential Violations of Ariz. Rev. Stat. § 19-118.01 By Outlaw Dirty Money Committee

Mr. Ahler:

I write on behalf of the Arizona Free Enterprise Club, we would like to report apparent criminal misconduct by Outlaw Dirty Money, an Arizona political committee (the “Committee”), and its officers and agents. Although the Committee is the designated sponsor of initiative number C-03-2018, which seeks to heavily regulate political speech, the Committee appears unwilling to conform its own finances and operations to the laws governing the circulation of ballot measure petitions.

To forestall petition fraud and maintain the integrity of the ballot measure process, “[a] person shall not pay or receive money or any other thing of value based on the number of signatures collected on a statewide initiative or referendum petition.” Ariz. Rev. Stat. § 19-118.01(A). In addition to disqualifying all affected petition signatures, a violation of this prohibition is punishable as a class 1 misdemeanor offense. *See id.* § 19-118.01(B). As with all criminal proscriptions, liability also attaches to persons who aid or abet the offense or who carry out prohibited conduct on behalf of an entity. *See* Ariz. Rev. Stat. §§ 13-303, -306.

Direct evidence from at least two independent sources reveals that the Committee is systematically defying the prohibition of per-signature payments. Raeklevia Mathis, who is registered with the Secretary of State as a paid circulator of the Committee’s petition, has reported to third parties that she is compensated at a rate of \$1.00 for each signature she collects in support of the Petition. According to Ms. Mathis, she is required to amass at least 120 signatures per day as a condition of her continued employment. Ms. Mathis’ registration indicates that she is employed by Advanced Micro Targeting, Inc., which appears to be a vendor retained by the Committee for petition circulation efforts.

A recent social media posting corroborates Ms. Mathis’ account of the Committee’s per-signature payment practices. A certain Will Stone recounted in a May 17, 2018 Twitter posting that he had been approached by one of the Committee’s circulators, who informed Mr. Stone that “I get paid 2\$ [sic] per signature.” A screenshot of Mr. Stone’s Twitter postings is attached hereto as Exhibit A.

That an organization ostensibly devoted to electoral integrity would employ criminal means to advance its objectives is troubling, and the foregoing evidence supplies an ample basis for the Attorney General, as the officer charged with the enforcement of state law in connection with statewide ballot measures, *see* Ariz. Rev. Stat. § 16-1021, to commence an investigation into potential violations of Section 19-118.01 by the Committee, its officers, and Advanced Micro Targeting, Inc.



Thank you for your prompt attention to this important matter.

Respectfully,

Scot Mussi
Scot Mussi
President
Arizona Free Enterprise Club

cc. Eric Spencer, Director of Elections