

Mr. Fred Phillis:

Re: Campaign Finance Complaint
End Corruption in Gilbert, No. PC2008-01

SUPPLEMENTAL INVESTIGATIVE REQUEST FOR DOCUMENTS

Dear Mr. Phillis:

This law firm has been requested by the Town Attorney, on referral by the Town Clerk, to investigate whether one or more campaign finance violations may have occurred, as alleged in the campaign finance complaint. Our investigation and this request are made pursuant to A.R.S. §16-924.

As a supplement to the Town Clerk's earlier request for a response and for documents pertaining to this Campaign Finance Complaint, you are requested to supply, by e-mail pdf attachment or by fax in the next five business days if possible, the following documents and information:

1. The total number of recall signs ordered and the date on which they were ordered. Please include a copy of any documents regarding the recall sign order, including vendor contact information, date of placement of order, number of signs ordered, content of signs including "paid for by" notification, date signs were to be ready, and pricing.
2. The date the recall signs were received and the number of signs received. Provide all shipping or receipt documents. Did any of the signs omit the "paid for by" notification? If so, how many?
3. Your response to the Town Clerk states that you paid for the recall signs personally. By what means of payment did you pay for the recall signs? Is the bank account, credit card account or other source of funds that was used for this payment held in your name personally? Identify the check or transaction number and date on all payment(s) for the recall signs. Identify the invoice number and date. Provide copies of these documents. You may redact the bank account or credit card number.
4. On what date was first contact made with Ms. Floyd about becoming involved with the recall drive? Who initiated the contact? On what date did Ms. Floyd agree to serve as Treasurer for the political committee? On what date(s) was (were) the Statement of Organization for the political committee filled out and signed by each signatory? Provide a copy of any written communications.
5. Prior to February 13, 2008, did you have contact with any person other than Ms. Floyd about the recall drive or becoming involved with the recall drive in any capacity? Identify each such person and the date and content of all such communications. Provide a copy of any written communications.

6. Who decided and when was it decided that the official depository bank for the political committee would be “Chase”? When was an account first opened for the political committee? What was the date, amount and source of funds for all deposits into the account prior to filing of the Statement of Organization on February 13, 2008? What was the date, amount and to whom were any disbursements from the account made prior to filing of the Statement of Organization on February 13, 2008? Please provide all documents.

7. In what manner was the in kind contribution of ten recall signs to the political committee made or signified on February 13, 2008? In the same or other manner, were additional in kind contributions made by you of recall signs? If so, in what manner, numbers and on what dates? Provide any documents.

8. In addition to the costs of the recall signs themselves, did you also make in kind contributions to the recall committee of other materials, including poles or stakes, ties, or other materials for placement of the recall signs? Identify the type, number and costs of such materials per sign and in total and the date(s) on which such in kind contributions were made. When were they acquired, from what source, and using what source of funding? Please provide all documents.

We appreciate the willingness expressed in your response to the Town Clerk’s request to provide any additional information that is needed to conclude investigation of this complaint.

To ensure that there is an accurate record of communications, please correspond via e-mail or fax as to any questions you may have on this supplemental investigative request.

David Pennartz
Gust Rosenfeld P.L.C.