



**NOTICE OF PUBLIC MEETING
AND POSSIBLE EXECUTIVE SESSION OF THE
STATE OF ARIZONA
CITIZENS CLEAN ELECTIONS COMMISSION**

Location: Citizens Clean Elections Commission
1110 W. Washington, Suite 250
Phoenix, Arizona 85007

Date: Thursday, December 5, 2024

Time: 10:30 a. m.

Pursuant to A.R.S. § 38-431.02, notice is hereby given to the Commissioners of the Citizens Clean Elections Commission and the general public that the Citizens Clean Elections Commission will hold a regular meeting, which is open to the public on December 5, 2024. This meeting will be held at 10:30 a.m. **This meeting will be held in person and virtually. The meeting location will be open by 10:15 a.m. at the latest.** Instructions on how the public may participate in this meeting are below. For additional information, please call (602) 364-3477 or contact Commission staff at ccec@azcleelections.gov.

The meeting may be available for live streaming online at <https://www.youtube.com/c/AZCCEC/live>. You can also visit <https://www.azcleelections.gov/clean-elections-commission-meetings>. Members of the Citizens Clean Elections Commission may attend in person, by telephone, video, or internet conferencing.

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Commission members may not discuss items that are not specifically identified on the agenda. Therefore, pursuant to A.R.S. § 38-431.01(H), action taken as a result of public comment will be limited to directing Commission staff to study the matter, responding to any criticism, or scheduling the matter for further consideration and decision at a later date.

The Commission may vote to go into executive session, which will not be open to the public, for the purpose of obtaining legal advice on any item listed on the agenda, pursuant to A.R.S. § 38-431.03 (A)(3). The Commission reserves the right at its discretion to address the agenda matters in an order different than outlined below.

Any person with a disability may request a reasonable accommodation, such as a sign language interpreter, by contacting the Commission at (602) 364-3477. Requests should be made as early as possible to allow time to arrange accommodations.

The agenda for the meeting is as follows:

- I. Call to Order.
- II. Discussion and Possible Action on Meeting Minutes for October 10, 2024.
- III. Discussion and Possible Action on Executive Director’s Report, Enforcement and Regulatory Updates, and Legislative Update.

Note: The executive director’s report includes announcements and information about elections and campaign finance, a report on voter education activities, administrative information, information on candidates running clean, reports on legal proceedings involving Clean Elections and other Arizona election officials, a report on correspondence from other agencies, appointments, enforcement status, and regulatory agenda. It is included in the Commission packet available on the Commission’s website or by request at ccec@azcleelections.gov.

- IV. Discussion and Possible Action on 2024 Voter Education Report.

The Commission may recess to greet Captain Activate.

No Commission business will be discussed or acted upon during such a recess.

- V. Discussion and Possible Action on the following 2024 Primary Election Candidate Audits:

- A. Jennifer Wynne – State Representative LD 22
- B. Jonathon Hill – Corporation Commission
- C. Josh Barnett – State Senate LD 2
- D. Juan Mendez – State Representative LD 8
- E. Lea Marquez Peterson – Corporation Commission
- F. Leezah Sun – State Senate LD 22
- G. Rachel Walden – Corporation Commission
- H. Ylenia Aguilar – Corporation Commission
- I. Shawn Wildman – State Representative LD 1
- J. Steve Markegard – State Representative LD 25

- VI. Discussion and Possible Action on Annual Budgetary Calculations and 2025 Spending Plan.
- VII. Recognition of the Hon. Patty Hansen, Coconino County Recorder for contributions to Arizona elections.
- VIII. Discussion and Possible Action on Proposed 2025 Meeting Dates, January – June.

IX. Public Comment.

This is the time for consideration of comments and suggestions from the public. Action taken as a result of public comment will be limited to directing staff to study the matter or rescheduling the matter for further consideration and decision at a later date or responding to criticism

X. Adjournment.

This agenda is subject to change up to 24 hours prior to the meeting. A copy of the agenda background material provided to the Commission (with the exception of material relating to possible executive sessions) is available for public inspection at the Commission's office, 1110 W Washington St, #250, Phoenix, AZ 85007.

Dated this 3rd day of December, 2024
Citizens Clean Elections Commission
Thomas M. Collins, Executive Director

THE STATE OF ARIZONA
CITIZENS CLEAN ELECTIONS COMMISSION

REPORTER'S TRANSCRIPT OF PUBLIC MEETING

Phoenix, Arizona

October 10, 2024

9:30 a.m.

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1 PUBLIC MEETING, BEFORE THE CITIZENS CLEAN ELECTIONS
 2 COMMISSION, convened at 9:30 a.m. on October 10, 2024, at the
 3 State of Arizona, Citizens Clean Elections Commission, 1110
 4 West Washington, Suite 250, Phoenix, Arizona, in the presence
 5 of the following Board Members:
 6 Mr. Mark S. Kimble, Chairman
 7 Ms. Amy Chan
 8 Ms. Christina Estes-Werther
 9 Mr. Steve Titla (videoconference)

10 OTHERS PRESENT:
 11 Thomas M. Collins, Executive Director
 12 Paula Thomas, Executive Officer
 13 Gina Roberts, Voter Education Director
 14 (videoconference)
 15 Avery Xola, Voter Education Manager
 16 Paige Jarrell, KCA
 17 Mike Noble, Noble Predictive Insights
 18 Craig Morgan, Sherman & Howard
 19 Barrett Marson (public)

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1 With that, I want to move to discussion and
 2 possible action on the Executive Director's report.
 3 But before that, I want to say that the
 4 production of U.S. -- of last night's U.S. Senate debate was
 5 really top notch. Our moderator Steve Goldstein and Nohelani
 6 Graf were very good and clearly very well prepared. The
 7 debate allowed voters to really get a sense of who these
 8 candidates are, and I believe it made a significant
 9 contribution to our State's democracy.
 10 This year we did 29 broadcast debates and many
 11 more legislative and local debates. We will have a full
 12 report on that later this year, but this was by far the most
 13 successful effort to make voters aware of the election and
 14 the candidates in Arizona history.
 15 That said, with such a large number of viewers
 16 last night, we have received a tremendous volume of comments.
 17 Some positive, some negative. Staff is already working to
 18 contact those of you who have reached out to us, and we hope
 19 to reach as many of you as possible and will incorporate that
 20 feedback into our planning for the 2026 election debates.
 21 Commissioner Werther attended last night's
 22 debates -- debate with me, and I wonder if she has any
 23 comments she wanted to add.
 24 Commissioner?
 25 COMMISSIONER WERTHER: I just wanted to

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P R O C E E D I N G

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 3 CHAIRMAN KIMBLE: Good morning. Agenda Item I
 4 is call to order. It is 9:30 a.m. on October 10, 2024.
 5 I call this meeting of the Citizens Clean
 6 Elections Commission to order.
 7 With that -- with that, we will take
 8 attendance. Commissioners please identify yourself for the
 9 record.
 10 COMMISSIONER CHAN: Amy Chan.
 11 COMMISSIONER WERTHER: Christina Werther.
 12 CHAIRMAN KIMBLE: And I am Mark Kimble; we do
 13 have a quorum.
 14 Now we're going to deviate a little from the
 15 printed agenda. The order of items will be first the
 16 Executive Director's report for a brief discussion of our
 17 debate program, including last night's U.S. Senate debate.
 18 Second we'll do the discussion/possible action on Clean
 19 Elections Voter Education Survey For General Election 2024
 20 with Mike Noble. We'll wrap Mike's presentation and question
 21 by about 10:15 a.m. Third we will do our item on legal
 22 representation; fourth we will return to the beginning of the
 23 agenda and approve the minutes and complete the executive
 24 director's report. Finally, we will do public comment and
 25 adjourn the meeting.

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1 express my sincere appreciation for the Clean Elections staff
 2 and all our partners. Having seen sort of behind the scenes
 3 yesterday of all the logistics and coordination that was
 4 involved, it's certainly a significant endeavor to pull this
 5 off each and every time. And I think it was really well
 6 done; just wanted to thank everyone.
 7 CHAIRPERSON PARKER: Thank you,
 8 Commissioners -- Commissioner.
 9 Are there any additional comments at this
 10 time?
 11 MR. COLLINS: Gina, do you want to -- Gina, do
 12 you want to add anything now?
 13 Okay.
 14 MS. ROBERTS: No, thank you.
 15 CHAIRMAN KIMBLE: Okay. Thank you, Gina.
 16 Okay, we'll now move on to Item IV,
 17 discussion/possible action on Clean Elections Voter Education
 18 Survey For General Election 2024.
 19 For the past few elections, Clean Elections
 20 has certifi -- has surveyed voters around the state to
 21 understand how they see the issues in front of them. We use
 22 this data in several ways: We provide it to our moderators
 23 to help ensure the questions in our debates reflect what
 24 voters are concerned about, and we provide them to voters to
 25 help ensure that they have a better understanding of how

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1 their friends and neighbors see the issues.
2 To do this we've engaged Mike Noble of Noble
3 Predictive Insights, the leading public opinion researcher in
4 Arizona.
5 Mike, the floor is yours.
6 MR. NOBLE: Thank you, Commissioners.
7 And with the slides, how do we --
8 MS. THOMAS: Paige will switch it for you.
9 MR. NOBLE: Okay, Paige will.
10 Thank you Commissioners, for having me. It's
11 a privilege to work on the behalf of Arizonans and the State
12 of Arizona and this Commission. And I think we've been doing
13 this for about four or five years now and, you know, it's the
14 leading public opinion research firm in the Southwest that's
15 non-partisan, we very much believe, you know, believe in this
16 effort for which you're trying to do, which is actually
17 listen to the folks and just not the noise that's out there.
18 So what do the people actually care about? So appreciate it.
19 So I know I only have limited time, so I'm
20 going to set my timer here to go over because I have 47
21 slides in 30 minutes. So we will -- we will see how this
22 goes.
23 So if I don't get through all this, just
24 please know I'll be available for after, and I'll be
25 available to answer any questions. So, all right.

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1 So we very much guide this, but this should
2 sum up the Commission's objective.
3 And with that, let's dig in.
4 Next.
5 All right, so first off. Just kind of a level
6 set. That enthusiasm is basically high between likely voters
7 and registered voters. You'll hear that a lot of times by
8 folks when talking about polling the two main population,
9 especially during election times is "registered" and
10 "likely."
11 So the thing is, though, is that normally it's
12 like: Oh, it's not registered or it's not likely, that
13 doesn't count.
14 Here's the thing, so just trying to show for
15 like enthusiasm level broken out by some key demographic
16 groups such as gender, age, and party, you notice that pretty
17 much on the bars that there really is no statistical
18 difference between the two. And why that is, we're in a
19 presidential election. Last election for president was eight
20 in ten Arizona voters came out to vote. In a midterm it's
21 anywhere from the high forties to mid sixties, so I mean it
22 really fluctuates in midterms.
23 Arizona is arguably one of the most
24 competitive states in the country, and so -- anyways, so
25 people's awareness is higher than ever, but -- and just

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1 Paige, you ready?
2 All right, let's do this.
3 First off, these are going to be our topics
4 today. So we have kind of five core focuses. Trying to stay
5 from looking top of the funnel view and then start working
6 our way down to issues that matters most. Then talk about
7 the shift, since this is our third survey that we have done.
8 Show, you know, hey where were things at early on in the
9 year, you know, as we compared to where we wrapped up to the
10 election time frame.
11 Now we're, what, 26, 27 days from election
12 days, so that's fun.
13 And then a couple of upcoming policy proposals
14 that really are talked about on there and then some
15 consistency in the voter preferences.
16 So next slide, please.
17 All right, briefly so the goal is we just
18 don't survey to survey, there's very much an intention to
19 what we do. So these were the goals, so when -- you know,
20 there's a lot that goes in when you see these final numbers.
21 Ultimately, this is what is kind of our North Star of, you
22 know, what are we trying to do? So how are we going to
23 sample our audience and collect those opinions, to how are we
24 going to write the survey script to run the analysis, et
25 cetera.

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1 showing that so when you're looking at these numbers, know
2 that there's not really a difference between registered from
3 likely because the turnout is so high. Pretty much everyone
4 is a likely voter right now.
5 All right, state to state.
6 State to state, next slide. Arizona is still
7 believes the state is headed in a wrong direction. So this
8 is kind of the on track or going the wrong direction. So
9 look at the green and red lines as green meaning optimism and
10 red being pessimism of how they think things are going.
11 And right now Arizonans are a little bit more
12 pessimistic than optimistic, but you'll notice that's kind of
13 driven a little bit more by partisan priorities. You have
14 Republicans driving a little bit more of the -- the negative
15 sentiment and then Democrats are a little bit more positive
16 that's come to the state. But things have actually changed
17 very much politically here in the last five years.
18 Next slide, please.
19 So when we look at which party to run the
20 State, so this is what we call, like, a generic -- the
21 generic balance. So I mean, it's interesting that eight out
22 of ten of the electorate is kind of the die is already kind
23 of already cast on which side they're kind of voting for. So
24 you really only have like 20 percent of the electorate that
25 really is non-party loyal.

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1 And you notice this trend from, you know, our
2 first survey back in November, so end of 2023, and we did mid
3 in 2024 in March and then August the most recent one. And
4 you noticed as we marched closer to election day, you notice
5 how that has gotten tighter. But you notice from -- the race
6 for president, for senate, the balance control for Congress,
7 the balance control for state legislature, everything is
8 tight; everything is competitive.
9 And if you look at this, it's right now at 41
10 to 40, you know, Republicans with maybe one point, but that's
11 basically statistically insignificant. But it's close, but
12 that's why we are a battleground state and probably the most
13 popular state in all of Ar- -- in the country these days when
14 it comes to politics: good, bad, or indifferent.
15 Next slide.
16 So what do Arizonans care about? I think
17 that's why we're kind of more so here, so that's just kind of
18 a level set of the mood where we're at.
19 And what we see here, we did a multilayer
20 approach, so what's interesting about this survey of the
21 objective is we're really trying to dig down into the voters
22 what -- what is -- what do they care about? What keeps them
23 up at night?
24 And I would argue that this truly unique, but
25 also I think this is one of the most comprehensive and robust

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1 immigration, gun policy, public safety, et cetera.
2 Next.
3 All right, so let's look first. So
4 candidates -- so when picking the issues, so like, this is
5 the one of, hey, which ones are you kind of interested or you
6 want to know more about a candidate's position when running
7 for office.
8 And it's interesting, jobs and economy was the
9 first one at the highest 7 of 10 chose that; immigration was
10 number two, 6 in 10 chose that; healthcare not far behind;
11 education, housing, infrastructure; and farther down the
12 line, you notice environment has kind of taken a little more
13 of a backseat, at least this election, when it comes to
14 voter's mind. I mean, you still have 3 in 10 of voters that
15 believe that; but, again, it's maybe not as prevalent as
16 maybe we've seen in previous elections.
17 Next.
18 So but when asked their top three issues,
19 abortion climbs four spots, cementing itself in the top
20 three.
21 So when you see the rank change, so that
22 change of numbers above, so those either gray boxes, the
23 green or the red boxes, that's showing the difference
24 between, okay, when we -- we started from the top of the
25 funnel, what are they mainly interested in, like what are

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1 ways to go about it.
2 So we allow people to select from 50 issues --
3 most surveys have, like, 12 -- 50 issues and each of them are
4 slotted into larger categories. For instance, you'd have
5 jobs/economy and then parenthesis taxes. So kind of that
6 subcategory, so what's really driving the jobs/economy or
7 jobs/economy/gas prices. Or inflation, I mean, you know,
8 choose your adventure.
9 So we use a multistage question. First is
10 asking people, like what is -- which are the issues that you
11 want at first? So like what do you want to know? And that's
12 a "select all that applies." So again, like, what are you
13 curious about? What's interesting?
14 And then we start drilling them down to, okay,
15 pick your top three, so what do you want to know more about;
16 and then the "need to know" issues which is like what is
17 their number one driver.
18 So anyway, so I think this is a good sense of
19 where folks are at and really hitting it from a multi-pronged
20 approach. And again, I think it's the most robust in all of
21 Arizona.
22 Next.
23 These are our 12 categories that were in there
24 and of course they have a bunch of subcategories. But as you
25 can see, they run the gamut from healthcare, government,

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1 they curious about, to, okay, now pick their top three, where
2 did they move ranking wise; did they go up, did they go down
3 or did they stay the same?
4 You notice jobs stayed the same; immigration
5 stayed the same in ranking, right, so there it was still a
6 top priority; abortion, though, moved up, so moved up four
7 spots actually.
8 So when it was like, hey, I'm curious about
9 this issue; but then saying, oh, pick your top three, where
10 they want to learn more that definitely moved up. Healthcare
11 dropped down slightly, education slightly, housing doesn't
12 change, elections moved up three --I think you all have/know
13 a little bit about that stuff.
14 And so -- anyways, and then it was interesting
15 infrastructure dropped down five.
16 So next one.
17 So now we get to, okay, let's ask them their
18 top issue. So as we're drilling down more, like, you got to
19 pick your one. Like, let's stay do I really care about
20 inflation, but I also care about abortion or immigration, but
21 okay now I got to pick one, like what's my main driver.
22 And you notice here that abortion then creeps
23 up tied. It's actually abortion, immigration are tied for
24 that top spot -- or I'd say tier one is abortion, immigration
25 and jobs are really driving that right now. And you notice

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1 some of those other ones start tailoring off, but those are
 2 the three biggies that are really being talked about that's
 3 on voters' mind that's really keeping them up at night.
 4 Next.
 5 All right. So to frame this a little easier,
 6 so I know we showed a bunch of boxes, bunch of line charts,
 7 so how do we bring this kind of -- incapsulate a little bit
 8 easier for you is that a lot of voters care about -- and we
 9 just showed your top three or top issue, then your, you know,
 10 where they can select all that they're interested in, their
 11 top three, and then finally their main priority and showing
 12 you kind of what was driving what.
 13 And you see a lot of voters care about
 14 affordable housing, but when they had to narrow it down, laws
 15 regarding abortion access, you know, overtook it. And border
 16 security or immigration and inflation/rising prices which is
 17 jobs and economy were consistently near the top.
 18 So what were some of those underlying issues?
 19 These were the ones really, you know, poking their heads up.
 20 Next slide.
 21 All right, so let's first look at there's, you
 22 know, this is just what we have right now. We have, I would
 23 say, a blue team which are Democrats; you have the red team
 24 which are Republicans and then you have the purple team which
 25 are your Independents or non-party affiliated.

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1 healthcare and reproductive choices. If they don't like
 2 abortions, they shouldn't get them."
 3 Anyways, then you have folks like a non-white,
 4 non-Hispanic in Maricopa County, 65 and older, "Inflation is
 5 killing the American dream."
 6 And then you have a young voter, 18 to 34 in
 7 Maricopa County saying: "Housing is necessary for survival."
 8 So trying to bring some light to it, but you
 9 notice with Democrats on the younger end of the lane, but
 10 they're a little more concerned on the housing affordability
 11 because they're probably more in that frame of thinking about
 12 getting a house. But also especially older, but abortion is
 13 definitely a big driver of that group.
 14 Next one.
 15 All right, red team. Immigration,
 16 jobs/economy continue to influence the vote choice of the red
 17 team or Republicans, and you see immigration is still their
 18 number one issue. Number two is job and the economy --
 19 they're hands down the two dominate ones. Abortion is there,
 20 but again compared to the top two is very strong.
 21 You notice elections is actually number four
 22 in this group but it's only 7 percent in total.
 23 But, you know, with the group, again, very
 24 much on the border security, it's been in a big issue in
 25 general with that group of voters and "inflation is really

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1 So let's look first at what's driving what.
 2 And by the way, in Arizona we're basically a
 3 third a third a third of these few groups with a very slight
 4 edge to Republicans overall statewide. In Maricopa County,
 5 Independents are actually now the larger of the three groups
 6 of how that's trending.
 7 Anyways, so let's look at the blue team first.
 8 So what's driving this team?
 9 And you notice that -- and we've put the
 10 surveys out there since we've done three of them, the
 11 first -- the first -- the first bar is in August, the next
 12 bar is, you know, March, and then of course when we're in
 13 early -- or late last year in November.
 14 And you notice that abortion really as we've
 15 marched closer to election day is really a strong driver for
 16 their vote choice, and it's only gotten stronger as the
 17 campaign season has gone along.
 18 Jobs and economy slipped a little bit for that
 19 group, but we wanted to pull out some open-ends too to kind
 20 of get some voice. So we put some kind of demographic makeup
 21 of this group.
 22 So like a Caucasian voter in Maricopa County,
 23 kind of 55 to 64 in age, that, you know, abortion is a big
 24 deal because, you know, they're "not okay with a minority
 25 using religious beliefs to restrict half of the population's

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1 hurting Arizona residents" some are saying, and "abortion
 2 should be decided by each state."
 3 So again a lot of conflicting views,
 4 especially when you look at the red team. When they talk
 5 about abortion, they're just talking about it from very
 6 different angles.
 7 Next slide.
 8 Oh, we're going.
 9 Independents. So all right those folks that
 10 are not -- that are not registered with either two major
 11 political parties. Do partisan preference persuade, though,
 12 the Independents? And their top issues encapsulate basically
 13 Democratic and Republican priorities, almost like they're
 14 caught in the middle of these two sides. That's why I like
 15 to just refrain [verbatim] to them as "red team," "blue
 16 team."
 17 And so we look at the abortion as we've gotten
 18 closer to election time seeing abortion has become a bit more
 19 important than immigration. Immigration was more hot and
 20 heavy or on the top of these voters' minds of Independents
 21 during the March time frame, kind of as we were heading up to
 22 the primary elections. But now we've gone into what I like
 23 to call the Super Bowl which we have again in less than four
 24 weeks, you know, that slipped and abortion has become --
 25 become a little more important.

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1 So again you got some open-ends there, but
2 for time's sake, we'll continue.
3 Next slide.
4 So the top issue driver by party, just to kind
5 of show this, the gray bar is registered voters, red bar is
6 red team, blue, and again purple. Again, we try to keep it
7 intuitive to make it easier for everyone digestive-wise.
8 But when you look this, so, you know, we have
9 abortion (laws regarding access); jobs/economy, which is
10 specifically looking at inflation or rising prices;
11 housing -- or affordable housing more specifically; and
12 immigration, more so on border security.
13 You look at what -- what are the party
14 differences. You notice the blue team is very much driving
15 that abortion laws regarding access; they're very much
16 driving that. But you then you look over on the far right on
17 immigration, which again we noticed was a base issue for
18 Republicans, is that they were -- border security is really
19 driving that one.
20 So you notice that the parties are kind of
21 couldn't be farther off on those two issues, and you notice
22 the Independents kind of caught in the middle, right? And
23 compared to like housing affordability, you know, everyone is
24 kind of on par with that, which is interesting. And of
25 course, jobs and economy, you see a little partisan split

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1 again, it's just the pocketbook.
2 And when you think about it, why do a lot of
3 people want to live in Arizona? Low cost of living. And
4 fantastic weather. Just in -- maybe in three weeks from now
5 it will be better weather. I just looked today, 104. We're
6 on like a 16-day streak of the record high temperatures.
7 Anyways, I'm going down a rabbit hole.
8 So the insight here is that immigration,
9 abortion and inflation are the key topics. Although abortion
10 has been on the rise, different voters care about each issue.
11 The key: Tailoring topics to the audience.
12 And I will point out, I did watch that debate
13 last night that Arizona Clean Elections provided regarding
14 the Arizona Senate race. It was a master class. The topics
15 that were brought up, if you look at the research and then
16 what was talked about, oh my gosh, it was all the topics that
17 voters really, really, really care about. And remember, you
18 only have an hour with these folks up there and, again,
19 there's a lot of issues you can talk about.
20 So again, I just want to give a hat tip there
21 because I watched that, and I'm like these are excellent
22 topics and I thought it was a great debate because, again,
23 they're getting to things that Arizonans care about.
24 So, anyways.
25 MR. COLLINS: We need to mark that in the

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1 there as well.
2 Next slide.
3 So also let's not forget about this one: The
4 local issue, water. In an open-ended question on local
5 issues perceived water scarcity is impacting voters.
6 And so a couple of "Arizona won't be a place
7 where anyone can live if the water doesn't flow." "Water is
8 very important for the future of the state." "We need water
9 to live." It's pretty straightforward. And "limited water
10 and yet Arizona leaders are encouraging more people to move
11 here."
12 So it's interesting is that water is
13 definitely an underlying issue. It's almost like Arizonans
14 understand we live in a desert. So, that's good.
15 So next slide.
16 So key takeaways. So to kind of sum it up, I
17 know threw a little bit of data out there and that's probably
18 the heaviest of the stuff that I have; here are the key
19 takeaways to kind of sum up that section is: Republicans
20 need to know more -- want to know immigration, that matters
21 to them more than anything else. For Democrats abortion
22 matters most but economics and other core life concerns like
23 housing affordability and healthcare matter too, but everyone
24 wants to talk about inflation. That has been hands down the
25 number one issue. We have our surveys, other surveys and,

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1 minutes and come back to it.
2 MR. NOBLE: And again, that -- that's my --
3 that was my take as, you know, 20 years in this and as a
4 public opinion expert, that's my thought.
5 So shift in voter focus. So change in the
6 rankings of the top issues. Voters' focus has drifted from
7 immigration to abortion over the last five months, remaining
8 steady everywhere else.
9 So again, when you look at the dark bar is our
10 most recent survey, the lighter bar what it was in March.
11 So again, do these issues stay the same and
12 hence why I think this is such a great project is that a lot
13 of people just identify these issues back in like the March
14 time frame and then just consider that that, oh, these don't
15 change; they're monolithic. But as we understand, these
16 priorities do change, and we want to be adaptable to your
17 audience.
18 So next slide.
19 So here are the biggest movers on any
20 individual issues. So abortion law -- so laws regarding
21 abortion access, that went up as you had to have them drill
22 down, but also as we move closer to election day that
23 increased.
24 What also increased since March was another
25 end of the abortion which is whether the candidate calls

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1 him/herself pro-life or pro-choice. That came out.
 2 And immi- -- so border security, though,
 3 dropped five points in that time frame.
 4 So ballot propositions. All right, we have 13
 5 that I'm aware of. That's just at the state level; that
 6 doesn't include county or anything else. But if you got it,
 7 I think it's three -- I had the number just yesterday. It's
 8 not a voter guide, you got a voter phonebook basically in
 9 size. It's, what, 355 pages, somewhere in that line -- it's
 10 in the 300s, somewhere in there. But that's a ton. We have
 11 a lot of initiatives.
 12 So looking at these, these are the election
 13 related ballot measures. The first one is "Make Elections
 14 Fair Initiative," so that's open primaries. The next one
 15 down, the middle, is "Arizona Require Partisan Primary
 16 Elections Amendment," and that's literally the exact opposite
 17 which is closed primaries; and then you have the "30
 18 Legislative District Signature Requirement."
 19 What's fascinating about this, and we've seen
 20 it with other research, is that all of these are in a
 21 pretty -- pretty good spot. And by the way, when you see
 22 "net" on the slide, that's among those that have an opinion.
 23 So the support or opposed, so not including those "not
 24 sures," so among those that have an opinion is that positive
 25 or negative?

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1 5 percent of voters consider elections their most important
 2 issue right now.
 3 And again, you're going against a lot of other
 4 tough issues. But election-minded voters care about securing
 5 the integrity of current election laws more than implementing
 6 new laws, increasing or decreasing ballot access or rehashing
 7 the 2020 election.
 8 Voters themselves aren't sure about the finer
 9 details of the debate between open versus partisan
 10 primaries -- as we just saw -- and they support both partisan
 11 and open primaries.
 12 Which again, it will take you a while, you
 13 will be thinking about this for days because I did too what
 14 that happened, I was like, how does that happen? But here we
 15 are.
 16 Potential question topics though of applicable
 17 use: Why candidates support or oppose partisan or open
 18 primaries?
 19 So based on that, I think that's a real great
 20 question to kind of throw in there to based on the research
 21 to get some -- yield some really good answers that the
 22 electorate is really looking for.
 23 And what's interesting, one little stat, only
 24 1 percent is the share of voters who say the results of the
 25 2020 election are the most important position of a -- for a

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1 And you other notice that a lot of those are
 2 on a strong positive and you're probably wondering why in the
 3 world would open primaries and closed primaries which
 4 couldn't be more vastly different are both positive?
 5 Me and my research team thought the same thing
 6 when we found this in another survey just before and, of
 7 course, we saw it again here. It's -- our deduction is that
 8 the electorate is just kind of in this pro-election mood.
 9 But also that I think there might be a little confusion of
 10 parsing the difference between -- I mean, "open" and
 11 "closed," that couldn't be more different. It's like red
 12 light and green light, right?
 13 So anyways, interesting but also I think
 14 opportunity for education on those topics.
 15 Next slide.
 16 All right, so -- by the way I notice going in
 17 here, "cheat sheet," please don't take that as literal.
 18 "Cheat sheet," again we try to have fun with these
 19 presentations, make them digestible. So kind of, hey, this
 20 is kind of a cheat sheet for moderators or for when you're
 21 doing these debates, some things that stick out that how can
 22 you apply this -- these insights to the action steps that you
 23 do and create more value and make this even better for your
 24 audience.
 25 So although there are newsy topics, only

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1 candidate for them to learn. So another takeaway -- and this
 2 is not to suppress an issue by any stretch -- well when you
 3 have only 1 percent to say, hey, to relitigate 2020, just
 4 know that no one, you know -- 99 percent of electorates moved
 5 past that.
 6 So anyways, where to spend your time.
 7 All right, next one. Opinions on abortion.
 8 Again as we saw, this is an important issue. Especially when
 9 you look at any female demographic under the age of 50. And
 10 so Republicans are the only large demographic group who
 11 believes that abortion should be legal in all or most cases.
 12 So when you look at the -- the questions and
 13 the yellow is, hey, should it be legal; in all for the dark,
 14 and light yellow is legal in most cases. So are they kind of
 15 a hardliner or most of the way there?
 16 And then same on the other side.
 17 And you notice that the majority of the
 18 electorate, 54 percent believe abortion should be legal, and
 19 the 42 percent that think it should be illegal, two-thirds of
 20 that number is -- is kind on the softer end of that, so
 21 they're less fervent about it.
 22 But when you see the key demographic groups on
 23 the right, pretty much everyone is there and as I was saying,
 24 any demographic with women attached to it, look at that,
 25 they're plus 28. The only one higher is Democrats overall.

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1 But, again, we notice that's a core-based
 2 issue for them.
 3 But the Republicans are the only ones that's
 4 saying potentially lean towards there. So where the
 5 electorates' mood is, is they're a little bit more on the
 6 legal side than illegal.
 7 Next slide.
 8 So now we have something on the ballot,
 9 though. So that's just their opinions on the topic. Now
 10 they actually have something in front of them that they can
 11 vote for which is that Arizona Abortion Access Act.
 12 And so when asking about that of where they
 13 support or opposed, trying to get a feel of where folks are
 14 at, by a 2:1 margin Arizona voters support adding abortion
 15 rights to the Arizona Constitution. And again, looking at
 16 the previous numbers, not surprised why, it's in that state,
 17 and the Arizona Abortion Access Act or the quadruple "A" I
 18 think you could probably sum it down to, would amend the
 19 Constitution to expressly state that every individual has a
 20 fundamental right to abortion and prohibit Arizona from
 21 denying, restricting and interfering with the fundamental
 22 right to abortion before fetal viability.
 23 Anyways, want to get in the weeds, that's what
 24 it is.
 25 Anyways, by party you notice where folks are,
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1 it's not extreme one way or extreme the other, actually the
 2 bulk of the electorate is like, hey, it should be somewhere
 3 in the middle. But here's the thing, can anyone define what
 4 the middle looks like? But that's a key thing that they're
 5 wanting to know and have that conversation about.
 6 So potential question topics: Is there a
 7 point in pregnancy after which abortion should be banned? If
 8 so, how many weeks?
 9 So again, where do they sit in that gray area?
 10 How do these candidates that are going to be making policy
 11 decision, where -- where do they sit there on this issue?
 12 Next.
 13 All right, four minutes left; we can do this.
 14 Voters want to curb illegal immigration. So
 15 moving on to the immigration topic. This one is fascinating
 16 because if you look at Gallup, they have a track, you know,
 17 they track stuff over the next five decades. It's funny,
 18 we've been, like, three decades always very, like, open to
 19 immigration, like, hey, folks come in, et cetera. And the
 20 last three years or so is the first time where it's actually
 21 moved from either from being open to, hey, we should either
 22 keep the same or kind of pull it back.
 23 So what we're seeing from a national
 24 perspective but, remember, we're Arizona; we're literally on
 25 the front lines when it comes to this topic. It's a very
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1 but the big thing is you are in this very hyper-partisan time
 2 frame, so you have Democrats on one end, Republicans on the
 3 other, so -- but notice Independents. They're plus 33.
 4 So next slide.
 5 So here is the kind of takeaway for -- Paige,
 6 next slide please.
 7 Oh. Hold on. By the way, it wasn't Paige,
 8 she's doing a great job; it's the technology.
 9 See, I got your back, Paige, don't worry.
 10 For the record, yeah.
 11 All right, perfect.
 12 So all right, so abortion. So roughly half of
 13 the voters consider abortion when deciding their vote. So
 14 it's already in their mind space of their decision-making
 15 process, and -- but to those voters it's very important; and
 16 nearly two-thirds of Arizona voters, including 50 percent of
 17 Republicans support the repeal of the 1864 abortion ban and
 18 one-quarter or 27 percent think they should have stayed in
 19 place. So again where we're at in this issue is just that
 20 the electoral is just kind of moved.
 21 But abortion is a key issue in Arizona and
 22 voters want deeper questions. They care less about
 23 pro-choice/pro-life labels and more about the candidates'
 24 policy positions on this.
 25 Because what we know is for the vast majority
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1 unique to our state. If you're living in -- and I see it all
 2 the time, if you poll across country, if you're not on a
 3 border state -- like Nevada, we poll in Nevada all the
 4 time -- immigration is just way less important there. But
 5 oh, well, you know, Arizona, because it directly impacts us,
 6 right? Good, bad or indifferent.
 7 So when you look at legal immigration, when
 8 saying, hey, asking the electorate should legal immigration
 9 be increased, decreased or kept about the same, they're
 10 basically split, a third, a third, a third. Interesting.
 11 But illegal immigration, they're very much
 12 saying that should decrease. So they're -- they're fine on
 13 legal immigration, but illegal immigration is kind of where
 14 that separation is. But a lot of people just get that all
 15 jumbled together.
 16 So next slide.
 17 So there happens to be a ballot proposition
 18 regarding border security or immigration which is HCR 2060,
 19 which is I think that was passed out of legislature that was
 20 a kind of tougher thing on border. But large majority of
 21 Arizona voters support this measure. Primarily because of
 22 the work verification requirement and increased punishments
 23 for fentanyl dealers.
 24 And what was interesting about this initiative
 25 is that it kind of had like three core parts to it. Normally
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1 initiative kind is kind of just on one part. This one had
 2 three things in it so we wanted to break out those three core
 3 items and ask, hey, why are supporters supporting it? Which
 4 is in the blue. So what's driving support? What of those
 5 three aspects, what's driving it?
 6 The fentanyl and the immigration status, that
 7 is clearly the two biggest drivers, but what isn't driving as
 8 much for the supporters of that measure is the public
 9 benefits aspect.
 10 And then when you look at why opponents
 11 oppose, main reason what's driving opposition to this is the
 12 worker verification. So, again, that's one of the big
 13 issues; and then interesting, in the fentanyl portion, less
 14 of an issue on those opposition slide.
 15 So next slide.
 16 We can -- we can't do this. I probably won't
 17 get it done.
 18 All right, moving fast. Cheat sheet:
 19 Immigration. Particularly border security remains a dominant
 20 issue for Arizona voters. 3 in 5 voters consider immigration
 21 when deciding on a candidate. And voters are fairly united
 22 in wanting illegal immigration to decrease, but there is
 23 little agreement about legal immigration.
 24 So given that this immigration is a ballot
 25 initiative on immigration, it's one of the big draws for
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1 that's that chart on the left. 71 percent said, yes, they
 2 had in the last 12 months.
 3 And then when you look at that group, that
 4 group that said they were, on the "job search outlook," is it
 5 good or bad? Like, how is that job search going? And you
 6 notice that that vast majority, 6 in 10 basically say it's
 7 not going good.
 8 So what are the barriers, what are the job
 9 search barriers? The type of jobs available, and the next
 10 two highest are pay or applied, but never received no further
 11 information. So that's what is driving it.
 12 Next slide and I'll wrap up here in just a
 13 moment.
 14 Anyways, jobs very much on people's minds,
 15 et cetera. Because of time let's go -- can you go jump two,
 16 three slides and I'll wrap this up.
 17 Okay, perfect. Arizonans want ideological
 18 fighters. So this is kind of more specific to you the
 19 Commission of like what people are looking in these
 20 candidates, right, what do they want?
 21 Is that ideology versus party? Is it all
 22 about parties these days or is it hey, do these issues matter
 23 still?
 24 And Arizonans care more about issues than
 25 party, which you would never guess looking at the news these
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1 certain voters is the same reason it's unpopular among
 2 others. It's a very polarized issue, and it requires
 3 employers to verify employee's immigration status which is
 4 the main one.
 5 And potential topics: Do you support
 6 requiring employers to verify the immigration status of their
 7 employees? Why or why not?
 8 All right, next one. Optimism about economy.
 9 Whether you look at national, state, local or personal
 10 finances, they're all looking pretty negative. The
 11 electorate is pretty negative and pretty pessimistic when it
 12 comes to this issue.
 13 What's interesting, though, is there's a big
 14 difference between the red and the blue team. Oh my gosh,
 15 it's almost like they are hyper partisan on total sides.
 16 Democrats look at it much better; Republicans think it's
 17 absolutely terrible. And again you have Independents in the
 18 middle.
 19 Next slide. I got to go fast.
 20 Arizona voters think the job hunt has gotten
 21 harder -- this is a really unique takeaway that we had from
 22 this survey -- largely because the right top of jobs aren't
 23 hiring and the pay is not what voters need.
 24 So we asked about have you or someone you know
 25 looked for work some time in the last 12 months? And so
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1 days. And they want the ideas represented. And it shows the
 2 majority of them "A candidate agrees with me on the issues
 3 that I care about."
 4 So, will they go a past their partisanship and
 5 go with that? And yes, it is. So there is hope and that is
 6 why these debates matter.
 7 Next slide and I'll hurry up and finish.
 8 All right, I'll just sum up the end here,
 9 we'll just get to slide 46 because I want to be mindful of
 10 time. And again, that's why I said if you need extra time
 11 after this, happy to go through this with you. It relates.
 12 Next slide. Sorry.
 13 Point is, from that takeaway is that voters
 14 are very open, they want to know about issues. They're
 15 willing to cross to the other side if they know about the
 16 issues. But if it states very partisan, they're going to
 17 stay partisan. So hence why I think it's so important that
 18 we're having probably the most available watched debates
 19 available.
 20 Hey, I was able to watch because of what the
 21 Elections Commission did and with their partnerships. I
 22 missed -- I got the last 10 minutes of the debate. I was
 23 able to watch it live -- or not live but recorded online,
 24 which is fantastic. So again, it just provided access like
 25 for me because otherwise I would have missed most of it.
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1 So anyways, I think that's cool.
 2 Anyways and so here are the key takeaways of
 3 what we all went through. Voters feel that Arizona is
 4 heading in the wrong direction. They're divided on who
 5 should run the state -- again, we're a battleground state for
 6 a reason. Ballot box decisions will come down to platform
 7 over party, candidates' stances on specific issues they care
 8 about will matter most.
 9 That's why candidates they need to do these
 10 debates if they want to win, especially with how tight things
 11 are.
 12 And Arizonans say they want an ideological
 13 fighter, but there are limits. They don't want these
 14 fighters to prevent solutions and compromise.
 15 So here's the insight: Voters value principle
 16 and compromise and debate questions should give candidates
 17 the chance to draw contrasts, talk about what they'd change,
 18 and how they would make it work with the other side.
 19 So don't believe everything you hear; hear it
 20 straight from Arizonans themselves. There is light at the
 21 end of the tunnel and, again, they want to know about this
 22 stuff.
 23 So with that, I'll wrap.
 24 And I'm sorry for going three minutes over.
 25 CHAIRMAN KIMBLE: Thank you, Mike.
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1 know, it's just not enough information or why -- why -- why
 2 should I matter. And actually number three on the list was,
 3 you know, my vote doesn't count.
 4 So I think it's really just some education,
 5 frankly, that is missing. Because think about it, when
 6 you're at 20 years old, how much are we talking about the
 7 presidential election or who senate or like state legislature
 8 or HCR 1060 [verbatim], right?
 9 And so again for them, I think the big
 10 breakthrough is how to communicate to them of how this
 11 impacts them, and the more you can communicate to how that
 12 impacts them, the more they're going to care. Because at the
 13 end of the day, it is human nature at its finest. We are
 14 going to care about things that directly impact us. So the
 15 best way to do it and to get around like "why does my vote
 16 matter?" It's like, well, I don't know, presidential race is
 17 decided by 11,000 votes. Our governor's race who is the CEO
 18 of the state was decided by 30,000 votes. Yeah, people's
 19 votes matter, right?
 20 And especially where Arizona is and it can go
 21 either way in policy direction. So I would argue right now
 22 that it has never been more important for people and
 23 neither -- you can't win if you don't play. So either you do
 24 your civic duty or, you know, just enjoy the -- or, you know,
 25 don't complain about the consequences after, right.
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1 Fascinating presentation.
 2 Any questions for Mike?
 3 COMMISSIONER WERTHER: I did have a question
 4 about sort of the younger voters and I guess sort of trying
 5 to get them engaged and whether or not they are engaged, and
 6 that I saw on a couple of the slides about how like the
 7 issues that were more important to them are more like housing
 8 and that type of thing that obviously impacts them.
 9 Is there any more sort of additional
 10 information to break that down?
 11 MR. NOBLE: Yeah, no, no. So we did actually
 12 a study that I think Clean Elections Commission was done by
 13 the -- one of the policy groups over there at ASU where we
 14 specifically looked at 18- to 30-year -- 30-year-olds and we
 15 did a massive sample. And not only that, we had -- part of
 16 our sample was 18- to 30-year-olds that have voted and ones
 17 that have not voted -- which, by the way, are literally the
 18 hardest group out there to get -- and we had like 500 of the
 19 "hard to get" group. So we were able to really drill down on
 20 that.
 21 And what we saw was voters that -- the group
 22 was that they care -- abortion is a big deal. Pocketbook
 23 issues, mainly inflation and housing affordability, because
 24 their mind frame; border security there but not as high as
 25 those other three. And the barriers they saw is that, you
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1 So anyways, hope that answers it.
 2 And by the way, happy to send you as well
 3 after this, happy to send you the study. Again, it was
 4 publicly -- made publicly available since it was done by ASU,
 5 and so happy to share that. But it was a fascinating deep
 6 dive into that electorate, and so I think you'll love it.
 7 And so...
 8 COMMISSIONER WERTHER: That will be great,
 9 thank you.
 10 MR. NOBLE: Yep.
 11 CHAIRMAN KIMBLE: Thank you. Any more
 12 questions for Mike?
 13 (No audible response.)
 14 CHAIRMAN KIMBLE: Thank you very much, Mike.
 15 Appreciate it.
 16 MR. NOBLE: Not a problem.
 17 Thank you very much, Commission, it's a
 18 privilege.
 19 And last thing is Paige crushed it. Good job,
 20 Paige.
 21 Thank you all.
 22 COMMISSIONER WERTHER: Bye, thank you.
 23 CHAIRMAN KIMBLE: Let me note for the record
 24 that Commissioner Titla joined the meeting before Mr. Noble's
 25 presentation.
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1 Now we're going to move to Item V, discussion
 2 and possible action on Commission legal representations.
 3 Is there a motion to go into executive
 4 session?
 5 COMMISSIONER WERTHER: I make the motion.
 6 CHAIRMAN KIMBLE: Commissioner Werther has
 7 moved that we go into executive session.
 8 Is there a second?
 9 COMMISSIONER CHAN: I second the motion.
 10 CHAIRMAN KIMBLE: Seconded by Commissioner
 11 Chan.
 12 I will call the roll to go into executive
 13 session. Commissioner Chan.
 14 COMMISSIONER CHAN: Aye.
 15 CHAIRMAN KIMBLE: Commissioner Werther.
 16 COMMISSIONER WERTHER: Aye.
 17 CHAIRMAN KIMBLE: Commissioner Titla.
 18 COMMISSIONER TITLA: Aye.
 19 CHAIRMAN KIMBLE: Chair votes aye. The vote
 20 was 4-to-nothing to go into executive session.
 21 We will adjourn the public meeting to go into
 22 executive session.
 23 (Whereupon the proceeding is in executive
 24 session from 10:12 a.m. until 11:07 a.m.)
 25

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1 CHAIRMAN KIMBLE: Commissioner Titla.
 2 COMMISSIONER TITLA: Aye.
 3 CHAIRMAN KIMBLE: Chair votes aye.
 4 By a vote of 4-to-nothing, we've approved the
 5 motion.
 6 With that, we'll return to the approval of
 7 minutes.
 8 COMMISSIONER CHAN: Mr. Chairman?
 9 CHAIRMAN KIMBLE: Just a second. Discussion
 10 and possible action on the minutes for our July 25th meeting.
 11 Is there a motion to approve the meeting
 12 minutes?
 13 COMMISSIONER CHAN: I was going to move that
 14 we approve the minutes as written.
 15 CHAIRMAN KIMBLE: Okay, thank you,
 16 Commissioner Chan.
 17 Is there a second?
 18 COMMISSIONER WERTHER: Second.
 19 CHAIRMAN KIMBLE: It's been moved by
 20 Commissioner Chan and seconded by Commissioner Werther that
 21 we approve the minutes for our July 25th meeting. I'll call
 22 the roll.
 23 Commissioner Chan.
 24 COMMISSIONER CHAN: Aye.
 25 CHAIRMAN KIMBLE: Commissioner Werther.

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 3 (Whereupon all members of the public are present
 4 and the proceeding resumes in general session.)
 5 CHAIRMAN KIMBLE: We are back in public
 6 session now.
 7 Do I have a motion from -- from any member of
 8 the Commission based on our executive session?
 9 COMMISSIONER CHAN: Mr. Chairman, I move --
 10 CHAIRMAN KIMBLE: Commissioner Chan.
 11 COMMISSIONER CHAN: I move that we direct
 12 staff to proceed as we discussed -- our attorney to proceed
 13 as discussed in executive session.
 14 CHAIRMAN KIMBLE: Okay, thank you,
 15 Commissioner Chan.
 16 Is there a second?
 17 COMMISSIONER WERTHER: I second.
 18 CHAIRMAN KIMBLE: Motion is made to direct our
 19 attorneys to proceed as directed in executive session was
 20 made by Commissioner Chan, seconded by Commissioner Werther.
 21 I'll call the roll.
 22 Commissioner Chan.
 23 COMMISSIONER CHAN: Aye.
 24 CHAIRMAN KIMBLE: Commissioner Werther.
 25 COMMISSIONER WERTHER: Aye.

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1 COMMISSIONER WERTHER: Aye.
 2 CHAIRMAN KIMBLE: Commissioner Titla.
 3 COMMISSIONER TITLA: Aye.
 4 CHAIRMAN KIMBLE: Chair votes aye. The
 5 minutes are approved 4-to-nothing.
 6 Item III, discussion and possible action on
 7 Executive Director's report.
 8 We had a little bit of that, Tom, but we'll
 9 take the rest of it now.
 10 MR. COLLINS: Yes, thank you, Mr. Chairman.
 11 Just for anybody that doesn't know the general election is
 12 November 5th, and early voting is underway here in Arizona.
 13 You can go cast a ballot at the vote center if you're in
 14 Maricopa County. And if you're waiting for your mail ballot,
 15 it's coming.
 16 I want to highlight a bunch of stuff. I
 17 really think this is -- this is my favorite Executive
 18 Director's report I've worked on in quite some time.
 19 At the State Fair we have a really tremendous
 20 voter registration outreach exhibit that is generating I
 21 don't know how much traffic but -- but quite a bit, and I'm
 22 sure we'll get a report on that on our year-end wrap-up on
 23 voter education, but it's very cool, and you can watch that
 24 link for a story by -- by Cronkite News about it.
 25 Alec has been working very hard with is his --

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1 his team, which is mostly him, but nevertheless to update our
2 website with candidate propositions at the federal, state,
3 and as much as possible, city-level information as much as we
4 can.

5 So right now we think we've got the best and
6 we're moving towards trying to be the one-stop shop that
7 we're -- that we've been asked to be, but right now I think
8 we've got the most comprehensive, the richest website
9 available for folks who are -- who are looking for that
10 information.

11 And we stress all the time we're talking to
12 folks, the difference between what we do and everybody else
13 does is we're a website for voters not a website for an
14 election agency that actually has to talk to voters, right?
15 It's a little -- subtle difference and it -- not to denigrate
16 what those agencies do, it's just to say that we get to have
17 that -- that different focus.

18 We've talked about the debates.

19 The 2024 General Election Voter Education
20 Guide, that's out there.

21 Another thing that's out there, we've done
22 this in this past and we're trying to get to where we focus
23 on it is looking at those issues that Mike identified, we did
24 a series of interviews with subject matter experts, so three
25 professors, two from ASU and one from -- one from U of A on

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1 just took all of what Avery has been doing over the last
2 month and a half just in one -- in one -- in one place. And,
3 you know, I mean he's been everywhere; he's talked to
4 everybody. He has -- he has reached different regions of the
5 state, different subgroups, different demographics on
6 different topics whether it's voter registration, whether
7 it's civic engagement, whether it's Captain Activate! based
8 activities, propositions, it's an extraordinary amount of
9 work and in addition to his ongoing, you know, board and
10 other advisory roles, it's really been incredible.

11 So I'm -- you -- you, I'm always -- I just,
12 you know, want to thank him for his -- his efforts there.

13 I mean, you know, look, I mean, we've got --
14 between the five staff, I think I probably say this all the
15 time and I apologize if I'm being verbose as I've been -- I'm
16 often castigated for, but about this I will be verbose. I
17 mean, between Paula, Mike, Gina, Alec and Avery are -- work
18 harder than any people in government I have ever met.
19 They're more mission committed, they go wherever they need to
20 be, they are where they need to be; they -- they go the extra
21 mile and -- and beyond and -- and work as a team in a manner
22 that is -- I mean, I get -- I get a little -- I get verklempt
23 about it, I really do. It's just a great team and I just
24 want to make sure that I say that, especially after this
25 month has been -- this month has been a lot of hard work. So

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1 the economy, immigration, the border and abortion. And those
2 are really informative and really try to get at the -- at the
3 issues in a real way.

4 The economy one on inflation and the like with
5 professor Dennis Hoffman with ASU was a lot of fun to film.
6 He's very, very bright; I mean he's a genius. And he really
7 was able to explain inflation in a way that I -- I felt like
8 I really learned something.

9 We also produced as we have produced several
10 election cycles our -- our Arizona project board town -- Meet
11 the Candidates, which Avery was nice enough to -- to kick off
12 for us and that was -- that was -- that was really great.

13 I feel like I'm missing a page. I feel like
14 I'm missing a page.

15 No, we're missing a whole page. I don't know
16 what happened to it.

17 Okay. Well, there was a page about Avery's
18 activities that is not here for some reason. I must have
19 deleted it. I don't -- I don't know what happened to it.

20 It doesn't matter -- I mean, it matters, but
21 we have a whole bunch of other voter -- oh. That's the one.
22 Okay, I don't know.

23 My bad, I apologize.

24 So I wanted to just summarize, and if you --
25 if it's not in your packet, we'll get it to you, but I really

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1 everybody is really doing...

2 Gina is working, which is an amazing project,
3 with the ASU Athletics, develops a civic engagement and voter
4 programming plan which I think is going to be exciting.

5 We've done a couple of Morning Scoops segments
6 with Capitol Times, which are designed to give a sort of an
7 insiders's view on how elections work.

8 I'm going to toot my own horn briefly to talk
9 about our trip last week to St. Michaels, we were in
10 St. Michaels with -- which is the next town over from Window
11 Rock at KTNB which is the largest station, radio station, in
12 Navajo Nation. And we were there with the Navajo County
13 Recorder, the Apache County Recorder, the Coconino County
14 Election Director, supervis -- board of supervisor's members
15 from all three counties live -- all in person live in studio
16 for two hours in -- in both English and Diné, talking about
17 everything from voter registration to what's on your ballot,
18 to talking about how long the ballot is going to be, how much
19 time it's going to take to vote, correcting some
20 misinformation issues that are out there.

21 It was -- it was really a great -- a really
22 great experience, and Gina and Avery put it together in like
23 24 hours so all I had to do was drive up and show up. So it
24 was -- it was -- it was really cool.

25 I do want to mention just so you know that we

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1 are keeping up with the requests we've gotten from Senator
 2 Hoffman and -- you know, but no telling how that will end up.
 3 And then I think the only other thing that's
 4 really worth mentioning -- I mean, you can ask me anything --
 5 but on Election Day, we'll be in court for the Prop 211 oral
 6 argument about -- this is the Center for Arizona Policy's
 7 challenge under the state constitution. The state
 8 constitution has both free speech and private affairs
 9 clauses.
 10 The -- they were not successful in superior
 11 court; there's a lot of amicus briefs filed and if you're
 12 interested, we can send you the briefing. But you know,
 13 we'll see where we go from there.
 14 But, you know, that's kind of -- that's
 15 kind -- that concludes my report unless anybody has any
 16 questions.
 17 And I don't know if Gina or Avery have
 18 anything they want to add that I missed.
 19 CHAIRMAN KIMBLE: Are there any questions from
 20 members of the Commission?
 21 (No audible response.)
 22 CHAIRMAN KIMBLE: Thank you.
 23 And I understand Captain Activate! will be
 24 making an appearance at one of our future meetings which will
 25 be quite exciting.

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1 comment?
 2 I don't see anyone.
 3 (No audible response.)
 4 CHAIRMAN KIMBLE: No? Okay, thank you.
 5 The public may also send comment to the
 6 Commission by e-mail at ccec@arizonacleanelections.gov.
 7 At this time I would entertain a motion to
 8 adjourn.
 9 COMMISSIONER CHAN: Mr. Chairman, I move we
 10 adjourn.
 11 CHAIRMAN KIMBLE: Thank you. Is there a
 12 second?
 13 COMMISSIONER WERTHER: I second.
 14 CHAIRMAN KIMBLE: It's been moved by
 15 Commissioner Chan and seconded by Commissioner Werther that
 16 we adjourn. I'll call the roll.
 17 Commissioner Chan.
 18 COMMISSIONER CHAN: Aye.
 19 CHAIRMAN KIMBLE: Commissioner Werther.
 20 COMMISSIONER WERTHER: Aye.
 21 CHAIRMAN KIMBLE: Commissioner Titla.
 22 COMMISSIONER TITLA: Aye.
 23 CHAIRMAN KIMBLE: Chair votes aye. We are
 24 adjourned. Thank you.
 25 (Whereupon the meeting conclude at 11:19 a.m.)

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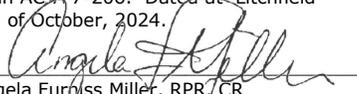
1 MR. COLLINS: I think -- I think we're going
 2 to have -- we're going to try to do it in November I think.
 3 CHAIRMAN KIMBLE: Okay.
 4 MR. COLLINS: As a -- as a --
 5 Captain Activate! has met -- will -- we're trying to get
 6 Captain together with other mascots.
 7 The one person who turned us down was Garfield
 8 The Movie. We were at -- when we launched Captain Activate!
 9 at Fan Fusion the -- the handlers of Garfield said
 10 Captain Activate! -- Garfield is too big for
 11 Captain Activate! And they were not -- it wasn't like a
 12 joking answer, it was like a -- it was like an adamant.
 13 CHAIRMAN KIMBLE: Well the opinions of
 14 Garfield aside, I think I can speak for all of us, we're
 15 looking forward to Captain Activate! coming to one of our
 16 future meetings.
 17 Item VI, public comment. This is the time for
 18 consideration of comments and suggestion from the public.
 19 Action taken as a result of public comment will be limited to
 20 directing staff to study the matter or rescheduling the
 21 matter for further consideration and decision at a later date
 22 or responding to criticism.
 23 Please limit your comment to more than -- to
 24 no more than two minutes.
 25 Is there anyone on Zoom who wishes to make a

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C E R T I F I C A T E

1
 2
 3 STATE OF ARIZONA)
 4) ss.
 5 COUNTY OF MARICOPA)
 6
 7 BE IT KNOWN that the foregoing proceedings were
 8 taken before me, Angela Furniss Miller, Certified Reporter
 9 No. 50127, all done to the best of my skill and ability;
 10 that the proceedings were taken down by me in shorthand and
 11 thereafter reduced to print under my direction.
 12 I CERTIFY that I am in no way related to any of the
 13 parties hereto nor am I in any way interested in the outcome
 14 thereof.
 15 I FURTHER CERTIFY that I have complied with the
 16 requirements set forth in ACJA 7-206. Dated at Litchfield
 17 Park, Arizona, this 15th of October, 2024.


 Angela Furniss Miller, RPR, CR
 CERTIFIED REPORTER (AZ50127)

* * *

17 I CERTIFY that Miller Certified Reporting, LLC, has
 18 complied with the requirements set forth in ACJA 7-201 and
 19 7-206. Dated at LITCHFIELD PARK, Arizona, this 15th of
 20 October, 2024.


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**CITIZENS CLEAN ELECTIONS COMMISSION
EXECUTIVE DIRECTOR REPORT
December 5, 2024**

Announcements:

- The results for the November 5th General Election were certified on November 25th.
 - Turnout rate: 78.49%
 - Ballots cast: 3,428,011
 - Automatic recounts triggered for: Legislative District 2 and local races across the state.
 - Approximately 265,000 ballots were dropped off by voters on election day.
- The Meeting of the Electoral College will occur on December 17th.
- A joint session of Congress will meet on January 6, 2025 to official count the electoral votes and declare the next President of the United States.
- The President will be sworn into office on January 20, 2025.

Voter Education and Outreach:

- The Arizona Bar Foundation recognized Avery as November Volunteer of the month for his work on civic engagement.
- Gina and Avery partnered with the ASU Athletics Department to create civic engagement programming for student athletes and coaches. This includes:
 - Tips for coaches on fostering a healthy civic environment for players
 - A toolkit for students on how to use their voices
 - A panel discussion with student athletes on their civic engagement activities
 - A presentation to a foreign delegation, through Global Ties Arizona and international student athletes and coaches, and a presentation and simulation on civil discourse during the holidays
 - A presentation to students from Darnell King, Assistant Coach, Phoenix Rising, on how to use your civic voice as an athlete.
- Gina and Tom conducted multiple interviews with the media (international, national, and local) regarding the election, timeline for counting ballots, election security, propositions, and the canvass.
- Avery moderated discussion on veterans and civic engagement with Veterans Perspectives and the Ed Pastor Center for Politics and Public Service in separate events during Veterans Day week.
- Avery partnered with Alpha Kappa Alpha Sorority to present information on ballot propositions and another with the Pastor Center. He also delivered a presentation to the Read Better Be Better Organization on civic engagement and presented to at ICAN: Positive Programs for Youth.
- Tom presented on ballot measures to Tempe Leadership Class XL, and at several community and organization meetings around the state.

- Captain Activate appeared at NAU for Mascot Day in conjunction with the university and Flagstaff Unified School district.

Administration and Correspondence from Other Agencies:

- Update on 2024 Participating Candidates:
Total Participating Candidates - 43
Participating Candidates in the General Election - 34
Total Participating Candidate Funding (Primary & General) - \$3,133,902
- The U.S. Government Accountability Office is drafting a report on the usage of public financing for candidates in elections. Please see Exhibit 1.

Legal:

Commission

- Center for Arizona Policy v. Arizona Secretary of State, 1CA-CV24-0272, Arizona Court of Appeals.
 - The Court of Appeals issued an opinion November 8 affirming the Superior Court's denial of the Plaintiffs' request for injunctive relief and the granting of the Commission and other defendants motion to dismiss.
<https://www.azcourts.gov/Portals/0/OpinionFiles/Div1/2024/CV%2024-0272%20Center%20for%20AZ%20Policies%20OP.pdf>.
 - A petition for review is expected.
- Americans for Prosperity v. Meyer, No. 24-2933 (9th Cir.).
 - Answering briefs were filed last week. Reply brief of AFP is due in January.
- Toma v. Fontes, 1CA-CV24-0002, Arizona Court of Appeals.
 - The legislative leadership filed Petition for Review to the Arizona Supreme Court by the legislative leaders.
- The Power of Fives, LLC v. Clean Elections, CV2021-015826, Superior Court for Maricopa County & Clean Elections v. The Power of Fives, LLC et al. CV2022-053917, Superior Court for Arizona. No new developments.
- Oral argument will be held tomorrow Dec. 6 on the defendants' motion to dismiss in Branch et al. v. Collins, et al., CV2024-004136 in Superior Court for Maricopa County.

Appointments:

- No additional information.

Complaints

- MUR 24-01 Barnett
- MUR 24-02, Walden, Marquez-Peterson, Lopez
- MUR 24-03, Arizona Senate Victory Fund
- MUR 24-04, Make Liberty Win
- MUR 24-05, Roberts
- MUR 24-06, Stand for Children IEC
- MUR 24-07, Arizona Solutions PAC

2024 Regulatory Agenda:

The Commission may conduct a rulemaking even if the rulemaking is not included on the annual regulatory agenda. The following information is provided under A.R.S. § 41-1021.02:

- Notice of Docket Opening: **None.**
- Notice of Proposed Rulemaking: **None.**
- Federal funds for proposed rulemaking: **None**
- Review of existing rules: **None pending**
- Notice of Final Rulemaking: **None.**
- Rulemakings terminated: **None.**
- Privatization option or nontraditional regulatory approach considered: **None Applicable.**



December 2024

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CAMPAIGN FINANCE

Observations on Public Financing Programs in Selected States and Localities

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restricted to official
use only.

This draft report is being provided to obtain advance review and comment. It has not been fully reviewed within GAO and is subject to revision.

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December 2024

GAO Highlights

Highlights of [GAO-25-106650](#), a report to congressional committees

Why GAO Did This Study

While most electoral campaigns are privately financed, 14 states and 26 localities offer programs through which candidates running for state or local offices can use public funds to finance their campaigns, according to a 2024 Brennan Center for Justice report.

The House committee report accompanying the Financial Services and General Government Appropriations Bill, 2023, includes a provision for GAO to revisit and update its 2010 report ([GAO-10-390](#)) on public campaign financing programs. This report describes, among other things, (1) key characteristics of public campaign financing programs in selected states and localities; (2) what available data indicate about candidates' use of these programs; and (3) factors affecting candidate participation in these programs.

GAO selected five locations with state and local public campaign financing programs that covered executive and legislative offices, were implemented for at least two election cycles, and represented a mix of program models, among other factors. GAO reviewed relevant law and documents and interviewed officials to describe key characteristics of the selected programs. GAO also analyzed candidate participation and campaign finance data for these five programs for the two most recent election cycles.

GAO interviewed officials from these five programs and four additional programs—selected with the same criteria—to obtain perspectives on public campaign financing programs. The findings from these interviews are not generalizable, but provide insight into state and local perspectives.

View [GAO-25-106650](#). For more information, contact Rebecca Gambler at (202) 512-8777 or gambler@gao.gov.

CAMPAIGN FINANCE

Observations on Public Financing Programs in Selected States and Localities

What GAO Found

States and localities have generally implemented public campaign financing programs using one of three models: (1) grants—participating candidates receive lump-sum grants of public funds; (2) matching funds—participating candidates receive public funds matching certain private contributions they raise, at a set rate; and (3) vouchers—eligible residents receive a credit of public funds they can assign to one or more participating candidates. GAO selected five programs representing the three model types (Arizona; Los Angeles, California; Minnesota; Montgomery County, Maryland; and Seattle, Washington) and examined their characteristics. For example, all five programs have requirements for candidates to qualify for the program, and once qualified, to be eligible to receive public funds. These requirements include collecting a specific number of contributions to qualify and then adhering to spending limits to receive public funds.

Voting Booths



Source: [vesperstock/adobe.stock.com](#). | [GAO-25-106650](#)

The amount of public funding participating candidates received varied by office sought and location, among other things. For example, in Minnesota in the 2022 election, legislative candidates received an average of \$4,716 in public funds, and the one participating gubernatorial candidate received \$584,034 in public funds. In Los Angeles in the 2022 election, participating city council candidates received an average of \$198,151 in public funds, and participating mayoral candidates received an average of \$1,284,158 in public funds.

GAO interviewed officials from the five selected programs and four additional programs (Albuquerque, New Mexico; Hawaii; Maine; and Washington, D.C.) to obtain perspectives on candidate participation. Officials from all nine programs said that many candidates are attracted to the public campaign financing programs because they provide an accessible source of funding. This may be particularly appealing for candidates with limited fundraising experience. Officials from eight of nine programs said a key reason candidates may not participate is because they perceive the available public funding is insufficient to run a competitive campaign.

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[Date]

The Honorable Chris Van Hollen
Chair
The Honorable Bill Hagerty
Ranking Member
Subcommittee on Financial Services and General Government
Committee on Appropriations
United States Senate

The Honorable David Joyce
Chair
The Honorable Steny Hoyer
Ranking Member
Subcommittee on Financial Services and General Government
Committee on Appropriations
House of Representatives

Campaign finance is the raising and spending of money to influence electoral campaigns at the federal, state, and local levels. While most electoral campaigns are privately financed, 14 states and 26 localities have implemented programs that offer public financing to candidates running for certain state and local offices, such as governor, state representative, mayor, or county council, as of 2024.¹ At the federal level, public financing of political campaigns is available to presidential campaigns, but has not been widely used by major party candidates since the 2008 election.

Supporters of public financing of political campaigns see these programs as a way to increase competition, while reducing the influence of private money in the political process and enabling candidates to spend more time connecting with citizens rather than raising campaign funds. Opponents of these programs believe that they restrict free speech because they may limit the amount of money that candidates can spend on political advertisements, and they may force taxpayers to subsidize candidates whose views they may oppose.

The House committee report accompanying the Financial Services and General Government Appropriations Bill, 2023, included a provision for us to revisit and update our 2010 report on public campaign financing programs in two states, to account for data and experiences in selected states and localities that have established systems of public financing over the last five

¹Brennan Center for Justice, *Guide to Public Financing Programs Nationwide* (New York, N.Y.: 2024).

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election cycles.² This report addresses (1) key characteristics of state and local public campaign financing programs in five selected locations; (2) what available data indicate about the use of these programs by candidates; and (3) factors affecting program structure and candidate participation in public campaign financing programs, and perspectives on the effects of these programs.

To address all three objectives, we selected public campaign financing programs in five locations—two states and three localities—to serve as nongeneralizable case studies. These locations are Arizona; Minnesota; the city of Los Angeles, California; Montgomery County, Maryland; and the city of Seattle, Washington. To select these locations, we identified programs that cover both executive and legislative offices and have been implemented for at least two of the last five election cycles at the time of our analysis to ensure we could obtain similar information across selected programs. We also selected these locations to represent a mix of program models and populations, and considered information on candidate program participation according to publicly available sources, such as summary program statistics or annual reports found on a jurisdiction’s website. For further information on the public campaign financing programs in the five locations we selected for review, see appendix II.

To address our first objective, we reviewed program documentation and interviewed program officials to describe the key characteristics of the selected programs in the five case study locations. To address our second objective, we analyzed existing data from each of the five case study locations obtained from program officials or public sources. We analyzed available data on candidate participation in the public campaign financing programs; election outcomes for primary and general elections for the last two election cycles in each location; and campaign finance data, such as public funding for candidates participating in the programs and reported contributions and expenditures for candidates in contests covered by public financing.

In each case study location, we analyzed data from the two most recent election cycles for which there were data available at the time of our analysis. Specifically, in Arizona, Minnesota, and Los Angeles, we analyzed data from elections in 2020 and 2022; in Montgomery County we analyzed data for the 2018 and 2022 elections; and in Seattle, we analyzed data for the 2019

²H.R. Rep. No. 117-393, at 67 (117th Cong.). The Explanatory Statement accompanying the Consolidated Appropriations Act, 2023, provided that the above committee report carries the same weight as language included in the joint explanatory statement. Staff of H. Comm. on Appropriations, 117th Cong., Explanatory Statement on the Consolidated Appropriations Act, 2023, Pub. L. No. 117-328, 136 Stat. 4459 (2022), at 1153 (Comm. Print 2023). GAO, *Campaign Finance Reform: Experiences of Two States That Offered Full Public Funding for Political Candidates*, [GAO-10-390](#) (Washington, D.C.: May 28, 2010).

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and 2021 elections.³ Additional information about these analyses and our assessment of data reliability can be found in appendix I.

To address our third objective on perspectives on the structure of public campaign financing programs, candidate participation, and program effects, we reviewed program documentation and interviewed officials from the five case study locations, as well as four additional locations with public campaign financing programs: Hawaii, Maine, Washington, D.C., and the city of Albuquerque, New Mexico, as shown in figure 1. We selected these additional locations by applying the same criteria we used to select the five case study locations, described above. We conducted interviews with officials from these four locations to obtain additional perspectives from program officials on public campaign financing programs.⁴

Additionally, we conducted a review of literature published since our last report on public campaign financing programs was issued in 2010. We reviewed 25 studies or reports on public campaign financing programs to obtain additional perspectives and research findings related to such programs. We also interviewed representatives from four nongovernmental organizations that we identified through our literature review and our prior work related to this topic.⁵ For additional information about our scope and methodology, see appendix I.

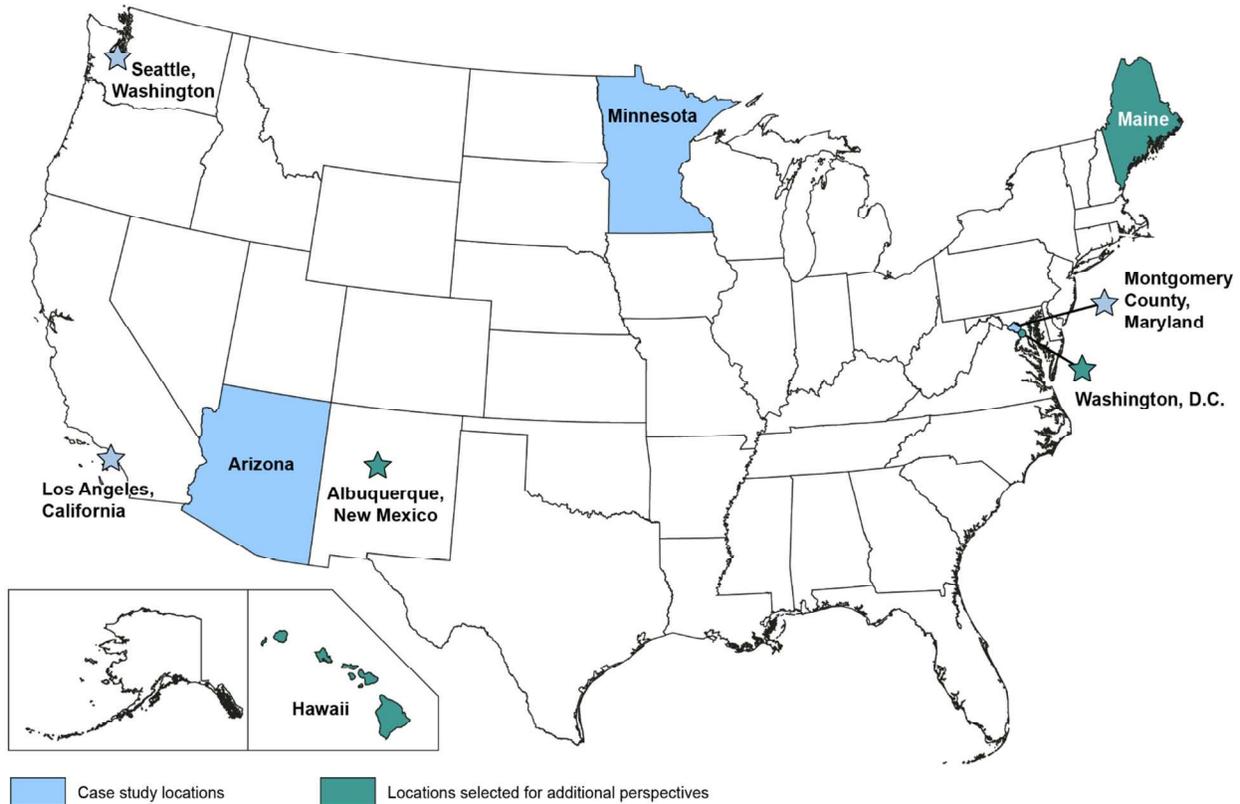
³In Minnesota, the public campaign financing program is only available to candidates participating in the general election, therefore data for Minnesota's primary election are not included in our analyses.

⁴In Seattle, we also spoke to representatives from two organizations that were contracted by the city to perform outreach to residents regarding the public campaign finance program.

⁵These organizations are the Brennan Center for Justice, the Campaign Legal Center, Common Cause – California, and the National Conference of State Legislatures.

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Figure 1: States and Localities with Public Campaign Financing Programs Selected for Case Study and Additional Perspectives



Source: GAO. | GAO-25-106650

We conducted this performance audit from February 2023 to December 2024 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

Types of Campaign Finance Activities

Campaign finance refers to the raising and spending of money to influence electoral campaigns. Money raised for an electoral campaign is also referred to as a campaign “donation” or “contribution,” and money spent on a campaign is referred to as a campaign “expenditure.” Most expenditures on elections are privately financed, via contributions from individuals, political committees, and other organizations such as corporations, unions, and tax-exempt

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organizations.⁶ In addition to these private sources of funding, federal public campaign financing is available for qualifying candidates for President of the United States during both the primaries and the general election, and in states and localities that have implemented their own public campaign financing programs.

Public Campaign Financing Program Models

States and localities that have implemented public campaign financing programs have generally used three different models, according to our review of relevant literature and interviews with representatives from organizations familiar with these programs:

- **Grants.** The jurisdiction provides qualifying candidates with lump-sum grants of public funds to finance their campaigns. The grant amount can be either for the full or partial cost of a campaign, depending on the program. In full grant systems, also called “clean elections” programs, participating candidates may only make campaign expenditures with public funds and may not raise private contributions after receipt of the grant.
- **Matching Funds.** The jurisdiction matches certain private contributions received by participating candidates with public funds at a set rate. Depending on the jurisdiction, private contributions are matched either dollar for dollar or at some multiple of public-to-private dollars. Generally, these programs limit the size of contributions that are eligible for public matching (e.g., \$250 or less) and will not match contributions from certain sources (e.g., government contractors).
- **Vouchers.** The jurisdiction provides eligible residents with a credit of public funds (i.e., “vouchers”) to assign to one or more participating candidates of their choosing. For example, all eligible jurisdiction residents may receive four \$25 vouchers, worth \$100 in total, each election year. Residents may then assign their vouchers to more than one candidate or assign them all to the same candidate. Once residents have assigned vouchers to participating candidates, the candidates can redeem them with the jurisdiction for public funds to use in their campaigns.

⁶Federal campaigns may not accept contributions from the general treasuries of corporations, labor organizations or national banks. See 52 U.S.C. § 30118; 11 C.F.R. § 114.2. This prohibition applies to any incorporated organization, including a nonstock corporation, a trade association, an incorporated membership organization and an incorporated cooperative. A federal campaign may, however, accept contributions from political action committees established by corporations, labor organizations, incorporated membership organizations, trade associations, and national banks.

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Selected Public Campaign Financing Programs Have a Range of Characteristics Related to Their Goals, Funding, Requirements and Oversight

Selected public campaign financing programs have a range of characteristics, which we identified as associated with four key categories. These four categories are (1) program goals, (2) program funding and revenue sources, (3) candidate qualification and participation requirements, and (4) oversight mechanisms to ensure program integrity. We identified these categories based on our review of program information and interviews with officials and representatives of four nongovernmental organizations that have conducted research on state and local programs.

Program Goals

All five programs across the three model types have similar goals, according to program documents and interviews. For example, all five selected programs aim to decrease the reliance on special interest money or large donations, increase the number or diversity of candidates running for office, and increase trust in the government or the election process. Program officials and representatives from nongovernmental organizations also reported that different models tend to emphasize different aspects of these goals.

- **Goals of grant programs.** These programs generally focus on limiting the time and effort a candidate must spend on fundraising by reducing or eliminating the role of private financing for participating candidates (such as contributions from individuals, corporations, or political action committees), thus reducing the barrier to entry for more candidates wishing to run for office and helping position them for more community engagement.⁷ For example, Minnesota officials stated that the public campaign financing grant program in their state is intended to allow individuals who are not familiar with fundraising a greater opportunity to run for office because it limits the amount of time a candidate may need to spend raising campaign funds. In addition, participating candidates in Arizona's public campaign financing program whom

⁷According to the Federal Election Commission, political action committees are organizations that raise and spend money to elect and defeat candidates. There are different types of political action committees. Some are established and administered by corporations, labor unions, membership organizations, or trade associations. Some are directly or indirectly established or controlled by a candidate. Others are not connected to an individual candidate and finance independent expenditures and other independent political activity. An independent expenditure is an expenditure for a communication that: expressly advocates the election or defeat of a clearly identified candidate; and is not made in cooperation, consultation, or concert with, or at the request or suggestion of any candidate, or his or her authorized committees or agents, or a political party committee or its agents. 11 C.F.R. § 100.16(a). According to the Federal Election Commission, an independent expenditure can be an advertisement through a website, digital device, application, advertising platform, newspaper, TV, or direct mail.

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we interviewed as part of our 2010 report stated that one of the main reasons they chose to run their campaign with public funds in the 2008 election was to have more time to focus on interaction with voters.⁸

- **Goals of matching funds programs.** In contrast to grant programs, candidates in matching funds programs still rely on fundraising, but these programs generally focus on encouraging greater citizen engagement and interest by amplifying the value of small contributions from individuals (as opposed to corporations or political action committees). For example, in Los Angeles, the city charter section related to the public campaign financing program states that “monetary contributions to political campaigns are a legitimate form of participation in the American political process, but the finance strength of certain individuals or organizations should not permit them to exercise a disproportionate or controlling influence on the election of candidates.”⁹

In addition, certain variations in the design of matching funds programs may further encourage candidates to obtain contributions from specific types of donors, such as those who reside within a candidate’s jurisdiction district or those who are in a position to make relatively smaller contributions. For example, in Montgomery County, Maryland, a candidate may only receive matching funds if the donor is a resident of the county.¹⁰ In addition, county candidates receive a scaled matching ratio depending on the dollar amount of the contribution. For example, candidates receive \$6 in public funds for every \$1 in qualified contributions up to \$50, and increasingly smaller ratios of public to private funds as contributions increase, up to a \$0 to \$1 ratio for contributions over \$150.¹¹ According to a report from one nongovernmental organization, matched public funds provide a financial incentive for candidates to engage with individuals who can provide small contributions and provides contributors with the knowledge that their contributions have a greater impact than they otherwise would.

- **Goals of voucher programs.** Similar to matching funds programs, voucher programs focus on citizen empowerment and engagement and prioritize doing so regardless of

⁸GAO-10-390.

⁹Public Matching Funds and Campaign Expenditure Limitations, L.A. Charter, § 471.

¹⁰Montgomery Cty., Md. Code, § 16-18 (defining qualifying contribution as one made by a resident of the county, among other things).

¹¹Id. at § 16-23.

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socioeconomic status. This is because vouchers provide the same dollar amounts to all residents regardless of their disposable income. According to program documents, Seattle's voucher program is specifically intended to increase the number of Seattle residents who donate in local elections with specific objectives to promote civic engagement in underserved communities.¹² A 2019 evaluation of Seattle's voucher program found that there was heavy utilization of vouchers by residents who had not previously donated to Seattle political campaigns.¹³ According to a survey in this evaluation of residents who used vouchers in the 2019 election, respondents with incomes under \$50,000 reported that the voucher program allowed them to support campaigns in ways they could not do previously.

Program Funding Sources

As shown in table 1, states and localities we studied use a variety of mechanisms to fund public campaign financing programs. These include standard appropriations from the state or local general fund; revenue from a specific tax, such as real estate taxes; or fines collected from candidates who violated program rules or regulations.

¹²Seattle Ethics and Elections Commission. *Democracy Voucher Program 2021 Biennial Report*. (Seattle, Washington, 2021).

¹³BERK, *2019 Election Cycle Evaluation: Seattle Ethics and Election Commission Democracy Voucher Program* (Seattle, Washington, 2020).

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Table 1: Program Funding Sources for Public Campaign Financing Programs in Selected Locations

Funding/revenue sources	Grant programs		Matching funds programs		Voucher program
	Arizona	Minnesota	Los Angeles, California	Montgomery County, Maryland	Seattle, Washington
Appropriation		X	X	X	
A percentage of revenue from a tax (e.g., sales, income, property, etc.)					X
A tax check-off program ^a		X			
Fines collected for public financing program violations	X				
A percentage of unrelated fines or fees collected by the state or locality	X				
Interest from the program fund or account holding program funds				X	
Initial qualifying contributions made to participating candidates	X				
Unspent or reclaimed funds from participating candidates	X		X	X	
Direct contributions to the program made by members of the public				X	

Source: GAO analysis of program documentation and interviews with program officials. | GAO-25-106650

^aA tax check-off program is a program where tax filers can indicate on their tax returns whether the government should allocate a set dollar amount to fund some or part of a public campaign financing program. For example, Minnesota's tax check-off program allows residents to check a box on their tax returns to allocate \$5 from the state's general fund to the general campaign account or to the account of a political party within the campaign account, which is then used to provide direct public subsidy payments to participating candidates.

A representative from one nongovernmental organization we spoke with noted that an otherwise well-designed program may become obsolete without sufficient and consistent funds. Program officials from all five locations stated they had not experienced any challenges in funding for their programs, and some noted the availability of mechanisms to accommodate potential budget shortfalls. For example, in Montgomery County officials have the flexibility to adjust the matching rate if the program funding would not be able to fully cover the matching payments for all participating candidates.¹⁴ Officials in Seattle stated that a specific fixed dollar maximum

¹⁴See Montgomery Cty., Md. Code, § 16-23(d).

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amount of funding over a ten-year period was included in the initiative establishing the program and this amount is not adjusted for inflation.¹⁵ They stated that a greater amount might be included in future authorizations to account for inflation.

Qualification and Participation Requirements

In addition to registering or qualifying for the ballot, all five programs included requirements for candidates to qualify for the program, and once qualified, additional requirements for participating candidates to be eligible to receive public funds, as shown in table 2. These include, for example, collecting a defined number of contributions to qualify for the program, and adhering to spending limits as a participating candidate.

¹⁵See Honest Elections Seattle Initiative No. 122, § 2 (2015).

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Table 2: Program Qualification and Participation Requirements for Public Campaign Financing Programs in Selected Locations

Qualification and participation requirements	Grant programs		Matching funds programs		Voucher program
	Arizona	Minnesota	Los Angeles, California	Montgomery County, Maryland	Seattle, Washington
File an application and receive certification to participate from program or other government officials	X	X	X	X	X
Attend a training session specific to program participation	X		X		
Collect a minimum number of qualifying signatures					X
Collect a minimum number and/or amount of qualifying contributions	X	X	X	X	X
Limit total campaign spending to a certain amount	X	X	X		X
Limit amount and source of contributions allowed (for example, individual contributions above a set dollar amount)	X		X	X	X
Limit the amount of money candidates can contribute to their own campaign	X	X	X	X	
Be opposed by a candidate who is qualified to appear on the ballot		X ^a	X	X	
Win the primary election/advance to the general election		X			
Participate in a certain number of public debates	X		X		X
Return all or some portion of unspent public funds following the election	X	X	X	X	X
Provide closed captions and written descriptions for political ads to accommodate those with hearing or visual impairments.		X			

Source: GAO analysis of program documentation and interviews with program officials. | GAO-25-106650

^aAccording to program documentation, Minnesota's program requires that candidates have an opponent in either the primary or general election.

Qualification Requirements. In four of five public campaign financing programs in our review, candidates can qualify for participation in the program during the primary or general elections, while in Minnesota, candidates are only qualified to receive a public subsidy payment if they win the primary election. In addition, programs in our review all had specific requirements each candidate must meet to qualify to participate in the program. For example, all five programs

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required candidates to collect a minimum number or dollar amount of qualifying contributions, or a minimum number of qualifying signatures.

For a contribution to be considered “qualifying” it must meet criteria specific to the program. For example, in Montgomery County, a qualifying contribution must be at least \$5 but no more than \$250, the contribution must be made after January 1 of the year after the last election for the same office, and the contributor must be a county resident, among other requirements.¹⁶ In Seattle, qualifying signatures demonstrating support for a candidate, whether or not the signatory is able to make a qualifying financial donation, must be from city residents.¹⁷ A report from one nongovernmental organization stated the reason for requiring a certain number of qualifying contributions or signatures is to ensure the candidate can demonstrate a threshold level of popular support.¹⁸

Participation Requirements. Once qualified to participate in a program, candidates must meet other requirements to receive public funding in all five locations we studied. Of the five selected programs

- Four required that participating candidates limit overall campaign spending to a certain amount,
- four required that participating candidates limit the total amount of contributions they receive from any individual contributor,
- four required that candidates limit how much they contribute to their own campaign, and
- three required candidates to participate in a certain number of public debates.

For example, in the 2021 election, participating at-large city council candidates in Seattle’s voucher program were required to agree not to spend more than a total of \$375,000 for their combined primary and general election campaigns.¹⁹ Participating candidates in Los Angeles’ matching fund program were required to appear in a public debate or town hall event.²⁰

¹⁶Montgomery Cty., Md. Code, § 16-18 (defining qualifying contribution).

¹⁷Seattle, Wash. Mun. Code, § 2.04.630(C).

¹⁸Catherine Hinckley Kelley and Austin Graham, *Buying Back Democracy: The Evolution of Public Financing in U.S. Election* (Washington, D.C., October 2018).

¹⁹Seattle, Wash. Mun. Code, § 2.04.634.

²⁰L.A.M.C., § 49.7.23(c)(6).

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Oversight Mechanisms to Ensure Program Integrity

Program officials from all five public campaign financing programs we studied stated that the programs each had oversight mechanisms designed to ensure program integrity, as shown in table 3.

Table 3: Oversight Mechanisms for Public Campaign Financing Programs in Selected Locations

Oversight mechanisms to ensure program integrity	Grant programs		Matching funds programs		Voucher program
	Arizona	Minnesota	Los Angeles, California	Montgomery County, Maryland	Seattle, Washington
Individual contributions or other specific transactions are reviewed on an ongoing basis	X	X	X	X	X
Routine internal audits are conducted	X	X	X	X	X
Routine external audits are conducted	X			X	
Fines can be issued for candidates who violate program regulations	X	X	X	X	X

Source: GAO analysis of program documentation and interviews with program officials. | GAO-25-106650

Specifically, according to program officials and program documents, all five programs have policies and procedures for reviewing required documentation for qualifying contributions, in part to determine if candidates are providing accurate and comprehensive documentation. For example, Seattle program officials told us that when reviewing documentation candidates submitted to qualify for the program during the 2017 election cycle, they identified a candidate who collected the required number of signatures from city residents but committed fraud. According to the officials, the candidate used their own money to meet the requirement that candidates collect a certain number of qualifying contributions from city residents.²¹

In Montgomery County, program officials described to us the procedures they used to review participating candidates' requests for matching funds payments. These procedures included reviewing specific contribution documentation to ensure that candidates are adhering to program rules (for example, that candidates only request matching funds for contributions from county residents), and that their requests for matching funds payments are legitimate (e.g., the documentation supports the request).

²¹Program officials referred this candidate to the city attorney for prosecution.

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Further, officials from all five programs told us they conduct internal audits at regular intervals. For example, in Los Angeles, program officials are required by law to audit the campaigns of any candidates that receive public funds, as well as those of any candidates for whom \$100,000 or more was raised or for whom \$100,000 or more in expenditures was made.²² Officials from Montgomery County stated that they conduct an internal review for each election cycle. In addition, as of October 2024, Montgomery County officials stated that an external audit of the county's public financing program during the 2022 election was being finalized. Going forward, they plan to continue this practice at regular intervals.

Candidate Participation, Contributions, and Expenditures in Selected Public Campaign Financing Programs Varied by Location and Other Factors

Candidate Participation Varied by Election and Candidate Characteristics; Most Contests Had At Least One Publicly Funded Candidate

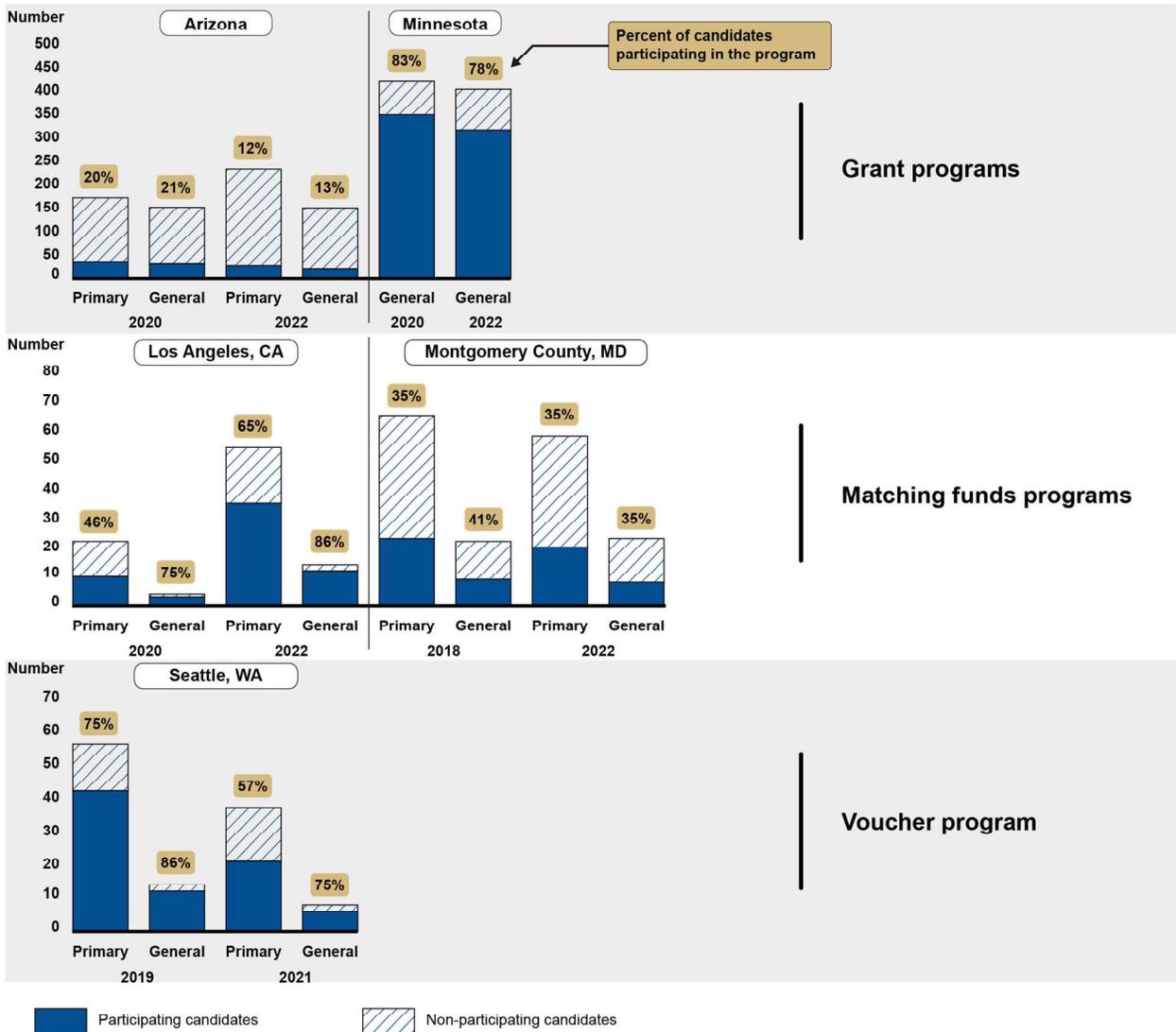
We analyzed data on candidate program participation, election outcome, and campaign finance for the two most recent elections in each location at the time of our analysis to provide insights on the use of these programs. Across the five locations, the percentage of candidates in a primary or general election who participated in the public campaign financing program ranged from about 12 to 86 percent of all candidates , as shown in figure 2. For example:

- Participation in the public campaign financing program in Montgomery County, Maryland, varied between about 35 and 41 percent during the primary and general elections in 2018 and 2022. Specifically, in 2018, there were 23 participating candidates in the primary and 9 in the general election; and in 2022, there were 20 participating candidates in the primary and 8 in the general election.
- In Seattle, participation rates were over 50 percent in the primary and general elections in 2019 and 2021, ranging from about 57 to 86 percent. Specifically, in 2019, there were 42 participating candidates in the primary and 12 in the general election; and in 2021, there were 21 participating candidates in the primary, and 6 in the general election.

²²L.A. Charter, § 702(d); L.A.A.C., § 24.41.

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Figure 2: Number and Percentage of Candidates Who Participated or Did Not Participate in Public Campaign Financing Programs by Selected Location and Election



Source: GAO analysis of public campaign financing program and elections data from selected locations. | GAO-25-106650

^aMinnesota’s public campaign financing program only issues public subsidy payments to candidates that will appear on the general election ballot. The program does not provide public subsidy payments for the primary election.

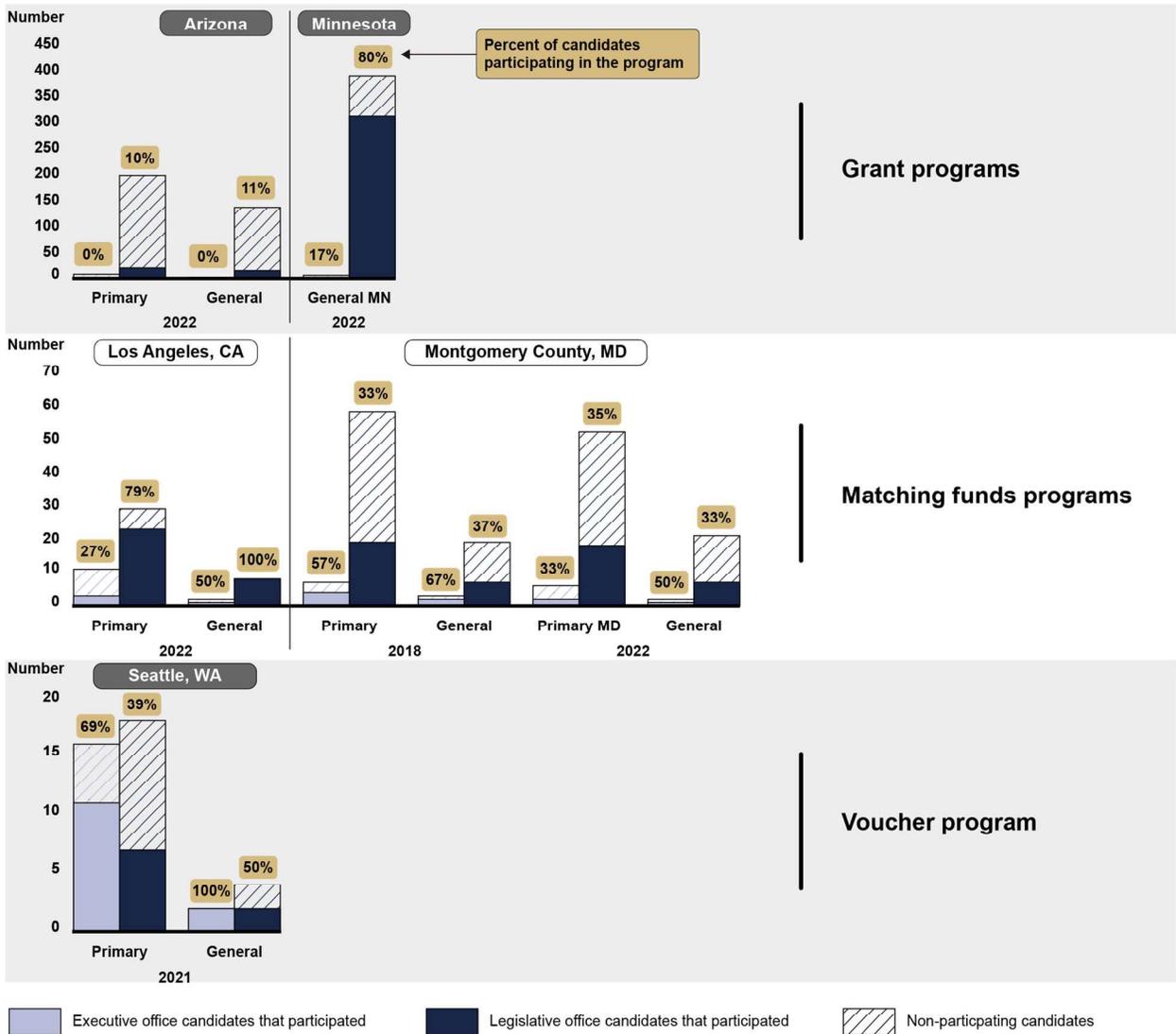
Executive and legislative offices sought. As shown in figure 3, in three of the five locations, candidates for executive office (such as governor, mayor, or county executive) participated at lower rates than candidates for legislative office (such as state legislator or city or county councilmember), when both executive and legislative contests occurred. In the other two locations, candidates for executive office participated at similar or higher rates than candidates for legislative office. For example:

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- In Los Angeles during the 2022 election, legislative candidates participated in the public campaign financing program at higher rates than executive candidates. Specifically, three of eleven mayoral candidates (about 27 percent) participated in the public campaign financing program in the primary and one of two candidates (50 percent) participated in the general election, while 23 of 29 city council candidates (about 79 percent) participated in the primary and all eight city council candidates (100 percent) participated in the general election in that year.
- Similarly, in Minnesota during the 2022 general election, one of six gubernatorial candidates (about 17 percent) participated in the public campaign financing program, while 311 of 389 state legislative candidates (about 80 percent) participated in the program.
- In Seattle, program participation rates were higher for mayoral candidates compared to city council candidates during the 2021 election. Specifically, 11 of 16 mayoral candidates (about 69 percent) participated in the primary, and both mayoral candidates (100 percent) participated in the general election. Seven of 18 city council candidates (about 39 percent) participated in the primary and two of four city council candidates (50 percent) participated in the general election.

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Figure 3: Number and Percentage of Executive and Legislative Candidates Who Participated in Public Campaign Financing Programs by Selected Location and Election



Source: GAO analysis of public campaign financing program and elections data from selected locations. | GAO-25-106650

Note: For the purposes of this analysis, we define executive candidates as those running for the offices of governor in Arizona and Minnesota, mayor in Los Angeles and Seattle, and county executive in Montgomery County. We define legislative candidates as those running for the offices of state senate and house of representatives in Arizona and Minnesota, city council member in Los Angeles and Seattle, and county council member in Montgomery County.

^aMinnesota’s public campaign financing program only issues public subsidy payments to candidates that will appear on the general election ballot. The program does not provide public subsidy payments for the primary election.

Candidate experience. We analyzed candidate participation by candidate experience, specifically whether candidates were incumbents or first-time candidates. With regard to incumbents, in four of the five selected locations at least 50 percent of incumbent candidates participated in the public campaign financing program in each election, as shown in figure 4. In addition, we found that in these four locations incumbents participated in the public campaign

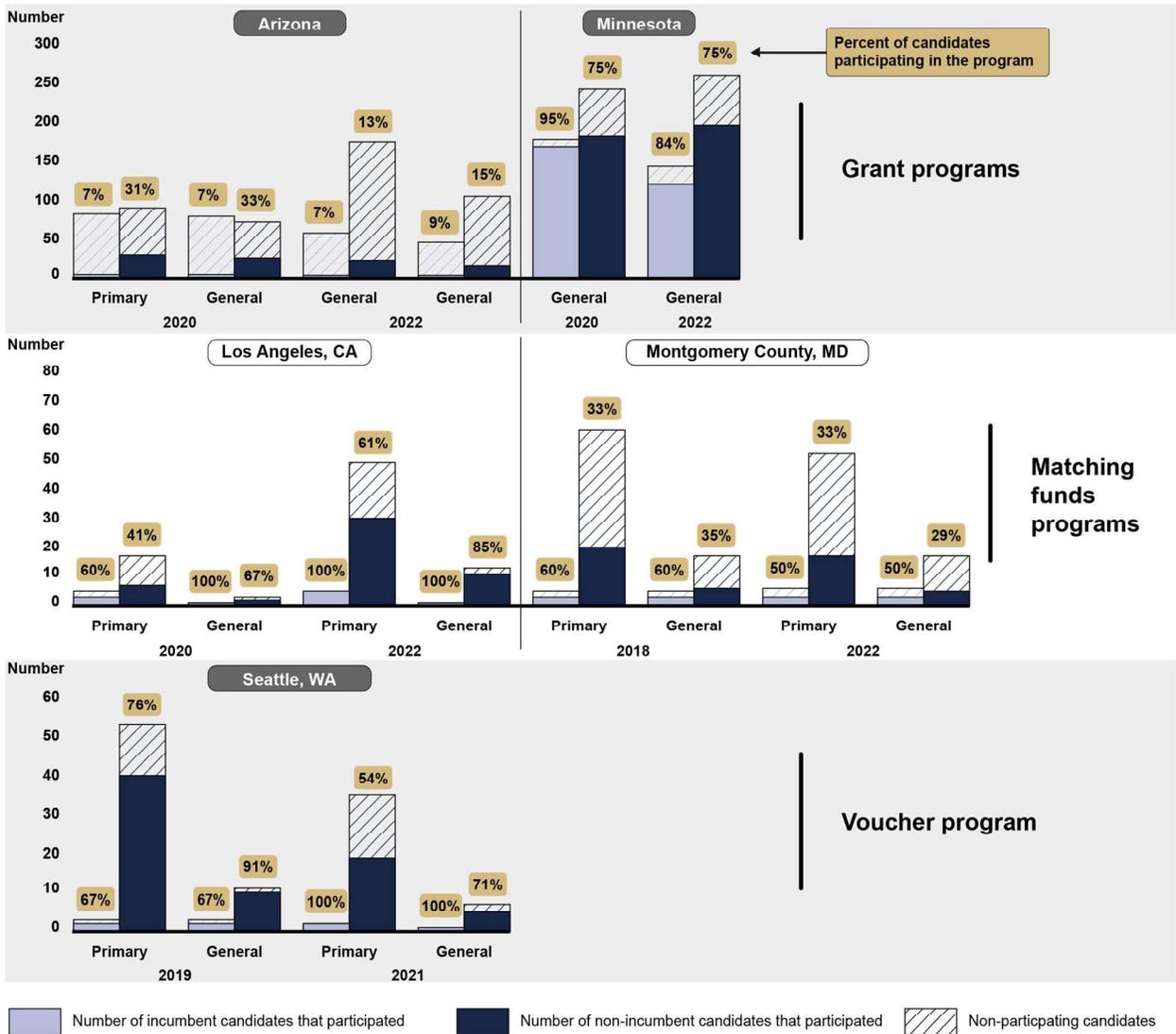
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financing program at higher rates than non-incumbents in all but one election cycle we reviewed in our case study locations.²³ For example, in Minnesota about 95 percent of incumbents (168 candidates) participated in the public campaign financing program in the 2020 general election compared to 75 percent (181 candidates) of non-incumbents. Further, about 84 percent of incumbents (120 candidates) participated in the public campaign financing program in the 2022 general election, compared to 74 percent (196 candidates) of non-incumbents. In Arizona, the percent of incumbents who participated in the public campaign financing program during each of the 2020 and 2022 primary and general elections ranged from about 7 to 9 percent (5 candidates in both the 2020 primary and general elections, and 4 candidates in both the 2022 primary and general elections). Non-incumbent participation ranged from about 13 to 33 percent during these elections (a range of 16 to 30 candidates).

²³The exception is Seattle's 2019 primary and general elections where non-incumbents participated more than incumbents.

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Figure 4: Number and Percentage of Incumbent and Non-Incumbent Candidates Who Participated in Public Campaign Financing Programs by Selected Location and Election



Source: GAO analysis of public campaign financing program and elections data from selected locations. | GAO-25-106650

^aMinnesota’s public campaign financing program only issues public subsidy payments to candidates that will appear on the general election ballot. The program does not provide public subsidy payments for the primary election.

With regard to first-time candidates, as shown in figure 5, in the three case study locations where these data were available—Minnesota, Los Angeles, and Seattle—our analysis showed that in most primary and general elections across locations and election years, over 50 percent of first-time candidates participated in the public campaign financing program.²⁴ We also compared the participation rate of first-time candidates to the participation rate of candidates

²⁴Data on first-time candidates were not available in Arizona or Montgomery County.

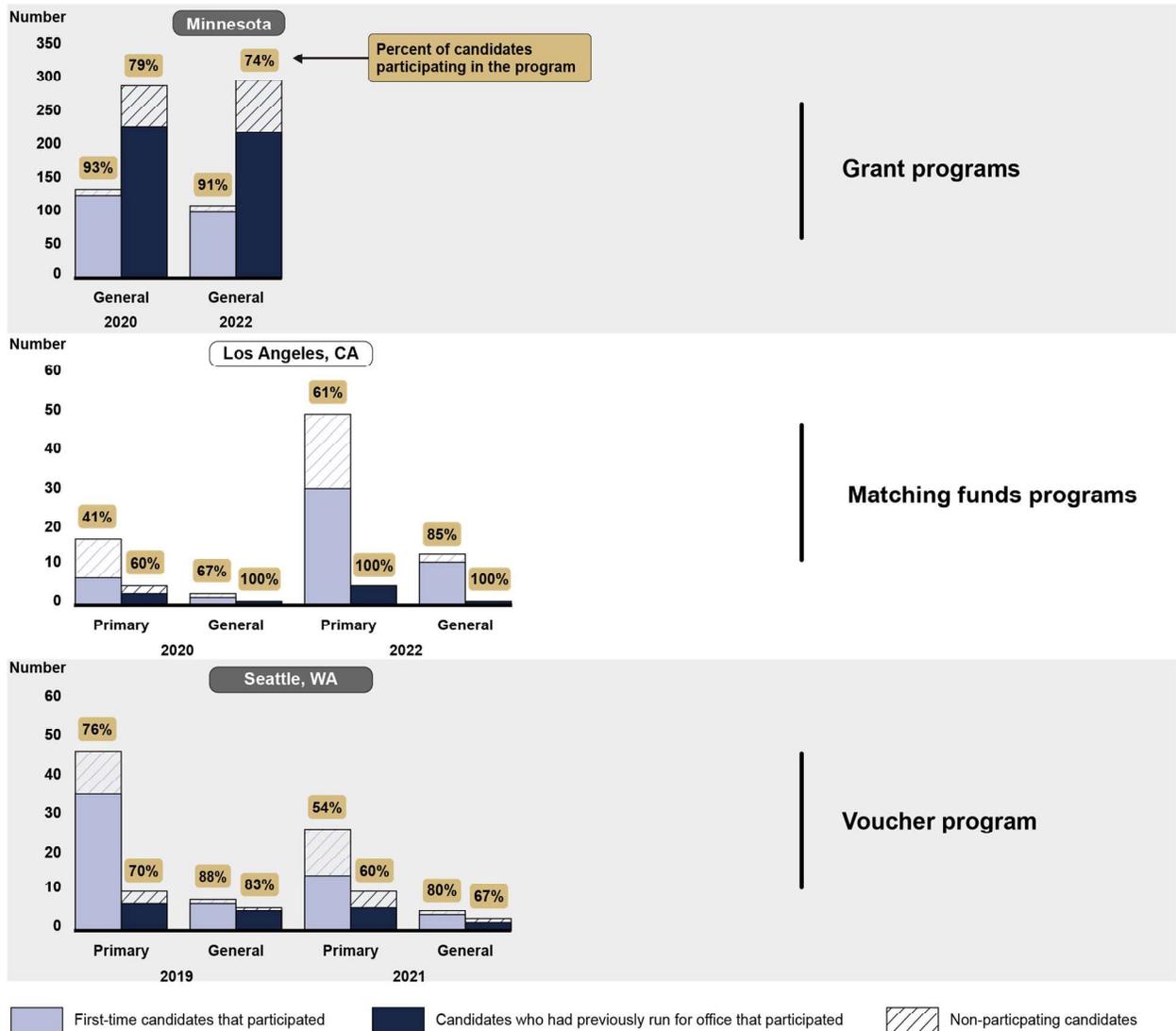
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who had previously run for office. We did not observe a consistent pattern in our study locations. Rather, we found variation by election and location. For example:

- In Minnesota first-time candidates participated at higher rates than candidates who had previously run for office in both the 2020 and 2022 elections. Specifically, about 93 percent (123 candidates) of first-time candidates compared to 79 percent (226 candidates) of candidates who had previously run participated in the public campaign financing program in the 2020 general election. In addition, about 91 percent (98 candidates) of first-time candidates compared to about 74 percent (218 candidates) of candidates who had previously run, in the 2022 general election.
- In Seattle, during the 2019 primary and general elections, first-time candidates participated at higher rates compared to candidates who had previously run—about 76 percent (35 candidates) and 88 percent (7 candidates) of first-time candidates, respectively, compared to 70 percent (7 candidates) and 83 percent (5 candidates) of candidates who had previously run. However, during the 2021 primary election, first-time candidates participated at a lower rate compared to candidates who had previously run—about 54 percent (14 candidates) of first-time candidates compared to about 60 percent (6 candidates) of candidates who had previously run. And in the 2021 general election first-time candidates participated at a higher rate than candidates who had previously run—about 80 percent (4 candidates) compared to about 67 percent (2 candidates).

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Figure 5: Number and Percentage of First-time Candidates and Candidates Who Had Previously Run Who Participated in Public Campaign Financing Programs by Selected Location and Election



Source: GAO analysis of public campaign financing program and elections data from selected locations. | GAO-25-106650

^aMinnesota’s public campaign financing program only issues public subsidy payments to candidates that will appear on the general election ballot. The program does not provide public subsidy payments for the primary election. Further, data on first-time candidacy were not available in Arizona or Montgomery County, Maryland.

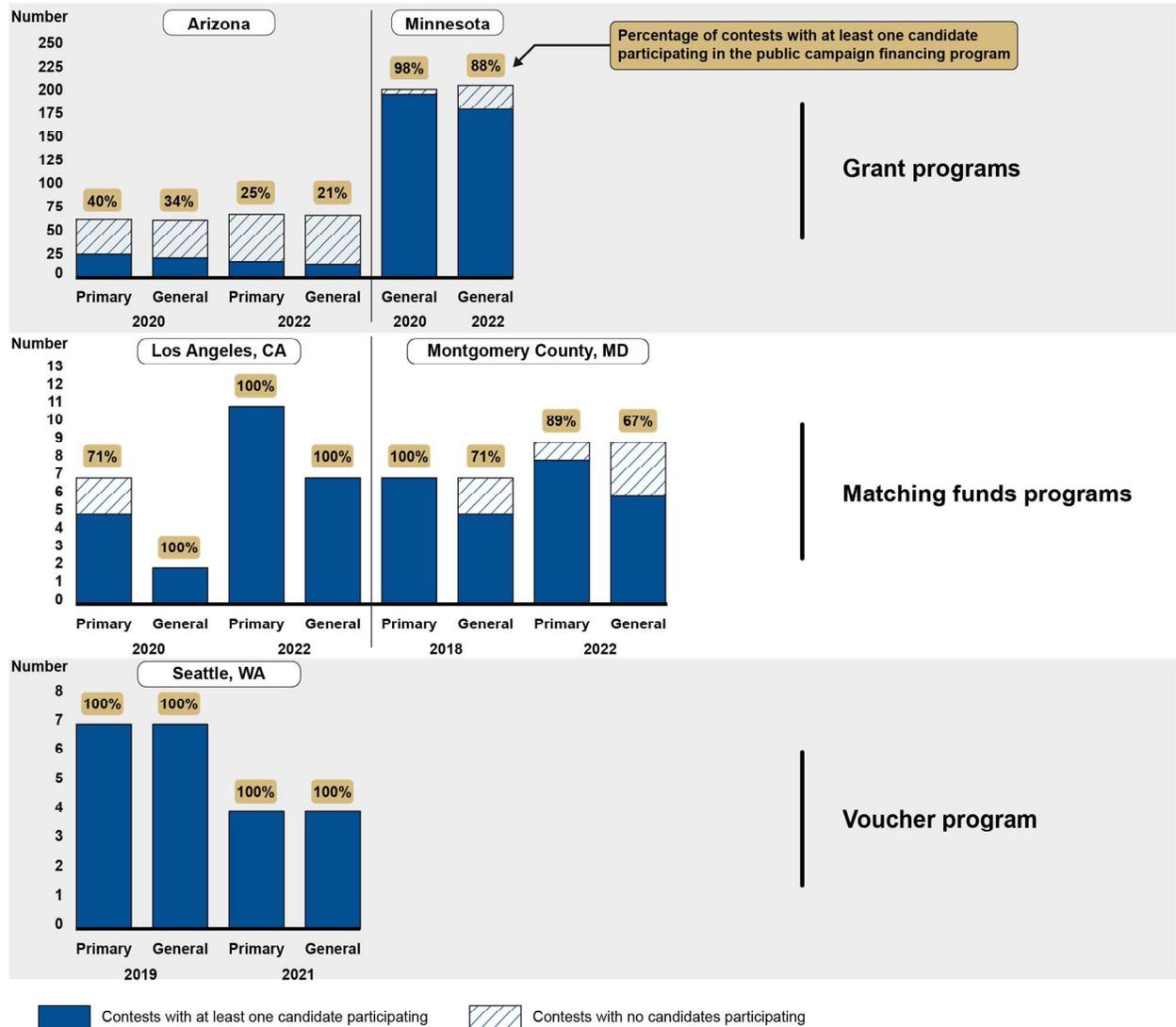
Contests for the offices eligible for public financing. For each case study location, we analyzed candidate participation in the public campaign financing program for each of the contests for the offices eligible for public financing. Specifically, we analyzed the percentage of all contests in which at least one candidate participated in the program.

As shown in figure 6, our analysis showed that the majority of contests in four of five locations had at least one candidate who participated in the public campaign financing program. For

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example, in Seattle at least one participating candidate ran in every contest during all four elections. In Arizona, most contests did not have any candidates participating in the public campaign financing program. Specifically, during the primary and general elections in 2020 and 2022, between 21 and 40 percent of contests (14 to 25 contests) had at least one participating candidate.

Figure 6: Number and Percentage of Contests with At Least One Participating Candidate by Selected Location and Election



Source: GAO analysis of public campaign financing program and elections data from selected locations. | GAO-25-106650

^aMinnesota's public campaign financing program only issues public subsidy payments to candidates that will appear on the general election ballot. The program does not provide public subsidy payments for the primary election.

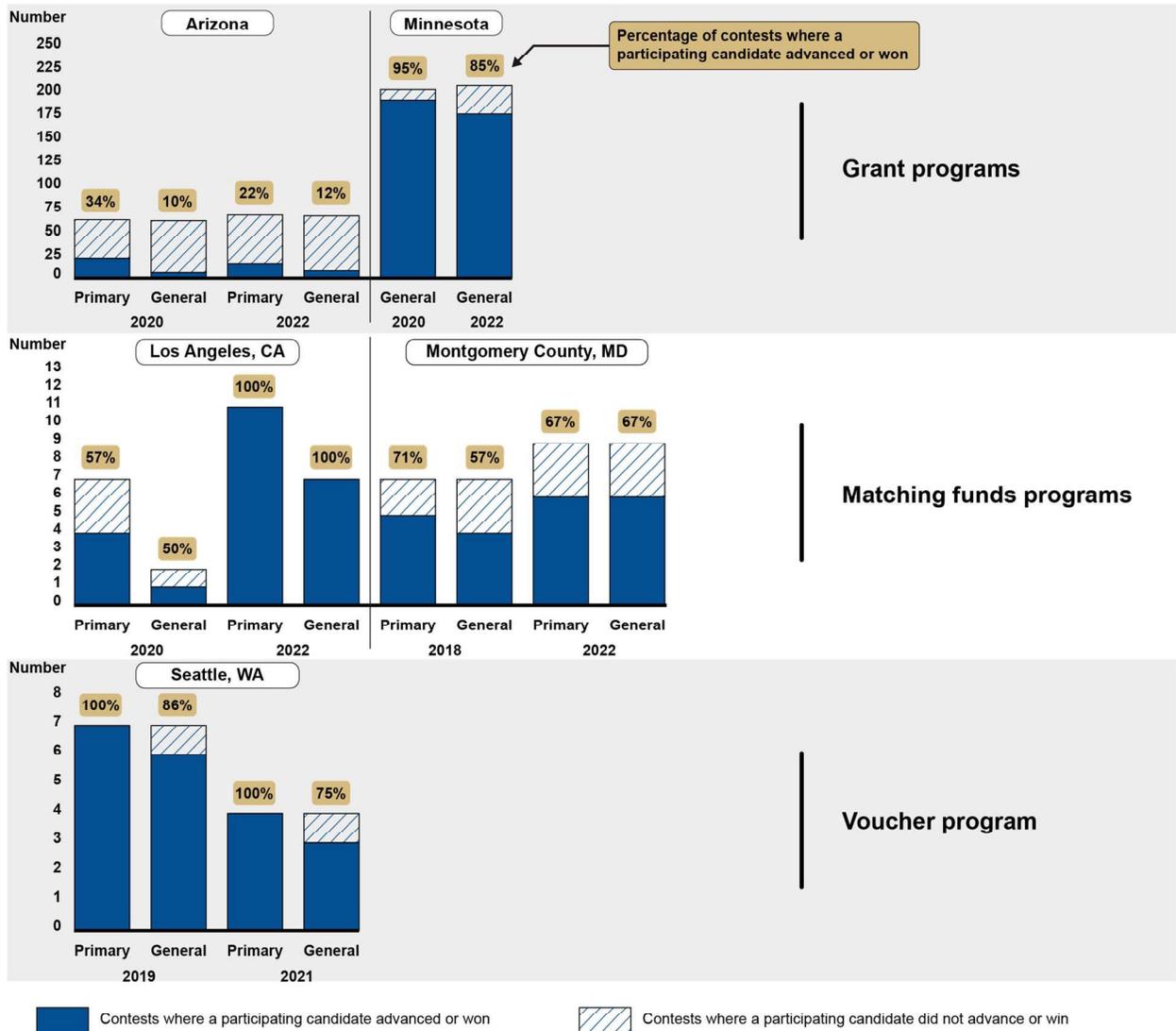
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We also analyzed the percentage of contests won by a participating candidate (either advanced in their primary contest or won the general contest) in each election for each selected location. We found that a participating candidate won or advanced in at least 50 percent of contests, in all primary and general elections, in four of the five selected locations—Minnesota; Los Angeles; Montgomery County; and Seattle. The percentage of all contests in which a participating candidate won the election—or advanced from a primary to a general election—varied by election and location, as shown in figure 7. For example:

- In Minnesota, of all contests in the 2020 general election, in about 95 percent (190 contests) of all contests a participating candidate won their election, and in the 2022 general election, in about 85 percent (175 contests) of all contests a participating candidate won their election.
- In Los Angeles, during the 2020 election cycle, in about 57 percent (4 contests) of all primary contests a participating candidate advanced, and in about 50 percent (1 contest) of all general election contests a participating candidate won their election. In the 2022 election cycle, in all primary contests (11 contests) a participating candidate advanced from their primary, and in all general election contests (7 contests) a participating candidate won their election.
- In Arizona, during the 2020 election cycle, in about 34 percent (21 contests) of all primary contests a participating candidate advanced in their primary, and in about 10 percent (6 contests) of general election contests a participating candidate won their contest. During the 2022 election cycle, in about 22 percent (15 contests) of all primary contests a participating candidate advanced in their primary, and in about 12 percent (8 contests) of general election contests a participating candidate won their election.

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Figure 7: Number and Percentage of Contests Won by a Participating Candidate by Selected Location and Election



Source: GAO analysis of public campaign financing program and elections data from selected locations. | GAO-25-106650

^aMinnesota’s public campaign financing program only issues public subsidy payments to candidates that will appear on the general election ballot. The program does not provide public subsidy payments for the primary election.

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Participating Candidates Received Relatively More Small Contributions; Average Candidate Expenditures Varied by Program and Office Type

We analyzed campaign finance data from each program to describe the amount of public funds received, the average number and size of contributions received, and the total amount of expenditures made by candidates in each case study location and by program model—grant programs, matching funds programs, and voucher programs.

Grant programs

As part of our analysis of the two selected grant programs in Arizona and Minnesota, we analyzed the average dollar amount that participating candidates received in public funds grants. In both Arizona and Minnesota, average grant amounts differed by the office sought by the participating candidate. Further, these amounts differed given the type of grant program each location has implemented. For example, Arizona is a “full” grant program—public funds are generally intended to cover all campaign spending during the primary and general election for participating candidates, and, in exchange, candidates agree not to accept private contributions starting one week before the primary election.²⁵ Minnesota’s program is a “partial” grant program—public campaign financing is only available for general elections, and candidates may accept private contributions in addition to public funds.

- In Arizona, participating candidates for state legislature received an average of about \$40,600 in public funding in 2020 and \$36,800 in public funding in 2022. Participating candidates running for other offices, such as secretary of state and state treasurer, received an average about \$270,700 and \$229,300 in 2020 and 2022, respectively. Although there was a gubernatorial election in Arizona in 2022, no candidates participated in the program during that election.
- We found that participating candidates for the Minnesota state legislature received an average of about \$6,100 in public funds in 2020 and \$4,700 in public funds in 2022. By comparison, the one gubernatorial candidate who participated in the program during the period we reviewed, in 2022, received about \$584,000 in public funds. As stated above, Minnesota’s program offers partial grants to help candidates who will appear on the

²⁵Participating candidates in Arizona may collect early contributions, which are subject to limits, up until one week before the primary election.

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general election ballot fund their campaigns after the primary election through the general election.

Table 4 provides information on public funds received by candidates who participated in programs in Arizona and Minnesota. See appendix II for more information on these programs.

Table 4: Average Public Funds Received by Each Participating Candidate for Candidates Participating in Arizona and Minnesota Public Campaign Financing Programs (2020, 2022 Elections)

Office	Arizona (Primary and general elections)		Minnesota (General elections only) ^a	
	2020	2022	2020	2022
State legislature	\$40,638	\$36,805	\$6,108	\$4,716
Governor	N/A ^b	N/A ^c	N/A ^b	\$584,034
Other offices ^d	\$270,704	\$229,303	N/A ^b	\$74,535

Source: GAO analysis of public campaign financing program and elections data from the Arizona State Elections Funds Portal website, and Minnesota Campaign Finance and Public Disclosure Board officials. | GAO-25-106650

^aMinnesota’s public campaign financing program only issues public subsidy payments to candidates that will appear on the general election ballot. The program does not provide public subsidy payments for the primary election.

^bNot applicable. There were no elections for these offices in these election years.

^cNot applicable. In Arizona in 2022, there were no candidates for governor that participated in the public campaign financing program.

^dIn Arizona, these offices include corporation commissioner in 2020, and attorney general, corporation commissioner, secretary of state, state mine inspector, state treasurer, and superintendent of public instruction in 2022. In Minnesota, these offices include attorney general, secretary of state, and state auditor.

We also analyzed average reported expenditures made by participating versus nonparticipating candidates based on office sought, such as state legislature or governor, and election. We did not find a consistent pattern of candidate spending across Arizona and Minnesota’s programs, and there are a variety of differences in the programs—such as the full-grant program in Arizona compared to the partial-grant program in Minnesota—that may contribute to these results, among other factors.

- In Arizona, we found that on average, where comparisons could be made, candidates who participated in the public financing program in the 2020 and 2022 elections spent less than those who did not participate. We found that participating candidates averaged from 57 to 80 percent lower spending than non-participating candidates running for similar offices during the same elections. For example, candidates for the state legislature who participated in the program during the 2022 election averaged \$44,653 in reported expenditures while those who did not participate averaged \$112,263 in expenditures.

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- In Minnesota, we found that among candidates for state legislature and governor, candidates who participated in the public financing program spent more than those who did not participate, during the 2020 and 2022 elections.

Table 5 provides information on the average campaign expenditures reported by candidates in Arizona and Minnesota’s public campaign financing programs. See appendix II for more information on programs in these two states.

Table 5: Average Campaign Expenditures Reported by Candidates Participating and Not Participating in Public Campaign Financing Programs in Arizona and Minnesota (2020, 2022 Elections)

Location	Election year	Office	Average campaign spending per candidate (\$)	
			Candidates participating in the program	Candidates not participating in the program
Arizona	2020	State legislature	\$44,653	\$112,263
		Other offices ^a	\$283,096	N/A ^b
	2022	State legislature	\$41,158	\$95,092
		Governor	N/A ^b	\$7,542,802
		Other offices ^a	\$249,258	\$1,203,256
	Minnesota	2020	State legislature	\$40,071
2022		State legislature	\$44,588	\$42,751
		Governor	\$5,458,005	\$5,039,428
		Other offices ^a	\$680,483	\$1,117,563

Source: GAO analysis of public campaign financing program and elections data from the Arizona State Election Funds Portal website, and Minnesota Campaign Finance and Public Disclosure Board officials. | GAO-25-106650

^aIn Arizona, these offices include corporation commissioner in 2020 and attorney general, corporation commissioner, secretary of state, state mine inspector, state treasurer, and superintendent of public instruction in 2022. In Minnesota, these offices include attorney general, secretary of state, and state auditor.

^bNot applicable. In these years no candidates participated in the public campaign financing program in contests for these offices.

Matching funds programs

For the two selected matching funds programs we studied—Los Angeles and Montgomery County—our analysis showed that program participants seeking a chief executive office received more public funds than those running for city or county council. Both programs place limits on the maximum amount of public funding a candidate can receive. For example:

- In Los Angeles, program participants on average received about \$199,000 and \$198,000 in public funds for city council contests in the 2020 and 2022 elections, respectively, and about \$1.284 million in public funds for the mayoral election in 2022.²⁶

²⁶There were no mayoral elections in 2020. In the 2022 election cycle in Los Angeles, city council candidates could receive a maximum of \$161,000 in public funds for a primary election and \$201,000 in public funds for a general

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- In Montgomery County, program participants on average received about \$70,000 and \$81,000 in public funds for county council district contests; about \$176,000 and \$207,000 for at-large county council contests; and about \$666,000 and \$804,000 for county executive contests in the 2018 and 2022 elections, respectively.²⁷

Table 6 provides information on public funds received for candidates who participated in public campaign financing programs in Los Angeles and Montgomery County. See appendix II for more information on these two programs.

Table 6: Average and Total Public Funds Received by Participating Candidates in Los Angeles, CA and Montgomery County, MD Public Campaign Financing Programs, by Office Type and Election Year

Location	Election cycle	Office type	Average public funds received per participating candidate	Number of participating candidates	Total public funds received by all participating candidates
Los Angeles	2020 ^a	City council	\$199,263	10	\$1,992,626
		Mayor	\$1,284,158	3	\$3,852,475
	2022	City council	\$198,151	24	\$4,755,621
		Other offices ^a	\$461,476	9	\$4,153,283
Montgomery County	2018	County council – district	\$69,713	7	\$487,991
		County council – at large	\$175,981	12	\$2,111,774
		County executive	\$665,930	4	\$2,663,721
	2022	County council – district	\$80,660	13	\$1,048,575
		County council – at large	\$207,075	5	\$1,035,375
		County executive	\$804,068	2	\$1,608,137

Source: GAO analysis of public campaign financing program and elections data from Los Angeles City Ethics Commission officials, and Montgomery County Department of Finance officials. | GAO-25-106650

^aThere were no elections for mayor or other offices eligible for public campaign financing in Los Angeles in 2020.

^bThese offices include city attorney and controller.

As shown in figure 8, in both matching funds programs we studied, public campaign financing program participants, on average, generally received a higher number of contributions of smaller size, compared to candidates running for the same office who did not participate in the program. For example, in the 2022 election in Los Angeles, each participating candidate for

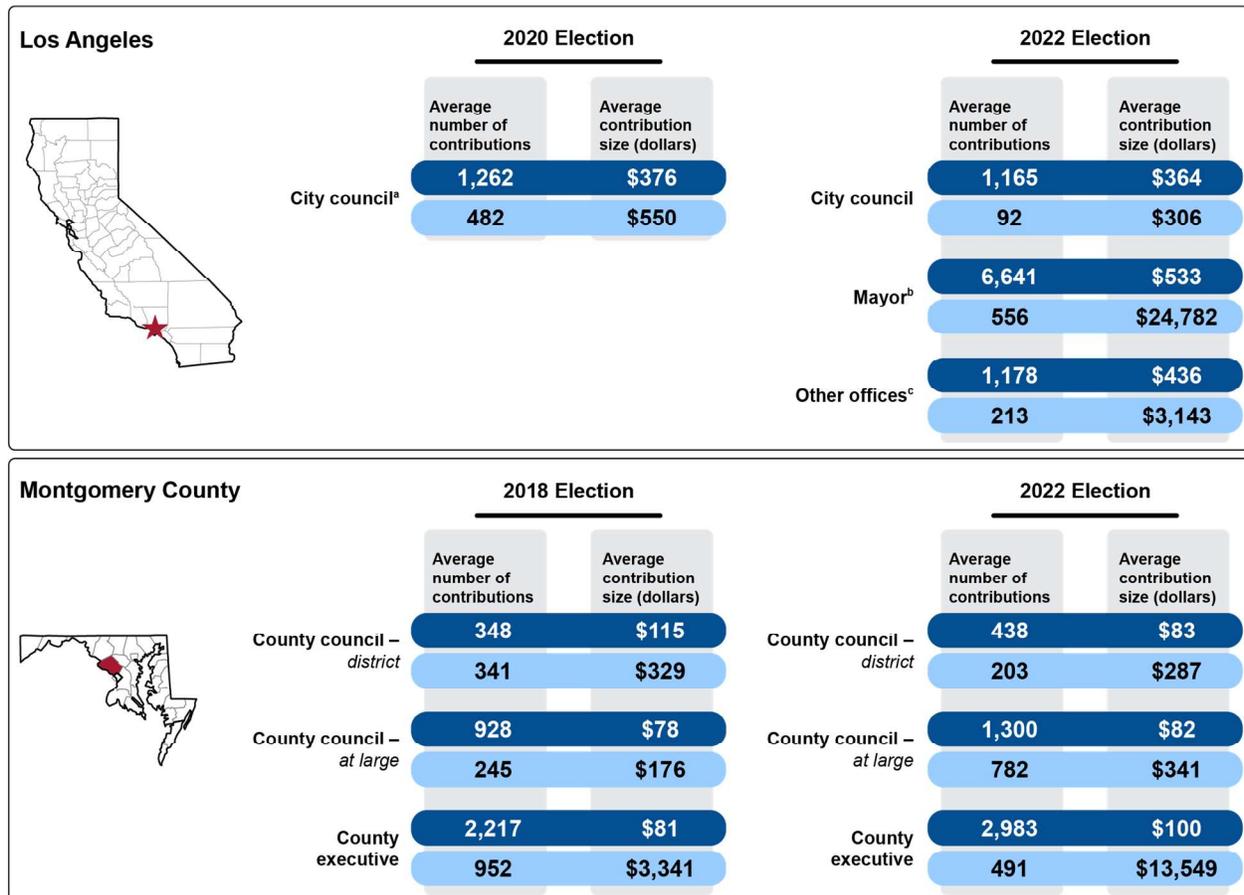
election, and mayoral candidates could receive a maximum of \$1,071,000 in public funds for a primary election and \$1,284,000 in public funds for a general election. See L.A.M.C., § 49.7.29.

²⁷In the 2018 and 2022 election cycles in Montgomery County, Maryland, county council district candidates could receive a maximum of \$125,000 in public funds, county council at-large candidates could receive a maximum of \$250,000 in public funds, and county executive candidates could receive a maximum of \$750,000 in public funds. Montgomery Cty., Md. Code, § 16-23(a)(3).

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mayor received an average of about 6,600 contributions of about \$530 each, compared to non-participating candidates for mayor who received an average of about 560 contributions of almost \$25,000 each.

Figure 8: Average Contributions Received By Candidates Participating and Not Participating in the Los Angeles, CA and Montgomery County, MD Public Campaign Financing Programs



■ Participating candidates ■ Non-participating candidates

Source: GAO analysis of public campaign financing program and elections data from the Los Angeles City Ethics Commission, and Montgomery County Department of Finance officials. | GAO-25-106650

^aThere were no elections for mayor or other offices eligible for public campaign financing in Los Angeles in 2020.

^bAlthough the contribution limit for the mayoral campaign in Los Angeles in 2022 was \$1,500, there is no limit to the amount that non-participating candidates may contribute to their own campaigns. See L.A. Charter, § 470.

Participating mayoral candidates in the 2022 election could contribute up to \$148,100 of their personal funds. L.A.M.C., § 49.7.23(C)(5).

^cThese offices include city attorney and controller.

We also analyzed average expenditures made by participating versus nonparticipating candidates based on office sought, such as city and county council, mayor, or county executive, and election. Our analysis showed that, in general, candidates for mayor and county executive spent more on their campaigns compared to candidates for other offices. See table 7.

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- In Los Angeles, program participants running for mayor spent less on average compared to mayoral candidates who did not participate in the program. But program participants running for city council spent more on average than non-participating city council candidates.
- Candidate spending in Montgomery County also followed this pattern. Specifically, program participants running for county executive spent less on average compared to county executive candidates who did not participate in the program. Conversely, program participants running for county council outspent their non-participating counterparts, on average.

Table 7: Average Campaign Expenditures Reported by Candidates Participating and Not Participating in Public Campaign Financing Programs in Los Angeles, CA and Montgomery County, MD

Location	Election year	Office	Average campaign spending per candidate (\$)	
			Candidates participating in the program ^a	Candidates not participating in the program
Los Angeles	2020	City council	\$677,020	\$271,108
	2022	City council	\$633,412	\$28,464
		Mayor	\$4,881,304	\$13,833,432
		Other office ^b	\$981,281	\$685,005
Montgomery County	2018	County council – district	\$103,675	\$98,777
		County council – at large	\$246,562	\$54,613
		County executive	\$828,595	\$1,990,309
	2022	County council – district	\$119,791	\$35,447
		County council – at large	\$310,444	\$285,294
		County executive	\$1,125,243	\$3,461,801

Source: GAO analysis of public campaign financing program and elections data from Los Angeles City Ethics Commission officials, and Montgomery County Department of Finance officials. | GAO-25-106650

^aAs part of Los Angeles’s public campaign financing program, participating candidates agreed to adhere to the following campaign spending limits. Specifically, in 2020, combined primary and general election spending limits were: \$985,000 for city council candidates. In 2022, combined primary and general election spending limits were: \$1,047,000 for city council; \$5,991,000 for mayor; \$2,497,000 for controller; and \$2,332,000 for city attorney. There are no spending limits that apply in Montgomery County’s public campaign financing program.

^bThese offices include city attorney and controller.

Voucher program

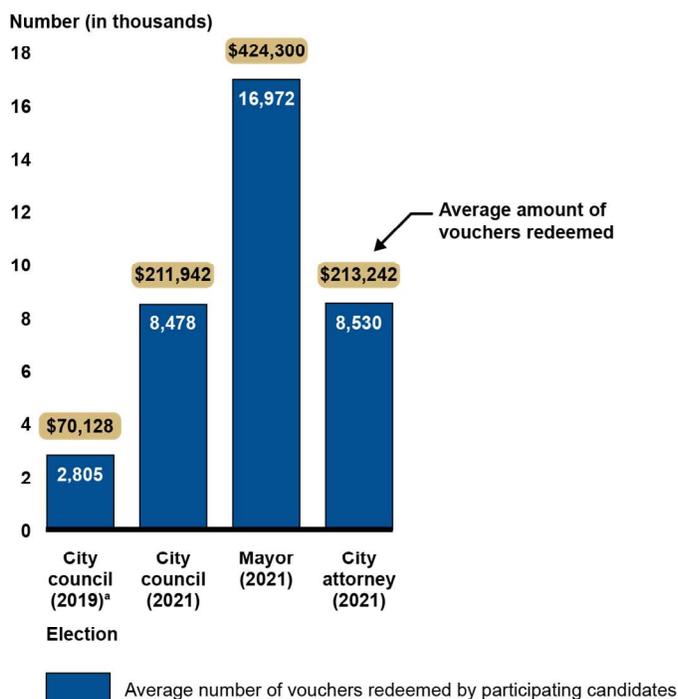
Candidates who participated in Seattle’s voucher program redeemed each voucher they received from a resident for \$25 in both the 2019 and 2021 elections.²⁸ For city council

²⁸According to the Seattle public campaign financing program’s biennial reports, the program mailed packets of four vouchers worth \$25 each to about 476,000 residents for the 2019 election and about 513,000 residents for the 2021 election. According to Seattle program officials, there have been instances where vouchers were assigned by residents to a candidate but could not be redeemed because the candidate had already redeemed the maximum number of vouchers allowed.

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elections, the average number of vouchers redeemed by participating candidates was about 2,800 in 2019 and 8,500 in 2021. One reason for this difference may be that the city council seats up for election in 2019 were district-level seats, while those up for election in 2021 were citywide seats.²⁹ Figure 9 shows information on the average number and dollar amounts of vouchers redeemed by candidates in the 2019 and 2021 elections. For more information on Seattle's program see appendix II.

Figure 9: Average Number and Value of Vouchers Redeemed by Candidates Participating in the Seattle, WA Public Campaign Financing Program, By Office Type (2019, 2021 Elections)



Source: GAO analysis of Seattle Ethics and Election Commission Democracy Voucher Program data. | GAO-25-106650

^aIn 2019, there were only elections for district-level city council members, while the 2021 elections were for citywide city council members as well as mayor and city attorney.

^bAs part of Seattle's public campaign financing program rules, participating candidates agreed to adhere to the following spending limits for both primary and general elections: \$800,000 for mayor; \$375,000 for city attorney, \$375,000 for city council - citywide \$375,000, and \$187,500 for city council - district.

Participating candidates in the Seattle mayoral election received about twice as many vouchers as participating candidates in elections for other offices in the same year. In 2021, mayoral candidates received on average about 17,000 vouchers (totaling about \$424,000 in public

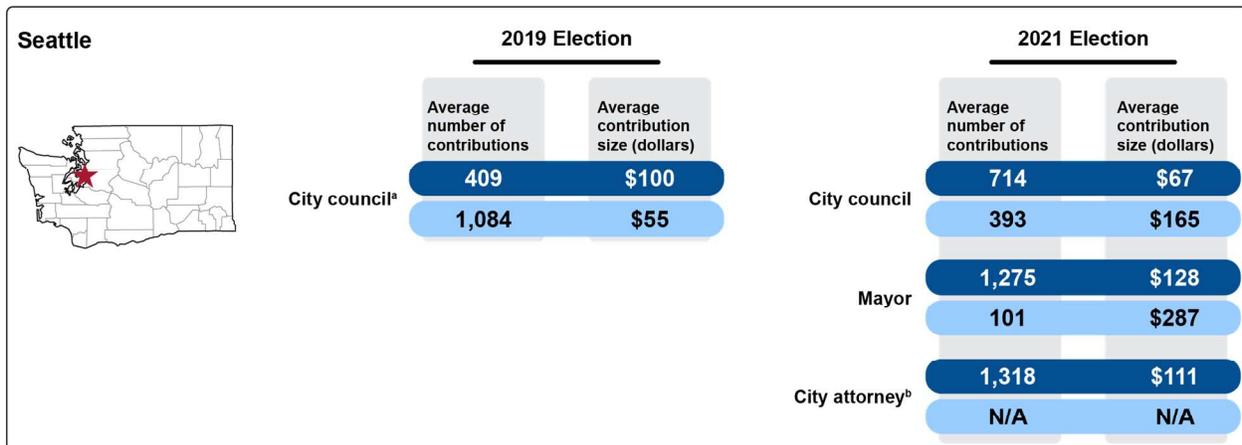
²⁹Seattle's city council includes seven councilmembers who represent individual districts, and two citywide councilmembers representing the entire city. Participating candidates for citywide councilmember seats are permitted to redeem approximately 18,000 vouchers during an election cycle while candidates for district councilmember seats are permitted to redeem approximately 9,000 vouchers during an election cycle, with certain limitations.

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funds) compared to citywide city council and city attorney candidates in the same year, who received on average about 8,500 vouchers (totaling about \$213,000 in public funds per candidate).

During the 2019 election, candidates who participated in the program received fewer non-voucher contributions compared to candidates who did not participate. However, in the 2021 election this pattern was reversed and on average, candidates participating in the voucher program received more non-voucher contributions and these contributions were smaller in size, as shown in figure 10.

Figure 10: Average Number and Size of Non-voucher Contributions Received By Candidates Participating and Not Participating in the Seattle, WA Public Campaign Financing Program



Participating candidates
 Non-participating candidates

Source: GAO analysis of Seattle Ethics and Election Commission election and Democracy Voucher Program data. | GAO-25-106650

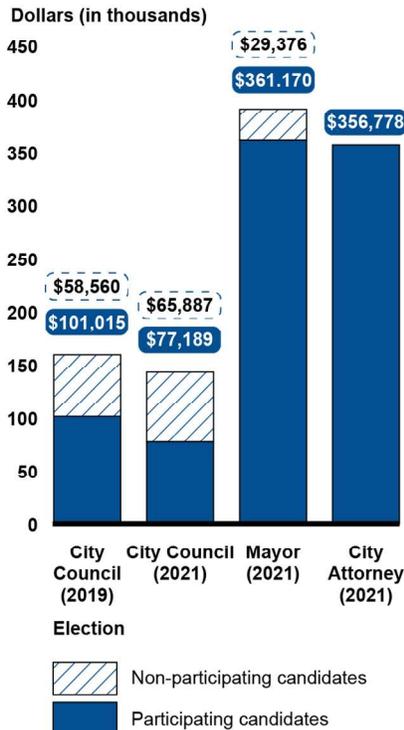
^aIn 2019, there were only elections for district-level city council members, while the 2021 elections were for citywide city council members as well as mayor and city attorney.

^bAll candidates for city attorney participated in Seattle’s public campaign financing program.

Further, as shown in figure 11, candidates participating in the voucher program spent a higher average amount in both 2019 and 2021 than candidates who did not participate in the program.

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Figure 11: Average Campaign Expenditures Reported by Candidates Participating and Not Participating in the Seattle, WA Public Campaign Financing Program (2019, 2021 Elections)



Source: GAO analysis of Seattle Ethics and Election Commission election and Democracy Voucher Program data. | GAO-25-106650

^aIn 2019, there were only elections for district-level city council members, while the 2021 elections were for citywide city council members as well as mayor and city attorney.

^bAll candidates for city attorney participated in Seattle’s public campaign financing program.

Certain Factors Can Affect the Structure and Participation Rates of Campaign Finance Programs, and Perspectives on Program Effects Varied

Legal Frameworks, Other Locations’ Programs, and Lessons Learned Can Affect Program Structure

To understand the factors affecting the structure of campaign finance programs, we interviewed program officials and reviewed program documentation from nine locations (our five case studies and four additional locations).³⁰ We found that the structure of public campaign financing programs is determined by the program’s legal framework (including relevant court decisions), and may be influenced by observations of other locations’ programs and lessons learned during implementation of the programs.

³⁰These four additional locations are Hawaii; Maine; Albuquerque, New Mexico; and Washington, D.C.

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Legal Framework

A jurisdiction's legal framework determines the key aspects of a public campaign financing program's structure. This framework can include both the laws that created the program and relevant court decisions.

The campaign finance programs we reviewed were created by initiatives enacted by voters, or enacted by state legislatures or local elected officials. The extent to which these laws included specific instructions about how to implement the programs varied. For example, the ballot measure which established Arizona's public financing program contained specific directions for how the program should be implemented, such as how many qualifying contributions candidates must collect to participate in the program and how much funding they may receive.³¹ By comparison, the constitutional amendment that created Hawaii's public financing program instructed the legislature to establish a fund for the partial public financing of state campaigns, among other things, but did not prescribe more specific features of the program.³²

The legal framework within which programs are created can also determine the roles and responsibilities of state and local officials as they implement a public campaign financing program. For example, responsibilities for managing the program in Montgomery County, Maryland, are divided between the county and state. The program was established by the county after a 2013 Maryland state law authorized counties to create public campaign financing programs. Under statute, the county is responsible for funding the program and disbursing payments to candidates, while state officials are responsible for certifying whether candidates qualify to participate in the program and reviewing their claims for matching funds, among other things.³³

State officials said the state's law was structured this way so that the state could provide centralized, consistent oversight for any county that chooses to implement a public campaign financing program. They stated that candidates in Maryland are already required to submit financial reports to the State Board of Elections; therefore, the shared oversight structure avoids the duplication of requiring candidates to report campaign finance data to both the county and the state. However, state and county officials said that state officials have found the process of reviewing candidate claims for matching funds to be more burdensome than they expected.

³¹Arizona Citizens Clean Elections Act, A.R.S. § 16-940 *et seq.*

³²Haw. Const., art. II, § 5.

³³Montgomery Cty., Md. Code, art. IV.

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After the 2018 election, to help address this issue, county officials began assisting state officials with reviewing some candidate claims, where needed.

Court decisions have also affected the structure of public campaign financing programs. For example, as we discussed in our 2010 report, Arizona and Maine's programs included triggered matching provisions, in which participating candidates received matching funds when they were outspent by nonparticipating candidates.³⁴ In 2011, in *Arizona Free Enterprise Club v. Bennett*, the Supreme Court found Arizona's triggered matching provision unconstitutional under the First Amendment.³⁵ As a result, public campaign financing programs we reviewed in Arizona and Maine that previously had such triggered matching provisions no longer include such triggered matching provisions, though they can include spending limitations for participating candidates.

Observations of Other Programs

Officials from three of nine locations we interviewed told us their observations of campaign financing programs in other states and localities influenced aspects of their program structure. Officials may research or review other public campaign financing programs when determining the initial legal framework of their own location's program, or when implementing later changes to their program.

For example, program officials from Washington, D.C., said their public campaign financing program was modeled after New York City's program, with allowances for D.C.'s smaller size and different municipal structure. While New York City uses a matching funds model, D.C.'s program combines a matching funds model with grant payments.³⁶ Program officials told us they saw benefits to the matching funds programs, but also wanted to provide seed money that would allow candidates to campaign before they had generated matching funds.

As another example, the law authorizing Montgomery County's program also created a committee responsible for recommending funding levels for the public campaign financing

³⁴[GAO-10-390](#).

³⁵*Arizona Free Enterprise Club v. Bennett* struck down an Arizona law that required that matching funds be provided to a publicly financed candidate if a privately financed candidate's contributions, combined with certain independent expenditures, exceeded the allotment of state funds to the publicly financed candidate. The Court said this part of Arizona's public financing program impermissibly forced privately funded candidates and independent political organizations to restrain their spending, which infringed on their First Amendment rights. *Ariz. Free Enter. Club's Freedom Club PAC v. Bennett*, 564 U.S. 721, 131 S. Ct. 2806 (2011).

³⁶Washington, D.C.'s program documents refer to the grant or lump sum payments as "base" payments," which are issued to participating candidates. These grant or "base" payments are issued in two parts: (1) when the candidate has met the financial threshold to qualify for the program, and (2) when the candidate qualifies to have their name placed on the ballot.

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program.³⁷ In its first annual report, the committee wrote that it arrived at a recommendation by studying how other programs nationwide determined their funding levels.

The committee reported that it met with representatives from nonprofit organizations that studied public campaign financing programs nationwide to solicit their observations about these programs and any lessons learned about how to determine funding needs. In particular, the committee reported that they considered New York City's matching funds program a useful model due to similarities with Montgomery County's program structure. However, program officials also noted some differences, such as New York City's program having more staffing resources than Montgomery County. The officials said they were not aware of any other county-level programs in existence at the time their program was created, and that this posed a challenge in seeking ideas from other programs.

Much like programs within our review have been influenced by existing public campaign financing programs nationwide, they themselves have also influenced newer programs. For example, voters in Oakland, California passed a ballot measure in 2022 to establish a voucher-based public campaign financing program. According to a City of Oakland memorandum on the program, the city's program is modelled after Seattle's voucher program.³⁸ Another memorandum reports that program staff met with Seattle officials to learn about their program procedures, such as for processing vouchers.³⁹ Similarly, according to Maryland state officials, other Maryland counties that adopted public campaign financing programs used Montgomery County's structure as a model for their own programs, making only small changes such as slightly different matching rates.

Lessons Learned during Implementation

Officials we interviewed from six of nine public financing programs told us that aspects of their program structure changed as a result of lessons learned during program implementation. Generally, these changes were in response to candidate feedback or observations from program officials regarding potential program inefficiencies or possible improvements.

³⁷Montgomery Cty., Md. Code, § 16-31.

³⁸City of Oakland, *Measure W Implementation Update and Consideration of the Postponement of the Distribution and Use of Democracy Dollars Vouchers for the 2024 Election*. Staff Memorandum to Public Ethics Commission (June 30, 2023).

³⁹City of Oakland, *Measure W Oakland Fair Elections Act Implementation Update for the August 9, 2023, Regular PEC Meeting*. Staff memorandum to Public Ethics Commission (July 28, 2023).

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Program officials in Montgomery County provided an example of a lesson learned. In Montgomery County, a participating candidate may not accept more than \$250 in contributions from a given individual during an election cycle—except for personal loans from the candidate or their spouse. When the program was first implemented, this exception allowed a candidate and their spouse to each loan \$6,000 to the candidate’s campaign. However, according to program officials, one candidate noted that this unfairly benefited married candidates because their household could loan the campaign twice as much as an unmarried candidate’s household. Subsequently, the county council updated the rule to allow a candidate and spouse to collectively loan the campaign no more than \$12,000. This new rule provides unmarried and married candidates the same opportunity to receive up to \$12,000 for their campaigns via this exception to the threshold on individual contributions.

As another example, program officials in Seattle told us about a lesson learned related to the distribution of vouchers. They told us that Seattle initially distributed vouchers to the public on January 1 of an election year. However, they observed that many residents were discarding their vouchers because they received the vouchers too far in advance of the election. They also reported receiving feedback from voters and candidates that January 1 was too early to receive the vouchers. As a result, Seattle’s program issued vouchers in February during the 2019 election and subsequent elections.

Program Requirements and Candidate Needs and Views May Influence Participation

Program officials we interviewed said that when deciding whether to participate in a public campaign financing program, candidates are influenced by program requirements, their own funding needs, and views about public financing, among other things.

Program Requirements

Program officials told us that program requirements can influence candidates’ decisions to participate in a public campaign financing program. Program officials we interviewed from seven of nine locations said a key reason candidates may decide not to participate in a public campaign financing program is because of program requirements such as restrictions around spending and fundraising. For example, these requirements may restrict how much money a candidate can raise and spend overall, how much money they can accept from individual donors, and how much money they can personally donate to their campaign. Program officials from Minnesota and Los Angeles said that independently wealthy candidates who wish to self-fund their campaigns may choose not to participate in the programs due to such requirements. Similarly, program officials from Montgomery County said some candidates prefer to fund their

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campaigns with large donations which would not be allowed under the program's requirements. The officials said that, for some candidates, requesting large donations from a few donors can be easier than attempting to raise the same amount of funding by requesting small donations. Program officials from Hawaii said their public campaign financing program provides relatively limited funding, which may affect whether candidates participate in the program.

Program officials we interviewed also said that in some cases candidates sought to participate in the program but were unable to meet the qualifying requirements. For example, program officials in Albuquerque and Hawaii said that many candidates attempt to qualify for the public funding programs but find it challenging to obtain the minimum number of contributions from voters to qualify. Program officials in Washington, D.C., also stated that a key reason candidates may not qualify to participate in the city's program is because they have unpaid fines or penalties owed for a violation of the Fair Elections Act, which are disqualifying.⁴⁰

While certain requirements may affect whether candidates participate in public campaign financing programs, program officials also provided context as to why these requirements exist. For example, program officials in Los Angeles stated that candidates must qualify for the ballot to participate in the program. The officials said the ballot is not finalized until four or five months before the election. Officials noted that candidates therefore will not know if they qualify for public funds until relatively close to the election. This can create uncertainty for the candidates regarding decisions about raising and spending money early in their campaigns. However, officials said the purpose of the requirement is to ensure that city funds only go to candidates who are genuinely able to run for office and to assure city residents that public funds are being properly safeguarded.

Candidate Funding Needs

Program officials told us that another key factor affecting program participation is how much funding candidates perceive their campaign will require, and whether participating in the public financing program would provide that level of funding compared to private fundraising. A candidate's decision may depend upon the amount of funding the program provides, the candidate's perception of their own fundraising ability, the competitiveness of a specific contest, and the resources of the candidate's opponents.

Program officials from all nine of the locations we interviewed stated that many candidates are attracted to the public campaign financing program because it provides an accessible source of

⁴⁰See 3 D.C.M.R. § 4206.2(b)(5).

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funding for their campaign. This can be particularly appealing for candidates who may have limited fundraising experience, such as grassroots and first-time candidates. For example, program officials in Montgomery County stated that participating in the public campaign financing program allows candidates who may not have widespread name recognition to compete with candidates who are more well known.

However, program officials from six of nine locations stated that candidates may perceive public funding to be insufficient to run a competitive campaign. For example, program officials from Albuquerque said a key reason candidates may not participate in the city's public campaign financing program is if they are concerned that participating will prevent them from being competitive against a well-funded opponent. Similarly, program officials from Maine told us that gubernatorial candidates are much less likely to participate in the program compared to other candidates (such as legislative candidates) because a statewide gubernatorial race typically involves higher spending than these other races.

Views about Public Financing

According to some program officials, candidate participation in a public campaign financing program can be influenced by the candidate's views about public financing, and their perceptions of the public's views about these programs. For example, program officials from Maine and Minnesota said that some candidates may choose not to participate in the public campaign financing programs because they believe public funds should not be used to support campaigns. On the other hand, program officials in Arizona, Montgomery County, and Washington, D.C. said that some candidates choose to participate in public campaign financing programs due to their perception of positive public opinions on public campaign financing.

Perspectives on Program Effects Varied

Program officials shared perspectives on the effects they believe their programs have had, such as new candidates running for office, increased voter engagement, and other effects.

New candidates running for office. Officials from six of nine programs we interviewed said they believed their program encouraged new candidates to run for office. For example, officials from five programs said their programs may have contributed to some first-time candidates who lacked fundraising experience deciding to run for office. Program officials in Montgomery County and Maine said the presence of new candidates contributes to a more diverse candidate pool overall.

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There are several benefits to encouraging more candidates to run for office, according to program officials we interviewed. For example, program officials from Los Angeles said that a larger candidate pool results in more choices for voters and that new candidates can introduce new ideas into the public discourse. However, program officials from Montgomery County, Seattle, and Los Angeles said that it can be challenging to attribute observed trends to the program itself, rather than to external factors that they had observed, including recent increases in grassroots campaigns nationwide.

Findings from the studies we reviewed showed mixed results regarding the effect of public campaign financing programs on the number of candidates running. One nationwide study we reviewed analyzed data on all candidates running for state legislature across all U.S. states between 1976 and 2018 and found that public campaign financing increases the number of candidates running for legislative offices.⁴¹ On the other hand, a study we reviewed on New York City's public campaign financing program using data from 1981 through 2009 did not find evidence that the program led to an increase in the number of candidates running for office in that city.⁴²

Increased voter engagement. Officials from seven of nine programs said they thought their program had increased voter engagement or trust in the political process. One way in which officials said the program in their location has contributed to increased voter engagement is by incentivizing candidates to engage more with voters, such as by matching small donations or requiring candidates to obtain numerous small donations to qualify for the program.

For example, program officials in Los Angeles said that the program's structure incentivized more communication between candidates and potential constituencies because candidates must gather small qualifying contributions from city residents. The officials said that when an individual makes a small contribution to a campaign, it may help create a feeling of investment, and the individual may consider becoming more engaged in local politics as a result. A study we reviewed of Seattle's program in the 2017 election found that Seattle residents who used their

⁴¹Abigail Mancinelli, "Does Public Financing Motivate Electoral Challenges?" *State Politics & Policy Quarterly*, vol. 22, no. 4 (2022) [438-462], <https://doi.org/10.1017/spq.2022.12>.

⁴²Jeffrey Kraus, "Campaign Finance Reform Reconsidered: New York City's Public Finance Program at Twenty." *Public Financing in American Elections*, edited by Costas Panagopoulos, 147-175. Philadelphia, PA: Temple University Press, 2011.

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vouchers were more likely to vote in the election than those who did not use their vouchers, even after accounting for previous political engagement.⁴³

Other perspectives on program effects. Program officials shared varied perspectives on other effects they believed their programs have had, such as reducing the influence of large donors and enabling participating candidates to win their contests. For example, officials in four of the nine programs stated that they thought their programs had reduced the influence of special interest money or large donors. However, officials from three other programs said that they did not think it was feasible for their programs to reduce the influence of special interests or large donors, since the programs can not restrict the fundraising of non-participating candidates. As another example, officials from four of the nine programs said that they thought their programs enabled participating candidates to win their contests. However, officials from another program said that increased contest wins are not necessarily attributable to the program because there may be numerous reasons unrelated to the program that may explain why voters prefer one candidate over another, such as voters preferring one candidate's platform over another's.

Agency and Third-Party Comments

We provided a draft of this report to campaign finance and election officials in the nine locations we contacted.

We are sending copies of this report to the appropriate congressional committees and members, campaign finance and election offices in the nine locations that participated in our research, and other interested parties. In addition, the report is available at no charge on the GAO website at <http://www.gao.gov>.

If you and your staff have any questions concerning this report, please contact me at (202) 512-8777, or gablerr@gao.gov. Contact points for our Offices of Congressional Relations and

⁴³Jennifer Heerwig and Brian J. McCabe, "Expanding Participation in Municipal Elections: Assessing the Impact of Seattle's Democracy Voucher Program." University of Washington Center for Studies in Demography & Ecology, 2018.

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Public Affairs may be found on the last page of this report. GAO staff members who made key contributions to this report are listed in appendix IV.

Rebecca Gambler

Director, Homeland Security and Justice

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Appendix I: Objectives, Scope, and Methodology

This report addresses (1) key characteristics of public campaign financing programs implemented in selected states and localities; (2) available data on the use of these programs by candidates; and (3) factors affecting program structure and candidate participation in public campaign financing programs, and perspectives on the effects of these programs.

Overview

To obtain background information, identify changes in campaign financing programs since our 2010 report, and address our objectives, we conducted a search of literature published since 2010 to identify relevant reports, studies, and articles on the public financing of campaigns.⁴⁴ Specifically, a GAO research librarian conducted a literature search of research databases using search terms such as public financing of campaigns, public campaign finance, matching fund election programs, and campaign spending. We identified 25 sources that were relevant to our work and reviewed these sources to identify key findings. We also used this literature review, among other sources, to identify the four nongovernmental organizations with expertise in campaign finance reform or issues related to state and local public campaign finance programs that we interviewed.⁴⁵

To address all three of our objectives, we selected five states and localities with public campaign financing programs to serve as nongeneralizable case studies. These locations were Arizona; Minnesota; Los Angeles, California; Montgomery County, Maryland; and Seattle, Washington. To select these locations, we identified programs that covered both executive and legislative offices at the state and local level, and programs that had been implemented for at least two election cycles at the time of our analysis.⁴⁶ We also selected locations to represent a mix of program models (grant programs, matching fund programs, and voucher programs) and population size. In addition, we considered candidate participation using publicly available sources, such as program statistics or annual reports available on a jurisdiction's website.

⁴⁴GAO, *Campaign Finance Reform: Experiences of Two States That Offered Full Public Funding for Political Candidates*, [GAO-10-390](#) (Washington, D.C.: May 28, 2010).

⁴⁵These organizations were the Brennan Center for Justice, the Campaign Legal Center, Common Cause – California, and the National Conference of State Legislatures.

⁴⁶Executive offices include governor, mayor, or county executive. Legislative offices include state legislator or city or county councilmember.

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To address our first objective, we reviewed program documentation and interviewed program officials to describe the key characteristics of the selected programs in the five locations. We also reviewed relevant state and local statutes and administrative codes governing each public financing program and other documentation related to the program, such as candidate handbooks, annual reports, and information on the program's website.

To address our second objective, we obtained and analyzed, to the extent possible, available data on candidate program participation, election outcomes, and reported campaign finance data for the two most recent election cycles for which data were available, for each case study location. Our methodology for obtaining and analyzing these data is described in detail in the next section of this appendix.

To address our third objective, we selected four other locations with public campaign financing programs, using the same selection methodology described above. These four locations were Hawaii, Maine, Albuquerque, New Mexico, and Washington, D.C. For each of the five case study locations and the four additional locations, we reviewed program documentation and interviewed program officials to obtain their perspectives on program structure, candidate participation, and program effects. We also identified further perspectives on public campaign financing programs, including any discussions of the ways in which program effects might be assessed, during our review of the 26 reports and studies obtained from our literature search.

Analyses of Data on the Use of Public Campaign Financing Programs by Candidates

To address our second objective regarding what existing data indicate about the use of public campaign financing programs by candidates, we obtained and analyzed, to the extent possible, available data from each case study location on candidate program participation, characteristics of participating and non-participating candidates, election outcomes, and campaign finance information for each of the two most recent election cycles for which data were available.

We defined an election cycle to include both the primary and general election in a given election year, but excluded any special elections or runoff elections that may have taken place during that year. Where possible, we analyzed data separately for the primary and general election in each election cycle.⁴⁷ For each location we requested data from program officials or obtained such data from publicly available sources on all contests in these elections for which candidates

⁴⁷We did not analyze information on primary elections in Minnesota because Minnesota's public campaign financing program is only available to candidates in the general election.

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were eligible to participate in the public campaign financing program.⁴⁸ We analyzed the data to determine the following types of information for each of the five locations we reviewed:

Program participation and candidate characteristics

- Candidate participation in the public campaign financing program, by election and type of office sought (e.g. executive or legislative offices);⁴⁹
- Candidate program participation, by incumbent and nonincumbent candidates, by election;⁵⁰
- Program participation by first-time candidates and those who had previously run for office, by election;⁵¹
- Percentage of contests in which at least one candidate participated in the program, by election;

Election outcomes

- Percentage of contests where participating candidates won the primary or advanced to the general election, or won the general election, by election;

Campaign finance information

- Public financing dollar amounts issued to all participating candidates, and to each individual candidate, by election or election cycle;
- Private contributions reported by candidates (including the number of contributions and the dollar amount); and
- Expenditures reported by candidates.

⁴⁸We define each contest as the election race for a specific seat or district within each office sought. For example, city council district 5 in Los Angeles is one contest for the office of city council.

⁴⁹We defined a participating candidate as one who was listed on the ballot, accepted into the public campaign finance program, and who received at least \$1 in public funds. For the purposes of this analysis, we define executive candidates as those running for the offices of governor in Arizona and Minnesota, mayor in Los Angeles and Seattle, and county executive in Montgomery County. We define legislative candidates as those running for the offices of state senate and state house of representatives in Arizona and Minnesota, city council member in Los Angeles and Seattle, and county council member in Montgomery County.

⁵⁰We defined incumbency as specific to the office sought by the candidate.

⁵¹We defined a first-time candidate as a candidate who had not previously run for election to that office. We defined a candidate who had previously run for election as having run for the specific office in question. First-time candidate information was not available in Arizona or Montgomery County, Maryland.

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Arizona

We obtained data on Arizona’s public campaign financing grant program for the 2020 and 2022 primary and general elections. We obtained data on candidate program participation from a public portal maintained by the Arizona Secretary of State’s Office.⁵² This data portal is a public record of candidates’ required campaign finance reporting to the state, including any public funds received by their campaigns. We identified candidates who participated in the program by identifying any candidate who reported receiving public funding during the election cycle from Arizona’s Citizens Clean Elections Commission, which administers the public campaign financing program.

Under Arizona program requirements, a participating candidate participates during an entire election cycle. Therefore, any candidate who has received public funds during the election cycle is considered a participating candidate for all elections during that cycle (i.e., the primary and general elections, should they run in both). For the 2020 and 2022 election cycles, we examined any contests for offices that were eligible for public financing. In 2020, those offices were state legislator, and corporation commissioner. In 2022, those offices were governor, state legislature, attorney general, corporation commissioner, secretary of state, state mine inspector, state treasurer, and superintendent of public instruction.

We obtained data on which candidates were on the ballot for each contest, and the outcomes of those contests, from the official election canvasses reported by the Arizona Secretary of State on its election information website.⁵³ We determined whether a candidate was an incumbent based on whether that candidate had won the general election contest for that office in the prior election. To conduct that analysis, we also analyzed data on outcomes for the 2018 general election solely for the purposes of determining incumbency in the 2020 elections for offices with two-year terms (i.e., state legislative positions) and for determining incumbency in the 2022 election for offices with four-year terms (i.e., governor, secretary of state, attorney general, state treasurer, superintendent of public instruction, state mine inspector).

We also analyzed data on outcomes for the 2016 general election and 2018 general election for the purposes of determining incumbency for the corporation commissioner elections held in 2020

⁵²Arizona Secretary of State, See *The Money Election Funds Portal*, Database, accessed: June 20, 2024, <https://seethemoney.az.gov>.

⁵³“Current and Historical Election Information,” Elections Division, Arizona Office of the Secretary of State, accessed June 20, 2024, <https://azsos.gov/elections/results-data/election-information>.

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and 2022, as those positions serve four-year terms and approximately half the commission's seats are elected on alternate years. The election results did not include information on whether candidates were running for a particular office for the first time.

We also obtained data on public grant funding received, and campaign contributions and spending from the Arizona Secretary of State's data portal. The database includes transaction-level data on candidate contributions received and expenditures made for a given candidate, from which we created candidate-level summaries for our analyses. The structure of the database did not allow us to differentiate whether a contribution or expenditure was associated with the primary or general election in each election cycle. Therefore, we analyzed financial data for Arizona candidates at the election cycle level, rather than for the primary and general election within a given cycle. Of the 404 candidates we analyzed across both election cycles, nine had no or incomplete reported financial data in the portal. We excluded these nine candidates when analyzing information related to financial reporting, such as average total campaign expenditures, but included them in our analyses of candidate program participation, candidate characteristics, and election outcomes.

Minnesota

Officials from Minnesota's Campaign Finance and Public Disclosure Board provided data files for the 2020 and 2022 general elections extracted from a campaign finance database maintained by the board. We obtained data on all contests eligible for public campaign financing, including for state legislator, in 2020, and for governor, attorney general, secretary of state, state auditor, and state legislator in 2022. In Minnesota's public campaign financing grant program, candidates are only eligible to participate in the program if they have qualified to appear on the ballot and if they have advanced from the primary election to the general election. Therefore, we only obtained and analyzed data for Minnesota's general election in the selected election years.

To determine candidate participation in the public campaign financing program including the amount of public funds each candidate received, we used data files provided by officials that contained each participating candidate's name, and office sought for the 2020 and 2022 election years. In addition, to determine the total number of candidates, election outcomes, and characteristics of candidates, we used data files provided by officials that included all candidates on the general election ballot, their office sought, if they won their general election, and if they were an incumbent or first-time candidate for these election years.

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For campaign finance information for the 2020 and 2022 election years, Minnesota officials provided data files we used to determine the number and amount of campaign contributions, public funds received and expenditures, by candidate and office type. Specifically, we used data files that contained transaction-level data on campaign contributions by candidate, and candidate-level data on contributions by type of contributor (individuals, political committees, etc.), total public funds received, and total expenditures for each election year.

Of the 822 unique candidates we analyzed across both election years, 52 had no reported financial data in the portal. We excluded these 52 candidates when analyzing information related to financial reporting, such as average total campaign expenditures, but included them in analyses of candidate program participation and election outcomes.

Los Angeles, California

We obtained and analyzed data on Los Angeles' matching funds program for the 2020 and 2022 primary and general elections from the Los Angeles City Ethics Commission officials responsible for administering the public campaign finance program. The campaign finance data originated from required campaign filings submitted to the Ethics Commission, which can also be found in the Ethics Commission's public data hub. Program officials provided data on all candidates in contests eligible for matching funds, which included contests for city council in 2020, and for mayor, city attorney, city controller, and city council in 2022.⁵⁴

These data included whether the candidate participated in the matching funds program, whether the candidate was an incumbent, and whether the candidate was running for the specific office for the first time. Program officials also provided information on whether the candidate won or advanced from the primary election, and the outcome of the general election. Additionally, officials provided campaign finance data for all participating and non-participating candidates at the candidate level rather than the individual transaction level, for example, the total dollar amount of matching funds received by each participating candidate, and the total number and amount of contributions received and the total amount of expenditures made by each participating and non-participating candidate. Program officials also provided information on total public funds disbursed for each candidate by election.

⁵⁴We combined data on contests for city attorney and controller into one category which we labeled as "other" contests.

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Montgomery County, Maryland

We obtained and analyzed data from several sources for Montgomery County's public campaign finance matching funds program for the two most recent primary and general elections (2018 and 2022).

Public campaign financing program officials from the Montgomery County Department of Finance provided candidate-level data on candidates participating in the public campaign finance program during these two election years for the offices that are eligible for public matching funds: county executive, county council-at-large, and county council-district. Specifically, for each participating candidate, the candidate-level data file included office sought and the public financing amounts (matching funds) issued to each participating candidate.

Montgomery County Department of Finance officials did not have information on various data elements relevant to our analyses for candidates who did not participate in the public campaign financing program. To obtain election outcome information for all candidates in contests eligible for public matching funds, including those who did not participate in Montgomery County's public campaign financing program, we extracted information from Maryland's Board of Elections website.⁵⁵

Specifically, we obtained from this website information about which candidates appeared on the ballot for eligible contests, whether they won the primary election or advanced to the general election, and outcomes from the general election. This data source did not include information on whether candidates were first-time candidates. We also used this data source to determine whether a candidate was an incumbent based on whether that candidate had won the general election contest for that office in the prior election. Specifically, to determine incumbency in the 2018 election, we used election outcome data for the 2014 general election, and to determine incumbency in the 2022 election we used election outcome data for the 2018 general election.

We merged the Montgomery County public campaign financing program participation data with the State of Maryland election outcome data for each primary and general election in 2018 and 2022. We analyzed the merged dataset to determine candidate program participation by office sought, contest and election, as well as whether the candidate won their contest, and whether the candidate was an incumbent.

⁵⁵"Elections by Year," The State Board of Elections, Maryland, accessed March 18, 2024, <https://elections.maryland.gov/elections/>.

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For data on the number and amount of contributions and expenditures, by candidate, we extracted information from the Maryland Campaign Reporting Information System.⁵⁶ We undertook a multi-step process to extract and assemble individual transaction data from this source for the purposes of our analysis based on interviews with Maryland State Board of Elections officials, and subsequently confirmed the steps we took to extract the data for our analysis with these officials. We obtained information on contributions and expenditures filed by candidates in the 2018 and 2022 elections using a candidate’s committee name in the reporting system.

Seattle, Washington

We obtained candidate-level data on Seattle’s voucher program for the 2019 and 2021 election cycles prepared for us by the Seattle Ethics and Elections Commission officials responsible for administering the program. We obtained data on all contests eligible for vouchers, which included contests for city council in 2019, and for mayor, city attorney, and city council in 2021. Program officials provided data on candidate office sought, program participation, candidate characteristics (including incumbency and whether the candidate was running for that office for the first time), and election outcomes in the primary and general elections.

Program officials also provided candidate-level campaign finance information for each candidate, including the number and dollar amount of vouchers received, the number and dollar amount of contributions received from non-public sources, and the dollar amount of campaign expenditures. The officials provided campaign finance data at the candidate-level for the entire election cycle, without distinguishing between funds received or spent during the primary and general election. In addition, officials provided information on the total public funds disbursed for each candidate by election cycle.

Data Reliability

In addition to the specific steps described above for each case study location, we assessed the reliability of each data source by performing electronic testing for obvious errors in accuracy and completeness and reviewing associated documentation, such as system flow charts. We also interviewed the relevant state and local officials responsible for each of the data systems about the structure of each system, and any concerns relevant to the data fields we planned to use in

⁵⁶“Campaign Finance Information,” Maryland Campaign Reporting Information System, accessed: March 11, 2024, <https://campaignfinance.maryland.gov/>.

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our analyses. When we found discrepancies, such as nonpopulated fields, we worked with relevant officials to address the discrepancies before conducting our analyses. Based on these steps, we determined that the data from the five case study locations were sufficiently reliable for the purposes of describing candidate participation in public campaign financing programs, and the level of public funding, private contributions, and spending by candidates in contests in the study years specific to each location.

We conducted this performance audit from February 2023 to **December 2024** in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

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Appendix II: Case Study Profiles

States and localities that have implemented public campaign financing programs have generally used three different models: grants, matching funds, or vouchers. We selected public campaign financing programs in five locations—two states and three localities—that have implemented programs using these models to serve as nongeneralizable case studies. These locations are Arizona; Minnesota; the city of Los Angeles, California; Montgomery County, Maryland; and the city of Seattle, Washington. Detailed information on each program is included in the remainder of this appendix.

Grant Programs

The jurisdiction provides qualifying candidates with lump-sum grants of public funds to finance their campaigns. The grant amount can be either for the full or partial cost of a campaign, depending on the program. In full grant systems, also called “clean elections” programs, participating candidates may only make campaign expenditures with public funds and may not raise private contributions after receipt of the grant.

- Arizona: Provides candidates with a grant for the full cost of a campaign.
- Minnesota: Provides candidates with a grant for the partial cost of a campaign.

Matching Funds Programs

The jurisdiction matches certain private contributions received by participating candidates with public funds at a set rate. Depending on the jurisdiction, private contributions are matched either dollar for dollar or at some multiple of public-to-private dollars. Generally, these programs limit the size of contributions that are eligible for public matching (e.g., \$250 or less) and will not match contributions from certain sources (e.g., government contractors).

- Los Angeles, California: Matches \$6 in public funds for every dollar a participating candidate receives, up to certain limits.
- Montgomery County, Maryland: Matches between \$2 and \$6 in public funds for every dollar a participating candidate receives, up to certain limits.

Voucher Programs

The jurisdiction provides eligible residents with a credit of public funds (i.e., “vouchers”) to assign to one or more participating candidates of their choosing. For example, all eligible jurisdiction residents may receive four \$25 vouchers, worth \$100 in total, each election year. Residents may then assign their vouchers to more than one candidate or assign them all to the

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same candidate. Once residents have assigned vouchers to participating candidates, the candidates can redeem them with the jurisdiction for public funds to use in their campaigns.

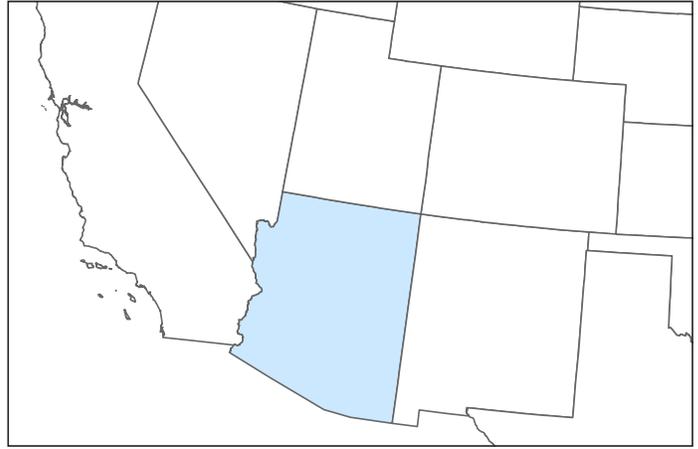
- Seattle, Washington: Issues eligible residents 4 vouchers worth \$25 each that may be assigned to candidates of their choosing.

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Arizona

Public Campaign Financing Program:

Grant Model



Source: U.S. Census Bureau. | GAO-25-106650

HISTORY

Arizona's public campaign financing program was created in 1998 by ballot initiative.^a The stated intent of this initiative was to diminish the influence of special interest money and encourage citizen participation in the political process, among other things. The program went into effect for the 2000 election.

The program has undergone several changes since its adoption. For example, the program initially provided

additional matching funds to participating candidates facing non-participating opponents whose contributions, in combination with certain independent expenditures, exceeded the allotment of state funds for the participating candidate. However, this provision was declared unconstitutional by the Supreme Court and subsequently removed from the program.^b Arizona legislation has also prohibited the program from spending money to promote its benefits.^c

^aSee A.R.S. §§ 16-940-16-961.

^bIn *Arizona Free Enterprise Club v. Bennett*, the Supreme Court held this part of Arizona's public financing program impermissibly forced privately funded candidates and independent political organizations to restrain their spending, which infringed on their First Amendment rights. *Ariz. Free Enter. Club's Freedom Club PAC v. Bennett*, 564 U.S. 721, 131 S. Ct. 2806 (2011).

^c2002 Ariz. Sess. Law, ch. 212, § 1 (codified as amended at Ariz. Rev. Stat. § 16-949(D)).

STRUCTURE

The program is managed by the Arizona Citizens Clean Elections Commission, which also enforces state campaign finance rules for all candidates. This nonpartisan commission has five members and a professional staff.

The program is funded by a 10 percent surcharge on all civil penalties and criminal fines, civil penalties for violations of limits on spending and contributions or campaign finance reporting requirements, and \$5 qualifying contributions collected from participating candidates. According to program officials, the program's trust fund had about \$28 million in funding as of November 2023.

PROGRAM REQUIREMENTS

Candidates running for governor, secretary of state, attorney general, treasurer, superintendent of public instruction, corporation commissioner, mine inspector, state senator, and state representative are eligible to participate in the public financing program. To qualify for public funds, candidates must:

- File an application for certification as a participating candidate.
- Abide by contribution limits.
- Attend at least one commission-sponsored candidate training class.
- File the paperwork required to appear on the ballot.
- Collect a minimum number of qualifying contributions of \$5 each which must be reported to the secretary of state's campaign finance reporting system. These qualifying contributions are to be submitted to the secretary of state's office. The qualifying contributions must be accompanied by forms with each contributor's name, address, and signature.
- Adhere to spending limits.
- Attend commission-sponsored debates held in both the primary and general election periods.

Qualifying contributions and contribution limits required for participation in Arizona’s public campaign financing program in the 2022 election

Office sought	Number of qualifying contributions required ^a	Early contribution limit ^b	Individual contribution limit ^c	Personal contribution limit ^d
<i>Governor</i>	4,000	\$63,450	\$180	\$1,580
<i>Secretary of state, attorney general</i>	2,500	\$55,361	\$180	\$1,580
<i>Corporation commissioner, superintendent of public instruction, treasurer</i>	1,500	\$27,675	\$180	\$1,580
<i>Mine inspector</i>	500	\$13,842	\$180	\$1,580
<i>State senator, state representative</i>	200	\$4,323	\$180	\$800

Source: Arizona public campaign financing program law and documentation. | GAO-25-106650

- ^a Qualifying contributions are contributions of \$5 that candidates must collect from voters in their district (or statewide, if running for statewide office) in order to qualify for the public campaign financing program.
- ^b Early contributions are contributions that candidates are permitted to raise and spend during the period beginning the day after a general election and ending one week before the primary election. Early contributions serve as a form of seed money for their campaign.
- ^c To participate in the program, a candidate may not accept early contributions exceeding \$180 from any one individual, not including the candidate themselves. Contributions from political action committees, businesses, corporations, political parties, and labor unions are prohibited.
- ^d Personal contributions are funds contributed by the candidate to their own campaign. The personal contribution limit includes contributions received from certain family members and may only be spent up until one week before the primary election.

AVAILABLE PUBLIC FUNDING

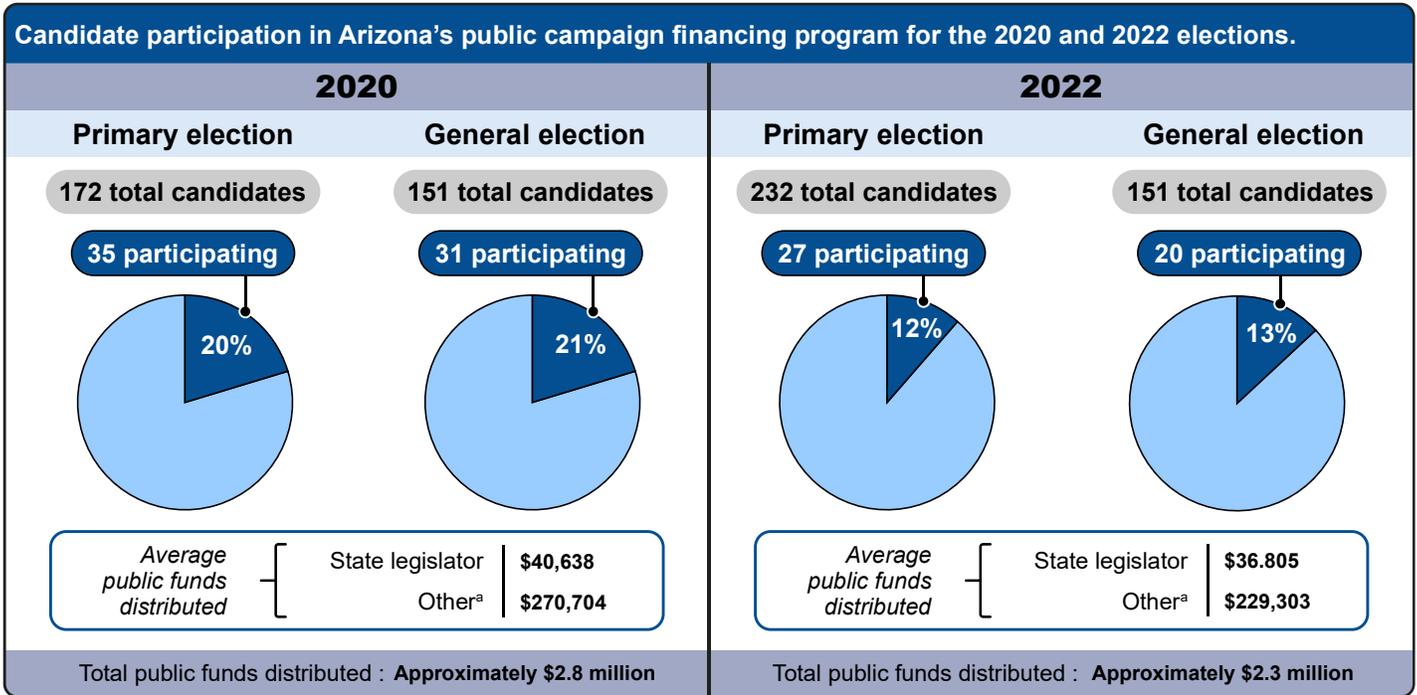
Candidates who meet program requirements can apply for public funds. The Secretary of State’s office verifies a random sample of the candidate’s qualifying contributions to determine whether to approve the candidate for funding. The commission provides the candidates with funding prior to the primary election and general election, respectively. Unopposed candidates receive funding equal to five times the number of qualified contributions submitted to the Secretary of State..

Public funding available to each candidate participating in Arizona’s public campaign financing program in the 2022 election

Office sought	Election funding for party-affiliated candidates ^a		Election funding for independent candidates ^b
	Primary	General	
<i>Governor</i>	\$854,567	\$1,281,851	\$1,495,493
<i>Secretary of state, attorney general</i>	\$221,442	\$332,163	\$387,524
<i>Corporation commissioner, superintendent of public instruction, treasurer</i>	\$110,698	\$166,047	\$193,722
<i>Mine inspector</i>	\$55,367	\$83,051	\$96,893
<i>State senator, state representative</i>	\$17,293	\$25,940	\$30,263

Source: Arizona public campaign financing program law and documentation. | GAO-25-106650

- ^a To participate in the program, candidates must either be independent candidates or be running for the primary or general election of a party recognized on the ballot. Legislative candidates from the majority party in a one-party-dominant district can opt to reallocate funds from the general election period to the primary election period.
- ^b Independent candidates receive 70 percent of the election’s primary and general spending limits, as a single disbursement to be spent in both the primary and general election.



Source: GAO analysis of Arizona public campaign financing program and elections data. | GAO-25-106650

^a In the 2020 election, this included the corporation commission and no other offices. In 2022, these offices included secretary of state, attorney general, treasurer, superintendent of public instruction, corporation commission, and mine inspector. There was no gubernatorial election in 2020, and no participating gubernatorial candidates in 2022.

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Minnesota

Public Campaign Financing Program:

Grant Model



Source: U.S. Census Bureau. | GAO-25-106650

HISTORY

Minnesota's public campaign financing program was created through legislation in 1974.^a According to program officials, the program was an effort to improve public confidence in government following the Watergate scandal and Vietnam War. The first public

^aMinn. Stat. §§ 10A.30-10A.324

subsidy payments were made to candidates in 1976.

According to program officials, the program has undergone several changes since its adoption, generally related to increasing funding for the program.

STRUCTURE

Minnesota's public campaign financing program consists of two components: (1) direct public subsidy payments made to the candidates; and (2) the political contribution refund program. The political contribution refund program provides a refund for eligible Minnesota voters (\$50 for individuals and \$100 for married couples through 2023) who contribute to a registered political party unit or to a candidate who has signed the public subsidy agreement. The political contribution refund program does not issue public funds to candidates.

Direct public subsidy payments are made from a state elections campaign account. The elections campaign account is funded through an appropriation from the state general fund and a state tax checkoff in which taxpayers can designate that \$5 be paid from the state's general fund to the general campaign account or to the account of a political party within the campaign account. In 2010 through 2012, and again in 2016 the governor suspended the political contribution refund program, and the account did not receive an appropriation.

The public campaign financing program is administered by the Campaign Finance and Public Disclosure Board, including professional staff, with the support of the Minnesota Department of Revenue and Minnesota Department of Administration. The board is bipartisan and comprised of six members appointed by the governor for staggered four-year terms. The board's responsibilities include interacting with candidates and their campaigns to help ensure compliance with the requirements of the program, as well as investigating any alleged or potential violations of the requirements.

In the 2020 election, \$2,131,750 in public subsidy payments were issued to qualified candidates. In the 2022 election, \$2,348,803 in public subsidy payments were issued to qualified candidates.

PROGRAM REQUIREMENTS

Candidates running for governor, attorney general, secretary of state, state auditor, and state senate or state house of representatives are eligible to participate in the public financing program and receive direct public subsidy payments. To qualify for direct public subsidy payments, candidates must meet the following requirements:

- The candidate must sign and file a public subsidy agreement with the board by the applicable deadline.
- The candidate must form and register a campaign committee.
- The candidate must raise a specified amount in monetary contributions from people eligible to vote in Minnesota by July of the election year. Only the first \$50 received from each contributor can be counted as a qualifying contribution in any one election cycle. The amount that must be raised varies by office as described below.^b
- The candidate or the campaign committee treasurer must sign an affidavit stating that the contribution threshold described above has been met and file the affidavit by the statutory deadline.
- The candidate must file to run for office as the candidate of a political party recognized in Minnesota. Candidates not affiliated with a recognized political party are not eligible for public subsidy payments.
- The candidate must have an opponent in either the primary or general election.
- The candidate's campaign committee must file the required pre-primary report with the board.
- The candidate must win the primary.

^bThe candidate can count contributions received between January 1 of the previous year and the cutoff date before the primary election. If one person gives the candidate more than \$50 during the specified time period, the candidate can count only the first \$50 of that person's contribution toward the public subsidy requirement. The candidate must record the name and address of the contributor, regardless of the amount of the contribution, to count the contribution toward the required threshold.

Contribution limits, qualifying contributions required for participation, and spending limits for participating candidates in Minnesota's public campaign financing program in the 2022 election

Office sought	Personal contribution limit ^a	Total amount that must be raised in qualifying contributions	Base spending limit ^b
<i>Governor</i>	\$20,000	\$35,000	\$4,232,700
<i>Attorney general</i>	\$12,500	\$15,000	\$725,800
<i>Secretary of state</i>	\$10,000	\$6,000	\$483,900
<i>State auditor</i>	\$10,000	\$6,000	\$483,900
<i>State senate</i>	\$5,000	\$3,000	\$109,100
<i>State house of representatives</i>	\$5,000	\$1,500	\$72,700

Source: Minnesota public campaign financing program law and documentation. | GAO-25-106650

^a According to Minnesota program documents, personal contributions are those a candidate makes to their own campaign committee.

^b According to Minnesota campaign finance rules, candidates may be eligible for a 10 percent increase in their base campaign spending limit if they have not previously held the same office or run for that office and if they have not in the past 10 years raised or spent more than \$750 in a run for any other office whose territory includes more than one-third of the people able to vote for the new office. Candidates may also receive a 20 percent increase in their base campaign spending limit if they won a closely contested primary election. Candidates can receive both increases if they are a first-time candidate and won a closely-contested primary.

AVAILABLE PUBLIC FUNDING

Candidates who meet program requirements can apply for public funds. The public subsidy payment amounts are determined in the spring of an election year, when the Campaign Finance and Public Disclosure Board estimates payment amounts for candidates of each office type based on how much money the Department of Revenue collected from the tax check-off by political party for each legislative district. The board publishes the estimated amounts before the filing period opens.

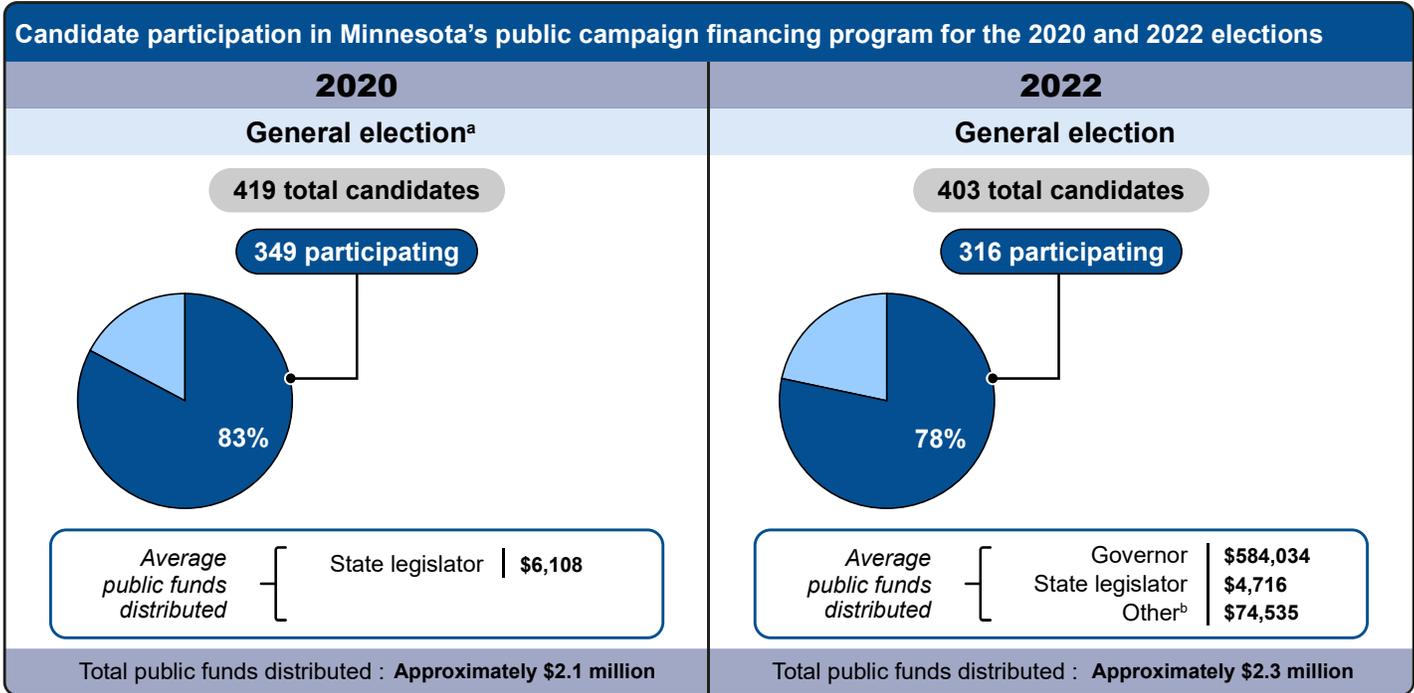
Average public funding payments made to individual candidates participating in the Minnesota public campaign financing program by office for the 2022 election

Office sought	Average public subsidy payment amounts made to individual candidates
<i>Governor^a</i>	\$584,034
<i>State senate</i>	\$7,021
<i>State house of representatives</i>	\$3,541
<i>Other^b</i>	\$74,535

Source: GAO analysis of Minnesota public campaign financing program and elections data. | GAO-25-106650

^a There was only one candidate running for these offices who participated in the public campaign financing program for the 2022 election.

^b These offices included attorney general, secretary of state, and state auditor.



Source: GAO analysis of data provided by officials from the Minnesota Campaign Finance and Public Disclosure Board. | GAO-25-106650

^aThere were no contests for governor, attorney general, secretary of state or state auditor in 2020.

^bThese offices included attorney general, secretary of state, and state auditor.

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Los Angeles, CA

Public Campaign Financing Program: Matching Funds Model



Source: U.S. Census Bureau. | GAO-25-106650

HISTORY

The city of Los Angeles’s public campaign financing program was created in 1990 by ballot initiative.^a According to program officials, the ballot initiative included a package of campaign finance and ethics reforms motivated by an ethics scandal in city government. The public financing program went into effect for the 1993 election.

The program has undergone several changes since its adoption, including lowering the threshold total dollar amount of contributions candidates must collect to qualify for the program and increasing the maximum amount and rate of matching funds available to participating candidates.

^aSee L.A.M.C. §§ 49.7.22-49.7.30; L.A.A.C. §§ 24.31-24.38.

STRUCTURE

The program is managed by the city’s Ethics Commission, which administers city and state laws related to campaign financing, contracts, developers, governmental ethics, and lobbying. The commission has a professional staff and is governed by a five-member board of commissioners.

The program receives an annual appropriation that is adjusted based on the consumer price index. In fiscal year 2023, the program received a \$4 million appropriation. Program funds are deposited into a trust.

PROGRAM REQUIREMENTS

Candidates running for mayor, city council, city attorney, and controller are eligible to participate in the public financing program. To qualify for matching funds, candidates must:

- Collect qualified contributions of \$5 or more from at least 100 individuals who reside in the council district (for city council candidates) or the city (for citywide candidates).
- Collect a minimum aggregate dollar threshold of qualified contributions from individuals residing within the city. In 2022, these thresholds were \$11,400 for city council candidates, \$32,100 for city attorney and controller, and \$64,200 for mayor.
- Limit their campaign spending.
- Limit the amount they contribute or loan to their own campaigns to certain amounts. In the 2022 election, these limits were \$37,000 for city council candidates and \$148,100 for citywide candidates, such as mayor, city attorney, and controller.
- Qualify to appear on the ballot and be opposed by a candidate who is also qualified to appear on the ballot.
- Participate in a debate or conduct a town hall meeting, subject to certain criteria.
- Attend an Ethics Commission training session.
- File all required campaign statements.

Qualified contributions of \$5 or more required to participate in Los Angeles’s public campaign financing program for the 2022 election

Office sought	Minimum cumulative threshold required	Maximum amount per contributor that counts towards that threshold
City council	\$11,400	\$114
Controller	\$32,100	\$214
City attorney	\$32,100	\$214
Mayor	\$64,200	\$214

Source: Los Angeles public campaign financing program law and documentation. | GAO-25-106650

AVAILABLE PUBLIC FUNDING

Candidates who meet program requirements receive \$6 in public funds for every matchable dollar of a contribution they receive, up to certain limits.^a Candidates request matching funds by filing a claim that identifies the contributions they wish to have matched and includes supporting documentation for those contributions, such as copies of checks or credit card transactions. Ethics Commission staff review each claim and then send the claim to the city comptroller's office for processing and payment.

Public funding maximums available to each participating candidate in the Los Angeles public campaign financing program for the 2022 election

Office sought	Per contributor	Per candidate in primary election	Per candidate in general election
City council	\$684	\$161,000	\$201,000
Controller	\$1,284	\$428,000	\$482,000
City attorney	\$1,284	\$482,000	\$562,000
Mayor	\$1,284	\$1,071,000	\$1,284,000

Campaign spending limits for candidates participating in Los Angeles' public campaign finance program for the 2022 election^b

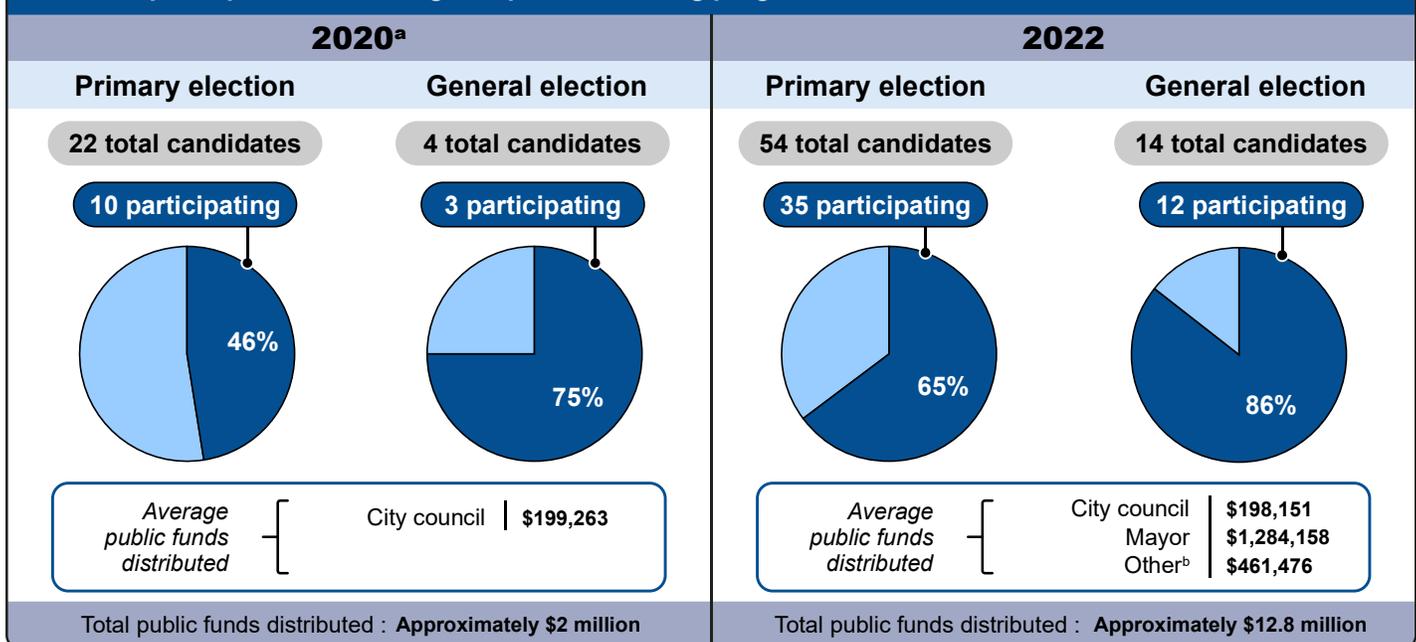
Office sought	Primary election	General election
City council	\$571,000	\$476,000
Controller	\$1,332,000	\$1,000,000
City attorney	\$1,498,000	\$1,165,000
Mayor	\$3,329,000	\$2,662,000

Source: Los Angeles, California public campaign financing program law and documentation. | GAO-25-106650

^a Some types of contributions cannot be matched. Non-matchable contributions include those from the candidate or their immediate family, those from individuals who do not reside within the city, those from non-individuals (such as corporations or unions), those received before the candidate filed their declaration of intent to solicit or receive contributions; those received more than three months after the election, loans, pledges, non-monetary contributions, contributions unlawful under federal, state, or city law, and returned or unpaid contributions (i.e., bounced checks).

^b The applicable spending limit is no longer binding on a participating candidate if a non-participating candidate in the same race makes or incurs campaign expenditures in excess of the expenditure ceiling or independent expenditure communications in support of or opposition to any candidate in the same race exceed, in the aggregate, certain thresholds.

Candidate participation in Los Angeles' public financing program for the 2020 and 2022 elections



Source: GAO analysis of Los Angeles, California public campaign financing programs and elections data. | GAO-25-106650

^a There were no contests for mayor, city attorney or city controller in 2020.

^b These offices include city attorney and controller.

DRAFT

Montgomery County, MD

Public Campaign Financing Program: Matching Funds Model



Source: U.S. Census Bureau. | GAO-25-106650

HISTORY

Montgomery County, Maryland's public campaign financing program was created in 2014 through legislation enacted by the county.^a This legislation followed a 2013 Maryland state law that authorized counties to create public campaign financing programs and was the first of its kind in the state, according to county and state officials. The public financing

program went into effect for the 2018 election.

The program has undergone several changes since its creation, including increasing the contribution limit for individual contributors, allowing candidates to collect additional qualifying contributions if their application is denied, and requiring candidates to return unspent money in the candidate's public funded campaign.

^aSee Montgomery Cty., Md. Code, §§ 16-18-16-32.

STRUCTURE

The program is managed by officials from both the Montgomery County Department of Finance and the Maryland Board of Elections, which administer county and state laws related to election administration and campaign financing. In addition, a bipartisan Public Election Fund Committee is responsible for estimating and recommending funding levels for the public campaign financing program for the current year and following year. The committee is comprised of seven county residents appointed by the county council.

The program receives an annual general appropriation, with funding levels determined by the county council in consultation with the committee. The program can also keep unused funds from previous elections to use in subsequent elections and voluntary donations made directly to the program. The council appropriated \$7 million for the 2018 election, and \$5.5 million for the 2022 election.

PROGRAM REQUIREMENTS

Candidates running for county executive, and county council--at-large and county council--district offices are eligible to participate in the public financing program. To qualify for matching funds, candidates must:

- Register their public campaign financing committee via the state's electronic filing system prior to the qualification deadline.
- File a notice of 'intent to qualify' with the state board of elections.
- Open a publicly funded campaign account with a bank for receiving deposits of contributions and matching funds, and for making expenditures. Any other campaign finance accounts must be closed or kept inactive while the candidate is seeking public funds.
- Collect a threshold of qualifying contributions from county residents, based on office sought.
- Submit to the Board of Elections (1) a declaration agreeing to follow the regulations governing the use of a public contribution, (2) a campaign finance report that includes a list of each qualifying contribution received, a list of each expenditure made by the candidate during the qualifying period, and the receipt associated with each contribution and expenditure, and (3) a certificate of candidacy for a covered office.

AVAILABLE PUBLIC FUNDING

Candidates who meet program requirements receive a certain amount of public funds for every matchable dollar of a qualified contribution they receive, up to certain limits.^a Candidates may request matching funds on a set schedule (about twice monthly) by submitting a report that identifies each qualifying contribution received, each expenditure made by the candidate, and all receipts associated with each contribution and expenditure. The state board of elections reviews these reports and determines the amount of public funds to be disbursed, which are processed and paid by the county.

Qualifying contributions required to qualify for participation in Montgomery County, Maryland's public campaign financing program

Office sought	Number of qualifying contributions required	Allowable qualifying contribution amounts	Minimum dollar threshold of qualifying contributions required
County executive	500	\$5 to \$250	\$40,000
County council – at-large	250	\$5 to \$250	\$20,000
County council – district	125	\$5 to \$250	\$10,000

Public funding available to each participating candidate in the Montgomery County, Maryland public financing program in the 2022 election

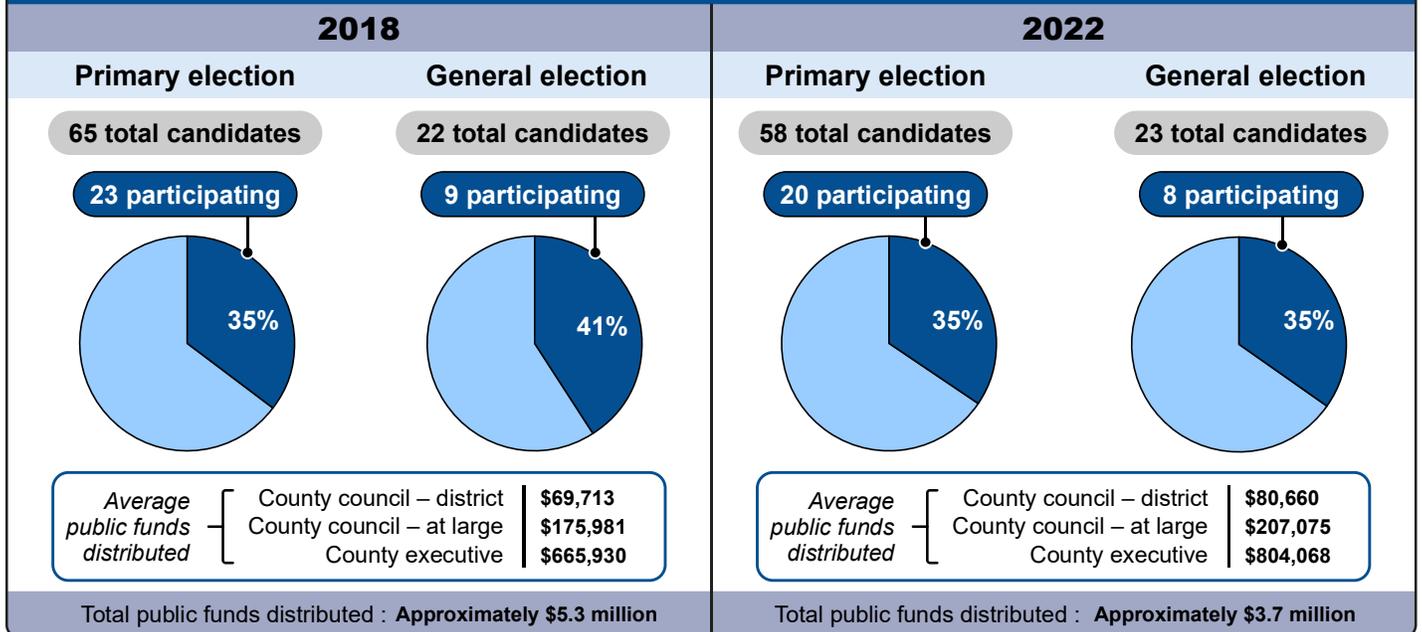
Candidate type	Matching ratio for public dollars	Qualified contribution amounts	Maximum public contribution
County executive	6 to 1	First \$50 for contributions that total at least \$5 ^b	\$750,000 per primary and general election
	4 to 1	\$51 to \$100	
	2 to 1	\$101 to \$150	
	0	\$151 to \$250	
County council – at-large & district	4 to 1	First \$50 for contributions that total at least \$5 ^c	\$250,000 per primary and general election for at-large
	3 to 1	\$51 to \$100	
	2 to 1	\$101 to \$150	\$125,000 primary and general election for district
	0	\$151 to \$250	

Source: Montgomery County, Maryland public campaign financing program law and documentation. | GAO-25-106650

^a Non-matchable contributions include contributions from the candidate or the candidate's spouse or an in-kind contribution of property, goods, or services.

^b According to program documents, the minimum contribution amount for a match is \$5. Contributions below \$5 will not be matched or eligible as a qualifying contribution.

Candidate participation in Montgomery County, Maryland public campaign financing program for the 2018 and 2022 elections



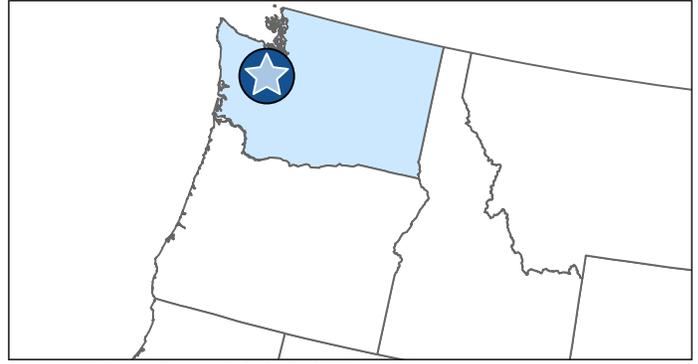
Source: GAO analysis of Montgomery County, Maryland public campaign financing program and elections data. | GAO-25-106650

DRAFT

Seattle, WA

Public Campaign Financing Program:

Voucher Model



Source: U.S. Census Bureau. | GAO-25-106650

HISTORY

Seattle’s public campaign financing program was created in 2015 by ballot initiative.^a The program went into effect for the 2017 election.

Program officials said the program has not

undergone any major changes since its adoption. They stated that the city council had made small changes to the program after the first election during which it was implemented, such as changing the timing of when vouchers are distributed.

^a Seattle, WA Mun. Code, §§ 2.04.600 - 2.04.696.

STRUCTURE

The program is managed by the Seattle Ethics and Elections Commission, which is responsible for administering and enforcing the Seattle Ethics Code. The commission has seven appointed members and a professional staff.

The program is funded through a property tax levy which is authorized until 2025, at which point voters must reauthorize the tax in order for the program to continue, according to program officials. The program receives about \$3 million per year through this tax, according to program officials.

PROGRAM REQUIREMENTS

Candidates running for mayor, city council, and city attorney are eligible to participate in the public financing program.^c To qualify for matching funds, candidates must:

- Register with the Seattle Ethics and Elections Commission as a candidate and submit required reports.
- Agree to take part in at least three debates for each of the primary and general election.
- Agree not to solicit money for or on behalf of any political action committee, political party, or any organization that will make an independent expenditure for or against any city candidate within the same election cycle.
- Agree not to solicit or accept total contributions from any individual or entity exceeding \$500 for mayoral candidates, or \$250 for city council and city attorney candidates.
- Obtain and report the requisite number of contributions (of at least \$10) and signatures from Seattle residents. Like qualifying contributions, qualifying signatures help demonstrate support for a candidate, whether or not the signatory is able to make a qualifying financial donation. Candidates must obtain the requisite number of both signatures and contributions, but these can come from either the same individual or different individuals.
- File paperwork showing an itemized list of qualifying contributions.
- Agree to abide by campaign spending limits.^d

Number of qualifying contributions and qualifying signatures required for participation in Seattle’s public campaign financing program in 2021 election

Office sought	Qualifying contributions of \$10 or more	Qualifying signatures
<i>Mayor</i>	600	600
<i>City attorney</i>	400	400
<i>City council—citywide</i>	400	400
<i>City council—district^b</i>	150	150

Source: Seattle, Washington public campaign financing program law and documentation. | GAO-25-106650

^bHalf (75) of the contributions and signatures must come from within the candidate’s district.

^cSeattle’s city council has nine councilmembers, of whom seven represent a specific district and two are citywide representatives.

^dCandidates can request to be released from this limit if they can demonstrate that their opponent’s campaign spending—or independent expenditures made on their opponent’s behalf—exceed the spending limits imposed on the participating candidate.

AVAILABLE PUBLIC FUNDING

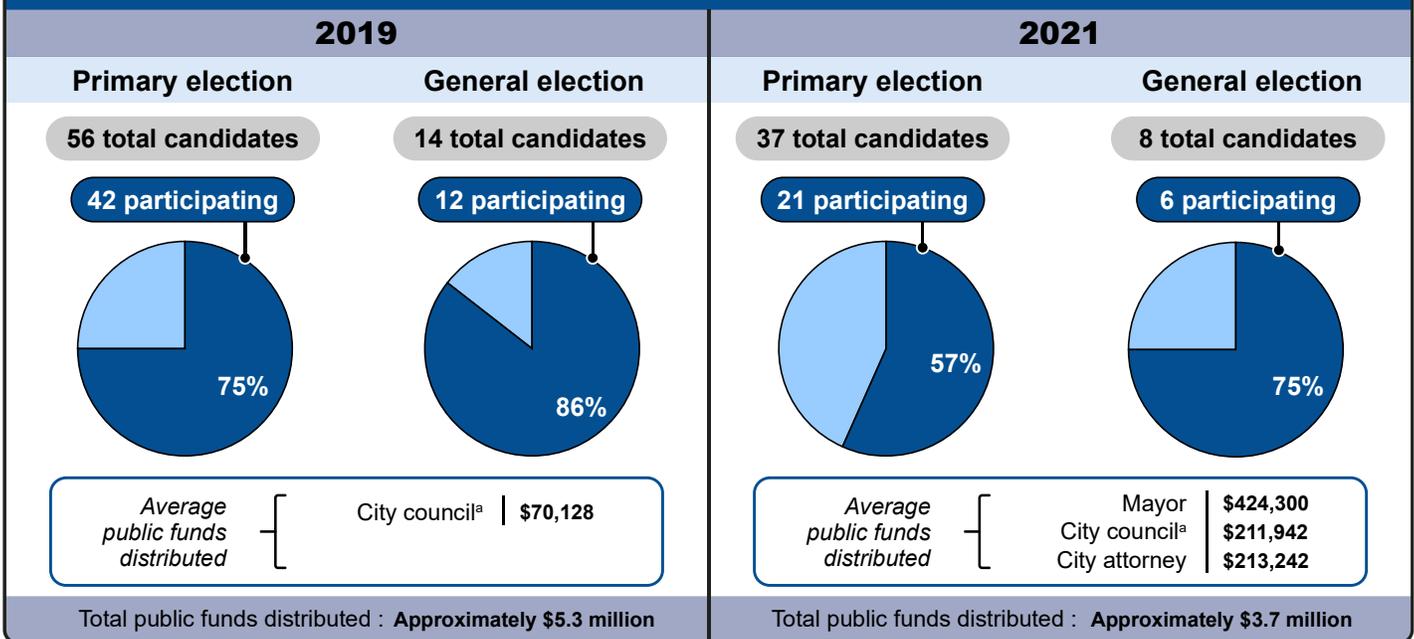
A candidate who meets the qualification requirements can receive vouchers for public funds from city residents. The candidate may collect signed vouchers from residents and deliver them to the commission. Residents may also bring their vouchers directly to the commission. The commission determines how many vouchers to issue, and of what dollar value, for each election. For the 2021 election, the commission issued 4 vouchers worth \$25 each to a total of 512,746 residents. In total, the commission processed 184,747 vouchers from 48,071 residents in 2021.

Spending limits for participation in Seattle's public campaign financing program in the 2021 election

Office sought	Primary election	Full election cycle, inclusive of primary and general election
Mayor	\$400,000	\$800,000
City attorney	\$187,500	\$375,000
City council—citywide	\$187,500	\$375,000
City council—district	\$93,750	\$187,500

Source: GAO analysis of Seattle public campaign financing program law and documents. | GAO-25-106650

Candidate participation in Seattle's public campaign financing program for the 2019 and 2021 elections



Source: GAO analysis of Seattle, Washington public campaign financing program and elections data. | GAO-25-106650

^a In 2019, elections were only held for district-level city council members. There were no mayoral or city attorney elections in 2019. In 2021, elections were held for citywide but not district-level city council members.

DRAFT

Appendix III: Agency Comments

[placeholder for any comment letters]

Appendix IV: GAO Contact and Staff Acknowledgments

GAO Contact

Rebecca Gambler, (202) 512-8777 or gablerr@gao.gov

Staff Acknowledgements

In addition to the contact named above, Tom Jessor (Assistant Director), Michelle Loutoo (Analyst-in-Charge), Carmen Altes, Benjamin Crossley, Dominick Dale, Kelsey Griffiths, Tracey King, Jocelyn Kuo, Amanda Miller, Heidi Nielson, Jeff Tessin, Ashni Verma, and Alexander Waskiewicz made key contributions to this report.

Katie Hobbs
Governor

Thomas M. Collins
Executive Director



Mark S. Kimble
Chair

Steve M. Titla
Amy B. Chan
Galen D. Paton
Christina Werther
Commissioners

State of Arizona
Citizens Clean Elections Commission

1110 W. Washington St. - Suite 250 - Phoenix, Arizona 85007 - Tel (602) 364-3477
Fax (602) 364-3487 - www.azcleelections.gov

MEMORANDUM

To: Commissioners

From: Mike Becker, Policy Director

Date: 12/5/2024

Subject: 2024 Primary Candidate Audits

The following primary candidate audits have been completed and no issues were raised. They have been placed on the Commission agenda for your approval.

1. Jennifer Wynne – State Representative LD 22
2. Jonathon Hill – Corporation Commission
3. Josh Barnett – State Senate LD 2
4. Juan Mendez – State Representative LD 8
5. Lea Marquez Peterson – Corporation Commission
6. Leezah Sun – State Senate LD 22
7. Rachel Walden – Corporation Commission
8. Ylenia Aguilar – Corporation Commission
9. Shawn Wildman – State Representative LD 1
10. Steve Markegard – State Representative LD 25

CITIZENS CLEAN ELECTIONS COMMISSION

Report on Agreed-Upon Procedures

**Jennifer Wynne
Participating Candidate for
State Representative - District 22
Primary Election 2024**



Independent Accountants' Report on
Applying Agreed-Upon Procedures

To the Chairman and Members of the
Citizens Clean Elections Commission
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Jennifer Wynne's (the Candidate)'s 2024 Qualifying Period Recap (QPR) Report which covers the period from August 1, 2023 through July 30, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Jennifer Wynne. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

Fester & Chapman, PLLC

October 25, 2024

Summary of Procedures and Findings

1. Preliminary Procedures

- a) Contractor will obtain a copy of the candidate's campaign finance report for the reporting period.

Finding

We obtained the Candidate's QPR report from the Arizona Secretary of State's Website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance report to identify any unusual items requiring follow-up during fieldwork.

Finding

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

Finding

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

2. Fieldwork Procedures

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 4th Quarter Report.

Finding

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

Finding

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

Finding

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements one month prior to the election date (beginning on the first of the month), the month including the election day, and one month after the election day (ending on the last of the month) in the reporting period and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance report.

Finding

We selected two deposits (total population tested) and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance report.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the July 2024 bank statement and the 2024 Qualifying Period Recap Report.

Finding

The Candidate's 2024 Qualifying Period Recap Report campaign finance report listed a balance of \$3,523.78 at July 30, 2024. The Candidate's campaign bank account statement listed a balance of \$4,598.78 at July 31, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

Finding

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

Finding

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

Finding

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

Finding

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

Finding

We reviewed the supporting documentation for five early contributions reported in the Candidate's Campaign finance report and determined the name of the contributors for the contributions was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance report, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

Finding

No other types of cash receipts were reported in the Candidate's Campaign finance report during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

Finding

No in-kind contributions were reported in the Candidate's Campaign finance report during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance report and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance report.

Finding

We reviewed five expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance report.

Finding

We reviewed five expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance report.

- Agree the amount of the expenditure to the campaign account bank statement.

Finding

We reviewed five expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

Finding

We reviewed five expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

Finding

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

Finding

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

Finding

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

Finding

The Candidate did not report any debt on the 2024 Qualifying Period Recap Report.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

Finding

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

CITIZENS CLEAN ELECTIONS COMMISSION

Report on Agreed-Upon Procedures

**Jonathon Hill
Participating Candidate for
Corporation Commissioner
Primary Election 2024**



Independent Accountants' Report on
Applying Agreed-Upon Procedures

To the Chairman and Members of the
Citizens Clean Elections Commission
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Jonathon Hill's (the Candidate)'s 2024 Qualifying Period Recap (QPR) Report which covers the period from August 1, 2023 through July 30, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Jonathon Hill. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

Fester & Chapman, PLLC

October 17, 2024

Summary of Procedures and Findings

1. Preliminary Procedures

- a) Contractor will obtain a copy of the candidate's campaign finance report for the reporting period.

Finding

We obtained the Candidate's QPR report from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance report to identify any unusual items requiring follow-up during fieldwork.

Finding

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

Finding

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

2. Fieldwork Procedures

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 4th Quarter Report.

Finding

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

Finding

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

Finding

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements one month prior to the election date (beginning on the first of the month), the month including the election day, and one month after the election day (ending on the last of the month) in the reporting period and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance report.

Finding

We selected five deposits and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance report.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the July 2024 bank statement and the 2024 Qualifying Period Recap Report.

Finding

The Candidate's 2024 Qualifying Period Recap Report campaign finance report listed a balance of \$673.62 at July 30, 2024. The Candidate's campaign bank account statement listed a balance of \$46,049.57 at July 31, 2024. The Candidate is continuing on to the General Election.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

Finding

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

Finding

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

Finding

Early contributions received during the reporting period did not exceed the \$33,884 limit for a Corporation Commission candidate.

- (iv) Check compliance with the maximum personal contribution limits.

Finding

Personal contributions received during the reporting period did not exceed the \$1,800 limit for a Corporation Commission candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

Finding

We reviewed the supporting documentation for ten early contributions reported in the Candidate's Campaign finance report and determined the name of the contributors for the contributions was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance report, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

Finding

No other types of cash receipts were reported in the Candidate's Campaign finance report during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

Finding

No in-kind contributions were reported in the Candidate's Campaign finance report during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance report and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance report.

Finding

We reviewed six expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance report.

Finding

We reviewed six expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance report.

- Agree the amount of the expenditure to the campaign account bank statement.

Finding

We reviewed five expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

Finding

We reviewed six expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

Finding

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

Finding

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

Finding

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

Finding

The Candidate did not report any debt on the 2024 Qualifying Period Recap Report.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

Finding

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

CITIZENS CLEAN ELECTIONS COMMISSION

Report on Agreed-Upon Procedures

**Josh Barnett
Participating Candidate for
State Senator - District 2
Primary Election 2024**



Independent Accountants' Report on
Applying Agreed-Upon Procedures

To the Chairman and Members of the
Citizens Clean Elections Commission
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Josh Barnett's (the Candidate)'s 2024 Qualifying Period Recap (QPR) Report which covers the period from August 1, 2023 through July 30, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Josh Barnett. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

Fester & Chapman, PLLC

October 30, 2024

Summary of Procedures and Findings

1. Preliminary Procedures

- a) Contractor will obtain a copy of the candidate's campaign finance report for the reporting period.

Finding

We obtained the Candidate's QPR report from the Arizona Secretary of State's Website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance report to identify any unusual items requiring follow-up during fieldwork.

Finding

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

Finding

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

2. Fieldwork Procedures

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 4th Quarter Report.

Finding

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

Finding

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

Finding

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements one month prior to the election date (beginning on the first of the month), the month including the election day, and one month after the election day (ending on the last of the month) in the reporting period and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance report.

Finding

We selected five deposits and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance report.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the July 2024 bank statement and the 2024 Qualifying Period Recap Report.

Finding

The Candidate's 2024 Qualifying Period Recap Report campaign finance report listed a balance of \$0.00 at July 30, 2024. The Candidate's campaign bank account statement listed a balance of \$538.00 at July 31, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

Finding

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

Finding

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

Finding

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

Finding

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

Finding

We reviewed the supporting documentation for five early contributions reported in the Candidate's Campaign finance report and determined the name of the contributors for the contributions was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance report, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

Finding

No other types of cash receipts were reported in the Candidate's Campaign finance report during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

Finding

No in-kind contributions were reported in the Candidate's Campaign finance report during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance report and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance report.

Finding

We reviewed five expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance report.

Finding

We reviewed five expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance report.

- Agree the amount of the expenditure to the campaign account bank statement.

Finding

We reviewed five expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

Finding

We reviewed five expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

Finding

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

Finding

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

Finding

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

Finding

The Candidate did not report any debt on the 2024 Qualifying Period Recap Report.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

Finding

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

CITIZENS CLEAN ELECTIONS COMMISSION

Report on Agreed-Upon Procedures

**Juan Mendez
Participating Candidate for
State Representative - District 8
Primary Election 2024**



Independent Accountants' Report on
Applying Agreed-Upon Procedures

To the Chairman and Members of the
Citizens Clean Elections Commission
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Juan Mendez's (the Candidate)'s 2024 Qualifying Period Recap (QPR) Report which covers the period from August 1, 2023 through July 30, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Juan Mendez. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

Fester & Chapman, PLLC

October 28, 2024

Summary of Procedures and Findings

1. Preliminary Procedures

- a) Contractor will obtain a copy of the candidate's campaign finance report for the reporting period.

Finding

We obtained the Candidate's QPR report from the Arizona Secretary of State's Website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance report to identify any unusual items requiring follow-up during fieldwork.

Finding

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

Finding

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

2. Fieldwork Procedures

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 4th Quarter Report.

Finding

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

Finding

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

Finding

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements one month prior to the election date (beginning on the first of the month), the month including the election day, and one month after the election day (ending on the last of the month) in the reporting period and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance report.

Finding

We selected five deposits and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance report.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the July 2024 bank statement and the 2024 Qualifying Period Recap Report.

Finding

The Candidate's 2024 Qualifying Period Recap Report campaign finance report listed a balance of \$8,170.58 at July 30, 2024. The Candidate's campaign bank account statement listed a balance of \$10,843.15 at July 31, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

Finding

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

Finding

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

Finding

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

Finding

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

Finding

We reviewed the supporting documentation for five early contributions reported in the Candidate's Campaign finance report and determined the name of the contributors for the contributions was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance report, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

Finding

No other types of cash receipts were reported in the Candidate's Campaign finance report during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

Finding

No in-kind contributions were reported in the Candidate's Campaign finance report during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance report and perform the following:
 - (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance report.

Finding

We reviewed five expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance report.

Finding

We reviewed five expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance report.

- Agree the amount of the expenditure to the campaign account bank statement.

Finding

We reviewed five expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

Finding

We reviewed five expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

Finding

During testing of five expenditures, we noted one that was a joint expenditure with two other candidates. We determined that the amount paid represented the Candidate's proportionate share of the total cost

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

Finding

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

Finding

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

Finding

The Candidate did not report any debt on the 2024 Qualifying Period Recap Report.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

Finding

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

CITIZENS CLEAN ELECTIONS COMMISSION

Report on Agreed-Upon Procedures

**Lea Marquez Peterson
Participating Candidate for
Corporation Commissioner
Primary Election 2024**



Independent Accountants' Report on
Applying Agreed-Upon Procedures

To the Chairman and Members of the
Citizens Clean Elections Commission
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Lea Marquez Peterson's (the Candidate)'s 2024 Qualifying Period Recap (QPR) Report, which covers the period from August 1, 2023 through July 30, 2024 (the reporting period), was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Lea Marquez Peterson. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

Fester & Chapman, PLLC

October 14, 2024

Summary of Procedures and Findings

1. Preliminary Procedures

- a) Contractor will obtain a copy of the candidate's campaign finance report for the reporting period.

Finding

We obtained the Candidate's QPR report from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance report to identify any unusual items requiring follow-up during fieldwork.

Finding

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

Finding

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

2. Fieldwork Procedures

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 4th Quarter Report.

Finding

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

Finding

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

Finding

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements one month prior to the election date (beginning on the first of the month), the month including the election day, and one month after the election day (ending on the last of the month) in the reporting period and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance report.

Finding

We selected five deposits and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance report.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the July 2024 bank statement and the 2024 Qualifying Period Recap Report.

Finding

The Candidate's 2024 Qualifying Period Recap Report campaign finance report listed a balance of \$63.35 at July 30, 2024. The Candidate's campaign bank account statement listed a balance of \$2,163.35 at July 31, 2024. The Candidate is continuing on to the General Election.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

Finding

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

Finding

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

Finding

Early contributions received during the reporting period did not exceed the \$33,834 limit for a Corporation Commission candidate.

- (iv) Check compliance with the maximum personal contribution limits.

Finding

Personal contributions received during the reporting period did not exceed the \$1,800 limit for a Corporation Commission candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

Finding

We reviewed the supporting documentation for ten contributions reported in the Candidate's Campaign finance report and determined the name of the contributors for the contributions was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance report, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

Finding

No other types of cash receipts were reported in the Candidate's Campaign finance report during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

Finding

No in-kind contributions were reported in the Candidate's Campaign finance report during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance report and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance report.

Finding

We reviewed five expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance report.

Finding

We reviewed five expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance report.

- Agree the amount of the expenditure to the campaign account bank statement.

Finding

We reviewed five expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

Finding

We reviewed five expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

Finding

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

Finding

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

Finding

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

Finding

The Candidate did not report any debt on the 2024 Qualifying Period Recap Report.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

Finding

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

CITIZENS CLEAN ELECTIONS COMMISSION

Report on Agreed-Upon Procedures

**Leezah Sun
Participating Candidate for
State Senator - District 22
Primary Election 2024**



Independent Accountants' Report on
Applying Agreed-Upon Procedures

To the Chairman and Members of the
Citizens Clean Elections Commission
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Leezah Sun's (the Candidate)'s 2024 Qualifying Period Recap (QPR) Report which covers the period from August 1, 2023 through July 30, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Leezah Sun. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

Fester & Chapman, PLLC

October 25, 2024

Summary of Procedures and Findings

1. Preliminary Procedures

- a) Contractor will obtain a copy of the candidate's campaign finance report for the reporting period.

Finding

We obtained the Candidate's QPR report from the Arizona Secretary of State's Website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance report to identify any unusual items requiring follow-up during fieldwork.

Finding

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

Finding

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

2. Fieldwork Procedures

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 4th Quarter Report.

Finding

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

Finding

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

Finding

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements one month prior to the election date (beginning on the first of the month), the month including the election day, and one month after the election day (ending on the last of the month) in the reporting period and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance report.

Finding

We selected two deposits (total population tested) and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance report.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the July 2024 bank statement and the 2024 Qualifying Period Recap Report.

Finding

The Candidate's 2024 Qualifying Period Recap Report campaign finance report listed a balance of \$2,563.04 at July 30, 2024. The Candidate's campaign bank account statement listed a balance of \$1,343.53 at July 31, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

Finding

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

Finding

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

Finding

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

Finding

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

Finding

We reviewed the supporting documentation for five early contributions reported in the Candidate's Campaign finance report and determined the name of the contributors for the contributions was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance report, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

Finding

No other types of cash receipts were reported in the Candidate's Campaign finance report during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

Finding

No in-kind contributions were reported in the Candidate's Campaign finance report during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance report and perform the following:
 - (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance report.

Finding

We reviewed five expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance report.

Finding

We reviewed five expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance report.

- Agree the amount of the expenditure to the campaign account bank statement.

Finding

We reviewed five expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

Finding

We reviewed five expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

Finding

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

Finding

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

Finding

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

Finding

The Candidate did not report any debt on the 2024 Qualifying Period Recap Report.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

Finding

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

CITIZENS CLEAN ELECTIONS COMMISSION

Report on Agreed-Upon Procedures

**Rachel Walden
Participating Candidate for
Corporation Commissioner
Primary Election 2024**



Independent Accountants' Report on
Applying Agreed-Upon Procedures

To the Chairman and Members of the
Citizens Clean Elections Commission
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Rachel Walden's (the Candidate)'s 2024 Qualifying Period Recap (QPR) Report which covers the period from August 1, 2023 through July 30, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Rachel Walden. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

Fester & Chapman, PLLC

October 10, 2024

Summary of Procedures and Findings

1. Preliminary Procedures

- a) Contractor will obtain a copy of the candidate's campaign finance report for the reporting period.

Finding

We obtained the Candidate's QPR report from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance report to identify any unusual items requiring follow-up during fieldwork.

Finding

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

Finding

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

2. Fieldwork Procedures

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 4th Quarter Report.

Finding

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

Finding

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

Finding

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements one month prior to the election date (beginning on the first of the month), the month including the election day, and one month after the election day (ending on the last of the month) in the reporting period and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance report.

Finding

We selected five deposits and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance report.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the July 2024 bank statement and the 2024 Qualifying Period Recap Report.

Finding

The Candidate's 2024 Qualifying Period Recap Report campaign finance report listed a balance of negative (\$327.40) at July 30, 2024. The Candidate's campaign bank account statement listed a balance of \$891.06 at July 31, 2024. The Candidate is continuing on to the General Election.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

Finding

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

Finding

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

Finding

Early contributions received during the reporting period did not exceed the \$33,884 limit for a Corporation Commission candidate.

- (iv) Check compliance with the maximum personal contribution limits.

Finding

Personal contributions received during the reporting period did not exceed the \$1,800 limit for a Corporation Commission candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

Finding

We reviewed the supporting documentation for five early contributions reported in the Candidate's Campaign finance report and determined the name of the contributors for the contributions was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance report, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

Finding

No other types of cash receipts were reported in the Candidate's Campaign finance report during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

Finding

No in-kind contributions were reported in the Candidate's Campaign finance report during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance report and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance report.

Finding

We reviewed five expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance report.

Finding

We reviewed five expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance report.

- Agree the amount of the expenditure to the campaign account bank statement.

Finding

We reviewed five expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

Finding

We reviewed five expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

Finding

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

Finding

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

Finding

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

Finding

The Candidate did not report any debt on the 2024 Qualifying Period Recap Report.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

Finding

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

CITIZENS CLEAN ELECTIONS COMMISSION

Report on Agreed-Upon Procedures

**Ylenia Aguilar
Participating Candidate for
Corporation Commissioner
Primary Election 2024**



Independent Accountants' Report on
Applying Agreed-Upon Procedures

To the Chairman and Members of the
Citizens Clean Elections Commission
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Ylenia Aguilar's (the Candidate)'s 2024 Qualifying Period Recap (QPR) Report, which covers the period from August 1, 2023 through July 30, 2024 (the reporting period), was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Ylenia Aguilar. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

Fester & Chapman, PLLC

October 18, 2024

Summary of Procedures and Findings

1. Preliminary Procedures

- a) Contractor will obtain a copy of the candidate's campaign finance report for the reporting period.

Finding

We obtained the Candidate's QPR report from the Arizona Secretary of State's website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance report to identify any unusual items requiring follow-up during fieldwork.

Finding

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

Finding

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

2. Fieldwork Procedures

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 4th Quarter Report.

Finding

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

Finding

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

Finding

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements one month prior to the election date (beginning on the first of the month), the month including the election day, and one month after the election day (ending on the last of the month) in the reporting period and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance report.

Finding

We selected five deposits and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance report.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the July 2024 bank statement and the 2024 Qualifying Period Recap Report.

Finding

The Candidate's 2024 Qualifying Period Recap Report campaign finance report listed a balance of \$41,255.08 at July 30, 2024. The Candidate's campaign bank account statement listed a balance of \$41,961.47 at July 31, 2024. The Candidate is continuing on to the General Election.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

Finding

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

Finding

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

Finding

Early contributions received during the reporting period did not exceed the \$33,834 limit for a Corporation Commission candidate.

- (iv) Check compliance with the maximum personal contribution limits.

Finding

Personal contributions received during the reporting period did not exceed the \$1,800 limit for a Corporation Commission candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

Finding

We reviewed the supporting documentation for ten contributions reported in the Candidate's Campaign finance report and determined the name of the contributors for the contributions was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance report, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

Finding

No other types of cash receipts were reported in the Candidate's Campaign finance report during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

Finding

No in-kind contributions were reported in the Candidate's Campaign finance report during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance report and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance report.

Finding

We reviewed ten expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance report.

Finding

We reviewed ten expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance report.

- Agree the amount of the expenditure to the campaign account bank statement.

Finding

We reviewed ten expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

Finding

We reviewed ten expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

Finding

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

Finding

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

Finding

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

Finding

The Candidate did not report any debt on the 2024 Qualifying Period Recap Report.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

Finding

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

CITIZENS CLEAN ELECTIONS COMMISSION

Report on Agreed-Upon Procedures

**Shawn Wildman
Participating Candidate for
State Representative - District 1
Primary Election 2024**



Independent Accountants' Report on
Applying Agreed-Upon Procedures

To the Chairman and Members of the
Citizens Clean Elections Commission
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Shawn Wildman's (the Candidate)'s 2024 Qualifying Period Recap (QPR) Report which covers the period from August 1, 2023 through July 30, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Shawn Wildman. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

Fester & Chapman, PLLC

October 30, 2024

Summary of Procedures and Findings

1. Preliminary Procedures

- a) Contractor will obtain a copy of the candidate's campaign finance report for the reporting period.

Finding

We obtained the Candidate's QPR report from the Arizona Secretary of State's Website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance report to identify any unusual items requiring follow-up during fieldwork.

Finding

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

Finding

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

2. Fieldwork Procedures

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 4th Quarter Report.

Finding

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

Finding

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

Finding

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements one month prior to the election date (beginning on the first of the month), the month including the election day, and one month after the election day (ending on the last of the month) in the reporting period and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance report.

Finding

We selected one deposit (total population tested) and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance report.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the July 2024 bank statement and the 2024 Qualifying Period Recap Report.

Finding

The Candidate's 2024 Qualifying Period Recap Report campaign finance report listed a balance of \$0.48 at July 30, 2024. The Candidate's campaign bank account statement listed a balance of \$10.00 at July 31, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

Finding

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

Finding

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

Finding

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

Finding

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

Finding

We reviewed the supporting documentation for five early contributions reported in the Candidate's Campaign finance report and determined the name of the contributors for the contributions was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance report, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

Finding

No other types of cash receipts were reported in the Candidate's Campaign finance report during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

Finding

No in-kind contributions were reported in the Candidate's Campaign finance report during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance report and perform the following:

- (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance report.

Finding

We reviewed five expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance report.

Finding

We reviewed five expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance report.

- Agree the amount of the expenditure to the campaign account bank statement.

Finding

We reviewed five expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

Finding

We reviewed five expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

Finding

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

Finding

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

Finding

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

Finding

The Candidate did not report any debt on the 2024 Qualifying Period Recap Report.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

Finding

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

CITIZENS CLEAN ELECTIONS COMMISSION

Report on Agreed-Upon Procedures

**Steve Markegard
Participating Candidate for
State Representative - District 25
Primary Election 2024**



Independent Accountants' Report on
Applying Agreed-Upon Procedures

To the Chairman and Members of the
Citizens Clean Elections Commission
Phoenix, Arizona

We have performed the procedures enumerated below, which were specified and agreed to by the State of Arizona Citizens Clean Elections Commission (the Commission), solely to assist the Commission in evaluating whether Steve Markegard's (the Candidate)'s 2024 Qualifying Period Recap (QPR) Report which covers the period from August 1, 2023 through July 30, 2024 (the reporting period) was prepared in compliance with Title 16, Articles 1 and 2 of the Arizona Revised Statutes, Campaign Contributions and Expenses, and the Citizens Clean Elections Act, and whether the reports complied with the rules of the Citizens Clean Elections Commission. The Candidate's management is responsible for the Campaign finance reports during the reporting period. The sufficiency of these procedures is solely the responsibility of those parties specified in this report. Consequently, we make no representation regarding the sufficiency of the procedures described below either for the purpose for which this report has been requested or for any other purpose.

The procedures and associated findings are presented on the subsequent pages.

We were engaged by the Commission to perform this agreed-upon procedures engagement and conducted our engagement in accordance with attestation standards established by the American Institute of Certified Public Accountants. We were not engaged to, and did not conduct an examination or review, the objective of which would be the expression of an opinion or conclusion, respectively, on the Campaign finance reports during the reporting period of Steve Markegard. Accordingly, we do not express such an opinion or conclusion. Had we performed additional procedures, other matters might have come to our attention that would have been reported to you.

We are required to be independent of the Commission and the Candidate and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements related to our agreed-upon procedures engagement.

This report is intended solely for the information and use of the parties listed in the first paragraph, and is not intended to be and should not be used by anyone other than those specified parties.

Fester & Chapman, PLLC

October 20, 2024

Summary of Procedures and Findings

1. Preliminary Procedures

- a) Contractor will obtain a copy of the candidate's campaign finance report for the reporting period.

Finding

We obtained the Candidate's QPR report from the Arizona Secretary of State's Website for the reporting period referred to above.

- b). Perform a desk review of the disbursements reported in the candidate's campaign finance report to identify any unusual items requiring follow-up during fieldwork.

Finding

We noted no unusual disbursements during our review.

- d). Contact the candidate or the campaign treasurer, as appropriate, to schedule a date to perform fieldwork. Discuss the nature of the documentation, which will be needed to perform the engagement and ascertain the location of the necessary documentation.

Finding

We contacted the Candidate to discuss the agreed-upon procedures, the timing of our procedures, and the documentation needed.

2. Fieldwork Procedures

- a) Contractor will contact the candidate to request the records for an agreed-upon procedures attest engagement. Candidates receiving audits after the Primary Election shall provide records from the election cycle through the 2024 Qualifying Period Recap Report. Candidates receiving audits after the General Election shall provide records from the election cycle through the 4th Quarter Report.

Finding

Commission staff sent an initial notice to the Candidate and informed the Candidate that we would be contacting them. We then communicated to the Candidate in a written request, the purpose of the request, agreed-upon procedures to be performed, documentation needed, and potential future requirements of the Candidate.

- b) The contractor shall contact the candidate and/or his or her representative(s) to discuss the purpose of the engagement, the general procedures to be performed and potential future requirements of the candidate, such as possible repayments to the Fund.

Finding

See comment in a) above.

- c) The Contractor shall contact or conduct an interview with the candidate and/or his or her representative(s) to discuss the bookkeeping policies and procedures utilized by the campaign committee.

Finding

The Candidate provided a description of bookkeeping policies and procedures utilized by the Campaign Committee.

- (i) Review bank statements one month prior to the election date (beginning on the first of the month), the month including the election day, and one month after the election day (ending on the last of the month) in the reporting period and perform the following:

- Select five (5) samples of deposits and withdrawals from the bank statements and determine that the transaction is properly reflected in the candidate's records and campaign finance report.

Finding

We selected five deposits and five withdrawals from the bank statements for the reporting period and determined that they appeared to be properly recorded in the Candidate's Campaign finance report.

- Perform a proof of receipts and disbursements for the reporting period, which is defined as reporting the ending balances of the July 2024 bank statement and the 2024 Qualifying Period Recap Report.

Finding

The Candidate's 2024 Qualifying Period Recap Report campaign finance report listed a balance of \$6.51 at July 30, 2024. The Candidate's campaign bank account statement listed a balance of \$6.51 at July 31, 2024.

- d) Using the dates and limits defined in the Arizona Citizens Clean Elections Guide, review the receipts reported in the candidate's campaign finance reports to determine the following:

- (i) The candidate accepted contributions only from individuals.

Finding

The contributions received during the reporting period appeared to be only from individuals.

- (ii) None of the contributions received from individuals exceed the early contribution limit.

Finding

Contributions received from individuals during the reporting period did not exceed the \$210 early contribution limit.

- (iii) Check compliance with the maximum early contribution limits.

Finding

Early contributions received during the reporting period did not exceed the \$5,293 limit for a Legislative candidate.

- (iv) Check compliance with the maximum personal contribution limits.

Finding

Personal contributions received during the reporting period did not exceed the \$910 limit for a Legislative candidate.

- e) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) contributions reported in the candidate's campaign finance report (not including the \$5 qualifying contributions) and agree to supporting documentation, which reflects the name of the contributor (for all contributions) and for individuals who contributed greater than \$100, which reflects the contributor's address, occupation and employer.

Finding

We reviewed the supporting documentation for five early contributions reported in the Candidate's Campaign finance report and determined the name of the contributors for the contributions was included on the support. For individuals who contributed over \$50, we determined that the contributor's address, occupation, and employer were also included on the support.

- (i) For other types of cash receipts reported on the candidate's campaign finance report, review supporting documentation and review for compliance with regulatory rules and laws and agree the receipt to inclusion in the campaign account bank statement.

Finding

No other types of cash receipts were reported in the Candidate's Campaign finance report during the reporting period.

- (ii) For in-kind contributions, review the supporting documentation and determine the methodology utilized to value the contribution and assess the reasonableness.

Finding

No in-kind contributions were reported in the Candidate's Campaign finance report during the reporting period.

- f) For both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) of cash expenditures reported in the candidate's campaign finance report and perform the following:
 - (i) Review supporting invoice or other documentation and agree amount to the amount reported in the candidate's finance report.

Finding

We reviewed five expenditures and agreed amounts to supporting invoices or other documentation to the Candidate's Campaign finance report.

- (ii) Determine that the name, address and nature of goods or services provided agree to the information reported in the candidate's campaign finance report.

Finding

We reviewed five expenditures and agreed the name, address, and nature of goods or services provided in the Candidate's Campaign finance report.

- Agree the amount of the expenditure to the campaign account bank statement.

Finding

We reviewed five expenditures and agreed amounts to the Campaign account bank statements without exception.

- (iii) Determine whether the expenditure was made for a direct campaign purpose. Direct campaign purpose includes, but is not limited to, materials, communications, transportation, supplies and expenses used toward the election of the candidate.

Finding

We reviewed five expenditures and determined that all appeared to have been made for direct campaign purposes.

- If the expenditure is a joint expenditure made in conjunction with other candidates, determine that the amount paid represents the candidate's proportionate share of the total cost.

Finding

None of the expenditures we tested appeared to be for joint expenditures.

- g) Determine whether any petty cash funds have been established and, if so, determine how expenditures from these funds have been reflected in the accounting records. Determine whether aggregate petty cash funds exceed the limit of \$1,800.

Finding

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- (i) If applicable, for both the primary election and the general election, contractor will judgmentally select a 10% sample size with a minimum of five (5) candidate's petty cash fund expenditures and obtain supporting documentation for the expenditure. Determine whether the expenditure was for a direct campaign expense and whether the expenditure was in excess of the \$210 limit on petty cash expenditures.

Finding

Based on inquiry of the Candidate, the Candidate did not establish a petty cash fund during the reporting period.

- h) Determine if the candidate/campaign incurred any debt. If so, report all debt.

Finding

The Candidate did not report any debt on the 2024 Qualifying Period Recap Report.

- i) Contact the candidate and/or his or her representative(s) to discuss the preliminary engagement findings and recommendations that the Contractor anticipates presenting to the CCEC. During this conference, the Contractor will advise the candidate and/or his or her representative(s) of their right to respond to the preliminary findings and the projected timetable for the issuance of the final issuance of the report.

Finding

We reported our findings to the Candidate and the Candidate did not provide responses to our findings.

Katie Hobbs
Governor

Thomas M. Collins
Executive Director



Mark S. Kimble
Chair

Damien R. Meyer
Steve M. Titla
Galen D. Paton
Amy B. Chan
Commissioners

**State of Arizona
Citizens Clean Elections Commission**

1110 W. Washington - Suite 250 - Phoenix, Arizona 85007 - Tel (602) 364-3477 - Fax (602) 364-3487 - www.azcleelections.gov

MEMORANDUM

To: Commissioners

From: Thomas Collins, Executive Director and Mike Becker, Policy Director

Date: December 5, 2024

Subject: Proposed 2025 Calendar Year Budget

The Commission operates under system of caps that operate on a calendar year basis. We are asking the Commission to approve:

1. the 2025 expenditure cap (\$); \$27,962,216
2. the 2024 administration and enforcement expenditure cap (\$); \$2,796,221
3. the 2024 public education (paid media) expenditure cap (\$); \$2,796,221
4. the projection of 2025 candidate funding disbursements (\$);0
5. the projection of no excess funds in the Clean Elections Fund in 2025.

Expenditure Cap on Total Expenses

In compliance with A.R.S. § 16-949, the Commission projects an expenditure cap for each calendar year for all expenses under the Act, including candidate funding. *Id.* That expenditure cap, in turn, may be exceeded during a four-year period so long as the difference is made up by a cap reduction in a subsequent year.

The Commission's projected expenditure cap for 2025 is \$27,962,216

Specific Categories of Expenses

The Commission categorizes operating expenses using four categories under the expenditure cap: Administration/Enforcement, Public Education, Voter Education and Candidate Funding. Our overhead costs are apportioned by a 50/50 split between Administration/Enforcement and Voter Education. Personal Services and Employee Related Expenses are apportioned by allocated staff-time between administration/enforcement and voter education responsibilities.

Administrative/Enforcement

The Clean Elections Act ("Act") permits the Commission to spend up to 10 percent of the calendar year expenditure cap for administrative and enforcement costs (A.R.S. §16-949 (B)). Administrative and Enforcement expenditures are projected to be: \$2,348,850.

Public Education

The Commission may apply up to ten percent of the yearly expenditure cap for reasonable and necessary expense associated with public education, including participation and the purposes of the Act. A.R.S. §16-949 (C). Public education expenditures are projected at \$2,000,000.

Voter Education and Implementation of the Act

The Commission may make reasonable and necessary expenditures to implement the Act, including expenditures for voter education pursuant to A.R.S. 16-956(A). A.R.S. § 16-949(D) These expenditures are not subject to any cap. Id. Voter Education and Implementation Expenditures are projected at \$1,323,900.

Candidate Funding

Section 16-954(c) provides that the Commission annually project the “amount of clean elections funding for which all candidates will have qualified. . . for the following calendar year.”

There will be \$0 in candidate funding in calendar year 2025.

Other Projections

The Act provides that the Commission make two projections each year relating to the balance of and availability of funds in the Clean Elections Fund.

Section 16-954(B) provides that the Commission shall project the amount of money that will be collected in the fund over the next four years and the availability of those funds. The statute instructs the Commission to compare that projection to projected expenditures “under the assumption that expected expenses will be at the expenditure limit in § 16-949, subsection A” to determine whether there are “excess monies” in the fund.

This year, staff recommends that the Commission determine that there are no excess monies in the fund based on the chart below.

Calendar Year	2025	2026	2027	2028
Projected Revenue	\$5,005,500	\$5,652,000	\$5,005,500	\$5,177,000
Projected Expenses (Assuming at expenditure limit)	\$27,962,216	\$27,962,216	\$27,962,216	\$27,962,216
Difference	\$(22,956,716)	\$(22,310,216)	\$(22,956,716)	\$(22,785,216)

Section 16-954(C) also provides that the Commission shall annually “announce whether the amount that the [C]ommission plans to spend the following year pursuant to § 16-949[A] . . . exceeds the projected amount of clean elections funding.” The statute continues by stating that if the Commission “determines that the fund contains insufficient monies or the spending cap would be exceeded were all candidates’ accounts fully funded,” then the commission may take steps to adjust the funding available to candidates.

Staff believes that the fund contains sufficient monies to fully fund participating candidates in 2024 without exceeding the expenditure cap, as adjusted for carryover funds as described above. Therefore, staff does not recommend that the Commission take steps to adjust candidate funding.

Prop 211 – Voters Right to Know Act

The passage of Proposition 211, Voters Right to Know Act (VRKA), established a 1% surcharge on civil and criminal penalties to help offset costs incurred implementing the VRKA.

As of November 1, 2024, the VRKA fund balance stands at: \$341,014.

The VRKA requires the Commission to review the funds available and to determine if it is appropriate to continue with the 1% surcharge. Based on the above-mentioned fund balance and with the VRKA being implemented for the first time in 2024, it is staff’s recommendation to continue the 1% surcharge.

	2024 Actuals (as of Nov 1)	2025 Projections
<i>Expenses</i>		
Personal Services	\$ 297,490	\$ 500,000
ERE	113,605	190,000
<i>Total Personal & ERE</i>	<u>411,095</u>	<u>690,000</u>
Professional & Outside Services		
Attorney General Legal Services	77,883	80,000
External Legal Services	833,666	750,000
Temperary Agency Services	85	40,000
Information and Communication Technology Consulting Services	55,564	173,800
Other Professional Outside Services	101,291	375,000
<i>Total Professional & Outside Services</i>	<u>1,068,489</u>	<u>1,418,800</u>
Travel-In State	3,537	4,500
Travel Out-of-State	0	5,000
<i>Total Travel</i>	<u>3537</u>	<u>9,500</u>
Other Operating Expenditures		
Risk Management Charges	1,150	2,000
DOA Finance Divison	755	7,500
Other External Data Processing	23	50
External Telecomm Charges	6,096	11,500
Other External Telecom Service	-	4,000
AFIS Usage and Development	1,138	2,000
Rent Charges to State Agency	37,200	38,000
Rental of Other Machinery & Equip	-	500
Miscellaneous Rent	-	1,500
Internal Acct/Budg/Financial Services	29,902	30,000
Repair & Maintenance - Other Equip	1,111	2,500
Other Repair & Maintenance	-	2,000
Software Support and Maintenance	-	3,500
Office Supplies	558	3,500
Other Oppering Supplies	-	750
Conference, Education & Training Reg.	588	5,000
Advertising	-	250
External Printing	3,536	2,000
Postage & Delivery	1,271	4,500
Awards	-	3,500
Dues	660	2,000
Books Subscriptions & Publications	5,896	8,000
Other Miscellaneous Operating/Sponsorships	3,750	1,000
<i>Total Other Operating Expenditures</i>	<u>93,634</u>	<u>135,550</u>
Aid to Individua/Organization	-	50,000
Capital Equipment	-	-
Non-Capital Equipment	5,519	30,000
Transfers (other state agencies)	-	15,000
		<u>95,000</u>
Total Expenses	\$ 1,582,274	2,348,850

	2024 Actuals (as of Nov 1)	2025 Projections
<i>Expenses</i>		
Personal Services	\$ 279,092	\$ 500,000
ERE	101,015	190,000
<i>Total Personal & ERE</i>	<u>380,107</u>	<u>690,000</u>
Professional & Outside Services		
Public Ed- Paid Media, Social Media, etc	2,000,000	2,000,000
Debates, VEG	4,055,850	-
Attorney General Legal Services	77,883	80,000
Temporary Agency Services	-	40,000
Information and Communication Technology Consulting Services	144,039	273,800
Other Professional Outside Services	219,774	650,000
<i>Total Professional & Outside Services</i>	<u>6,497,546</u>	<u>3,043,800</u>
Travel-In State	961	5,000
Travel Out-of-State	2,845	10,000
<i>Total Travel</i>	<u>3,806</u>	<u>15,000</u>
Other Operating Expenditures		
DOA Financial Division	755	7,500
Risk Management Charges	1,150	3,000
Other External Data Processing	6,244	6,000
AFIS Usage and Development	1,138	2,000
External Telecom Charges	6,602	10,000
Other External Telecom Service	-	6,500
Rent Charges to State Agency	37,200	38,000
Rental of Info Tech Equipment	-	1,100
Rental of Other Machinery and Equipment	-	1,500
Miscellaneous Rent	5,054	10,000
Internal Acct/Budg/Financial Services	29,902	30,000
Repair & Maintenance - Info Tech PCLAN	-	1,000
Repair & Maintenance - Buildings	-	1,000
Repair & Maintenance - Other Equip	980	3,500
Other Repair & Maintenance	-	3,500
Software Support and Maintenance	160	4,500
Uniforms	-	750
Office Supplies	-	2,500
Computer Supplies	79	750
Other Operating Supplies	-	5,000
Conference Education & Training Reg.	1,264	10,000
Food	6,292	-
Advertising	-	-
Employee Tuition and Training	-	2,500
External Printing	1,881,939	15,000
Postage & Delivery	658,574	1,000
Awards	63	1,000
Entertainment & Promo Items	30,671	30,000
Other Miscellaneous Operating	839	5,000
Dues	75	1,000
Books, Subscriptions & Publications	-	1,500
<i>Total Other Operating Expenditures</i>	<u>6,724,831</u>	<u>205,100</u>
Capital Equipment	-	-
Non-Capital Equipment	6,140	30,000
Transfers (other state agencies)	-	30,000
Total Expenses	\$ 9,556,580	3,323,900

	2024 Actuals	2025	2026	2027	2028
<i>Revenues</i>					
Court Assessments	\$ 5,353,216	\$ 5,000,000	\$ 5,000,000	\$ 5,000,000	\$ 5,000,000
Commission Assessments	342,314	2,000	1,000	2,000	1,000
\$5 Tax Donations	-	-	-	-	-
\$5 Candidate Qualifying Contributions	85,695	-	650,000	-	175,000
Miscellaneous	54,498	3,500	1,000	3,500	1,000
Total Revenues	\$ 5,835,723	\$ 5,005,500	\$ 5,652,000	\$ 5,005,500	\$ 5,177,000

Expenditure Cap	Amount
Total Expenditure Cap	\$27,962,216
Public Ed Paid Media	\$2,796,221
Admin & Enforcement	\$2,796,221

2024 Tax Filers	Spending Limit Coefficient
3,495,277	\$8

Calendar Year	Beginning Fund	Revenues	Expenditure Cap	Ending Fund
2021	\$31,455,508	\$5,565,786	\$22,974,427	\$14,046,867
2022	\$14,046,867	\$5,715,629	\$23,919,756	(\$4,157,260)
2023	(\$4,157,260)	\$5,767,402	\$23,948,344	(\$22,338,202)
2024	(\$22,338,202)	\$5,835,723	\$24,087,966	(\$40,590,445)
2025	(\$40,590,445)	\$5,005,500	\$27,962,216	(\$63,547,161)

Calendar Year	Beginning Fund Balance	Projected Revenues	Projected Expenditure Cap	Ending Fund Balance
2025	\$20,909,728	\$5,005,500	\$27,962,216	(\$2,046,988)
2026	(\$2,046,988)	\$5,652,000	\$27,962,216	(\$24,357,204)
2027	(\$24,357,204)	\$5,005,500	\$27,962,216	(\$47,313,920)
2028	(\$47,313,920)	\$5,177,000	\$27,962,216	(\$70,099,136)

Calendar Year	Beginning Fund Balance	Projected Revenues	Projected Expenditures	Ending Fund Balance
2024	\$28,319,427	\$5,835,723	\$9,438,002	\$24,717,148
2025	\$24,717,148	\$5,005,500	\$5,672,750	\$24,049,898
2026	\$24,049,898	\$5,652,000	\$10,000,000	\$19,701,898
2027	\$19,701,898	\$5,177,000	\$6,000,000	\$18,878,898

***Proposed CEC Meeting Dates
January - June 2025***

Month	<i>Date</i>	<i>State Holiday – Office Closed</i>
January	<i>30</i>	<i>New Year's Day, Jan 1st & MLK Day, Jan 20th</i>
February	<i>27</i>	<i>President's Day, Feb 17th</i>
March	<i>27</i>	
April	<i>24</i>	
May	<i>TBD</i>	<i>Memorial Day, May 26th</i>
June	<i>26</i>	



During the months of January – June 2025, staff estimates commission meetings will be held once a month. All meeting dates are on Thursday and scheduled to begin at 9:30 a.m.

In the event additional meetings are required, Staff will work directly with each Commissioner to determine availability and ensure we have a quorum for the meeting.