



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

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

**Date:** Thursday, June 26, 2025

**Time:** 10:00 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 June 26, 2025. This meeting will be held at 10:00 a.m. **This meeting will be held in person and virtually. The meeting location will be open by 9:45 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@azcleanelections.gov](mailto:ccec@azcleanelections.gov).

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

**Join Zoom Meeting**

**<https://us02web.zoom.us/j/82191015647>**

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Please note that members of the public that choose to use the Zoom video link must keep their microphone muted for the duration of the meeting. If a member of the public wishes to speak, they may use the Zoom raise hand feature and once called on, unmute themselves on Zoom once the meeting is open for public comment.

Members of the public may participate via Zoom by computer, tablet or telephone. A dial-in option is also available but you will not be able to use the Zoom raise hand feature, so the meeting administrator will assist phone attendees. Please keep yourself muted unless you are prompted to speak.

The Commission may allow time for public comment on any item on the agenda. 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 May 22, 2025.
- 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 the regulatory agenda. The legislative update includes bills that have or may be considered for action by the Arizona legislature or the Governor. Materials are included in the Commission packet available on its website or by request at [ccec@azcleelections.gov](mailto:ccec@azcleelections.gov).

- IV. Discussion and Possible Action on Advisory Opinion Requested by Fair Democracy Regarding Application of the Definition of Campaign Media Spending to Public Communications.
- V. Discussion and Possible Action on 5-year Rule Review Report for Submission to the Governor's Regulatory Review Council.

VI. 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

VII. 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 24th day of June, 2025  
Citizens Clean Elections Commission  
Thomas M. Collins, Executive Director

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THE STATE OF ARIZONA  
CITIZENS CLEAN ELECTIONS COMMISSION  
  
REPORTER'S TRANSCRIPT OF PUBLIC MEETING

Phoenix, Arizona  
May 22, 2025  
10:00 a.m.

By: Kathryn A. Blackwelder, RPR  
Certified Reporter  
Certificate No. 50666

**CERTIFIED  
TRANSCRIPT**

Page 2	Page 4
<p>1 PUBLIC MEETING BEFORE THE CITIZENS CLEAN 2 ELECTIONS COMMISSION convened at 10:00 a.m. on May 22, 3 2025, at the State of Arizona, Clean Elections 4 Commission, 1110 West Washington, Conference Room, 5 Phoenix, Arizona, in the presence of the following 6 Board Members: 7 8 Mr. Mark Kimble, Chairman 9 Mr. Galen Paton 10 Ms. Amy Chan 11 Ms. Christina Werther 12 Mr. Steve Titla 13 14 OTHERS PRESENT: 15 Thomas M. Collins, Executive Director 16 Mike Becker, Policy Director 17 Avery Xola, Voter Education Manager 18 Alec Shaffer, Web Content Manager 19 Mary O'Grady, Osborn Maledon 20 Shayna Stuart, Taft Law 21 Cathy Herring, Meeting Planner, KCA 22 Yasmin Alvarado, Member of the Public 23 Commissioner Galen Paton's Brother, Member 24 of the Public 25</p>	<p>1 Is there a second? 2 COMMISSIONER PATON: I'll second. 3 CHAIRMAN KIMBLE: It's been moved and 4 seconded that we approve the minutes. I'll call the 5 roll. 6 Commissioner Chan. 7 COMMISSIONER CHAN: Aye. 8 CHAIRMAN KIMBLE: Commissioner Werther. 9 COMMISSIONER WERTHER: Aye. 10 CHAIRMAN KIMBLE: Commissioner Paton. 11 COMMISSIONER PATON: Aye. 12 CHAIRMAN KIMBLE: Chair votes aye. 13 The minutes are approved 4-to-nothing. 14 Item III, discussion and possible action on 15 the Executive Director's Report. 16 Tom. 17 MR. COLLINS: Yes. Thank you, Commissioners. 18 I just wanted to hit some of the highlights here. Our 19 primary -- special primary election for Congressional 20 District 7, that process is under way and we will be 21 holding debates for the Republican and Democratic 22 primaries in Tucson at the Arizona Public Media 23 studios. And we have all -- confirmation from all the 24 candidates for that, and we'll have a -- and we are -- 25 also will have a digital Voter Education Guide</p>
Page 3	Page 5
<p>1 P R O C E E D I N G 2 CHAIRMAN KIMBLE: Good morning. Agenda 3 Item I is the call to order. It's 10:00 a.m. on 4 May 22nd, 2025. I call this meeting of the Citizens 5 Clean Elections Commission to order. 6 With that, we will take attendance. 7 Commissioners, please identify yourselves for the 8 record. 9 COMMISSIONER WERTHER: Christina Werther. 10 COMMISSIONER PATON: Galen Paton. 11 COMMISSIONER CHAN: Amy Chan. 12 CHAIRMAN KIMBLE: And I'm Mark Kimble. We 13 have a quorum. Four of the five of us are here. 14 Item II, discussion and possible action on 15 the minutes from the April 24th, 2025 meeting. 16 Commissioners, you have the minutes from our 17 April meeting in your packets. Is there any 18 discussion? 19 (No response.) 20 CHAIRMAN KIMBLE: Hearing none, is there a 21 motion to approve the minutes? 22 COMMISSIONER WERTHER: I motion to approve 23 the minutes for April 24th, 2025. 24 CHAIRMAN KIMBLE: Thank you, 25 Commissioner Werther.</p>	<p>1 available for that. So we are pretty excited about the 2 opportunity there. And that will, as in our debates in 3 the regular election years, that will be available to 4 be distributed widely to newspapers, radio stations, 5 television stations, and the like. 6 The -- 7 COMMISSIONER PATON: I have a couple 8 questions. 9 MR. COLLINS: Sure, please. 10 CHAIRMAN KIMBLE: Commissioner Paton. 11 COMMISSIONER PATON: So that's where PBS 12 is -- 13 MR. COLLINS: Correct. 14 COMMISSIONER PATON: -- in Tucson? 15 MR. COLLINS: Yes. Yes. 16 COMMISSIONER PATON: And are the primary 17 ones, is it on the same night, Republican and Democrat? 18 MR. COLLINS: They're on the -- I believe 19 they're on the 8th and 9th, so -- and I think it's 20 Republicans 8th, Democrats 9th. 21 COMMISSIONER PATON: Okay. 22 MR. COLLINS: And if you're interested, I 23 mean, Gina will be able to -- she's -- we'll be able to 24 follow up with you about attending -- 25 COMMISSIONER PATON: Okay.</p>

Page 6	Page 8
<p>1 MR. COLLINS: -- if you're interested.</p> <p>2 CHAIRMAN KIMBLE: Thank you,</p> <p>3 Commissioner Paton.</p> <p>4 Tom.</p> <p>5 MR. COLLINS: Okay. Related to the voter</p> <p>6 education, I want to highlight this -- that the</p> <p>7 Governor signed HB2376, which will expand the Voter</p> <p>8 Education Guide that's mailed to registered voters to</p> <p>9 include county-wide and county supervisors candidates.</p> <p>10 I think this is a really good bill. It will fill in a</p> <p>11 gap that exists, and in -- especially in those</p> <p>12 non-statewide years, the voters routinely call us or</p> <p>13 call the counties and say, you know, where do I find</p> <p>14 that information. So that will -- I think that's a</p> <p>15 good addition to fill out the materials that folks are</p> <p>16 looking for there. And it passed unanimously and --</p> <p>17 and we didn't have to testify.</p> <p>18 I wanted to highlight one other bill. The</p> <p>19 Governor is going through, I don't know how many bills</p> <p>20 she has, and there are a number that are being vetoed,</p> <p>21 but this one was interesting, and it doesn't deal with</p> <p>22 us directly, but it's a bill that would -- creates a</p> <p>23 180-day deadline for filing officers to act on campaign</p> <p>24 finance complaints. So acting on them, you know, I'm</p> <p>25 not sure I know precisely what that means under the</p>	<p>1 got selected as a Flinn-Brown Fellow, so I'm going to</p> <p>2 highlight that. Deference to Gina writing this for me</p> <p>3 and -- but I'm excited about it, you know, I --</p> <p>4 COMMISSIONER CHAN: Mr. -- Mr. Chairman and</p> <p>5 Tom.</p> <p>6 If I could just congratulate you on that,</p> <p>7 Tom. That is such an accomplishment and an honor and</p> <p>8 well deserved. And I know that Gina has been a</p> <p>9 proponent of this, and it's a wonderful opportunity,</p> <p>10 and so wanted to recognize that as well. It's just</p> <p>11 exciting for -- that she has been a part of it for so</p> <p>12 long, and that now you'll be able to -- to be a part of</p> <p>13 it as well. So congrats.</p> <p>14 CHAIRMAN KIMBLE: Yeah. And I join that,</p> <p>15 Amy. And it's worth pointing out that -- that the</p> <p>16 office has had several previous recipients, including</p> <p>17 Gina and Avery.</p> <p>18 MR. COLLINS: Yeah. And I --</p> <p>19 COMMISSIONER CHAN: Oh, my gosh. Did not</p> <p>20 mean to leave out Avery. My apologies. Thank you,</p> <p>21 Mr. Chairman.</p> <p>22 MR. COLLINS: Yeah. No, that's right. And I</p> <p>23 assume we'll have more in the future too.</p> <p>24 It looks like Commissioner Titla has his hand</p> <p>25 up.</p>
Page 7	Page 9
<p>1 statute, but the effect of it is that if the -- if a</p> <p>2 filing officer just doesn't do anything with the</p> <p>3 complaint within a certain period of time, then it</p> <p>4 essentially -- it gets dismissed by operation of law.</p> <p>5 It also allows the filing officer to keep that clock</p> <p>6 going, extend that clock if they need to. So it</p> <p>7 doesn't affect us directly, but it is kind of</p> <p>8 interesting.</p> <p>9 For purposes of what we do under the Clean</p> <p>10 Elections Act, we have -- our deadlines operate</p> <p>11 differently. We have a -- if we don't take action on a</p> <p>12 Clean Elections Act complaint or we don't take action</p> <p>13 on a -- at all on a -- and when I say "action," we</p> <p>14 don't -- we -- staff action on a voter protection -- a</p> <p>15 voter --</p> <p>16 MR. BECK: Right to Know.</p> <p>17 MR. COLLINS: -- Voters' Right to Know Act</p> <p>18 complaint, then some people -- or, in the case of a</p> <p>19 voter -- Voters' Right to Know Act, any -- any voter</p> <p>20 can file an action against the Commission for not</p> <p>21 acting. So it was a little different incentive</p> <p>22 structure there. But it also -- it also applies to all</p> <p>23 filing officers, not just the Secretary of State's</p> <p>24 Office.</p> <p>25 Gina was nice enough to write up this -- I</p>	<p>1 COMMISSIONER TITLA: Yeah. Chairman, this is</p> <p>2 Steve Titla. I just joined. Tried to get on earlier,</p> <p>3 but -- thanks.</p> <p>4 CHAIRMAN KIMBLE: Thank you, Commissioner</p> <p>5 Titla. The record will show that you've joined us now</p> <p>6 and we have all five Commissioners present.</p> <p>7 Tom, do you want to continue?</p> <p>8 MR. COLLINS: Yeah. Yeah. I wanted to also</p> <p>9 highlight the other voter education work that is</p> <p>10 happening. And we just got through the last local</p> <p>11 election, so we'll be transitioning to the CD7, so</p> <p>12 that one -- that one had some interesting results, if</p> <p>13 anybody is paying attention to the Glendale Resort</p> <p>14 vote, if anyone has that -- that's undecided, I think,</p> <p>15 as of now. But Alec has been managing to -- that and</p> <p>16 keeping that up.</p> <p>17 And then Gina and Avery have been working</p> <p>18 with a variety of civics partners to work on how</p> <p>19 everyone can kind of coordinate the various events that</p> <p>20 are coming on the calendar.</p> <p>21 And the second episode of Beyond the Ballot</p> <p>22 AZ is up, and it's really kind of an interesting one,</p> <p>23 if you get a chance to listen to it. I -- I recommend</p> <p>24 all of you -- I mandate, if I can, and urge those who I</p> <p>25 can't to -- to listen to it and subscribe. This one is</p>


<p style="text-align: right;">Page 10</p> <p>1 great because it's a -- and I didn't know this. But 2 prior to 1988 in Arizona, the Arizona Constitution 3 specified that a statewide officeholder had to be a 4 man. And the Legislature put on, with the backing of 5 the Arizona Chamber, a measure to take that language 6 out, even though it was already essentially obviated by 7 other aspects of the Constitution, to recognize that 8 Governor Mofford had become Governor.</p> <p>9 And it -- and it's really kind of a thing I 10 didn't know. And we did an interview with an ASU law 11 professor named Erin Scharff, who is very good at 12 talking about this content and -- I -- I don't know. 13 It's very nerdy, but -- but -- you didn't know that, 14 did you?</p> <p>15 CHAIRMAN KIMBLE: I don't believe I did.</p> <p>16 I --</p> <p>17 MR. COLLINS: See.</p> <p>18 CHAIRMAN KIMBLE: It sounds vaguely familiar, 19 but I --</p> <p>20 MR. COLLINS: I didn't believe it. When 21 the -- when the -- when the production team brought it 22 to us, I -- I didn't believe them.</p> <p>23 CHAIRMAN KIMBLE: Astounding.</p> <p>24 MR. COLLINS: Anyway, the biennial 25 adjustments are out from the Secretary's Office,</p>	<p style="text-align: right;">Page 12</p> <p>1 confidentiality, essentially, happening, that the -- 2 and so a lot of the argument spent -- one of the -- the 3 sort of most engaged sort of interlocutor on the -- on 4 the panel spent a lot of time sort of talking about, 5 well, what if somebody puts money -- X-dollars into 6 a -- into some organization, and that money later ends 7 up in -- with an organization they don't like and that 8 becomes revealed.</p> <p>9 And sort of the issue is, well, on the one 10 hand -- their argument that the AFP makes is that 11 that's somehow forced association. But the association 12 has happened. You know, that's the -- it's the 13 question of whether or not they have a right to have 14 that association remain private, right. The fact it 15 gets revealed is a fact that exists. So, anyways, it's 16 kind of an interesting argument. I thought it was -- I 17 thought -- I think if you want to understand the 18 statute and the issues, the First Amendment issues, 19 it's worth watching.</p> <p>20 And that's -- I believe that completes the 21 report.</p> <p>22 COMMISSIONER PATON: I have a question about 23 the biennial --</p> <p>24 MR. COLLINS: Oh, sure.</p> <p>25 COMMISSIONER PATON: -- adjustments.</p>
<p style="text-align: right;">Page 11</p> <p>1 that's -- and that's important.</p> <p>2 And then -- and then the only -- I think the 3 other thing that I wanted to mention directly is that 4 we had the oral argument in the 9th Circuit on the Prop 5 211 case. That -- that's a much more straightforward 6 First Amendment claim by the -- a group called 7 Americans for Prosperity. You know, essentially 8 they -- it's a wide-ranging legal complaint and, you 9 know, the argument in the, you know --</p> <p>10 You know, it's hard -- it's hard to predict 11 and we couldn't -- you know, and we won't know for some 12 time what the -- what the 9th Circuit will do, but, you 13 know, I -- I watched it, and Commissioner Kimble 14 attended as well, and, I mean, I felt very comfortable 15 with -- with how our attorney, Eric Fraser, presented 16 our arguments. And so we'll see -- we'll see -- we'll 17 see what happens there.</p> <p>18 Just to spend a second more on this, there's 19 a -- this is really a case about whether or not you 20 have a First Amendment right to just basically have 21 your donors be essentially confidential and whether or 22 not the donors have a right to have their relationship 23 with the upstream users of their money confidential, 24 right.</p> <p>25 So there's two -- there's two types of</p>	<p style="text-align: right;">Page 13</p> <p>1 CHAIRMAN KIMBLE: Commissioner Paton.</p> <p>2 COMMISSIONER PATON: When -- when is the 3 Lieutenant Governor going to happen?</p> <p>4 MR. COLLINS: So -- so this is interesting. 5 So, Mr. Chairman, Commissioner Paton, the Lieutenant 6 Governor doesn't have a -- an office identified in the 7 Commission -- in the -- in the statute. And the 8 assumption -- and I've got to be honest with you. 9 That's a really good question, because we may have to 10 look -- may have to find the answer. I don't know how 11 the regular campaign finance system is going to assume 12 that.</p> <p>13 In the federal system, the President and Vice 14 President are part of the same account. It's a 15 presidential campaign account, and when the Vice 16 President becomes -- is identified as the Vice 17 President, they're essentially just wrapped up in the 18 President's account. And I assume that that's -- that 19 that's the case.</p> <p>20 Although, you know, now that you mention it, 21 I suspect that, if there's an opportunity for people to 22 raise additional funds and get an extra limit, they 23 might try to do that. So -- so I will follow up on 24 that. I don't know the answer. But for Clean 25 Elections purposes, there's not additional money</p>

<p style="text-align: right;">Page 14</p> <p>1 because of the --</p> <p>2 COMMISSIONER PATON: Well, when is -- when</p> <p>3 are we voting for them, the next time or --</p> <p>4 MR. COLLINS: Oh, 2026, yeah. Yeah, there</p> <p>5 will be --</p> <p>6 COMMISSIONER PATON: So you would think that</p> <p>7 would be in there.</p> <p>8 MR. COLLINS: Well, we'd have -- they'd have</p> <p>9 to amend the Clean Elections Act, which they are</p> <p>10 unlikely to do for that purpose. But I think it's an</p> <p>11 interesting question in general that I hadn't thought</p> <p>12 about, so we can -- we can look at that, because it'll</p> <p>13 be interesting to find out.</p> <p>14 CHAIRMAN KIMBLE: Interesting point.</p> <p>15 Any other questions or discussions from the</p> <p>16 Commission?</p> <p>17 (No response.)</p> <p>18 CHAIRMAN KIMBLE: Thank you, Tom.</p> <p>19 Item IV is discussion and possible action on</p> <p>20 MUR 25-03 and proposed repayment order from Monica</p> <p>21 Timberlake, 2024 participating candidate for State</p> <p>22 Legislature.</p> <p>23 The next item is the Executive Director's</p> <p>24 request that the Commission issue an order requiring a</p> <p>25 candidate to repay Clean Elections funds and make a</p>	<p style="text-align: right;">Page 16</p> <p>1 view on why we are where we are. I'm going to share</p> <p>2 this with you and then -- for you to review. It's two</p> <p>3 pages.</p> <p>4 CHAIRMAN KIMBLE: Tom, can you briefly</p> <p>5 summarize --</p> <p>6 MR. COLLINS: Yeah, I will.</p> <p>7 CHAIRMAN KIMBLE: -- this for people who</p> <p>8 don't have a copy of it?</p> <p>9 MR. COLLINS: Sure. Sure. So, you know,</p> <p>10 the -- the e-mail we got basically outlines that the</p> <p>11 candidate, respondent has had some health issues of a</p> <p>12 variety of kinds and -- and is -- therefore, was not</p> <p>13 able to, in their view, communicate with us over the</p> <p>14 past, I want to say, six months maybe.</p> <p>15 MR. BECK: At least six months.</p> <p>16 MR. COLLINS: Yeah, six months. So we -- and</p> <p>17 she also, you know, says that she will be able to start</p> <p>18 working on getting everything filed and turned in as</p> <p>19 soon -- starting at the beginning of June. So that's</p> <p>20 -- that's the upshot.</p> <p>21 From a staff perspective, the way we think</p> <p>22 about this is we've had -- you know, we've had</p> <p>23 situations that have come up where folks have ignored</p> <p>24 us, not sent us an e-mail ahead of the meeting, we have</p> <p>25 had a situation where people filed something before the</p>
<p style="text-align: right;">Page 15</p> <p>1 reason to believe determination related to a</p> <p>2 participating candidate's financial reports and</p> <p>3 records. We'll hear first from the Executive Director,</p> <p>4 followed by Monica Timberlake or her representative, if</p> <p>5 either are present.</p> <p>6 Tom.</p> <p>7 Oh, let me just mention one other thing.</p> <p>8 Shayna Stuart is here and will serve as the</p> <p>9 Commission's independent advisor for this matter. So</p> <p>10 if any of you have any legal questions, please direct</p> <p>11 them to Shayna.</p> <p>12 Okay, Tom.</p> <p>13 MR. COLLINS: Commissioners, thank you. I --</p> <p>14 just as a -- as a -- you probably had a chance to read</p> <p>15 over the memo and the proposed repayment order. The --</p> <p>16 excuse me. The factual template here is essentially --</p> <p>17 it's similar to what we've had with some of the -- with</p> <p>18 some other matters. The candidate didn't -- received</p> <p>19 funding, stopped filing campaign finance reports, and</p> <p>20 then declined to communicate effectively with either</p> <p>21 the auditors or the staff.</p> <p>22 I will say, just to -- just for your</p> <p>23 purposes, and I have it for you if you would like, we</p> <p>24 have an e-mail we received this morning from</p> <p>25 Ms. Timberlake where she sort of outlines her point of</p>	<p style="text-align: right;">Page 17</p> <p>1 meeting. And this is sort of in a -- we've got a --</p> <p>2 where we've got an e-mail saying, here is what's going</p> <p>3 on, but no -- and no filing of any kind associated with</p> <p>4 this. So the staff inclination is that the framework</p> <p>5 we have facilitates us moving ahead, regardless, and</p> <p>6 gives us, I think, the mechanism to ensure that we're</p> <p>7 able to hold the candidate to a schedule.</p> <p>8 So our inclination is -- I mean, based on</p> <p>9 where we are at, is that we don't have any filing, any</p> <p>10 representation around the -- at all around the use of</p> <p>11 the funds. We don't have a firm -- you know, we have a</p> <p>12 -- we have a statement along the lines of, I'm going to</p> <p>13 work on this starting this day for as long as it takes,</p> <p>14 but that's not like a I will have this done by X date.</p> <p>15 And then I think that, as sympathetic as we want to be</p> <p>16 to candidates who have issues of various kinds, you</p> <p>17 know, it just doesn't amount to, for us, a sufficient</p> <p>18 basis for us to sort of ask you to pause on this.</p> <p>19 What we instead would like to do is to have</p> <p>20 -- we would -- we would ask that you make -- determine</p> <p>21 that there is reason to believe, as outlined in the</p> <p>22 memo, on the failure to file and the -- and the various</p> <p>23 accounting issues and that you approve the repayment</p> <p>24 order. You know, I mean, those are -- the repayment</p> <p>25 order is a real thing. I mean, it's -- I mean, I don't</p>



<p style="text-align: right;">Page 18</p> <p>1 want to -- I don't want to leave you with the 2 impression that it's not a real action. It is, and 3 it's an appealable agency action. That's a serious 4 thing. But I don't -- I just don't feel that we're in 5 a position as staff members to just kind of hope that 6 we hear something in a month at this point. 7 CHAIRMAN KIMBLE: And just -- just to be 8 clear -- just to be clear, according to the time stamp 9 on this, this e-mail was received 8:00 this morning, 10 two hours before the start of the -- of the meeting -- 11 MR. COLLINS: Yeah. 12 CHAIRMAN KIMBLE: -- after not hearing from 13 her for months? 14 MR. COLLINS: Correct. 15 CHAIRMAN KIMBLE: Okay. Any questions or 16 comments from Members of the Commission? 17 COMMISSIONER PATON: I would just say that 18 this is -- I'm -- I'm beyond frustrated with these 19 different instances. And the time of no getting back 20 to us, dealing with the auditors, anything, is quite 21 frustrating to me and I think we should proceed with 22 this. 23 CHAIRMAN KIMBLE: Let me -- 24 COMMISSIONER CHAN: Mr. Chairman. 25 CHAIRMAN KIMBLE: Let me just say,</p>	<p style="text-align: right;">Page 20</p> <p>1 issue. And when they just ghost us or send incomplete 2 material or just vanish, it's totally unacceptable. 3 Any other comments or -- 4 COMMISSIONER PATON: Yes. 5 CHAIRMAN KIMBLE: Commissioner Paton. 6 COMMISSIONER PATON: I mean, the election was 7 November 5th, and this is the middle of May, and -- 8 and, you know, I guess I've said what I needed to say. 9 CHAIRMAN KIMBLE: Any other Members of the 10 Commission wish to make any comments? 11 (No response.) 12 CHAIRMAN KIMBLE: Any Member of the 13 Commission wish to make a motion? 14 Commissioner Werther. 15 COMMISSIONER WERTHER: I move to approve the 16 Executive Director's recommendation that a reason to 17 believe violation of the Clean Elections Act and rules 18 has occurred in the action MUR 25-03 and also approve 19 the proposed repayment order. 20 CHAIRMAN KIMBLE: Thank you very much, 21 Commissioner Werther. 22 Is there a second? 23 COMMISSIONER PATON: I'll second it. 24 CHAIRMAN KIMBLE: Thank you, 25 Commissioner Paton.</p>
<p style="text-align: right;">Page 19</p> <p>1 Commissioner Paton, I completely agree with you. It's 2 very frustrating. 3 Commissioner Chan. 4 COMMISSIONER CHAN: Thanks, Mr. Chairman. I 5 echo Commissioner Paton's comments and yours. I have 6 been dismayed to see that people ignore staff's 7 attempts to help them come into compliance and only 8 respond when it becomes more of a legal liability for 9 them. I don't recall this being so common years ago. 10 Maybe -- maybe I've got rainbow colored glasses on with 11 my memories, but -- and while I sympathize with the, 12 you know, reasons presented by this particular 13 participating candidate, I -- I support going forward 14 with the vote today and support approving the repayment 15 order. 16 CHAIRMAN KIMBLE: Thank you, 17 Commissioner Chan. And I -- I agree with you. It 18 seems like this is something that's -- I don't know if 19 it's gotten worse, but it's certainly gotten more 20 frequent in this past election. 21 We have contracts, essentially, with 22 candidates that we will provide them public funds, and 23 in return they will use those funds in an appropriate 24 manner in their campaign and -- and account to us on 25 how they spent it, and it's kind of a black and white</p>	<p style="text-align: right;">Page 21</p> <p>1 It's been moved and seconded that we approve 2 the Commissioner -- the Executive Director's 3 recommendation in MUR 25-03 and the proposed repayment 4 order. I will call the roll. 5 Commissioner Werther. 6 COMMISSIONER WERTHER: Aye. 7 CHAIRMAN KIMBLE: Commissioner Paton. 8 COMMISSIONER PATON: Aye. 9 CHAIRMAN KIMBLE: Commissioner Chan. 10 COMMISSIONER CHAN: Aye. 11 CHAIRMAN KIMBLE: Commissioner Titla. 12 COMMISSIONER TITLA: Aye. 13 CHAIRMAN KIMBLE: Chair votes aye. 14 The motion is approved unanimously, 15 5-to-nothing. 16 Thank you, Tom. 17 Item V, discussion and possible action on 18 rulemaking related to participating candidate campaign 19 finance reporting, repayment, and release of Clean 20 Elections funds to participating candidates. 21 Commissioners, before you is a rulemaking 22 proposal developed by staff. It is designed to 23 emphasize participating candidates' obligations to file 24 timely and accurate campaign finance reports by, 25 number one, requiring candidates to submit an</p>

<p style="text-align: right;">Page 22</p> <p>1 additional attestation regarding the completeness and 2 accuracy of their reports before receiving funds, and 3 number two, placing candidates on notice that failure 4 to file timely reports after receiving funding may 5 result in a presumption that the funds have not been 6 used in accordance with the Act and rules. 7 Tom, is there anything you want to add to 8 this? 9 MR. COLLINS: Mr. Chairman, Commissioners, I 10 just want to add, you know, so this is designed -- one 11 of -- one of other -- and there may be others, but this 12 is our initial stab at trying to address the concerns 13 that you all have expressed, and correctly expressed. 14 From our perspective as staff members, the 15 issues with reporting, and particularly the audit, are 16 new. You know, if someone was late, usually the audit 17 will get them, you know -- you know, get them -- get 18 their attention. And for whatever reason, and we don't 19 know the reason, that has not been the case. You know, 20 I'm really not in a position where I can talk too much 21 about the merits of the cases we have, obviously, but 22 I -- but I -- but nevertheless, I think that, broadly 23 speaking, there are different reasons in every case, 24 and that's interesting in itself. I mean, so there's 25 not like a -- we're not aware of like a -- I can't</p>	<p style="text-align: right;">Page 24</p> <p>1 affirm that their reporting to that point is correct 2 and they understand everything, I think -- you know, 3 they do sign the contract at the beginning of the 4 process. You know, I'm just -- I'm hopeful that, you 5 know, an additional, essentially, certification, you 6 know, which amounts to -- it really amounts to -- when 7 you -- it would amount to, when you get the check 8 itself, you're signing off -- I mean, before you get 9 the check, you're just signing off, just so you know, 10 this is what you agreed to. If you've forgotten what 11 you agreed to back in -- 12 And also, the way we've written the rule, it 13 has specific points of emphasis that we are concerned 14 about, particularly, you know, the -- an issue we have 15 worked on on and off for decades is how to address, you 16 know, the -- how to address the role that consultants 17 play as sort of umbrella, you know, spenders. And 18 we've done several iterations of that over the years, 19 but this one at least wants to bring that up again and 20 say, hey, you know, if you're going to use a 21 consultant, you need to make sure that -- a complete 22 report will be a report that will make sure that all of 23 the related expenses that should be reported under that 24 consultant's expenditures are there, so... 25 CHAIRMAN KIMBLE: Thank you.</p>
<p style="text-align: right;">Page 23</p> <p>1 divine, from the information we have, some -- some 2 specific theme. 3 But systemically, you know, one of the -- one 4 of the issues is that the Clean Elections funding is 5 not distributed on a timeline that accords with the 6 campaign finance reports. So if you qualify on Monday, 7 and the report was -- or, I should say this another 8 way. If the period -- if the -- if the reporting 9 period closes on Monday and you are funded on Tuesday, 10 we're not going to hear from you until -- until, you 11 know, some weeks later. And it -- and it's -- and so 12 by the time -- you know, so essentially time will have 13 lapsed. 14 Anyways, and so the presumption we're putting 15 in place here would do two -- would serve to, A, 16 provide a clear notice to the candidates that, you 17 know, these -- these failure to files are -- are going 18 to have meaning in the context of Clean Elections, and 19 we think that itself may remedy the situation. In 20 other words, because the last thing I would think a 21 candidate would want to do in the middle of a -- in the 22 middle of a campaign is have to deal with a repayment 23 order. I mean, that would be a serious -- it's not a 24 meaningless thing. 25 And then I think that asking them to sort of</p>	<p style="text-align: right;">Page 25</p> <p>1 Are there any comments or questions from 2 Members of the Commission? 3 (No response.) 4 CHAIRMAN KIMBLE: Hearing none, do we have a 5 motion to publish this proposed rulemaking for public 6 comment? 7 COMMISSIONER WERTHER: I move to publish this 8 proposed rulemaking for comment. 9 CHAIRMAN KIMBLE: Thank you, 10 Commissioner Werther. 11 Is there a second? 12 COMMISSIONER PATON: Second it. 13 CHAIRMAN KIMBLE: It's been moved and 14 seconded that we propose this proposed -- publish this 15 proposed rulemaking for public comment. I will call 16 the roll. 17 Commissioner Werther. 18 COMMISSIONER WERTHER: Aye. 19 CHAIRMAN KIMBLE: Commissioner Paton. 20 COMMISSIONER PATON: Aye. 21 CHAIRMAN KIMBLE: Commissioner Chan. 22 COMMISSIONER CHAN: Aye. 23 CHAIRMAN KIMBLE: Commissioner Titla. 24 COMMISSIONER TITLA: Aye. 25 CHAIRMAN KIMBLE: Chair votes aye.</p>

Page 26	Page 28
<p>1 The motion is approved 5-to-nothing.</p> <p>2 Item VI, public comment. This is the time</p> <p>3 for consideration of comments and suggestions from the</p> <p>4 public. Action taken as a result of public comment</p> <p>5 will be limited to directing staff to study the matter</p> <p>6 or rescheduling the matter for further consideration</p> <p>7 and decision at a later date or responding to</p> <p>8 criticism. Please limit your comment to no more than</p> <p>9 two minutes.</p> <p>10 Does any member of the public wish to make</p> <p>11 comments at this time? Anyone on Zoom?</p> <p>12 (No response.)</p> <p>13 CHAIRMAN KIMBLE: Hearing none, the public</p> <p>14 may also send comments to the Commission by e-mail at</p> <p>15 ccec@azccleanelections.gov.</p> <p>16 Before we move to adjourn, Tom has an</p> <p>17 addition that we need to make to the motion on the</p> <p>18 rulemaking.</p> <p>19 MR. COLLINS: No. No. No. I'm sorry. It's</p> <p>20 just the dates that -- the proposed dates.</p> <p>21 COMMISSIONER WERTHER: We just skipped them.</p> <p>22 MR. COLLINS: Yeah.</p> <p>23 CHAIRMAN KIMBLE: Oh, we skipped them. Okay.</p> <p>24 Proposed meeting dates for the Commission</p> <p>25 from July through December. First of all, we are</p>	<p>1 Commissioner Werther.</p> <p>2 COMMISSIONER WERTHER: Aye.</p> <p>3 CHAIRMAN KIMBLE: Commissioner Paton.</p> <p>4 COMMISSIONER PATON: Aye.</p> <p>5 CHAIRMAN KIMBLE: Commissioner Chan.</p> <p>6 COMMISSIONER CHAN: Aye.</p> <p>7 CHAIRMAN KIMBLE: Commissioner Titla.</p> <p>8 COMMISSIONER TITLA: Aye.</p> <p>9 CHAIRMAN KIMBLE: Chair votes aye.</p> <p>10 We are adjourned. Thank you.</p> <p>11 (The meeting concluded at 10:32 a.m.)</p>
Page 27	Page 29
<p>1 meeting in June on -- what day are we meeting in June?</p> <p>2 COMMISSIONER WERTHER: That's a good</p> <p>3 question. The 26th.</p> <p>4 CHAIRMAN KIMBLE: We're meeting June 26th,</p> <p>5 and then after that we will be meeting on July 17th,</p> <p>6 August 28th, September 25th, October 23rd,</p> <p>7 November 20th, and December 11th, so mark your</p> <p>8 calendars. The Commission meetings will be held always</p> <p>9 on Thursday and scheduled to begin at 10:00 a.m. The</p> <p>10 schedule is subject to change, but this is the dates we</p> <p>11 now have.</p> <p>12 Okay. Is there a motion to adjourn?</p> <p>13 COMMISSIONER WERTHER: Do we need to take a</p> <p>14 motion on those or no?</p> <p>15 MR. COLLINS: We -- we have, but, you know,</p> <p>16 there's not actually a -- there's not actually a strict</p> <p>17 requirement.</p> <p>18 COMMISSIONER WERTHER: Okay. I motion to</p> <p>19 adjourn.</p> <p>20 CHAIRMAN KIMBLE: Thank you,</p> <p>21 Commissioner Werther.</p> <p>22 Is there a second?</p> <p>23 COMMISSIONER PATON: I'll second.</p> <p>24 CHAIRMAN KIMBLE: There's been a motion to</p> <p>25 adjourn that's been seconded. I will call the roll.</p>	<p>1 STATE OF ARIZONA )</p> <p>2 ) ss.</p> <p>3 COUNTY OF MARICOPA )</p> <p>4</p> <p>5 BE IT KNOWN that the foregoing proceedings</p> <p>6 were taken by me; that I was then and there a Certified</p> <p>7 Reporter of the State of Arizona; that the proceedings</p> <p>8 were taken down by me in shorthand and thereafter</p> <p>9 transcribed into typewriting under my direction; that</p> <p>10 the foregoing pages are a full, true, and accurate</p> <p>11 transcript of all proceedings had and adduced upon the</p> <p>12 taking of said proceedings, all to the best of my skill</p> <p>13 and ability.</p> <p>14</p> <p>15 I FURTHER CERTIFY that I am in no way related</p> <p>16 to nor employed by any of the parties hereto nor am I</p> <p>17 in any way interested in the outcome hereof.</p> <p>18</p> <p>19 DATED at Tempe, Arizona, this 23rd day of</p> <p>20 May, 2025.</p> <p>21</p> <p>22 </p> <p>23 Kathryn A. Blackwelder, RPR</p> <p>24 Certified Reporter #50666</p> <p>25</p>

<hr/> <p><b>1</b></p> <p><b>10:00</b> 3:3</p> <p><b>180-day</b> 6:23</p> <p><b>1988</b> 10:2</p> <hr/>	<p>19:24</p> <p><b>accounting</b> 17:23</p> <p><b>accuracy</b> 22:2</p> <p><b>accurate</b> 21:24</p> <p><b>act</b> 6:23 7:10,12,17,19 14:9 20:17 22:6</p> <hr/>	<p><b>approved</b> 4:13 21:14</p> <p><b>approving</b> 19:14</p> <p><b>April</b> 3:15,17,23</p> <p><b>argument</b> 11:4,9 12:2,10, 16</p> <p><b>arguments</b> 11:16</p> <p><b>Arizona</b> 4:22 10:2,5</p> <p><b>aspects</b> 10:7</p> <p><b>association</b> 12:11,14</p> <p><b>assume</b> 8:23 13:11,18</p> <hr/>	<p><b>biennial</b> 10:24 12:23</p> <p><b>bill</b> 6:10,18,22</p> <p><b>bills</b> 6:19</p> <p><b>black</b> 19:25</p> <p><b>briefly</b> 16:4</p> <p><b>bring</b> 24:19</p> <p><b>broadly</b> 22:22</p> <p><b>brought</b> 10:21</p> <hr/>
<hr/> <p><b>2</b></p> <p><b>2024</b> 14:21</p> <p><b>2025</b> 3:4,15,23</p> <p><b>2026</b> 14:4</p> <p><b>211</b> 11:5</p> <p><b>22nd</b> 3:4</p> <p><b>24th</b> 3:15,23</p> <p><b>25-03</b> 14:20 20:18 21:3</p> <hr/>	<p><b>acting</b> 6:24 7:21</p> <p><b>action</b> 3:14 4:14 7:11,12, 13,14,20 14:19 18:2,3 20:18 21:17</p> <p><b>add</b> 22:7,10</p> <p><b>addition</b> 6:15</p> <p><b>additional</b> 13:22,25 22:1 24:5</p> <p><b>address</b> 22:12 24:15,16</p> <p><b>adjustments</b> 10:25 12:25</p> <hr/>	<p><b>astounding</b> 10:23</p> <p><b>ASU</b> 10:10</p> <p><b>attempts</b> 19:7</p> <p><b>attendance</b> 3:6</p> <p><b>attended</b> 11:14</p> <p><b>attending</b> 5:24</p> <p><b>attention</b> 9:13 22:18</p> <p><b>attestation</b> 22:1</p> <p><b>attorney</b> 11:15</p> <p><b>audit</b> 22:15,16</p> <p><b>auditors</b> 15:21 18:20</p> <p><b>Avery</b> 8:17,20 9:17</p> <p><b>aware</b> 22:25</p> <p><b>aye</b> 4:7,9,11,12 21:6,8,10, 12,13</p> <p><b>AZ</b> 9:22</p> <hr/>	<p><b>C</b></p> <p><b>calendar</b> 9:20</p> <p><b>call</b> 3:3,4 4:4 6:12,13 21:4</p> <p><b>called</b> 11:6</p> <p><b>campaign</b> 6:23 13:11,15 15:19 19:24 21:18,24 23:6,22</p> <p><b>candidate</b> 14:21,25 15:18 16:11 17:7 19:13 21:18 23:21</p> <p><b>candidate's</b> 15:2</p> <p><b>candidates</b> 4:24 6:9 17:16 19:22 21:20,25 22:3 23:16</p> <p><b>candidates'</b> 21:23</p> <p><b>case</b> 7:18 11:5,19 13:19 22:19,23</p> <p><b>cases</b> 22:21</p> <p><b>CD7</b> 9:11</p> <p><b>certification</b> 24:5</p> <hr/>
<hr/> <p><b>4</b></p> <p><b>4-to-nothing</b> 4:13</p> <hr/>	<p><b>advisor</b> 15:9</p> <p><b>affect</b> 7:7</p> <hr/>	<p><b>affirm</b> 24:1</p> <p><b>AFP</b> 12:10</p> <p><b>agency</b> 18:3</p> <p><b>Agenda</b> 3:2</p> <p><b>agree</b> 19:1,17</p> <p><b>agreed</b> 24:10,11</p> <p><b>ahead</b> 16:24 17:5</p> <p><b>Alec</b> 9:15</p> <p><b>amend</b> 14:9</p> <p><b>Amendment</b> 11:6,20 12:18</p> <hr/>	<p><b>Chair</b> 4:12 21:13</p> <p><b>Chairman</b> 3:2,12,20,24 4:3,8,10,12 5:10 6:2 8:4, 14,21 9:1,4 10:15,18,23 13:1,5 14:14,18 16:4,7 18:7,12,15,23,24,25 19:4, 16 20:5,9,12,20,24 21:7,9, 11,13 22:9 24:25</p> <p><b>Chamber</b> 10:5</p> <p><b>Chan</b> 3:11 4:6,7 8:4,19 18:24 19:3,4,17 21:9,10</p> <p><b>chance</b> 9:23 15:14</p> <hr/>
<hr/> <p><b>5</b></p> <p><b>5-to-nothing</b> 21:15</p> <p><b>5th</b> 20:7</p> <hr/>	<p><b>affirm</b> 24:1</p> <p><b>AFP</b> 12:10</p> <p><b>agency</b> 18:3</p> <p><b>Agenda</b> 3:2</p> <hr/>	<p><b>B</b></p> <p><b>back</b> 18:19 24:11</p> <p><b>backing</b> 10:4</p> <p><b>Ballot</b> 9:21</p> <p><b>based</b> 17:8</p> <p><b>basically</b> 11:20 16:10</p> <p><b>basis</b> 17:18</p> <p><b>BECK</b> 7:16 16:15</p> <p><b>beginning</b> 16:19 24:3</p> <hr/>	<hr/>
<hr/> <p><b>7</b></p> <p><b>7</b> 4:20</p> <hr/>	<p><b>agree</b> 19:1,17</p> <p><b>agreed</b> 24:10,11</p> <p><b>ahead</b> 16:24 17:5</p> <p><b>Alec</b> 9:15</p> <hr/>	<hr/>	<hr/>
<hr/> <p><b>8</b></p> <p><b>8:00</b> 18:9</p> <p><b>8th</b> 5:19,20</p> <hr/>	<p><b>amend</b> 14:9</p> <p><b>Amendment</b> 11:6,20 12:18</p> <p><b>Americans</b> 11:7</p> <p><b>amount</b> 17:17 24:7</p> <p><b>amounts</b> 24:6</p> <p><b>Amy</b> 3:11 8:15</p> <p><b>apologies</b> 8:20</p> <p><b>appealable</b> 18:3</p> <p><b>applies</b> 7:22</p> <p><b>approve</b> 3:21,22 4:4 17:23 20:15,18 21:1</p> <hr/>	<hr/>	<hr/>
<hr/> <p><b>9</b></p> <p><b>9th</b> 5:19,20 11:4,12</p> <hr/>	<p><b>amounts</b> 24:6</p> <p><b>Amy</b> 3:11 8:15</p> <p><b>apologies</b> 8:20</p> <p><b>appealable</b> 18:3</p> <p><b>applies</b> 7:22</p> <p><b>approve</b> 3:21,22 4:4 17:23 20:15,18 21:1</p> <hr/>	<hr/>	<hr/>
<hr/> <p><b>A</b></p> <p><b>a.m.</b> 3:3</p> <p><b>accomplishment</b> 8:7</p> <p><b>accordance</b> 22:6</p> <p><b>accords</b> 23:5</p> <p><b>account</b> 13:14,15,18</p> <hr/>	<hr/>	<hr/>	<hr/>

<b>check</b> 24:7,9	<b>completeness</b> 22:1	<b>dealing</b> 18:20	<b>effectively</b> 15:20
<b>Christina</b> 3:9	<b>completes</b> 12:20	<b>debates</b> 4:21 5:2	<b>election</b> 4:19 5:3 9:11 19:20 20:6
<b>Circuit</b> 11:4,12	<b>compliance</b> 19:7	<b>decades</b> 24:15	<b>Elections</b> 3:5 7:10,12 13:25 14:9,25 20:17 21:20 23:4,18
<b>Citizens</b> 3:4	<b>concerned</b> 24:13	<b>declined</b> 15:20	<b>emphasis</b> 24:13
<b>civics</b> 9:18	<b>concerns</b> 22:12	<b>Deference</b> 8:2	<b>emphasize</b> 21:23
<b>claim</b> 11:6	<b>confidential</b> 11:21,23	<b>Democrat</b> 5:17	<b>ends</b> 12:6
<b>Clean</b> 3:5 7:9,12 13:24 14:9,25 20:17 21:19 23:4, 18	<b>confidentiality</b> 12:1	<b>Democratic</b> 4:21	<b>engaged</b> 12:3
<b>clear</b> 18:8 23:16	<b>confirmation</b> 4:23	<b>Democrats</b> 5:20	<b>ensure</b> 17:6
<b>clock</b> 7:5,6	<b>congrats</b> 8:13	<b>deserved</b> 8:8	<b>episode</b> 9:21
<b>closes</b> 23:9	<b>congratulate</b> 8:6	<b>designed</b> 21:22 22:10	<b>Eric</b> 11:15
<b>COLLINS</b> 4:17 5:9,13,15, 18,22 6:1,5 7:17 8:18,22 9:8 10:17,20,24 12:24 13:4 14:4,8 15:13 16:6,9, 16 18:11,14 22:9	<b>Congressional</b> 4:19	<b>determination</b> 15:1	<b>Erin</b> 10:11
<b>colored</b> 19:10	<b>Constitution</b> 10:2,7	<b>determine</b> 17:20	<b>essentially</b> 7:4 10:6 11:7, 21 12:1 13:17 15:16 19:21 23:12 24:5
<b>comfortable</b> 11:14	<b>consultant</b> 24:21	<b>developed</b> 21:22	<b>events</b> 9:19
<b>comments</b> 18:16 19:5 20:3,10	<b>consultant's</b> 24:24	<b>differently</b> 7:11	<b>excited</b> 5:1 8:3
<b>Commission</b> 3:5 7:20 13:7 14:16,24 18:16 20:10,13	<b>consultants</b> 24:16	<b>digital</b> 4:25	<b>exciting</b> 8:11
<b>Commission's</b> 15:9	<b>content</b> 10:12	<b>direct</b> 15:10	<b>excuse</b> 15:16
<b>Commissioner</b> 3:9,10, 11,22,25 4:2,6,7,8,9,10,11 5:7,10,11,14,16,21,25 6:3 8:4,19,24 9:1,4 11:13 12:22,25 13:1,2,5 14:2,6 18:17,24 19:1,3,4,5,17 20:4,5,6,14,15,21,23,25 21:2,5,6,7,8,9,10,11,12	<b>context</b> 23:18	<b>directly</b> 6:22 7:7 11:3	<b>Executive</b> 4:15 14:23 15:3 20:16 21:2
<b>Commissioners</b> 3:7,16 4:17 9:6 15:13 21:21 22:9	<b>continue</b> 9:7	<b>Director</b> 15:3	<b>exists</b> 6:11 12:15
<b>common</b> 19:9	<b>contract</b> 24:3	<b>Director's</b> 4:15 14:23 20:16 21:2	<b>expand</b> 6:7
<b>communicate</b> 15:20 16:13	<b>contracts</b> 19:21	<b>discussion</b> 3:14,18 4:14 14:19 21:17	<b>expenditures</b> 24:24
<b>complaint</b> 7:3,12,18 11:8	<b>coordinate</b> 9:19	<b>discussions</b> 14:15	<b>expenses</b> 24:23
<b>complaints</b> 6:24	<b>copy</b> 16:8	<b>dismayed</b> 19:6	<b>expressed</b> 22:13
<b>complete</b> 24:21	<b>correct</b> 5:13 18:14 24:1	<b>dismissed</b> 7:4	<b>extend</b> 7:6
<b>completely</b> 19:1	<b>correctly</b> 22:13	<b>distributed</b> 5:4 23:5	<b>extra</b> 13:22
	<b>counties</b> 6:13	<b>District</b> 4:20	
	<b>county</b> 6:9	<b>divine</b> 23:1	
	<b>county-wide</b> 6:9	<b>donors</b> 11:21,22	
	<b>couple</b> 5:7		
	<b>creates</b> 6:22		
		<b>E</b>	<b>F</b>
	<b>D</b>	<b>e-mail</b> 15:24 16:10,24 17:2 18:9	<b>facilitates</b> 17:5
	<b>date</b> 17:14	<b>earlier</b> 9:2	<b>fact</b> 12:14,15
	<b>day</b> 17:13	<b>echo</b> 19:5	<b>factual</b> 15:16
	<b>deadline</b> 6:23	<b>education</b> 4:25 6:6,8 9:9	<b>failure</b> 17:22 22:3 23:17
	<b>deadlines</b> 7:10	<b>effect</b> 7:1	<b>familiar</b> 10:18
	<b>deal</b> 6:21 23:22		<b>federal</b> 13:13

<b>feel</b> 18:4	<b>glasses</b> 19:10	<b>ignore</b> 19:6	15,23,25 19:16 20:5,9,12, 20,24 21:7,9,11,13 24:25
<b>Fellow</b> 8:1	<b>Glendale</b> 9:13	<b>II</b> 3:14	
<b>felt</b> 11:14	<b>good</b> 3:2 6:10,15 10:11 13:9	<b>III</b> 4:14	<b>kind</b> 7:7 9:19,22 10:9 12:16 17:3 18:5 19:25
<b>file</b> 7:20 17:22 21:23 22:4	<b>gosh</b> 8:19	<b>important</b> 11:1	<b>kinds</b> 16:12 17:16
<b>filed</b> 16:18,25	<b>Governor</b> 6:7,19 10:8 13:3,6	<b>impression</b> 18:2	
<b>files</b> 23:17	<b>great</b> 10:1	<b>incentive</b> 7:21	<b>L</b>
<b>filing</b> 6:23 7:2,5,23 15:19 17:3,9	<b>group</b> 11:6	<b>inclination</b> 17:4,8	<b>language</b> 10:5
<b>fill</b> 6:10,15	<b>guess</b> 20:8	<b>include</b> 6:9	<b>lapsed</b> 23:13
<b>finance</b> 6:24 13:11 15:19 21:19,24 23:6	<b>Guide</b> 4:25 6:8	<b>including</b> 8:16	<b>late</b> 22:16
<b>financial</b> 15:2		<b>incomplete</b> 20:1	<b>law</b> 7:4 10:10
<b>find</b> 6:13 13:10 14:13	<b>H</b>	<b>independent</b> 15:9	<b>leave</b> 8:20 18:1
<b>firm</b> 17:11	<b>hand</b> 8:24 12:10	<b>information</b> 6:14 23:1	<b>legal</b> 11:8 15:10 19:8
<b>Flinn-brown</b> 8:1	<b>happen</b> 13:3	<b>initial</b> 22:12	<b>Legislature</b> 10:4 14:22
<b>folks</b> 6:15 16:23	<b>happened</b> 12:12	<b>instances</b> 18:19	<b>liability</b> 19:8
<b>follow</b> 5:24 13:23	<b>happening</b> 9:10 12:1	<b>interested</b> 5:22 6:1	<b>Lieutenant</b> 13:3,5
<b>forced</b> 12:11	<b>hard</b> 11:10	<b>interesting</b> 6:21 7:8 9:12, 22 12:16 13:4 14:11,13,14 22:24	<b>limit</b> 13:22
<b>forgotten</b> 24:10	<b>HB2376</b> 6:7	<b>interlocutor</b> 12:3	<b>lines</b> 17:12
<b>forward</b> 19:13	<b>health</b> 16:11	<b>interview</b> 10:10	<b>listen</b> 9:23,25
<b>framework</b> 17:4	<b>hear</b> 15:3 18:6 23:10	<b>issue</b> 12:9 14:24 20:1 24:14	<b>local</b> 9:10
<b>Fraser</b> 11:15	<b>hearing</b> 3:20 18:12	<b>issues</b> 12:18 16:11 17:16, 23 22:15 23:4	<b>long</b> 8:12 17:13
<b>frequent</b> 19:20	<b>hey</b> 24:20	<b>item</b> 3:3,14 4:14 14:19,23 21:17	<b>lot</b> 12:2,4
<b>frustrated</b> 18:18	<b>highlight</b> 6:6,18 8:2 9:9	<b>iterations</b> 24:18	<b>M</b>
<b>frustrating</b> 18:21 19:2	<b>highlights</b> 4:18	<b>IV</b> 14:19	<b>mailed</b> 6:8
<b>funded</b> 23:9	<b>hit</b> 4:18		<b>make</b> 14:25 17:20 20:10, 13 24:21,22
<b>funding</b> 15:19 22:4 23:4	<b>hold</b> 17:7		<b>makes</b> 12:10
<b>funds</b> 13:22 14:25 17:11 19:22,23 21:20 22:2,5	<b>holding</b> 4:21	<b>J</b>	<b>man</b> 10:4
<b>future</b> 8:23	<b>honest</b> 13:8	<b>join</b> 8:14	<b>managing</b> 9:15
<b>G</b>	<b>honor</b> 8:7	<b>joined</b> 9:2,5	<b>mandate</b> 9:24
<b>Galen</b> 3:10	<b>hope</b> 18:5	<b>June</b> 16:19	<b>manner</b> 19:24
<b>gap</b> 6:11	<b>hopeful</b> 24:4	<b>K</b>	<b>Mark</b> 3:12
<b>general</b> 14:11	<b>hours</b> 18:10	<b>keeping</b> 9:16	<b>material</b> 20:2
<b>ghost</b> 20:1	<b>I</b>	<b>Kimble</b> 3:2,12,20,24 4:3, 8,10,12 5:10 6:2 8:14 9:4 10:15,18,23 11:13 13:1 14:14,18 16:4,7 18:7,12,	<b>materials</b> 6:15
<b>Gina</b> 5:23 7:25 8:2,8,17 9:17	<b>identified</b> 13:6,16		<b>matter</b> 15:9
	<b>identify</b> 3:7		<b>matters</b> 15:18
			<b>meaning</b> 23:18

<b>meaningless</b> 23:24	<b>nice</b> 7:25	<b>Paton</b> 3:10 4:2,10,11 5:7, 10,11,14,16,21,25 6:3 12:22,25 13:1,2,5 14:2,6 18:17 19:1 20:4,5,6,23,25 21:7,8	<b>professor</b> 10:11
<b>means</b> 6:25	<b>night</b> 5:17		<b>Prop</b> 11:4
<b>measure</b> 10:5	<b>non-statewide</b> 6:12		<b>proponent</b> 8:9
<b>mechanism</b> 17:6	<b>notice</b> 22:3 23:16		<b>proposal</b> 21:22
<b>Media</b> 4:22	<b>November</b> 20:7	<b>Paton's</b> 19:5	<b>proposed</b> 14:20 15:15 20:19 21:3
<b>meeting</b> 3:4,15,17 16:24 17:1 18:10	<b>number</b> 6:20 21:25 22:3	<b>pause</b> 17:18	<b>Prosperity</b> 11:7
<b>Member</b> 20:12	<hr/> <b>O</b> <hr/>	<b>paying</b> 9:13	<b>protection</b> 7:14
<b>members</b> 18:5,16 20:9 22:14	<b>obligations</b> 21:23	<b>PBS</b> 5:11	<b>provide</b> 19:22 23:16
<b>memo</b> 15:15 17:22	<b>obviated</b> 10:6	<b>people</b> 7:18 13:21 16:7, 25 19:6	<b>public</b> 4:22 19:22
<b>memories</b> 19:11	<b>occurred</b> 20:18	<b>period</b> 7:3 23:8,9	<b>purpose</b> 14:10
<b>mention</b> 11:3 13:20 15:7	<b>office</b> 7:24 8:16 10:25 13:6	<b>perspective</b> 16:21 22:14	<b>purposes</b> 7:9 13:25 15:23
<b>merits</b> 22:21	<b>officeholder</b> 10:3	<b>place</b> 23:15	<b>put</b> 10:4
<b>middle</b> 20:7 23:21,22	<b>officer</b> 7:2,5	<b>placing</b> 22:3	<b>puts</b> 12:5
<b>minutes</b> 3:15,16,21,23 4:4,13	<b>officers</b> 6:23 7:23	<b>play</b> 24:17	<b>putting</b> 23:14
<b>Mofford</b> 10:8	<b>operate</b> 7:10	<b>point</b> 14:14 15:25 18:6 24:1	<hr/> <b>Q</b> <hr/>
<b>Monday</b> 23:6,9	<b>operation</b> 7:4	<b>pointing</b> 8:15	<b>qualify</b> 23:6
<b>money</b> 11:23 12:5,6 13:25	<b>opportunity</b> 5:2 8:9 13:21	<b>points</b> 24:13	<b>question</b> 12:13,22 13:9 14:11
<b>Monica</b> 14:20 15:4	<b>oral</b> 11:4	<b>position</b> 18:5 22:20	<b>questions</b> 5:8 14:15 15:10 18:15
<b>month</b> 18:6	<b>order</b> 3:3,5 14:20,24 15:15 17:24,25 19:15 20:19 21:4 23:23	<b>precisely</b> 6:25	<b>quorum</b> 3:13
<b>months</b> 16:14,15,16 18:13	<b>organization</b> 12:6,7	<b>predict</b> 11:10	<hr/> <b>R</b> <hr/>
<b>morning</b> 3:2 15:24 18:9	<b>outlined</b> 17:21	<b>present</b> 9:6 15:5	<b>radio</b> 5:4
<b>motion</b> 3:21,22 20:13 21:14	<b>outlines</b> 15:25 16:10	<b>presented</b> 11:15 19:12	<b>rainbow</b> 19:10
<b>move</b> 20:15	<hr/> <b>P</b> <hr/>	<b>President</b> 13:13,14,16,17	<b>raise</b> 13:22
<b>moved</b> 4:3 21:1	<b>packets</b> 3:17	<b>President's</b> 13:18	<b>read</b> 15:14
<b>moving</b> 17:5	<b>pages</b> 16:3	<b>presidential</b> 13:15	<b>real</b> 17:25 18:2
<b>MUR</b> 14:20 20:18 21:3	<b>panel</b> 12:4	<b>presumption</b> 22:5 23:14	<b>reason</b> 15:1 17:21 20:16 22:18,19
<hr/> <b>N</b> <hr/>	<b>part</b> 8:11,12 13:14	<b>pretty</b> 5:1	<b>reasons</b> 19:12 22:23
<b>named</b> 10:11	<b>participating</b> 14:21 15:2 19:13 21:18,20,23	<b>previous</b> 8:16	<b>recall</b> 19:9
<b>needed</b> 20:8	<b>partners</b> 9:18	<b>primaries</b> 4:22	<b>received</b> 15:18,24 18:9
<b>nerdy</b> 10:13	<b>passed</b> 6:16	<b>primary</b> 4:19 5:16	<b>receiving</b> 22:2,4
<b>newspapers</b> 5:4	<b>past</b> 16:14 19:20	<b>prior</b> 10:2	<b>recipients</b> 8:16
		<b>private</b> 12:14	
		<b>proceed</b> 18:21	
		<b>process</b> 4:20 24:4	
		<b>production</b> 10:21	

<b>recognize</b> 8:10 10:7	<b>revealed</b> 12:8,15	<b>staff</b> 7:14 15:21 16:21 17:4 18:5 21:22 22:14	<b>testify</b> 6:17
<b>recommend</b> 9:23	<b>review</b> 16:2	<b>staff's</b> 19:6	<b>theme</b> 23:2
<b>recommendation</b> 20:16 21:3	<b>role</b> 24:16	<b>stamp</b> 18:8	<b>thing</b> 10:9 11:3 15:7 17:25 18:4 23:20,24
<b>record</b> 3:8 9:5	<b>roll</b> 4:5 21:4	<b>start</b> 16:17 18:10	<b>thought</b> 12:16,17 14:11
<b>records</b> 15:3	<b>routinely</b> 6:12	<b>starting</b> 16:19 17:13	<b>Timberlake</b> 14:21 15:4, 25
<b>registered</b> 6:8	<b>rule</b> 24:12	<b>State</b> 14:21	<b>time</b> 7:3 11:12 12:4 14:3 18:8,19 23:12
<b>regular</b> 5:3 13:11	<b>rulemaking</b> 21:18,21	<b>State's</b> 7:23	<b>timeline</b> 23:5
<b>related</b> 6:5 15:1 21:18 24:23	<b>rules</b> 20:17 22:6	<b>statement</b> 17:12	<b>timely</b> 21:24 22:4
<b>relationship</b> 11:22	<hr/> <b>S</b> <hr/>	<b>statewide</b> 10:3	<b>Titla</b> 8:24 9:1,2,5 21:11,12
<b>release</b> 21:19	<b>Scharff</b> 10:11	<b>stations</b> 5:4,5	<b>today</b> 19:14
<b>remain</b> 12:14	<b>schedule</b> 17:7	<b>statute</b> 7:1 12:18 13:7	<b>Tom</b> 4:16 6:4 8:5,7 9:7 14:18 15:6,12 16:4 21:16 22:7
<b>remedy</b> 23:19	<b>seconded</b> 4:4 21:1	<b>Steve</b> 9:2	<b>totally</b> 20:2
<b>repay</b> 14:25	<b>Secretary</b> 7:23	<b>stopped</b> 15:19	<b>transitioning</b> 9:11
<b>repayment</b> 14:20 15:15 17:23,24 19:14 20:19 21:3,19 23:22	<b>Secretary's</b> 10:25	<b>straightforward</b> 11:5	<b>Tucson</b> 4:22 5:14
<b>report</b> 4:15 12:21 23:7 24:22	<b>selected</b> 8:1	<b>structure</b> 7:22	<b>Tuesday</b> 23:9
<b>reported</b> 24:23	<b>send</b> 20:1	<b>Stuart</b> 15:8	<b>turned</b> 16:18
<b>reporting</b> 21:19 22:15 23:8 24:1	<b>serve</b> 15:8 23:15	<b>studios</b> 4:23	<b>types</b> 11:25
<b>reports</b> 15:2,19 21:24 22:2,4 23:6	<b>share</b> 16:1	<b>submit</b> 21:25	<hr/> <b>U</b> <hr/>
<b>representation</b> 17:10	<b>Shayna</b> 15:8,11	<b>subscribe</b> 9:25	<b>umbrella</b> 24:17
<b>representative</b> 15:4	<b>show</b> 9:5	<b>sufficient</b> 17:17	<b>unacceptable</b> 20:2
<b>Republican</b> 4:21 5:17	<b>sign</b> 24:3	<b>summarize</b> 16:5	<b>unanimously</b> 6:16 21:14
<b>Republicans</b> 5:20	<b>signed</b> 6:7	<b>supervisors</b> 6:9	<b>undecided</b> 9:14
<b>request</b> 14:24	<b>signing</b> 24:8,9	<b>support</b> 19:13,14	<b>understand</b> 12:17 24:2
<b>requiring</b> 14:24 21:25	<b>similar</b> 15:17	<b>suspect</b> 13:21	<b>upshot</b> 16:20
<b>Resort</b> 9:13	<b>situation</b> 16:25 23:19	<b>sympathetic</b> 17:15	<b>upstream</b> 11:23
<b>respond</b> 19:8	<b>situations</b> 16:23	<b>sympathize</b> 19:11	<b>urge</b> 9:24
<b>respondent</b> 16:11	<b>sort</b> 12:3,4,9 15:25 17:1, 18 23:25 24:17	<b>system</b> 13:11,13	<b>users</b> 11:23
<b>response</b> 3:19 14:17 20:11	<b>sound</b> 10:18	<b>systemically</b> 23:3	<hr/> <b>V</b> <hr/>
<b>result</b> 22:5	<b>sounds</b> 10:18	<hr/> <b>T</b> <hr/>	<b>vaguely</b> 10:18
<b>results</b> 9:12	<b>speaking</b> 22:23	<b>takes</b> 17:13	<b>vanish</b> 20:2
<b>return</b> 19:23	<b>special</b> 4:19	<b>talk</b> 22:20	<b>variety</b> 9:18 16:12
	<b>specific</b> 23:2 24:13	<b>talking</b> 10:12 12:4	
	<b>spend</b> 11:18	<b>team</b> 10:21	
	<b>spenders</b> 24:17	<b>television</b> 5:5	
	<b>spent</b> 12:2,4 19:25	<b>template</b> 15:16	
	<b>stab</b> 22:12		



**vetoed** 6:20

---

**Y**

**Vice** 13:13,15,16

**view** 16:1,13

**years** 5:3 6:12 19:9 24:18

**violation** 20:17

**vote** 9:14 19:14

**voter** 4:25 6:5,7 7:14,15,  
19 9:9

**voters** 6:8,12

**Voters'** 7:17,19

**votes** 4:12 21:13

**voting** 14:3

---

**W**

**wanted** 4:18 6:18 8:10  
9:8 11:3

**watched** 11:13

**watching** 12:19

**weeks** 23:11

**Werther** 3:9,22,25 4:8,9  
20:14,15,21 21:5,6

**white** 19:25

**wide-ranging** 11:8

**widely** 5:4

**wonderful** 8:9

**words** 23:20

**work** 9:9,18 17:13

**worked** 24:15

**working** 9:17 16:18

**worse** 19:19

**worth** 8:15 12:19

**wrapped** 13:17

**write** 7:25

**writing** 8:2

**written** 24:12

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**X**

**X-DOLLARS** 12:5

**CITIZENS CLEAN ELECTIONS COMMISSION  
EXECUTIVE DIRECTOR REPORT  
June 26, 2025**

**Announcements:**

**July 15<sup>th</sup> CD7 Special Primary Election:**

- Early voting is underway for the CD7 July 15<sup>th</sup> Special Primary Election.
- Republican and Democratic debates were held on June 9<sup>th</sup> and June 10<sup>th</sup>. All eligible candidates participated. See the attached memo for metrics on the debates.
- An English and Spanish digital Voter Education Guide is available on the website.

**August 5<sup>th</sup> Local Elections:**

Alec has been working with the counties to update the CCEC website with voting information for the August 5<sup>th</sup> local elections.

- Tucson and the City of South Tucson, San Tan Valley, and Prescott are conducting elections.
- The voter registration deadline is July 7<sup>th</sup> and early voting begins July 9<sup>th</sup>.

**Other announcements:**

- As of Tuesday, June 24, the Legislature was still working on the state budget for the fiscal year beginning July 1. If there are developments that effect the Commission we will brief you at the meeting and provide any supplemental information.

**Voter Education and Outreach:**

- Gina and Avery presented to the Arizona Municipal Clerks Association on elections in Arizona and the role of Clean Elections.
- Tom, Gina, and Avery attended the 14th Annual African American Conference on Disabilities (AACD), where Tom participated in the panel “Access to the Electoral Process in a Partisan Environment.”
- The Voter Education team launched the second issue of Captain Activate! and The Future Voters at the 2025 Phoenix Fan Fusion to promote civic engagement and voter education.
- Avery tabled at the Greer Days event, hosted by the Greer Civic Association, to share Clean Elections resources and promote voter participation.
- Commissioner Werther, Gina, Tom, and Avery attended the Elections Officials of Arizona conference. Commissioner Werther was a panelist on city elections, Avery was a panelist on voter outreach, and Gina led a breakout session on pamphlets and voter guides.

- Avery met with Gilbert Castillo, Field Director for Arizona Asian American Native Hawaiian and Pacific Islander for Equity, to discuss a potential civic engagement partnership.
- Additional outreach included attending the AZSOS Native Voting Hour and ASU's "Meet the 2025 Mandela Washington Fellows" to support global civic connection.
- Staff is working on the production of an "Education Roundtable". This is a part of Clean Elections' efforts to engage Arizonans in policy discussions on the state's top issues so they may vote informed and participate in the debate process. The roundtable is tentatively scheduled to air live on a local broadcast station near the end of August. Staff is working with media partners and education experts on the production.
- The most recent Beyond the Ballot AZ podcast episode has been published. Senator J.D. Mesnard and former Senator Sean Bowie were guests to speak about the new Lieutenant Governor executive office that voters will see on the 2026 general election ballot.
- Alec and Mike have been updating candidate training videos for the website.
- Avery continues to serve on the Youth Committee for the Arizona African American Legislative Council, actively participates in the AZSOS Engagement Advisory Board, and leads a Voter Outreach Workgroup.

#### **Legal:**

- Center for Arizona Policy v. Arizona Secretary of State, Arizona Supreme Court No. CV-24-0295-PR.
  - The Court accepted the Petition for Review and the case is set for oral argument September 11, 2025. This is a state constitutional challenge to Proposition 211.
- Americans for Prosperity v. Meyer, No. 24-2933 (9th Cir.).
  - Pending at the Ninth Circuit following May Oral Argument.
- Montenegro v. Fontes, Arizona Supreme Court No. CV-24-0166-PR.
  - This case is pending a decision from the Arizona Supreme Court.
- 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. The Commission's attorneys filed a motion for summary judgement on June 20, 2025.
- Branch et al. v. Collins, et al., CV2024-004136 in Superior Court for Maricopa County. The Commission's attorneys will file a reply in support of our motion to dismiss this week.

#### **Appointments:**

- No additional information.

### **Complaints:**

- MUR 24-01, Barnett
- MUR 24-05, Roberts
- MUR 24-07, Arizona Solutions PAC
- MUR 25-01, Jaramillo
- MUR 25-02, Abeytia
- MUR 25-03, Timberlake

### **2025 Regulatory Agenda:**

The Commission may conduct a rulemaking even if the rulemaking is not included on the annual regulatory agenda. Staff will be taking a look at Proposition 211 implementation rules for improvement.

The Governor's Regulatory Review Council has issued its 90-day notice for the Commission's Five-Year Rule Review. Barring an extension, that review is due on or before June 30, 2025. See this agenda item for details.

The following information is provided under A.R.S. § 41-1021.02:

- Notice of Docket Opening: \_\_\_\_ A.A.R. \_\_\_\_ (revision and addition of funding rules).
- Notice of Proposed Rulemaking: \_\_\_\_ A.A.R. \_\_\_\_ (revision and addition of funding rules).
- Federal funds for proposed rulemaking: **None**
- Review of existing rules: **Five Year Report Pending**
- Notice of Final Rulemaking: **None.**
- Rulemakings terminated: **None.**
- Privatization option or nontraditional regulatory approach considered: **None Applicable.**

# Memorandum

Client CCEC  
Project Primary Debates  
Date June 23, 2025

Attached are the final "How to Watch" documents for last week's primary debates. In all, they indicate that:

- Six TV stations in Southern Arizona aired each debate live in English and one aired each debate live in Spanish. Telemundo Tucson and Phoenix both aired each debate on-delay as well.
- Six radio stations (four in Southern Arizona and two in Phoenix) aired each debate live in English and two radio stations aired each debate live in Spanish.

\*Note: Each of these debates surpasses the general election debate in Congressional District 6 in 2024 (a very close, highly contested race between Rep. Juan Ciscomani and his opponent, Kirsten Engel) in live TV & radio participation.


- 18 groups from across the state aired the Republican primary debate live on digital platforms in English and 19 groups aired the Democratic party primary debate live on digital platforms in English. Seven groups from across the state aired each debate live on digital platforms in Spanish.
- Additionally, there has been 80 hours of watch time from 337 views on the AMA YouTube channel for the primary debates.
- CCEC's YouTube page shows 778 views and 114.1 hours of watch time.
- 14 members of the media attended the Republican party primary debate in-person, and 17 attended the Democratic party primary debate in-person, for 31 total.
  - This rivals all 2024 debates besides the Senate debate. Most attending media members were based in Southern Arizona.

PR Coverage Report Highlights (Full report can be found attached)

- Links: 25
- Total Engagement: 27
- Avg. Engagement: 1
- UVM (Unique Visitors per Month): 19,231,750
- Total AVE (Advertising Value Equivalency): \$178,837.92

# CCEC - Tucson Debates Monitoring

Generated on June 11, 2025 at 12:52 PM ET


LINKS	TOTAL ENGAGEMENT	AVG. ENGAGEMENT	JOURNALIST SHARES
25	27	1	0
JOURNALIST REACH	UVM	TOTAL AVE	
0	19,231,750	\$178,837.92	
	Insights by  similarweb		

## ARTICLES


### Watch 5 Arizona Democrats face off in congressional debate

 KTAR-FM (Phoenix, AZ) | By Kevin Stone | June 10, 2025


The Arizona **Citizens Clean Elections Commission** is hosting the 7th Congressional District Democratic primary debate from 6 p.m. to 7 p.m. in Tucson.

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
465,446	0	0	0
SENTIMENT	LOCATION	AVE	
Neutral	Phoenix, AZ, United States	\$4,305.38	

# WATCH: Congressional candidates debate ahead of special Arizona CD7 election

 KNXV-TV (Phoenix, AZ) | June 10, 2025


The **Citizens Clean Elections Commission** and Arizona Media Association are hosting **debates** for the Republican and Democratic candidates. Republican candidates for CD7 are Daniel Butierez, Jorge Rivas, and Jimmy Rodriguez.

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
1,143,779	0	0	0
SENTIMENT	LOCATION	AVE	
Positive	Phoenix, AZ, United States	\$10,579.96	

## Republicans debate their primary points for CD 7

KOLD-TV (Tucson, AZ) | By J.D. Wallace | June 10, 2025


While all three Republican CD 7 candidates agreed on the use of tariffs, each had at least one or two points to distinguish themselves during the **Citizens' Clean Elections Commission** debate for the CD 7 Republican primary. Rivas called for a death penalty for drug smugglers and drug dealers.

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
—	0	0	2
SENTIMENT	LOCATION	AVE	
Neutral	Tucson, AZ, United States	\$239.08	

# Democrats aiming to replace Rep. Rau’l Grijalva will debate on TV ahead of early voting

 The Arizona Republic | By Laura Gersony | June 10, 2025

The debate is hosted by Arizona's publicly funded **Citizens Clean Elections Commission**. It will air for about an hour without commercial breaks starting at 6 p.m. A Republican debate aired the night before. News alerts in your inbox: Don't miss the important news of the day.


SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
5,513,688	0	0	0

SENTIMENT	LOCATION	AVE
Neutral	Phoenix, AZ, United States	\$51,001.61

## WATCH LIVE: Democratic Debate for Arizona Congressional District 7

Arizona Public Media | June 10, 2025

The debate will be moderated by Steve Goldstein and Nohelani Graf and is produced by the **Citizens Clean Elections Commission** and the Arizona Media Association. This debate is part of the lead-up to the special election to fill the seat left vacant by the late Rep. Raúl Grijalva.

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
—	0	0	0


SENTIMENT	LOCATION	AVE
Positive	Tucson, AZ, United States	\$23.23



# Republican candidates debate in Tucson for late Rep. Rau’l Grijalva's seat for Arizona's CD7

 The Arizona Republic | June 9, 2025


Republican candidate Jorge Rivas speaks to the media after a debate on June 9, 2025, for CD7 hosted by Arizona's publicly funded **Citizens Clean Elections Commission** at the University of Arizona in Tucson.

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
5,513,688	0	0	0
SENTIMENT	LOCATION	AVE	
Positive	Phoenix, AZ, United States	\$51,001.61	

# US Election News: Longshot GOP candidates to square off in TV debate for special election to fill Grijalva congressional seat

 Global News Report | June 9, 2025


., Jorge Rivas, and Jimmy Rodriguez will square off in a forum hosted June 9 by Arizona's publicly funded **Citizens Clean Elections Commission**. They are running to ...

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
361	0	0	0
SENTIMENT	LOCATION	AVE	
Positive	Bothell, WA, United States	\$3.34	

# Elections News: Longshot GOP candidates to square off in TV debate for special election to fill Grijalva congressional seat

 Global News Report | June 9, 2025


., Jorge Rivas, and Jimmy Rodriguez will square off in a forum hosted June 9 by Arizona's publicly funded **Citizens Clean Elections Commission**. They are running to ...

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
361	0	0	0
SENTIMENT	LOCATION	AVE	
Positive	Bothell, WA, United States	\$3.34	

## Branscomb’s Tucson reprieve

Tucson Agenda | By Joe Ferguson, Hank Stephenson | June 9, 2025


A glitchy phone-based voting system, fiery audience outbursts, and drawn-out **debates** set the tone for a chaotic Arizona State Democratic Party Committee meeting in Tucson on Saturday. But the real drama? It never made it to the floor. ... And remember: The Arizona **Citizens Clean Elections Commission** Republican primary debate in this deep blue district is today at 6 p.m. Democrats will debate tomorrow at 6 p.m. You can stream either debate on the Clean Elections YouTube page or on Arizona Public Media. “Are they trustworthy?

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
363	0	0	24
SENTIMENT	LOCATION	AVE	
Negative	Tucson, AZ, United States	\$3.36	

# Here's what you need to know about this week's Arizona CD7 primary debates

 Dnyuz | June 9, 2025


The Arizona **Citizens Clean Elections Commission** is hosting the **debates**, which are scheduled to run from 6 p.m. to 7 p.m. KTAR News will stream live broadcasts of the **debates** on its YouTube channel and air playbacks on 92.3 FM and the station's audio streams at 7 p.m.

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
614,930	0	0	0
SENTIMENT	LOCATION	AVE	
Negative	New York, NY, United States	\$5,688.10	

## Debates for Arizona CD7 primaries set for this week

 KTAR-FM (Phoenix, AZ) | By Kevin Stone | June 9, 2025


Raúl Grijalva will face off in **debates** this week. Republicans will make their arguments to 7th Congressional District voters on Monday, and Democrats will take the stage in Tucson the next day. ... The Arizona **Citizens Clean Elections Commission** is hosting the **debates**, which are scheduled to run from 6 p.m. to 7 p.m. KTAR News will stream live broadcasts of the **debates** on its YouTube channel and air playbacks on 92.3 FM and the station's audio streams at 7 p.m.

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
465,446	0	0	0
SENTIMENT	LOCATION	AVE	
Negative	Phoenix, AZ, United States	\$4,305.38	

# Longshot GOP candidates to square off in TV debate for special election to fill Grijalva congressional seat

 The Arizona Republic | By Laura Gersony | June 9, 2025


., Jorge Rivas, and Jimmy Rodriguez will square off in a forum hosted June 9 by Arizona's publicly funded **Citizens Clean Elections Commission**. They are running to succeed the late U.S. Rep. Rau'l Grijalva, a long-serving Arizona Democrat who died in March after a battle with lung cancer.

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
5,513,688	0	0	0
SENTIMENT	LOCATION	AVE	
Positive	Phoenix, AZ, United States	\$51,001.61	

## WATCH LIVE: Republican Debate for Arizona Congressional District 7

Arizona Public Media | June 9, 2025


Jorge Rivas Jimmy Rodriguez Daniel Butierez The debate will be moderated by Steve Goldstein and Nohelani Graf and is produced by the **Citizens Clean Elections Commission** and the Arizona Media Association.

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
—	0	0	0
SENTIMENT	LOCATION	AVE	
Positive	Tucson, AZ, United States	\$23.23	


## WATCH LIVE: Republican Debate for Arizona Congressional District 7

Arizona Public Media | June 9, 2025


Jorge Rivas Jimmy Rodriguez Daniel Butierez The debate will be moderated by Steve Goldstein and Nohelani Graf and is produced by the **Citizens Clean Elections Commission** and the Arizona Media Association.

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
—	0	0	0
SENTIMENT	LOCATION	AVE	
Neutral	Tucson, AZ, United States	\$23.23	

# Letter: Clean Elections Commission is not nonpartisan

 Arizona Daily Star | By Richard S. Grayson | June 4, 2025


The Arizona **Citizens Clean Elections Commission** purports to be a strictly nonpartisan organization that "seeks to improve the integrity of Arizona state government and promote public confidence in the Arizona political process." Yet on its website of the current candidates running for U.S.

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
—	0	0	0
SENTIMENT	LOCATION	AVE	
Positive	Tucson, AZ, United States	\$317.73	

## Tucson Speaks Out: June 4

 Arizona Daily Star | June 4, 2025

Uwe Manthei Midtown **Clean Elections Commission** The Arizona **Citizens Clean Elections Commission** purports to be a strictly nonpartisan organization that "seeks to improve the integrity of Arizona state government and promote public confidence in the Arizona political process."

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
—	0	0	1
SENTIMENT	LOCATION	AVE	
Neutral	Tucson, AZ, United States	\$317.73	

KTAR-AM (Phoenix, AZ)

News/Talk 92.3 KTAR | June 10, 2025

the most accessible in Arizona history. that means this debate will air on a long list of local TV stations, radio stations and digital platforms, including support from local newspapers. Now we have tried to keep the rules. Candidates have drawn straws to determine the order of each of those portions of this debate. Throughout the debate, we will pose questions to each candidate, allow them to answer and then make sure the other candidates have...

MEDIA TYPE	STATION	NETWORK	LOCATION
Radio	KTAR-AM (Phoenix, AZ)	---	Phoenix, AZ, United States
DATE AIRED	NATIONAL AUDIENCE	LOCAL AUDIENCE	NATIONAL AD VALUE
June 10, 2025 7:05 PM MST	70,500	---	---
	LOCAL AD VALUE		
	---		

KTAR-AM (Phoenix, AZ)

News/Talk 92.3 KTAR | June 10, 2025

account. Wow, that's a keeper. So where are you heading? I'm off the spray the good news that capital helps people keep more money in their wallet with no overdrawn our fees. You're the best Capital one bank guy. Hey, mind if I get a selfie sure, say Capital one w. what's in your wallet terms apply see capital .com /bank for details capital and a member fdic it's macey's friends and family sale which means if you're shopping for summer you can get...

MEDIA TYPE	STATION	NETWORK	LOCATION
Radio	KTAR-AM (Phoenix, AZ)	---	Phoenix, AZ, United States
DATE AIRED	NATIONAL AUDIENCE	LOCAL AUDIENCE	NATIONAL AD VALUE
June 10, 2025 7:00 PM MST	70,500	---	---
	LOCAL AD VALUE		
	---		

KVOA-TV (Tucson, AZ) - News 4 Tucson at 6pm

KVOA (NBC) | June 10, 2025

southern arizona congressman raul grijalva, arizona media association is hosting tonight's event on campus of the republican candidates took the stage last night. If you recall, if you missed it, you can watch that debate on our website at koaa t com slash decision 2025. >> And right now we're going to take you live to the campus of for the democratic debate. >> Welcome to this special primary election debate for arizona's congressional district....

MEDIA TYPE	STATION	NETWORK	LOCATION
Television	KVOA-TV (Tucson, AZ)	NBC	Tucson, AZ, United States
DATE AIRED	NATIONAL AUDIENCE	LOCAL AUDIENCE	NATIONAL AD VALUE
June 10, 2025 6:00 PM MST	1,571,287	21,106	\$34,034.08
	LOCAL AD VALUE		
	\$429.54		

KOLD (CBS) - News 13 at 4pm

KOLD (CBS) | June 10, 2025

seven will have a full stage tonight. Five candidates are running to be the democratic candidate for a seat held by democratic congressman raul grijalva for more than two decades. 13 news reporter J.D. wallace is live at the university of arizona, where the debate will start in less than two hours. The debate will be less than an hour long& and time management will be important. From left to right: adelita grijalva& deja fox& patrick harris senior&...

MEDIA TYPE	STATION	NETWORK	LOCATION
Television	KOLD (CBS)	CBS	Tucson, AZ, United States
DATE AIRED	NATIONAL AUDIENCE	LOCAL AUDIENCE	NATIONAL AD VALUE
June 10, 2025 4:00 PM MST	463,887	9,956	---
	LOCAL AD VALUE		
	\$189.20		

KTAR-AM (Phoenix, AZ)

News/Talk 92.3 KTAR | June 9, 2025

draft fees you're the best capital one bank guy hey mind if i get a selfie sure he say capital one what's in your wallet terms apply see capital bank for details capital and a member fdic ibly b 21 now there's a new way to take charge Of your blood sugar, introducing new garlic, healthy blood sugar formula from the makers at the nation's bestselling garlic supplement new garlic helps maintain healthy blood sugar levels with clinically supported levels...

MEDIA TYPE	STATION	NETWORK	LOCATION
Radio	KTAR-AM (Phoenix, AZ)	---	Phoenix, AZ, United States
DATE AIRED	NATIONAL AUDIENCE	LOCAL AUDIENCE	NATIONAL AD VALUE
June 9, 2025 7:00 PM MST	70,500	---	---
	LOCAL AD VALUE		
	---		

KVOA-TV (Tucson, AZ) - News 4 Tucson at 6pm

KVOA (NBC) | June 9, 2025

district seven's congressional seat. >> Of course, left vacant by the passing of longtime southern arizona congressman raul grijalva. >> The arizona media asciation are the ones hosting tonight's event taking place on campus. And don't forget that tomorrow night, it's going to be the democratic candidates. But right now it's the republicans. We tataka you live to the u of a for the distririct. 7 coressional debate. >> After the recent death of representative...

MEDIA TYPE	STATION	NETWORK	LOCATION
Television	KVOA-TV (Tucson, AZ)	NBC	Tucson, AZ, United States
DATE AIRED	NATIONAL AUDIENCE	LOCAL AUDIENCE	NATIONAL AD VALUE
June 9, 2025 6:00 PM MST	1,422,361	20,151	\$30,808.34
	LOCAL AD VALUE		
	\$432.64		



KOLD (CBS) - News 13 at 4pm

KOLD (CBS) | June 9, 2025

highway and alvernon. Mary coleman joins us now - to tell us the latest developments from the crash. Tucson police tell us this is a semi versus motorcycle crash. The motorcycle rider has life threatening injuries - after that collision with a semi. The intersection of south alvernon way and east benson highway has been shut down because of the crash. Authorities tell us that this closure could be in place for the next several hours. This is a live...

MEDIA TYPE Television	STATION KOLD (CBS)	NETWORK CBS	LOCATION Tucson, AZ, United States
DATE AIRED June 9, 2025 4:00 PM MST	NATIONAL AUDIENCE 1,559,133	LOCAL AUDIENCE 6,431	NATIONAL AD VALUE ---
	LOCAL AD VALUE \$89.32		

KVOA-TV (Tucson, AZ) - News 4 Tucson at 4PM

KVOA (NBC) | June 9, 2025

is hot outside. We're going to check in with stormtracker 4 chief meteorologist matt brbrode and what you need to know as we continue to monitor those triple digits. News. 4, tucson at 4 starts right now. >> Live from kvoa. This is news 4, tucson live at 4. >> We are learning more about an officer-involved shooting in downtown nogales over the weekend that left a state trooper injured. Good afternoon. I am monica garcia, our news 4 tucson, steve...

MEDIA TYPE Television	STATION KVOA-TV (Tucson, AZ)	NETWORK NBC	LOCATION Tucson, AZ, United States
DATE AIRED June 9, 2025 4:00 PM MST	NATIONAL AUDIENCE 531,666	LOCAL AUDIENCE 8,420	NATIONAL AD VALUE ---
	LOCAL AD VALUE \$175.74		

KOLD (CBS) - News 13 at 3pm

KOLD (CBS) | June 9, 2025

legislative immunity. 13 news reporter tom powell explains. << january 22nd ... Along the u-s 60. Body cam video shows a state trooper pull over state senator jake hoffman driving a tesla cybertruck with the word freedom on the back. 00:39 trooper says, "pulled you over for speeding, picked you up at 89 ... It's 65." senator hoffman is cooperative. He does\*not tell the trooper he's a lawmaker.... Or ask for immunity. But.... The trooper figures that...

MEDIA TYPE	STATION	NETWORK	LOCATION
Television	<a href="#">KOLD (CBS)</a>	CBS	Tucson, AZ, United States
DATE AIRED	NATIONAL AUDIENCE	LOCAL AUDIENCE	NATIONAL AD VALUE
June 9, 2025 3:36 PM MST	4,438,872	7,687	\$28,808.28
	LOCAL AD VALUE		
	\$161.60		

# **How to watch the Arizona Congressional District 7 Special Election Democratic Party Primary debate Tuesday, June 10 at 6 p.m.:**

<b>LIVE TV - ENGLISH</b>	AZPM (ch. 6 Tucson) Cox YurView (ch. 4 Phoenix) KOLD (CBS ch. 13 Tucson) KVOA (NBC ch. 4 Tucson) KWBA (CW ch. 58 Tucson) KYMA (CBS/NBC ch. 13, Yuma)
<b>LIVE TV - SPANISH</b>	KESE (Telemundo ch. 35, Yuma) KHRR (Telemundo ch. 40 Tucson) (on-delay) KTAZ (Telemundo ch. 39 Phoenix) (on-delay)
<b>LIVE RADIO - ENGLISH</b>	AZPM 89.1FM (NPR Tucson) KAWC/KAWP 88.9FM (NPR Yuma/Parker) KBRP-LP 96.1FM (Bisbee Radio Project, Bisbee) KFNX 1100AM (KFNX Phoenix) KTAR 92.3FM (KTAR Phoenix) KVOI 1030AM (Bustos Media, Tucson)
<b>LIVE RADIO - SPANISH</b>	KOFA 1320AM (NPR Yuma) La Onda 1190AM (KNUV Tolleson)
<b>LIVE STREAMING - ENGLISH</b>	<a href="http://12news.com">12news.com</a> (12News, Phoenix) <a href="http://abc15.com">abc15.com</a> (ABC15, Phoenix) <a href="http://azcentral.com">azcentral.com</a> (The Arizona Republic, statewide) <a href="http://azfamily.com">azfamily.com</a> (Arizona's Family, Phoenix) <a href="http://azluminaria.org">azluminaria.org</a> (Arizona Luminaria, Tucson) <a href="http://azpm.org">azpm.org</a> (AZPM, Tucson) <a href="http://cw7az.com">cw7az.com</a> (CW7, Phoenix) <a href="http://fox10phoenix.com">fox10phoenix.com</a> (FOX10, Phoenix) <a href="http://kgun9.com">kgun9.com</a> (KGUN, Tucson) <a href="http://kjzz.org">kjzz.org</a> (KJZZ, Phoenix) <a href="http://kold.com">kold.com</a> (KOLD, Tucson) <a href="http://ktar.com">ktar.com</a> (KTAR Phoenix) <a href="http://kvoa.com">kvoa.com</a> (KVOA, Tucson) <a href="http://kyma.com">kyma.com</a> (KYMA, Yuma) <a href="http://ltdmedia.net/live-broadcasts">ltdmedia.net/live-broadcasts</a> (Live the Dream Media, Tucson/Marana) <a href="http://patagoniaregionaltimes.org">patagoniaregionaltimes.org</a> (Patagonia Regional Times, Patagonia) <a href="http://realrydazonlyradio.com">realrydazonlyradio.com</a> (Real Rydaz Only) <a href="http://telemundoarizona.com">telemundoarizona.com</a> (KTAZ, Phoenix) <a href="http://thecentersquare.com">thecentersquare.com</a> (The Center Square, National)

<b>LIVE STREAMING - SPANISH</b>	<a href="http://azcentral.com">azcentral.com</a> (The Arizona Republic, statewide) <a href="http://azluminaria.org">azluminaria.org</a> (Arizona Luminaria, Tucson) <a href="http://azpm.org">azpm.org</a> (AZPM, Tucson) <a href="http://tucsonsentinel.com">tucsonsentinel.com</a> (Tucson Sentinel) <a href="http://kyma.com">kyma.com</a> (KYMA, Yuma) <a href="http://onda1190am.com">onda1190am.com</a> (La Onda 1190AM, Tolleson) <a href="http://univision.com/local/arizona-ktvw">univision.com/local/arizona-ktvw</a> (Univisión Arizona)
<b>RECORDING FOR NON- LIVE AIRING IN FULL OR PART</b>	Cronkite News (Phoenix) Green Valley News (Green Valley) Sahuarita Sun (Sahuarita)

# How to watch the Arizona Congressional District 7 Special Election Republican Party Primary debate Monday, June 9 at 6 p.m.:

<b>LIVE TV - ENGLISH</b>	AZPM (ch. 6 Tucson) Cox YurView (ch. 4 Phoenix) KOLD (CBS ch. 13 Tucson) KVOA (NBC ch. 4 Tucson) KWBA (CW ch. 58 Tucson) KYMA (CBS/NBC ch. 13, Yuma)
<b>LIVE TV - SPANISH</b>	KESE (Telemundo ch. 35, Yuma) KHRR (Telemundo ch. 40 Tucson) (on-delay) KTAZ (Telemundo ch. 39 Phoenix) (on-delay)
<b>LIVE RADIO - ENGLISH</b>	AZPM 89.1FM (NPR Tucson) KAWC/KAWP 88.9 (NPR Yuma/Parker) KBRP-LP 96.1 (Bisbee Radio Project, Bisbee) KFNX 1100AM (KFNX Phoenix) KTAR 92.3 (KTAR Phoenix) KVOI 1030AM (Bustos Media, Tucson)
<b>LIVE RADIO - SPANISH</b>	KOFA 1320AM (NPR Yuma) La Onda 1190AM (KNUV Tolleson)
<b>LIVE STREAMING - ENGLISH</b>	<a href="http://12news.com">12news.com</a> (12News, Phoenix) <a href="http://abc15.com">abc15.com</a> (ABC15, Phoenix) <a href="http://azcentral.com">azcentral.com</a> (The Arizona Republic, statewide) <a href="http://azfamily.com">azfamily.com</a> (Arizona's Family, Phoenix) <a href="http://azluminaria.org">azluminaria.org</a> (Arizona Luminaria, Tucson) <a href="http://azpm.org">azpm.org</a> (AZPM, Tucson) <a href="http://cw7az.com">cw7az.com</a> (CW7, Phoenix) <a href="http://fox10phoenix.com">fox10phoenix.com</a> (FOX10, Phoenix) <a href="http://kgun9.com">kgun9.com</a> (KGUN, Tucson) <a href="http://kjzz.org">kjzz.org</a> (KJZZ, Phoenix) <a href="http://kold.com">kold.com</a> (KOLD, Tucson) <a href="http://kvoa.com">kvoa.com</a> (KVOA, Tucson) <a href="http://kyma.com">kyma.com</a> (KYMA, Yuma) <a href="http://ltdmedia.net/live-broadcasts">ltdmedia.net/live-broadcasts</a> (Live the Dream Media, Tucson/Marana) <a href="http://patagoniaregionaltimes.org">patagoniaregionaltimes.org</a> (Patagonia Regional Times, Patagonia) <a href="http://realrydazonlyradio.com">realrydazonlyradio.com</a> (Real Rydaz Only) <a href="http://telemundoarizona.com">telemundoarizona.com</a> (KTAZ, Phoenix) <a href="http://thecentersquare.com">thecentersquare.com</a> (The Center Square, National)
<b>LIVE STREAMING - SPANISH</b>	<a href="http://azcentral.com">azcentral.com</a> (The Arizona Republic, statewide) <a href="http://azluminaria.org">azluminaria.org</a> (Arizona Luminaria, Tucson)

	<a href="http://azpm.org">azpm.org</a> (AZPM, Tucson) <a href="http://tucsonsentinel.com">tucsonsentinel.com</a> (Tucson Sentinel) <a href="http://kyma.com">kyma.com</a> (KYMA, Yuma) <a href="http://onda1190am.com">onda1190am.com</a> (La Onda 1190AM, Tolleson) <a href="http://univision.com/local/arizona-ktvw">univision.com/local/arizona-ktvw</a> (Univisión Arizona)
<b>RECORDING FOR NON-LIVE AIRING IN FULL OR PART</b>	Cronkite News (Phoenix) Green Valley News (Green Valley) Sahuarita Sun (Sahuarita)

# 2025 Legislative Update

## HB2004 - Voter registration cards; mailing limitation

### Sponsor

Rep. John Gillette (R)

### Summary

Prohibits the county recorders from providing an initial or updated voter registration card to a person whose mailing address is outside the state of Arizona, except for absent uniformed services voters or overseas voters as defined in the Uniformed and Overseas Citizens Absentee Voting Act, and persons who are residents of Arizona and who are not served by a United States Post Office.

### Action Taken

Passed House Federalism, Military Affairs, and Elections 5-2

Passed the House 32-27 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-11 and was sent to the Governor

Vetoed by the Governor

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## HB2005 - Voter registrations; recorder; inactive status

### Sponsor

Rep. John Gillette (R)

### Summary

Permits the county recorders to place a person's voter registration information in inactive status and provide the person with notice of the action, if the County Recorder believes the person provided fraudulent or incorrect voter registration information

### Action Taken

Passed House Federalism, Military Affairs, and Elections 4-3

Passed the House 32-26 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

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## **HB2006 - Election mailings; third-party disclosures**

### **Sponsor**

Rep. John Gillette (R)

### **Summary**

Requires a nongovernmental person or entity that mails or delivers by hand an official election-related document or a document that resembles an official election-related document from the county recorder, county officer in charge of elections, or the Secretary of State, including a voter registration application or an early ballot request to include the words "not from a government agency" in boldfaced, clearly legible print on the outside of the envelope.

### **Action Taken**

Passed House Federalism, Military Affairs, & Elections 5-2

Passed the House 37-19 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

Passed the Senate 16-12 and was sent back to the House

Sent to the Governor

Vetoed by the Governor

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## **HB2007 - Voter registrations; payment prohibited**

### **Sponsor**

Rep. John Gillette (R)

### **Summary**

Prohibits a person from paying or receiving money or any other thing of value based on the number of voter registrations or voter registration forms collected, completed or submitted.

### **Action Taken**

Passed House Federalism, Military Affairs, & Elections 5-2

Passed the House 34-23 and was sent to the Senate

Passed Senate Judiciary and Elections 5-2

Passed the Senate 17-12 and was sent back to the House

Sent to the Governor

Vetoed by the Governor

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## HB2017 - Voting centers ban; precinct size

### Sponsor

Rep. Rachel Jones (R)

### Summary

Prohibits a designated election precinct from containing more than 1,000 registered voters at the time County Board of Supervisors designate precincts. Prohibits the Board from authorizing the use of voting centers in place of or in addition to specifically designated polling places and repeals all other associated mandates and prohibitions.

### Action Taken

Passed House Federalism, Military Affairs, & Elections 4-3

Passed the House 32-26 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-12 and was sent to the Governor

Vetoed by the Governor

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## HB2021 - Early ballots; early voting; identification

### Sponsor

Rep. Selina Bliss (R)

### Summary

Prohibits early ballot distribution from beginning more than 30 days before an election and stipulates that if an early ballot request is received on or before the 34th day before the election, the early ballot may not be distributed earlier than the 30th day before the election. Requires the county recorder to mail an early ballot within 48 hours of the receipt of an early ballot request, if the request is complete and correct, and made within 30 days of an election. Modifies the required wording that must be printed on the backside of an official early ballot return envelope, and the official instructions included with the early ballot. Defines the criteria an early ballot submission must meet, beginning in 2026, to be counted as an official vote. Requires that a county recorder or other officer in charge of elections provide to a qualified elector who appears at the electors designated polling location, an on-site early voting location, or any other voting location after 7:00 PM on the Friday before Election Day proof that their ballot has been tabulated, provided that elector provide identification pursuant to state law.

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## **HB2045 - Ballot order; names; parties; rotation**

### **Sponsor**

Rep. Alexander Kolodin (R)

### **Summary**

Removes the exclusion for alternating the names of candidates on ballots in listed elections and during listed election related activities. Requires that beginning in 2027, the parties are to be alternated on the ballots used in each election precinct so that each party appears substantially in equal number of times at the top, bottom, and in each intermediate place of the list or group of parties in which they belong.

### **Action Taken**

Passed House Federalism, Military Affairs, & Elections 7-0

Passed the House 59-0 and was sent to the Senate

Passed Senate Judiciary and Elections 7-0

Failed In the Senate 14-15

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## **HB2046 - Audits; precincts; voting centers**

### **Sponsor**

Rep. Alexander Kolodin (R)

### **Summary**

Adds voting centers in with precincts for hand counts and defines when hand counts are to begin in listed election scenarios.

### **Action Taken**

Passed House Federalism, Military Affairs, & Elections 7-0

Passed the House 59-0 and was sent to the Senate

Passed Senate Judiciary and Elections 4-2

Passed the Senate 17-12 and was sent to the Governor

Vetoed by the Governor

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## HB2050 - Provisional ballots; cure data

### Sponsor

Rep. Alexander Kolodin (R)

### Summary

Adds electors that voted with a provisional ballot to the list of voter signatures that are to be sent to political parties after specified elections by the county recorder or other officer in charge of elections.

### Action Taken

Passed House Federalism, Military Affairs, & Elections 6-1

Passed the House 36-23 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-12 and was sent to the Governor

Vetoed by the Governor

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## HB2051 - Governor; question time

### Sponsor

Rep. Alexander Kolodin (R)

### Summary

Requires the Governor to appear before the legislature to answer questions posed by members of the legislature on the third Wednesday of every month the legislature is in session and lists the criteria for holding this special session. Stipulates that if the Governor is not present in the state, the Lieutenant Governor shall pose as a substitute and permits the Governor to designate that person, with approval from the presiding officer of the body to be attended, to appear for them. Presents the legislative intent that the Arizona legislature would like to emulate question and answer sessions that occur in the United Kingdom between Parliament and the Prime Minister.

### Action Taken

Passed House Government 4-3

Passed the House 32-26 and was sent to the Senate

Passed Senate Government 4-3

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## **HB2060 - State sovereign authority; elections**

### **Sponsor**

Rep. Lisa Fink (R)

### **Summary**

Requires that elections held in Arizona for federal offices adhere to the same rules and laws as elections held in Arizona for state and local offices, including statutes that cover voter registration and proof of citizenship, residency and identification.

### **Action Taken**

Passed House Federalism, Military Affairs, and Elections 4-3

Passed the House 32-27 and was sent to the Senate

Passed Senate Judiciary and Election 4-3

Passed the Senate 17-11 and was sent to the Governor

Vetoed by the Governor

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## **HB2072 - Voter registration; same day**

### **Sponsor**

Rep. Stacey Travers (D)

### **Summary**

A person who is otherwise qualified to register to vote may register during the 28 days immediately preceding an election and is eligible to vote in that election if the person has been a resident of the county and the precinct in which the person resides for at least 29 days immediately preceding the election. A person who is otherwise qualified to register to vote may register on election day by appearing at the polling place, completing a registration form, and providing proof of residence. A person registering in this manner may vote using a provisional ballot per state law. Registration under these circumstances does not qualify a person to vote in a partisan primary election.

## HB2096 - Permanent early voting list

### Sponsor

Rep. Seth Blattman (D)

### Summary

Replaces “Active” early voter list with “Permanent” Early Voter list. Except in a special taxing district that is authorized to conduct its own election and a special district mail ballot election, a voter is no longer removed automatically from being sent an early ballot if the voter fails to vote an early ballot in all “elections” (formerly defined) for two consecutive election cycles. Removes several exceptions to removing a voter from the permanent early voter list. Removes the definition of “election cycle” for this section.

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## HB2097 - Voting rights; restoration

### Sponsor

Rep. Seth Blattman (D)

### Summary

A person's right to vote is automatically restored on the person's completion of probation or the receipt of an absolute discharge from imprisonment.

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## HB2129 - Write-in candidates; filings; ballots

### Sponsor

Rep. Selina Bliss (R)

### Summary

Changes the deadline for a write-in candidate to file nomination paperwork to the 70th day before an election. Modifies the ballot format to accommodate as many blank lines as there are qualified write-in candidates, plus one additional blank line for each office, up to the total number of offices to be filled. Requires that there be one blank line for write-in candidates if no write-in candidates have qualified for an office and that each blank line will have a space for an elector to put a mark.

### Action Taken

Passed House Federalism, Military Affairs, and Federalism 7-0

Passed the House 53-0 and was sent to the Senate

Passed Senate Judiciary and Elections 7-0

Passed the Senate 30-0 and was sent back to the House

Passed the House 56-2 and was sent to the Governor

Signed by the Governor

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## **HB2153 - Voting locations; political party observers**

### **Sponsor**

Rep. Rachel Keshel (R)

### **Summary**

Permits the county chairman of each political party to designate for each precinct or voting location a party representative and alternate for polling places including on site early voting locations, emergency early voting locations, or any other early voting location. Prohibits party challengers from entering a voting booth except to mark the challenger's ballot.

### **Action Taken**

Passed House Federalism, Military Affairs, & Elections 4-3

Passed the House 32-26 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-13 and was sent to the Governor

Vetoed by the Governor

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## **HB2154 - Early voting list; undeliverable ballots**

### **Sponsor**

Rep. Rachel Keshel (R)

### **Summary**

Requires the county recorder or other election officer in charge to move a voter whose election notice is returned as undeliverable to inactive status, pursuant to state law, and from the active early voting list. Removes the requirement for follow up to determine the voter's new residence address.

### **Action Taken**

Passed Federalism, Military Affairs, and Elections 4-3

Passed the House 32-26 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-12 and was sent to the Governor

Vetoed by the Governor

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## **HB2205 - Election procedures manual; authority**

### **Sponsor**

Rep. James Taylor (R)

### **Summary**

States that the use of the Elections Procedures Manual does not constitute a delegation of the Legislature's power.

**Action Taken**

Passed House Federalism, Military Affairs, and Elections 4-3

Passed the House 33-26 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-12 and was sent to the Governor

Vetoed by the Governor

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**HB2206 - Multistate voter registration system; prohibition****Sponsor**

Rep. James Taylor (R)

**Summary**

Prohibits Arizona from entering or being a member of any multi state voter registration, or voter registration lists maintenance organization, that requires Arizona to provide the organization with information derived from voter registration records.

**Action Taken**

Passed House Federalism, Military Affairs, and Elections 4-3

Passed the House 31-27 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-12 and was sent back to the House

Passed the House 33-25 and was sent to the Governor

Vetoed by the Governor

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**HB2368 - Auditor general; records; financial institutions****Sponsor**

Rep. Matt Gress (R)

**Summary**

Requires the Auditor General or their authorized representative, in the performance of official duties, to have access to specific, listed information of financial institutions or financial enterprises, or any other information relating to any state agency, board, Commission, department, institution, program, Advisory Council, or committee or political subdivision of Arizona. Requires the affected financial institutions to provide requested information from the Auditor General, or their official representative, in a thorough and timely manner. Requires an authorized representative of the financial institution or enterprise to certify all information provided. Stipulates that the cost of complying with an Auditor General's request is to be covered by the state agency, board, Commission, department, institution, program, Advisory Council, or committee or political subdivision the Auditor General is reviewing. Stipulates that a financial institution or enterprise is not liable to the entity whose information it is turning over to the Auditor General, pursuant to state law.

**Action Taken**

Passed House Government 4-0

Passed the House 60-0 and was sent to the Senate

Passed Senate Regulatory Affairs and Government Efficiency 6-1

Passed the Senate 28-0 and was sent to the Governor

Signed by the Governor

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## **HB2376 - County candidates; clean elections pamphlet**

**Sponsor**

Rep. Pamela Carter (R)

**Summary**

Includes candidate names for county wide offices in the document that is delivered to eligible voters before the primary and general election, whether the candidate is participating or not participating. Stipulates that this legislation is effective only on the affirmative vote of at least three-fourths of the members of each House of the legislature.

**Action Taken**

Passed House Federalism, Military Affairs, and Elections 7-0

Passed the House 55-0 and was sent to the Senate

Passed Senate Judiciary and Elections 7-0

Passed the Senate 28-0 and was sent back to the House

Passed the House 58-0 and was sent to the Governor

Signed by the Governor

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## **HB2390 - Justices of the peace; online signature**

**Sponsor**

Rep. Neal Carter (R)

**Summary**

Allows Justice of the Peace candidates to use the Equal system to collect nomination petition signatures

**Action Taken**

Passed House Federalism, Military Affairs, and Elections 7-0

Passed the House 59-0 and was sent to the Senate



Passed Senate Judiciary and Elections 7-0

Passed the Senate 26-1 and was sent back to the House

Passed the House 56-1 and was sent to the Governor

Signed by the Governor

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## **HB2391 - JPs; constables; signatures**

### **Sponsor**

Rep. Neal Carter (R)

### **Summary**

Adds that to run for Justice of the Peace, or constable, in a county with a population of one million or more people, petition requirements are that at least 1%, but not more than 10% of the number of qualified signers in a precinct. Adds that in a county of less than one million people, for the position of Justice of the Peace, a candidate qualifies if they produce 300 signatures from a precinct.

### **Action Taken**

Passed House Federalism, Military Affairs, & Elections 4-2

Passed the House 33-25 and was sent to the Senate

Passed Senate Judiciary and Elections 5-2

Passed the Senate 18-12 and was sent to Conference Committee

Passed the House 41-16 and was sent to the Governor

Signed by the Governor

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## **HB2425 - Voter registration information; registers; violations**

### **Sponsor**

Rep. Alexander Kolodin (R)

### **Summary**

Repeals the classification as a Class 6 Felony any person who allows a precinct list of registered voters, or any other list of registered voters to be used in any other manner than for officially approved purposes.

### **Action Taken**

Passed House Federalism, Military Affairs, Elections 4-3

Passed the House 33-26 and was sent to the Senate

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## **HB2448 - Voting locations; emergency designation; electioneering**

### **Sponsor**

Rep. Michael Carbone (R)

### **Summary**

Removes the following requirements that delineate that the county recorder or election officer must post a public list of any sites designated as emergency polling places—along with the reasons for that designation and attempts made to secure alternatives—at least two weeks before election day, and that if a site is not on the emergency-designation list, the facility must allow political activity outside the seventy-five-foot zone, and that should an emergency arise after the initial posting, the county recorder or election officer is required to update the list promptly with the relevant details.

### **Action Taken**

Passed House Federalism, Military Affairs, Elections 4-1

Passed the House 39-19 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

Passed Senate 17-13 and sent to the House

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## **HB2521 - Elections; foreign money**

### **Sponsor**

Rep. Michael Way (R)

### **Summary**

Prohibits any Arizona government entity from using monies or in-kind goods or services that are donated, directly or indirectly, by a foreign government, or any “foreign nongovernmental source” (defined) for election administration. Requires any “person” (defined) or vendor that provides services to an Arizona government entity to provide a dated and sworn statement, under penalty of perjury, that they are not knowingly the recipient, directly or indirectly, of donations from a foreign source. This certification is to be updated annually and the person signing the statement shall update and amend their certification upon learning any new information pertaining to the above prohibitions. Lists the reports and records that must be submitted by government entities pertaining to verifying that no foreign influences have provided donations, directly or indirectly, from the individuals or vendors those agencies maintain a relationship with. Prescribes specific penalties for an individual for vendor who provides false information to the Arizona Secretary of State. Stipulates that for this legislation federally recognized sovereign tribal nations are not considered to be foreign governments. Prohibits any foreign government from aiding an individual or organization to help influence the outcome of an election or ballot measure. Requires any person, entity, or committee that is required to file campaign finance reports pursuant to state law, to certify under penalty of perjury in those reports that the person, entity or committee has not accepted or used monies or in-kind goods or services in violation of this legislation.

### **Action Taken**

Passed House Federalism, Military Affairs, and Elections 4-3

Passed House 33-25 and was sent to the Senate

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## HB2623 - Campaign finance; candidate committee transfers

### Sponsor

Rep. Jeff Weninger (R)

### Summary

Permits a candidate committee for a city or town candidate to transfer contributions to that same candidate's statewide or legislative campaign, provided the aggregate amount of contributions from any individual that are transferred do not exceed the legal contribution limitations of the office for which the candidate is running. Requires that any ordinance, rule, resolution or regulation a county, city or town adopts that mandates a candidate's financial disclosure also require the candidate or campaign disclosure also be accessible to the public on the county, city or town website.

### Action Taken

Passed House Federalism, Military Affairs, and Elections 4-0

Passed the House 37-21 and was sent to the Senate

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## HB2630 - Governor nominations; agency position; eligibility

### Sponsor

Rep. Alexander Kolodin (R)

### Summary

Modifies a reference to "his" to "the incumbent's." Stipulates that if the Senate rejects the nomination of a director made by the Governor pursuant to this legislation, the nominee is not eligible for any position within the same state agency for which the nominee was nominated.

### Action Taken

Passed House Regulatory Oversight 3-2

Passed the House 33-27 and was sent to the Senate

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## HB2632 - Regulatory costs; rulemaking; legislative ratification

### Sponsor

Rep. Alexander Kolodin (R)

### Summary

Requires an Arizona agency to submit to the Arizona Office of Economic Opportunity (AOEO) any proposed "rule" (defined) that is projected to increase regulatory costs in Arizona by more than \$100,000 within five years of implementation. Prohibits a submitted proposed rule from becoming effective unless approved by the legislature, if the AOEO, finds that the rule will likely cost more than \$500,000 within five years after implementation. Requires the AOEO to submit the proposed rule to the Administrative Rules Oversight Committee (Committee) no later than 30 days before the next regular legislative session and requires the Committee to submit the proposed rule to the legislature

as soon as practicable. Permits any member of the legislature to submit legislation to ratify the proposed rule and exempts it from any statutes regarding the time and manner of rulemaking. Prohibits an agency from filing the final rule with the Arizona Secretary of State without legislative approval and stipulates that if the legislature does not ratify the proposed rule during the current legislative session, the agency shall terminate the proposed rule by publishing a notice of termination in the register. Allows a person that is regulated by an agency that is proposing a rule, to request the AOEO review the proposed rule, and the legislature to be able to request the AOEO to review any proposed rule. Stipulates that this legislation does not apply to emergency rules, or the Arizona Corporation Commission. Provides for severability.

#### Action Taken

Passed House Regulatory Oversight 3-2

Passed the House 32-26 and was sent to the Senate

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## HB2649 - Electoral college; support

### Sponsor

Rep. Steve B. Montenegro (R)

### Summary

Affirms that the legislature recognizes the importance of the electoral college and provides the reasoning behind that support.

### Action Taken

Passed House Federalism, Military Affairs, & Elections 4-2

Passed the House 33-27 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-12 and was sent to the Governor

Vetoed by the Governor

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## HB2651 - Voting equipment; requirements; origin

### Sponsor

Rep. Steve B. Montenegro (R)

### Summary

Beginning January 1, 2029, the Secretary of State is prohibited from certifying a vote recording and vote tabulating machine or device used for elections for federal, state or county offices unless 100% of all the machine's or device's parts and components were sourced from the United States, and 100% of all the machine's or device's manufacturing and assembly was performed in the United States. Vote recording and vote tabulating machines and devices that were acquired before January 1, 2029 would have been exempt.

### Action Taken

Passed House Federalism, Military Affairs, & Elections 4-3

Passed the House 33-27 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3  
Passed the Senate 17-11 and was sent to the Governor  
Vetoed by the Governor

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## **HB2666 - Campaign finance; third-party complaints**

### **Sponsor**

Rep. Laurin Hendrix (R)

### **Summary**

Prohibits a filing officer from accepting a complaint from a third party unless the third party submits evidence that the individual is an identifiable human being.

### **Action Taken**

Passed House Federalism, Military Affairs, and Elections 7-0  
Passed 57-0 and was sent to the Senate  
Passed Senate Judiciary and Elections 7-0  
Passed the Senate 27-0 and was sent to the Governor  
Signed by the Governor

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## **HB2667 - Campaign finance complaints; resolution**

### **Sponsor**

Rep. Laurin Hendrix (R)

### **Summary**

For every complaint that is filed pursuant to this legislation related to campaign finance, that is not resolved, extended or ruled on within 180 days after the complaint is filed, the complaint is deemed dismissed.

### **Action Taken**

Passed House Federalism, Military Affairs, and Elections 7-0  
Passed the House 57-0 and was sent to the Senate  
Passed Senate Judiciary and Elections 5-2  
Passed the Senate 23-4 and was sent back to the House  
Passed the House 52-3 and was sent to the Governor  
Signed by the Governor

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## HB2673 - Early ballots; deadlines; foreign money

### Sponsor

Rep. Alexander Kolodin (R)

### Summary

Prohibits any Arizona government entity from using monies or in-kind goods or services that are donated, directly or indirectly, by a foreign government, or any "foreign nongovernmental source" (defined) for election administration. Requires any "person" (defined) or vendor that provides services to an Arizona government entity to provide a dated and sworn statement, under penalty of perjury, that they are not knowingly the recipient, directly or indirectly, of donations from a foreign source. Prescribes specific penalties for an individual for vendor who provides false information to the Arizona Secretary of State. Permits a qualified elector to bring an action pertaining to specific, listed law and violations and outlines what they are entitled to if they prevail. Requires a unique early voter ID number to be issued to each voter on the early voter list and stipulates that the early voter record does not constitute a public record and enjoys protections of personally identifying information. Defines the process for verifying early voter identifications and the process for handling voters whose identity or address cannot be identified. Permits a voter to remain on the early voter list if they confirm their address once every election cycle by telephone, in writing, or online, and they provide at least 2 methods of confirmation. Outlines the process and requirements for a mailed ballot to be counted, and the process by which submitted ballots shall be handled prior to, on, and after Election Day.

### Action Taken

Passed House Federalism, Military Affairs, and Elections 4-3

Passed the House 33-27 and was sent to the Senate

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## HB2703 - Early voting; tabulation; ballot deadlines

### Sponsor

Rep. Laurin Hendrix (R)

### Summary

Strikes the ability of a county Board of Supervisors to authorize by specific resolution the County Recorder or other election official to use emergency voting centers, and the ability of a principal of a school to deny a request to provide space for polling stations. Shifts the deadline for an early voter to cast a vote at an early voting location from Friday before an election to the Monday before an election. Strikes the ability of a qualified elector to request an emergency voting accommodation and a County Recorder or election official to grant an emergency accommodation. Outlines instructions that must be given to early voters up to 2026, and from 2026 forward. Defines ways an early voter can deliver their ballot to the County Recorder or Officer in Charge of elections, including identification requirements, locations and methods of delivery. Strikes the requirement of a County Recorder or election official to count and report early voting totals. Exempts early voters who show up in person from having their mail affidavit verified. Eliminates the ability of an elector that does not present identification to put their ballot in a drop box.

### Action Taken

Passed House Federalism, Military Affairs, and Elections 4-3

Passed the House 32-27 and was sent to the Senate

Passed the Senate 16-10 and was sent to the Governor

Vetoed by Governor

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## **HB2705 - Nomination petitions; counties; strict compliance**

### **Sponsor**

Rep. Alma Hernandez (D)

### **Summary**

Provides wording for partisan and nonpartisan nominations for elected public office. Permits signatures from multiple counties in a specific district, if the office they are running for spans multiple counties. Requires a nominee for elected public office to comply with all statutory requirements for seeking office.

### **Action Taken**

Failed House Federalism, Military Affairs, and Elections 3-4

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## **HB2722 - Public resources; expenditures; prohibition**

### **Sponsor**

Rep. Neal Carter (R)

### **Summary**

Requires that all use of public monies by a “public entity” (defined) must benefit the public by intent and be for a “public purpose” (defined), is supported by “consideration” (defined), and the public entity must retain continuing control over the funds. Allows the Arizona Attorney General or a taxpayer in Arizona to file an action in a court of general jurisdiction to challenge an expenditure, loan or use of “public resources” (defined). Outlines how a plaintiff in that situation would prevail in court. Entitles this legislation the “Taxpayers Protection Act.” Modifies the chapter heading of Title 1, Chapter 5, ARS, from “Public Programs” to “Public Resources”.

### **Action Taken**

Passed House Ways and Means 5-4

Passed the House 32-28 and was sent to the Senate

Passed Senate Government 4-3

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## **HB2735 - Ballot receptacles; electioneering limits**

### **Sponsor**

Rep. Brian Garcia (D)

### **Summary**

Prohibits a person from staying inside the 75-foot limit for each voting location except for the purposes of voting. Requires the Board of Supervisors to provide for each 75-foot zone for a designated ballot receptacle three notices expressing the 75-foot limit. Prohibits interfering with a voter, or electioneering, within the 75-foot limit for a designated ballot receptacle.

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## **HB2767 - Voter registrations; transportation department; recorders**

### **Sponsor**

Rep. Rachel Keshel (R)

### **Summary**

Requires the Arizona Department of Transportation (ADOT) to transmit simultaneously and directly any voter registration information received pursuant to state law, to the Arizona Secretary of State, and other listed, appropriate parties. Effective January 1, 2026. Provides for severability.

### **Action Taken**

Passed House Federalism, Military Affairs, and Elections 3-2

Passed the House 31-26 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-11 and was sent to the Governor

Vetoed by the Governor

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## **HB2794 - Polling places; accessible equipment**

### **Sponsor**

Rep. Brian Garcia (D)

### **Summary**

Requires that any accessible device placed at a precinct-based polling place or voting center be programmed and prepared so that all ballot styles for that jurisdiction or county are available from each device without regard to precinct or other locations in which the device is used.

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## **HB2796 - Politically engaged persons; criminal charges**

### **Sponsor**

Rep. Alexander Kolodin (R)

### **Summary**

Requires that criminal charges against a “politically engaged person” (defined) be pre-approved by a majority of the Attorney General and all county attorneys using standard prosecutorial criteria. Requires, if the approval of all required parties is not given, a court to dismiss charges unless prosecutors prove they were unaware of the defendant’s political status. Extends to prosecutors three months to refile charges after securing approval. Requires a motion to dismiss to be filed within 30 days of the charges.

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## **HB2804 - Sample ballots; mailing date**

### **Sponsor**

Rep. Nick Kupper (R)

### **Summary**

Requires a county Board of Supervisors print mailers of sample ballots 14 days before a primary or general election.

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## **HB2844 - Multiple nonpartisan candidates; primary**

### **Sponsor**

Rep. Lupe Diaz (R)

### **Summary**

Defines how nonpartisan candidates may appear on the ballot. Covers how to handle multiple nonpartisan candidates in an election and their assigned position on a nonpartisan ballot for consideration in the primary election. Stipulates that for the nonpartisan ballot, the candidate who receives the most votes advances to the general election as the nonpartisan nominee for that office. Addresses placement of nonpartisan candidates on the general election ballot. Requires the Legislative Council to prepare proposed legislation conforming the ARS to the provisions of this legislation, if needed.

### **Action Taken**

Failed House Federalism, Military Affairs, and Elections 0-5

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## **HB2927 - Public meetings; records; requirements; penalties**

### **Sponsor**

Rep. Michael Carbone (R)

### **Summary**

Requires minutes or recordings of a public meeting be posted online within three working days of the meeting and remain available online for at least five years after their posting, except as provided by law. Requires a public body that meets regularly to once a month, at least, make an open call to the public and stipulates that the open call must occur in the first 30 minutes of a public meeting and stay open for at least 30 minutes once commenced, unless each person who indicated a desire to speak has spoken within that 30 minutes window. Covers public notice for executive sessions unless the public body complies with other notice requirements required by this legislation. Requires public access if a public meeting occurs via technical devices via technical devices and a physical location where the public may view the meeting. Requires the Arizona Attorney General or applicable County Attorney to investigate and respond to written complaints pertaining to public meetings and public access within 120 days after receipt of the complaint. Requires electronic copies of records to be provided on request and limits charges to just the cost of materials. Requires the court to review de novo any question of law related to this legislation. Lists information that must be included in any request for information and penalties for willfully and intentionally refusing to honor part of this legislation.

### **Action Taken**

Passed House Government 4-2

Passed the House 36-20 and was sent to the Senate

Passed Senate Government 4-3

Passed the Senate 17-13 and was sent back to the House

Passed the House 39-18 and was sent to the Governor

Vetoed by the Governor

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## **HCR2002 - Voting centers; precinct voting**

### **Sponsor**

Rep. Rachel Jones (R)

### **Summary**

The 2026 general election ballot is to carry the question of whether to amend Arizona State law to require that election precincts not contain more than 1,000 registered voters at the time precincts are designated, and to prohibit the use of voting centers in place of or in addition to specifically designated polling places.

### **Action Taken**

Passed House Federalism, Military Affairs, & Elections 4-3

Passed the House 32-26 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

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## **HCR2013 - Early ballots; deadlines; foreign money**

### **Sponsor**

Rep. Alexander Kolodin (R)

### **Summary**

The 2026 general election ballot is to carry the question of whether to amend Arizona state statute to prohibit a government entity in Arizona from using money or in-kind goods or services that are donated, directly or indirectly, by foreign government, or any foreign nongovernmental source, for election administration. Asks voters to approve the issuance have a unique early voter ID number to each voter on the early voting list, defines the information that must be on an early voter ballot request, as well as rules to require a county recorder or other election officer to reject a voter's early ballot application if all required information is not submitted, and the process and wording that must be included on the issuance of early voting materials. Asks voters to approve the process and evaluator must follow to verify the information submitted by an early voter.

### **Action Taken**

Passed House Federalism, Military Affairs, and Elections 4-3

Passed the House 33-26 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

Failed in the Senate 11-18

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## **HCR2014 - House of representatives; designated seats**

### **Sponsor**

Rep. Rachel Jones (R)

### **Summary**

The 2024 general election ballot is to carry the question of whether to amend the Arizona Constitution to require the seats for the House of Representatives be designated "A" and "B" in the alphabetic order of the surnames, then first names of elected members of each district and thereafter candidates shall run for and be elected from either seat "A" or "B" in a legislative district, beginning with the Inauguration of the Members of the fifty-seventh legislature in 2027.

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## **HCR2038 - Rulemaking; legislative ratification; regulatory costs**

### **Sponsor**

Rep. Alexander Kolodin (R)

### **Summary**

The 2024 general election ballot is to carry the question of whether to amend the Arizona Revised Statutes related to rule making that would require an Arizona agency to submit to the Arizona Office

of Economic Opportunity (AOEO) any proposed “rule” (defined) that is projected to increase regulatory costs in Arizona by more than \$100,000 within five years of implementation. The measure would prohibit a submitted proposed rule from becoming effective unless approved by the legislature if the AOEO finds that the rule will likely cost more than \$500,000 within five years after implementation. Sets a deadline for submitting the rule for review to the Administrative Rules Oversight Committee (Committee) and requires the Committee to submit the proposed rule to the legislature as soon as practicable. Permits any member of the legislature to submit legislation to ratify the proposed rule and exempts it from any statutes regarding the time and manner of rulemaking. Prohibits an agency from filing the final rule with the Arizona Secretary of State without legislative approval and stipulates that if the legislature does not ratify the proposed rule during the current legislative session, the agency shall terminate the proposed rule by publishing a notice of termination in the register. Allows a person that is regulated by an agency that is proposing a rule, to request the AOEO review the proposed rule, and the legislature to be able to request the AOEO to review any proposed rule. Stipulates that this legislation does not apply to emergency rules, or the Arizona Corporation Commission. Provides for severability.

#### **Action Taken**

Passed House Regulatory Oversight 3-2

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### **SB1001 - Early ballots; identification; tabulation**

#### **Sponsor**

Sen. J.D. Mesnard (R)

#### **Summary**

Prohibits a County Recorder or other Officer in Charge of Elections from operating an on-site early voting location after 7:00 P.M. on the Friday preceding an election if the official in question is not able to revise precinct registrations and other election materials for use on election day to help identify which voters have requested and early ballot, voted, or are on the inactive voter list. Revises the effective date of this legislation to be upon enactment and defines early voting procedures, including voter identification, roll signature, ballot mailing, delivery, ballot handling, processing, and security requirements, and timeframes for accepting early ballots.

#### **Action Taken**

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-10 and was sent to the House

Passed House Federalism, Military, and Elections 4-2

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### **SB1011 - Early voting; ballot deadlines; certificates**

#### **Sponsor**

Sen. Warren Petersen (R)

#### **Summary**

Repeals provisions for a County Board of Supervisors to set up Emergency Voting Centers, for electors to request Emergency Voting Centers in the event of an emergency between 7 p.m. on the Friday and 5 p.m. on the Monday preceding an election, and for electors to deliver ballots to polling places on election day. Mandates that any early voting locations be open and available for use on the Saturday and Monday before an election, and details the requirements for an early voting elector to

vote up until 7 p.m. the Monday before an election. Requires voters showing up at an early voting location to be given a ballot upon verification of their identification and provides wording for the early voting certification form and procedures for processing that elector and his or her ballot.

#### **Action Taken**

Passed Senate Judiciary and Elections 4-3

Failed in the Senate 10-16 – was replaced by HB 2703.

HB 2703 was vetoed by the Governor.

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## **SB1013 - Municipalities; counties; fee increases; vote**

#### **Sponsor**

Sen. Warren Petersen (R)

#### **Summary**

Prohibits a Common Council or County Board of Supervisors from imposing or increasing any assessment, tax or fee without a two-thirds vote of the governing body. Stipulates a municipality's or county's ability to do such, provided the two-thirds vote authorizes the imposition or increase in any assessment, tax or fee, is not subject to further regulation by the applicable municipality or county.

#### **Action Taken**

Passed Senate Government 4-3

Passed the Senate 17-12 and was sent to the House

Failed in the House 26-30

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## **SB1019 - Photo enforcement systems; prohibition**

#### **Sponsor**

Sen. Wendy Rogers (R)

#### **Summary**

Prohibits the use of "photo enforcement systems" (defined) by law enforcement and local authorities to enforce traffic laws. Contains a legislative intent clause.

#### **Action Taken**

Passed Senate Public Safety 4-3

Passed the Senate 16-13 and was sent to the House

Passed House Transportation and Infrastructure 4-1

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## **SB1024 - State agencies; payments; cryptocurrency**

### **Sponsor**

Sen. Wendy Rogers (R)

### **Summary**

State agencies are authorized to accept “cryptocurrency” (defined) as a payment method for taxes, fees, fines, civil penalties, financial obligations, and special assessments by entering into an agreement with a “cryptocurrency service provider” (defined) to provide a method to accept cryptocurrency as a payment for any amount due to that agency or the state. Requirements for the agreement are listed. Effective January 1, 2026.

### **Action Taken**

Passed Senate Finance 4-3

Passed the Senate 17-11 and was sent to the House

Passed House Commerce 6-4

Passed the House 31-26 and was sent to the Governor

Vetoed by the Governor

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## **SB1036 - Public resources; influencing elections; penalties**

### **Sponsor**

Sen. John Kavanagh (R)

### **Summary**

Establishes penalties for a municipality or county found to be guilty of using municipal resources to influence an election and provides that the penalties be paid to the Arizona Attorney General, County Attorney or resident, as is appropriate based on the entity that brought the complaint and the entity or entities found guilty of violating the prohibition. Permits a resident to file an action in Superior Court pertaining to a violation of this prohibition.

### **Action Taken**

Passed Senate Government 4-3

Passed the Senate 17-12 and was sent to the House

Passed House Federalism, Military Affairs, and Elections 4-2

Passed the House 31-27 and was sent back to the Senate

Passed the Senate 17-9 and was sent to the Governor

Vetoed by the Governor

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## **SB1040 - Recall elections; procedures; timeline**

### **Sponsor**

Sen. John Kavanagh (R)

### **Summary**

Increases to 75 days after receiving the front and back of recall signature sheets the time the county recorder must determine the number of signatures or affidavits of individuals whose names were included on the sheets that must be disqualified. Increases to 120 days, or more, the time frame between when a recall election order is issued and the recall election held. Requires any person who desires to be a candidate for the office associated with the recall election to file a Statement of Interest with the appropriate filing officer in the form prescribed by state law. Stipulates that any nomination petition signatures that are collected before the Statement of Interest and the recall application are filed are invalid and subject to challenge.

### **Action Taken**

Passed Senate Judiciary and Elections 6-0

Passed the Senate 28-0 and was sent to the House

Passed House Federalism, Military Affairs, and Elections 7-0

Passed the House 58-0 and sent to the Governor

Signed by the Governor

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## **SB1052 - Voter registration; temporary absence**

### **Sponsor**

Sen. Wendy Rogers (R)

### **Summary**

Repeals the ability of a United States citizen who has never resided in the United States and whose parent is a United States citizen who is registered to vote in Arizona, to register to vote and vote in Arizona using a federal write-in early ballot.

### **Action Taken**

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-11 and was sent to the House

Passed House Federalism, Military Affairs, and Elections 4-3

Passed the House 32-25 and was sent to the Governor

Vetoed by the Governor

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## **SB1064 - Voting; equipment; internet; custody; violation**

### **Sponsor**

Sen. Mark Finchem (R)

### **Summary**

Requires the Arizona Secretary of State verify vote recording and tabulating machines approved for use pursuant to state law, have the appropriate level security, per industry best practices, not have hardware installed that supports any form of remote access, or software that allows any change to results in files or database, support the usage and tracking of users based on unique credentials that are changed at least once per election cycle, log deletions of ballot information, and maintain election data for 22 months after the election. Prohibits voting equipment used in a polling place or voting center from having Internet access and access by any means to any data or results, and if the equipment has an accessible port, the port must be locked with tamper proof sealing and logged in a chain of custody document when broken or accessed. Requires the same security, logging and management for tabulation equipment and permits only authorized personnel, including political party observers, to be present at the tabulation of votes. Requires two observers who are not members of the same political party be present when a removable storage device is employed, including during the insertion, removal, and transportation of the device. Requires activities at the counting center be included in a nonstop video, pursuant to state law, that is posted to the county's website. Stipulates that a person who violates this legislation is guilty of a Class 1 misdemeanor.

### **Action Taken**

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-11 and was sent to the House

Passed House Federalism, Military Affairs, and Elections 3-2

Passed the House 32-25 and was sent to the Governor

Vetoed by the Governor

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## **SB1097 - Elections; voting centers; polling places**

### **Sponsor**

Sen. Jake Hoffman (R)

### **Summary**

Requires district schools to close on a primary election day and a general election day but requires teachers and staff to receive in-service training or development and prohibits them from using personal, vacation or other leave excepting a school district from allowing an employee time off to vote. Allows voting centers to be created on a specific resolution of the Board of Supervisors. Requires a state, county, city, town or school district office to provide sufficient space for use as a polling place upon request of the Officer in charge of elections for any state, county, city or town elections and exempts district schools with a "gymnasium" (defined) from any state, local or school district requirements that would otherwise prevent or limit the use of the school or its gymnasium as a polling place. Removes the ability of the principal of a district or charter school to deny a request to provide space for use as a polling place for an election by providing a written statement indicating that space is not available at the school; or the safety or welfare of the children would be jeopardized.

### **Action Taken**

Passed Senate Judiciary and Elections 4-3



Passed the Senate 17-12 and was sent to the House

Passed House Federalism, Military Affairs, and Elections 4-2

Passed the House 31-23 and was sent to the Governor

Vetoed by the Governor

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## **SB1098 - Early ballot drop off; identification**

### **Sponsor**

Sen. Jake Hoffman (R)

### **Summary**

For any voter or voter's agent who delivers one or more voted early ballots in affidavit envelopes at any polling place or voting center, the election board must require the person to present valid identification that meets statutory requirements for his/her own early ballot or for another person's ballot, and to attest in writing that he/she is the voter's family member, household member or caregiver for another person's early ballot. Knowing violations are a class 5 (second-lowest) felony.

### **Action Taken**

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-12 and was sent to the House

Passed House Federalism, Military Affairs, and Elections 4-2

Passed the House 32-25 and was sent to the Governor

Vetoed by the Governor

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## **SB1100 - Maricopa county; division; new counties**

### **Sponsor**

Sen. Jake Hoffman (R)

### **Summary**

Defines the boundaries of Gila, Maricopa, Pinal, Yavapai, Yuma, and La Paz Counties. Requires legislative council staff to prepare proposed legislation to conform Arizona State Statutes to this legislation for the 57th legislature, second regular session. Effective date is January 1, 2026.

### **Action Taken**

Passed Senate Government 4-3

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## **SB1101 - Maricopa county; new counties; division**

### **Sponsor**

Sen. Jake Hoffman (R)

### **Summary**

Divides Maricopa County into four counties by modifying the Maricopa County boundaries and adding three new counties: Hohokam County, Mogollon County, and O'odham County. Maricopa County operations will continue in their existing form through a transition period of up to three years after the effective date of this legislation. The boards of supervisors of Hohokam, Mogollon, and O'odham Counties will be elected at a special election held within 120 days after the effective date of this legislation. Currently elected Maricopa County Supervisors continue in their capacity for the remainder of their term in whichever county their supervisory district is located. The elected boards of supervisors in the three new counties will determine an application process for municipalities to apply to be the county seat, which will be determined at a special election to be held within 120 days from the election of the boards of supervisors. The four counties are authorized to enter into a ten-year shared use agreement for the use of existing shared capital assets. The four counties are required to enter into an intergovernmental agreement for the continued operation of community colleges for at least ten years after the effective date of this legislation. Effective January 1, 2026.

### **Action Taken**

Passed Senate Government 4-3

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## **SB1142 - Elections; foreign contributions; prohibition**

### **Sponsor**

Sen. Mark Finchem (R)

### **Summary**

Prohibits monetary contributions or in-kind donations of any type from any foreign corporation or person and for any the person, entity, or committee to accept either. Requires any person, entity or committee that is required to file campaign finance reports pursuant to state law to certify under penalty of perjury that no prohibited form of contribution has been accepted by the person, entity or committee. Exempts federally recognized sovereign tribal nations.

### **Action Taken**

Passed Senate Judiciary and Elections 5-2

Passed the Senate 19-7 and was sent to the House

Passed House Federalism, Military Affairs, and Elections 4-2

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## **SB1237 - State employees; remote work; prohibition (Agency accounts; technical correction)**

### **Sponsor**

Sen. Warren Petersen (R)

### **Summary**

Prohibits full-time state employees from working remotely.

### **Action Taken**

Passed Senate Regulatory Affairs and Government Efficiency 4-2

Passed the Senate 17-12 and was sent to the House

Passed House Regulatory Oversight 3-2

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## **SB1243 - Open meetings; call to public**

### **Sponsor**

Sen. John Kavanagh (R)

### **Summary**

Outlines the process, permissions, mandatory schedule, Prohibitions, and management of open calls that a public body makes at a public meeting. Stipulates that official business does not include a prayer, pledge, or recognition of a person or organization.

### **Action Taken**

Passed Senate Government 4-3

Passed the Senate 17-12 and was sent to the House

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## **SB1289 - Elections; canvass; certification; acknowledgment**

### **Sponsor**

Sen. John Kavanagh (R)

### **Summary**

Requires that various governing bodies acknowledge without prejudice certain actions pertaining to an election, pursuant to state law.

### **Action Taken**

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-12 and was sent to the House

Failed in House Federalism, Military Affairs, and Elections 3-3

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## **SB1334 - Voting locations; emergency designation; electioneering.**

### **Sponsor**

Sen. Janae Shamp (R)

### **Summary**

Removes the following requirements that delineate that the county recorder or election officer must post a public list of any sites designated as emergency polling places—along with the reasons for that designation and attempts made to secure alternatives—at least two weeks before election day, and that if a site is not on the emergency-designation list, the facility must allow political activity outside the seventy-five-foot zone, and that should an emergency arise after the initial posting, the county recorder or election officer is required to update the list promptly with the relevant details.

### **Action Taken**

Passed Senate Judiciary and Elections 4-2

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## **SB1375 - Voter registration rolls; internet access**

### **Sponsor**

Sen. Mark Finchem (R)

### **Summary**

Strikes previous management arrangements to receive voter registration rolls and requires that the County Recorder provide free access to voter rolls via an internet portal that is accessible to the public and allows data to be downloaded. Requires any voter or precinct lists to be used as authorized.

### **Action Taken**

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-12 and was sent to the House

Passed House Federalism, Military Affairs, and Elections 4-3

Passed the House 32-25 and was sent back to the Senate

Passed the Senate 17-12 and was sent to the Governor

Vetoed by the Governor

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## **SB1376 - State elections; contest; technical correction**

### **Sponsor**

Sen. J.D. Mesnard (R)

### **Summary**

Minor change in Title 16 (Elections and Electors) related to the conduct of elections. Apparent striker bus.

### **Action Taken**

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## **SB1378 - Political signs; homeowners' associations**

### **Sponsor**

Sen. J.D. Mesnard (R)

### **Summary**

Adds to the definition of “political sign” for condominium and homeowner’s associations that a sign can be a flag and that except for a candidate prescribed in this legislation, without regard to whether the person supported or opposed is on the ballot at the next upcoming election.

### **Action Taken**

Passed Senate Government 5-2

Passed the Senate 21-7 and was sent to the House

Passed House Government 4-3

Passed the House 32-25 and was sent back to the Senate

Passed the Senate 29-0 and was sent to the Governor

Signed by the Governor

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## **SCR1002 - Photo enforcement systems; prohibition**

### **Sponsor**

Sen. Wendy Rogers (R)

### **Summary**

Bans local authorities and state agencies from using automated photo enforcement systems (defined) to identify excessive speed violations or failures to obey traffic control devices.

### **Action Taken**

Passed Senate Public Safety 4-3

Passed the Senate 16-13 and was sent to the House

Passed House Transportation and Infrastructure 4-1

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## SCR1022 - Legislative districts; population; census; citizenship

### Sponsor

Sen. Jake Hoffman (R)

### Summary

The 2026 general election ballot is to carry the question of whether to amend Article 4, Part 2, Section 1 of the Constitution of Arizona to require that during each year that ends in zero, the Independent Redistricting Commission, or other office or body as designated by the legislature, to take a census to adjust its federal and state legislative districts. The language in the proposed amendment outlines how the census is to work and creates the State Census Fund for the purposes of taking the census required by this amendment modification. Stipulates that state legislative districts must have equal citizenship population apportionment. Grants any member of the legislature standing to initiate an action or proceedings to enforce this change. **Takes \$5,000,000 from the Clean Elections Fund yearly and places it in the Census Fund.**

### Action Taken

Passed Senate Government 4-3

Passed the Senate 16-11 and was sent to the House

May 8, 2025

**BY EMAIL**

Arizona Citizens Clean Elections Commission  
1110 W. Washington St., Suite 250  
Phoenix, AZ 85007  
Email: [ccec@azcanelections.gov](mailto:ccec@azcanelections.gov)

**Re: Advisory Opinion Request**

**Dear Commissioners:**

Pursuant to Ariz. Admin. Code R2-20-808 adopted by the Arizona Citizens Clean Elections Commission (“**Commission**”), we seek an advisory opinion on behalf of Fair Democracy (“**FD**”). FD seeks clarification on whether certain public communications qualify as “campaign media spending” under the Voters’ Right to Know Act (“**VRKA**”).

**I. Background**

FD is a 501(c)(4) social welfare organization that is registered with the Internal Revenue Service. FD “works to ensure that the roots of American Democracy are healthy with strong voting rights and access, an engaged and informed electorate, an open and accountable government and trusted messengers engaging Americans in civil discourse.”<sup>1</sup> One such project in furtherance of its social welfare mission is the “Policy Information Center,” a website where FD provides educational content about legislative issues and officeholders. FD also sponsors digital issue advertisements to inform the public about these legislative issues, which typically link to the Policy Information Center website.

FD wishes to sponsor public communications in Arizona that discuss policy issues. The communications may refer to Arizona elected officials and/or candidates, as well as Arizona political parties. FD seeks guidance whether the following public communications qualify as “campaign media spending” if sponsored between 6 months and 90 days before a primary election. Each communication would link to an article posted on FD’s “Policy Information Center” website.

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<sup>1</sup> Internal Revenue Service, 2021 Form 990 (Fair Democracy), [https://apps.irs.gov/pub/epostcard/cor/822747849\\_202206\\_990O\\_2023060821409792.pdf](https://apps.irs.gov/pub/epostcard/cor/822747849_202206_990O_2023060821409792.pdf).

## Public Communication 1:



The following text would accompany the graphic: “Arizona Republicans are considering new restrictions on abortion medication. Supporters say the measures provide additional regulations, while critics argue they conflict with Proposition 139, which was approved by voters to protect abortion rights in the state constitution.

What are your thoughts on this ongoing discussion? 💬 #AZPolitics #ReproductiveRights #Legislation

Story at: [hyperlink]”

## Public Communication 2a:

Public Communications 2a, 2b, and 2c include the same graphic and text. However, each version contains a different call to action – Public Communication 2a asks viewers to share their thoughts; Public Communication 2b asks viewers to follow FD on Facebook; and Public Communication 2c asks viewers to join FD’s email list.





The following text would accompany the graphic: “🗣️ Arizona Democrats have pledged to curb waste, fraud and abuse in the state’s universal school voucher program! They’re pushing for stronger oversight to ensure funds are used properly and not at the expense of our public schools.

📖💰 Do you think the program needs more accountability? Share your thoughts! ⬇️  
#AZPolitics #EducationMatters #SchoolFunding

Story at: [hyperlink]”

### Public Communication 2b:



The following text would accompany the graphic: 🗣️ Arizona Democrats have pledged to curb waste, fraud and abuse in the state’s universal school voucher program! They’re pushing for stronger oversight to ensure funds are used properly and not at the expense of our public schools.

📖💰 Follow us on Facebook to learn more. ⬇️ #AZPolitics #EducationMatters #SchoolFunding”

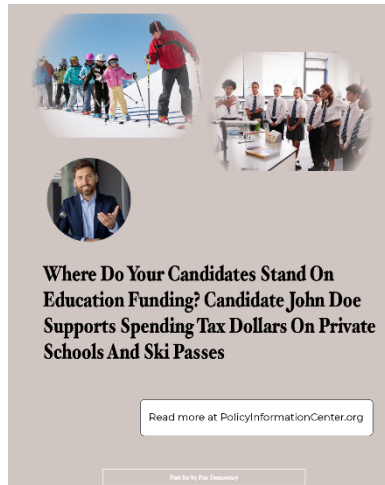
### Public Communication 2c:



The following text would accompany the graphic: 🗣️ Arizona Democrats have pledged to curb waste, fraud and abuse in the state’s universal school voucher program! They’re pushing for stronger oversight to ensure funds are used properly and not at the expense of our public schools.

📧💰 Join our email list to learn more. ⬇️ #AZPolitics #EducationMatters #SchoolFunding”

### Public Communication 3a:



The following text would accompany the graphic: “John Doe, a candidate for LD 31, supports Arizona’s universal school voucher program, which cost the state \$444 million in 2024. Doe opposes efforts to add oversight or prevent misuse of funds and describes himself as an ‘outspoken school choice advocate.’”

### Public Communication 3b:



The following text would accompany the graphic: John Doe supports Arizona’s universal school voucher program, which cost the state \$444 million in 2024. Doe opposes efforts to add oversight or prevent misuse of funds and describes himself as an “outspoken school choice advocate.”

## Public Communication 4



The following text would accompany the graphic: “🚨 Ethics Under Fire in State Politics 🚨

State Rep. Robert Jacobs is facing backlash after introducing a bill that would *slash taxes* for HighPrairie Energy — one of his biggest donors. While not illegal, critics say it’s a clear case of donor influence over public interest.

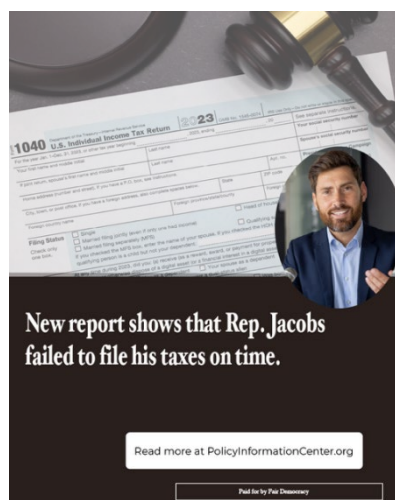
Jacobs claims the bill will boost jobs and help the energy sector, but watchdogs aren’t buying it. They say the timing and the direct benefit to his top donor raise serious red flags. ⚠️


Now, calls are growing for stronger ethics and transparency reforms. Voters and advocacy groups are watching closely. 👁️

Should lawmakers be allowed to push bills that benefit their biggest campaign donors? 💰😞

Share your thoughts! 📌 #EthicsMatter #FollowTheMoney #StatePolitics #TransparencyNow”

## Public Communication 5



The following text would accompany the graphic: “NEW REPORT: Rep. Jacobs failed to file his taxes on time — again. If we’re expected to follow the rules, why can’t our elected officials? Arizonans deserve accountability, not excuses.  #HoldThemAccountable #RepJacobs”

## **II. Relevant Legal Provisions**

Under the VRKA, campaign media spending includes “a public communication that promotes, supports, attacks or opposes a candidate within six months preceding an election involving that candidate.”<sup>2</sup>

Campaign media spending also includes a “public communication that supports the election or defeat of candidates of an identified political party or the electoral prospects of an identified political party [...]” regardless of when the communication is disseminated.<sup>3</sup>

## **III. Discussion**

None of FD’s proposed examples qualify as campaign media spending.

In Advisory Opinion 2024-03, the Commission determined that a public communication “that is focused on a particular policy view of an elected official but does not mention their candidacy” is not campaign media spending.<sup>4</sup> In making its determination, the Commission examined how the terms “promote, support, oppose, or attack” (“*PASO*”) bear on the word “candidate.”<sup>5</sup> The definition “uses verbs that speak to an action that involves not just the person who is a candidate, but the candidacy itself.”<sup>6</sup>

The Commission also concluded that communications that refer to a political party as “means to another end” were not campaign media spending.<sup>7</sup> According to the Commission, an “end” can include “providing context for a call to action to contact a legislature, seeking to bring more people into association with the organization, or facilitating direct communication with a particular elected official.”<sup>8</sup>

### **Public Communication 1:**

The advertisement refers to a current public official’s support of a specific policy – restricting the abortion pill. The advertisement does not express opposition to, or attack, the official’s candidacy. As such, the advertisement does not PASO a candidate under the VRKA.

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<sup>2</sup> Ariz. Rev. Stat. § 16-971(2)(a)(ii).

<sup>3</sup> *Id.* § 16-971(2)(a)(vi).

<sup>4</sup> Ariz. Clean Elections Commission, Adv. Op. 2024-03 at 6, [https://storage.googleapis.com.usgovcloudapi.net/public/docs/1009-1035AdvisoryOpinion24\\_03AOR24\\_01FinalapprovedApril18\\_2024.pdf](https://storage.googleapis.com.usgovcloudapi.net/public/docs/1009-1035AdvisoryOpinion24_03AOR24_01FinalapprovedApril18_2024.pdf).

<sup>5</sup> *Id.*

<sup>6</sup> *Id.*

<sup>7</sup> *Id.* at 10.

<sup>8</sup> *Id.*

### **Public Communications 2a, 2b, and 2c:**

The advertisements refer to a political party's desire to cut waste and abuse in school voucher spending. The language accompanying the graphic asks viewers whether they think the voucher program needs more accountability. The advertisements do not support the electoral prospects of a party. Instead, the advertisements aim to facilitate discussion on a particular issue.

The conclusion should be the same with respect to Public Communication 2a, Public Communication 2b, and Public Communication 2c. All three advertisements are "means to an[] end" other than voting, with Public Communication 2a inviting viewers to share their thoughts, Public Communication 2b asking viewers to follow FD on Facebook to learn more, and Public Communication 2c asking viewers to join FD's mailing list.

As such, the advertisements do not support the electoral prospects of a political party under the VRKA.

### **Public Communications 3a and 3b:**

The advertisements refer to an individual who supports spending Arizona tax dollars on private schools and ski passes. The individual referenced is not a current officeholder but is a candidate for office in Arizona.

Public Communication 3a identifies John Doe as a candidate for office, while Public Communication 3b does not identify John Doe as a candidate. Nonetheless, neither advertisement expresses opposition to or attacks the individual's candidacy but instead explains the individual's support of a particular policy. As such, the advertisements do not PASO a candidate under the VRKA.

### **Public Communication 4:**

The advertisement refers to a current public official's support of a tax bill that would benefit the energy sector. The advertisement mentions that the legislation would benefit a major donor to the legislator's campaign, to build opposition to this tax bill. The advertisement is a "means to an[] end" other than voting by building opposition to the substantive policy *and* asking voters to share their opinions on ethics and policy. The advertisement does not express opposition to, or attack, the official's candidacy. As such, the advertisement does not PASO a candidate under the VRKA.

### **Public Communication 5:**

The advertisement highlights a current public official's failure to timely file taxes and asks whether public officials are held to a different standard than other Arizonans. The advertisement does not reference or express opposition to, or attack, the official's candidacy. As such, the advertisement does not PASO a candidate under the VRKA.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jon S. Berkon". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jonathan S. Berkon  
Emma R. Anspach  
*Counsel to Fair Democracy*

Katie Hobbs  
Governor

Thomas M. Collins  
Executive Director



Mark S. Kimble  
Chair

Steve M. Titla  
Amy B. Chan  
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June 26, 2025  
Advisory Opinion 2025-01

Jonathan S. Berkon  
Emma R. Anspach  
Elias Law Group  
250 Massachusetts Ave. NW, Suite 400  
Washington, D.C. 20001

Re: Advisory Opinion Request of Fair Democracy

Dear Mr. Berkon and Ms. Anspach:

We are responding to your advisory opinion request (“AOR”) on behalf of Fair Democracy (“FD”). The request asks the Commission to evaluate public communications that would be made during a particular window prior to the primary election to determine whether those communications would constitute “campaign media spending” under the Voters’ Right to Know Act (“the Act” or “VRKA”).

***Question Presented***

How should covered persons evaluate public communications to determine whether they constitute campaign media spending between 6 months and 90 days before a primary election?

***Summary Answer***

Spenders should consider several factors when evaluating whether a communication constitutes campaign media spending under A.R.S. § 16-971. For the “promotes, supports, attacks or opposes” (“PASO”) standard in § 16-971(2)(a)(ii), relevant considerations include whether the communication identifies a candidate within six months of an election; whether it includes language that

praises, criticizes, or otherwise addresses the candidate, the targeting of the communication, its overall presentation and tone; and whether it would reasonably be understood as seeking to influence the outcome of that candidate's election or whether, if issue advocacy, it identifies and advocates for a position on the issue. Under § 16-971(2)(a)(vi), communications that reference political parties are not campaign media spending unless they, in context, support or oppose the electoral success of that party's candidates. This may include partisan calls to action, voter mobilization efforts, or messaging that advocates for or against a party's role in an upcoming election. Context remains central to both analyses.

## **I. Background**

FD is an organization that is registered with the Internal Revenue Service as a 501(c)(4) nonprofit organization. AOR at 1. It describes itself as nonpartisan and focused on advancing transparency and accountability in government. *Id.* It states that its core activities include public education and advocacy on policy issues. It is not formed for the purpose of supporting or opposing political candidates, and it does not engage in electoral campaigning.

FD proposes to disseminate several public communications related to public policy issues and seeks clarification on whether any such communications it sponsors, i.e., pays for or produces with in-kind contributions, would be campaign media spending.<sup>1</sup>

## **II. Legal Analysis**

Section 16-971(2)(a) defines “campaign media spending” to include, among other things:

A public communication that “promotes, supports, attacks or opposes a candidate within six months preceding an election involving that candidate.”

A. R. S. § 16-971(2)(a)(ii).

“An activity or public communication that supports the election or defeat of candidates of an identified political party or the electoral prospects of an identified political party, including partisan voter registration, partisan get-out-the-vote activity or other partisan campaign activity.”

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<sup>1</sup> The window the request identifies excludes the time period covered by A.R.S. § 16-971(2)(a)(iii)(referring to a clearly identified candidate beginning 90 days before a primary election).



A.R.S. § 16-971(2)(a)(vi).

In Advisory Opinion 2024-03, the Commission explained that the PASO verbs (“promote, support, attack, oppose”) relate to the candidacy of the elected official, not only their public office or policy positions. Ariz. Citizens Clean Elections Comm’n, Advisory Op. 2024-03, at 6 (Apr. 18, 2024), [https://storage.googleapis.com/core.usgovcloudapi.net/public/docs/1009-1035AdvisoryOpinion24\\_03AOR24\\_01FinalapprovedApril18\\_2024.pdf](https://storage.googleapis.com/core.usgovcloudapi.net/public/docs/1009-1035AdvisoryOpinion24_03AOR24_01FinalapprovedApril18_2024.pdf).

Similarly, the Commission explained that:

“[M]ention[ing] [a] party as a means to another end, whether providing context for a call to action to contact a legislature, seeking to bring more people into association with the organization, or facilitating direct communication with a particular elected official” does not “involve the electoral prospects of candidates of a particular party or the party itself.” *Id.* at 10.

As a general matter, communications that address pending issues or legislation without referencing candidacy or electoral consequences, or that mention a political party in connection with issue-based or civic engagement purposes, are likely not subject to the definition of campaign media spending under the Act.

### **III. Proposed Communications**

FD has submitted several proposed public communications that it may disseminate in Arizona. Each communication addresses matters of public concern, ranging from education and taxation to reproductive rights and government transparency. The messages vary in tone and format, and some identify elected officials or candidates by name. The communications are as follows:

#### **Public Communication 1**

This communication addresses proposed restrictions on abortion medication by Republican lawmakers in Arizona. The message contrasts supporter and critic perspectives and references Proposition 139, a voter-approved constitutional amendment on abortion rights. The communication invites the audience to weigh in on the policy debate with a prompt—“What are your thoughts on this ongoing discussion?”—accompanied by hashtags such as #AZPolitics and #ReproductiveRights. The post links to a more detailed article on FD’s website.

## Public Communication 2a

This advertisement focuses on Arizona Democrats' legislative efforts to advocate for more oversight and accountability in the state's Empowerment Scholarship ("ESA") program that provides students with money to obtain educational services outside of the public school system. The message highlights the Democratic members' commitment to curbing what they see as waste, fraud, and abuse, and concludes with an open-ended call for viewers to "[s]hare your thoughts." The communication includes hashtags that frame the content as part of a broader conversation on education policy and school funding, and links to an article with further information.

## Public Communication 2b

Identical in content to 2a, this version of the advertisement includes a different call to action: "Follow us on Facebook to learn more." The focus remains on Democratic lawmakers' stance on ESA oversight, but the call to action is designed to build social media engagement with FD rather than solicit policy input directly.

## Public Communication 2c

This version matches the narrative content of 2a and 2b, highlighting Democratic efforts to reform the ESA program with more oversight. The call to action here asks viewers to "Join our email list to learn more," suggesting the communication's purpose is to grow FD's audience and newsletter subscriber base.

## Public Communication 3a

This advertisement names John Doe as a candidate for Arizona Legislative District 31 and criticizes his support for the state's ESA program, noting the program's cost and Doe's resistance to oversight reforms. It refers to him as an "outspoken school choice advocate" and implies a policy-based critique of his stance.

## Public Communication 3b

Nearly identical in content to 3a, this version does not identify John Doe as a candidate. It focuses on the same policy positions and uses the same phrasing ("outspoken school choice advocate") but without expressly referencing his electoral status.

## Public Communication 4

This communication criticizes State Representative Robert Jacobs for introducing a tax bill that would benefit High Prairie Energy, a major donor to his campaign. While acknowledging the proposal is not illegal, the message suggests donor influence and raises concerns about legislative ethics. It ends by encouraging stronger transparency reforms and includes a question asking the public whether lawmakers should be permitted to advance bills that benefit their biggest donors.

## Public Communication 5

This final communication reports that Representative Jacobs failed to file his taxes on time again, questioning whether elected officials are held to the same standards as ordinary citizens. It uses a critical tone and hashtags like #HoldThemAccountable, but does not reference Jacobs' status as a candidate.

### **IV. Analysis of Proposed Communications under A.R.S. § 16-971(2)(a)(ii) (PASO candidate)**

The Commission begins by considering whether any of the proposed communications constitute campaign media spending under A.R.S. § 16-971(2)(a)(ii), which applies to a public communication that “promotes, supports, attacks or opposes a candidate within six months preceding an election involving that candidate.” In Advisory Opinion 2024-03, the Commission detailed that “a public communication that is focused on a particular policy view of an elected official but does not mention their candidacy is not contributing to the growth of or advertising the candidate, even if it might refer to the candidate” and therefore did not “promote” that candidate. Advisory Op. 2024-03 at 6. Consequently, whether a communication meets this definition depends in part on whether the individual is identified as a candidate, but also the language used to praise or criticize them and the targeting and presentation of the message. *Id.* at 6 and n.4.

Communications 1 and 4 do not identify any individual as a candidate or include content that promotes or opposes their election. These communications mention political parties or elected officials, they do so in the context of ongoing public policy debates. For example, Communication 1 discusses abortion medication access in connection with a particular Republican lawmaker as representative of the party position the communication describes, but does not reference any election. Communication 4 likewise highlights criticism of a current lawmaker's legislative activities.

Communication 3a and 3b differ and fall within the PASO standard because they attack the candidate. Communication 3a identifies an individual as a candidate for Legislative District 31 and criticizes his policy position by framing it negatively. The communication draws an inference that the candidate supports particular spending decisions by ESA users that have been held out for public scorn because the candidate “opposes effort to add oversight or prevent misuse of funds” and labels himself an “outspoken school choice advocate.” *See, e.g.,* Laurie Roberts, Poor rich kids. They (still) need our help to pay for piano lessons, *The Arizona Republic* (June 18, 2025), <https://www.azcentral.com/story/opinion/op-ed/laurieroberts/2025/06/18/esa-universal-school-voucher-reform-arizona/84261748007/> (noting that “12 News’ Craig Harris reports that taxpayers are shelling out \$20 million this year for such academic imperatives as dance, piano and private swimming lessons.”). Although the communication does not expressly call for the candidate’s defeat or use campaign slogans, the combination of candidate identification, negative framing within a period designated by the statute may reasonably be interpreted as opposing the candidate’s election. A.R.S. § 16-971(2)(a)(ii).

Communication 3b differs effectively only in that it does not use the term “candidate.” That distinction alone does not meaningfully differentiate Communication 3a. The candidate is not, apparently, an office holder, nor is there any suggestion that a viewer or reader of the communication take any steps relevant to a current policy discussion.

Communication 5 similarly constitutes campaign media spending. It identifies a representative by name, but does not indicate candidacy. It highlights his repeated failure to file his taxes on time, placing him in a negative light. The tagline is “#HoldThemAccountable,” and elections are a way of holding elected officials accountable. This falls within the definition by attacking a candidate. A.R.S. § 16-971(2)(a)(ii).<sup>2</sup>

## **V. Analysis of A.R.S. § 16-971(2)(a)(vi) (party support)**

The Commission next considers whether any of the proposed communications support or oppose the electoral prospects of an identified political party under A.R.S. § 16-971(2)(a)(vi). This provision applies to communications that, in context,

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<sup>2</sup> Because we reach this conclusion, we do not analyze whether these communications otherwise constitute express advocacy. *See* A.R.S. § 16-971(2)(a)(i); *see also Comm. for Just. & Fairness v. Ariz. Sec’y of State’s Off.*, 235 Ariz. 347 (App. 2014), A.R.S. § 16-901.01.

promote the electoral success or failure of a political party or its candidates—such. *Id.*

In Advisory Opinion 2024-03, the Commission explained that mere references to political parties are insufficient. Advisory Op. at 10. The communication must connect the party to an electoral outcome. *Id.* For example, identifying a party in the course of legislative criticism or policy debate does not, on its own, meet this standard. *Id.*

Here, communications 1 and 2a, 2b and 2c mention political parties in connection with specific legislative issues. Communication 1 references Republican lawmakers in the context of restrictions on abortion medication, while communications 2a, 2b and 2c refer to Democrats when discussing ESA oversight. None of these messages include calls to vote, endorse partisan outcomes, or link the policy positions to electoral success. The references are incidental to issue advocacy and do not serve to advance or oppose the *electoral* prospects of either party.<sup>3</sup>

Accordingly, the Commission finds that these proposed communications would not constitute campaign media spending under A.R.S. § 16-971(2)(a)(vi).<sup>4</sup>

## **V. Conclusion**

This advisory opinion is issued pursuant to Ariz. Admin. Code R2-20-808 and is based on the facts presented in the request. A Commission advisory opinion “may be relied upon by any person involved in the specific transaction or activity with respect to which such advisory opinion is rendered, and any person involved in any specific transaction or activity which is indistinguishable in all its material aspects from the transaction or activity with respect to which such advisory opinion is

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<sup>3</sup> The distinction among calls to action in Communications 2a, 2b, and 2c similarly do not convert these communications to campaign media spending. For example, the statute states that social media and mailing list “acquisition” in preparation for other campaign media spending can constitute campaign media spending. But generally building a list is not acquisition of, i.e., “to get as one’s own” the list. <https://www.merriam-webster.com/dictionary/acquire>.

To the extent that the taglines here are intended to develop campaign media spending, a covered person or other party contemplating the statute should consider whether the activity falls within Ariz. Admin. Code § R2-20-801(B).

<sup>4</sup> Communications 3a, 3b, 4 and 5 do not mention political parties so this section is not relevant to the analysis of those communications.

rendered.” Ariz. Admin. Code R2-20-808(C)(3). A “person who relies upon an advisory opinion and who acts in good faith in accordance with that advisory opinion shall not, as a result of any such act, be subject to any sanction provided in Chapter 6.1 of Title 16.” *Id.* § R2-20-808(C)(4). Advisory opinions may be affected by later events, including judicial opinions and changes in law.

Sincerely,

DRAFT

Katie Hobbs  
Governor

Thomas M. Collins  
Executive Director



Mark S. Kimble  
Chair

Steve M. Titla  
Amy B. Chan  
Galen D. Paton  
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**MEMORANDUM**

**To: Commissioners**

**From: Thomas Collins**

**Date: June 23, 2025**

**Subject: 2025 5 Year Review Report for Governor's Regulatory Review Council**

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I am asking for approval to finalize and submit the Commission's 5 year rule review report.

Every five years the Commission submits a report to the Governor's Regulatory Review Council (GRRC) regarding its rules under the Clean Elections Act.

According to GRRC,

The reports are intended to be a concise written analysis of an agency's administrative rules that covers the previous 5 years. Council staff reviews the report according to the criteria provided in A.R.S. § 41-1056(A) and A.A.C. R1-6-301. Staff then prepares a memorandum that recommends approval or return of the report. Council staff presents the memorandum to the Council at a Study Session for consideration. The Council may vote to approve or return the report at the subsequent Council Meeting.

Our last report was approved in 2020 with little discussion.

The report covers the following aspects of our administrative rules:

1. The rule's effectiveness in achieving its objectives, including a summary of any available data supporting the conclusions reached.
2. Written criticisms of the rule received during the previous five years, including any written analyses submitted to the agency questioning whether the rule is based on valid scientific or reliable principles or methods.
3. Authorization of the rule by existing statutes.
4. Whether the rule is consistent with statutes or other rules made by the agency and current agency enforcement policy.
5. The clarity, conciseness and understandability of the rule.
6. The estimated economic, small business and consumer impact of the rules as compared to the economic, small business and consumer impact statement prepared on the last making of the rules.
7. Any analysis submitted to the agency by another person regarding the rule's impact on this state's business competitiveness as compared to the competitiveness of businesses in other states.
8. If applicable, that the agency completed the previous five-year review process.
9. A determination that the probable benefits of the rule outweigh within this state the probable costs of the rule, and the rule imposes the least burden and costs to persons regulated by the rule, including paperwork and other compliance costs, necessary to achieve the underlying regulatory objective.
10. A determination that the rule is not more stringent than a corresponding federal law unless there is statutory authority to exceed the requirements of that federal law.

A.R.S. § 41-1056(A)(1)-(10). GRRC Staff reviews these items before making a recommendation to the council.

The Voters' Right to Know Act rules are excluded from this review by A.R.S. § 16-974(D).



*FIVE YEAR REVIEW REPORT*  
*Citizens Clean Elections Commission*  
*A.A.C. Title 2, Chapter 20, Articles 1-7*

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This report covers all rules in A.A.C. Title 2, Chapter 20, all articles. The Citizens Clean Elections Commission (the “Commission”) adopted these rules to further the goals of the Citizens Clean Elections Act (“Act”). The Act was passed by the voters in 1998 and created the clean elections system to diminish the influence of special-interest money, including the opportunities for and appearance of *quid pro quo* corruption, and thereby to promote the integrity of Arizona state government. The Act promotes freedom of speech under the United States and Arizona Constitutions. It also created a voluntary system wherein participating candidates receive public funds to finance campaigns. To qualify for funding, participating candidates must follow the rules and reporting requirements adopted by the Commission. The Act also applies to candidates who are nonparticipating candidates and independent spenders in elections. The Rules implement the provisions of the Act. All rules created or amended prior to June 25, 2013 have been “pre-cleared” by the U.S. Department of Justice pursuant to Section Five of the Federal Voting Rights Act.

The Commission reports the following analysis of its rules in the order required by Arizona Administrative Code (“A.A.C.”) R1-6-301. Pursuant to A.A.C. R1-6-301(B), Part I includes information pertaining to all, or a great number, of the rules. Part II reports information unique to individual rules.

Part I: Analysis Which Is Identical for all Rules

**1. Effectiveness of the rule in achieving the objective**

All the rules are effective in achieving their objectives as stated below.

**2. Written criticisms of the Rules Received in the Past Five Years**

To the extent that the Commission has received written criticisms of the rules in the past five years it has come in the form of responses to ongoing enforcement actions and related litigation and regarding the application of a Commission rules to candidates debates.

- A. In its response to a complaint by the Executive Director, respondents argued that the Commission’s definition of candidate, Ariz. Admin. Code R2-20-101(4), to include agents of the candidate is invalid. *See, e.g.,* Response to Complaint, In re The Power of 5s, Arizona Citizens Clean Elections Commission, MUR 21-01 (Oct. 13, 2021) (Response filed by Tim La Sota, Attorney for The Power of 5s), available at <https://storageccec.blob.core.usgovcloudapi.net/public/docs/746-December-21-Meeting-Packet.pdf> at 72; *see also* Complaint, *Power of Fives LLC v. Arizona Citizens Clean Elections Commission*, No. CV 2021-015826 (Ariz. Super. Ct., Maricopa Cty. Oct. 7, 2021).

- B. In a letter to the Executive Director, Senator Jake Hoffman explained his objection to the Executive Director's application of Ariz. Admin. Code § R2-20-107(C). *Jake Hoffman, Ariz. State Sen., Letter to Thomas M. Collins, Exec. Dir., Ariz. Citizens Clean Elections Comm'n* (Oct. 1, 2024) (on file with the Ariz. Citizens Clean Elections Comm'n).

**3. Authorization of the Rules by Existing Statutes**

The Commission's general rulemaking authority is found in A.R.S. §§ 16-940 through 16-961 and A.R.S. § 16-956 (C) gives the Commission specific authority to adopt rules to carry out the purposes of the Article and to govern procedures of the Commission.

**4. Consistency of the rule with state and federal statutes and rules and enforcement**

In the process of preparing this report the rules have been compared against each other and A.R.S. §§ 16-940 through 16-961 and the Commission has determined the rules are consistent and enforced as written.

**5. Clarity, conciseness, and understandability of the rule**

All the rules are clear, concise, and understandable.

**6. Economic, Small Business, and Consumer Impact Comparison**

The economic impact has not differed from that projected when the rules were adopted/amended. The rules create no discernible economic impact for small businesses or consumers. For small businesses or consumers who make expenditures subject to the rules' reporting requirements, compliance with the rules imposes zero economic impact because the reporting requirement is simple and may be filed without any filing fee. To the extent that the obligation to file a report itself imposes an economic impact, that impact comes from the statutory reporting requirement and not from the rules. A failure to abide by any of the statutes or rules may create an economic impact on those subject to the penalties the Commission may impose.

The main costs are born by the Commission and include staff time to process reports. The Commission receives funds from the following sources:

- A 10% surcharge imposed on all civil and criminal fines and penalties collected pursuant to A.R.S. § 12-116.01;
- A \$5 voluntary contribution per taxpayer (\$10 when married and filing jointly) who files an Arizona state income tax return and marks an optional check-off box on the first page of the form. A taxpayer who checks this box receives a \$5 reduction in tax liability and \$5 goes to the Clean Elections Fund (NOTE: As of August 2, 2012, the Commission only receives \$5 voluntary taxpayer contributions from individuals filing tax returns for tax years 2012 and earlier.);

- A voluntary donation to the Clean Elections Fund by designating the Fund on an income tax return form filed by the individual or business entity, or by making a payment directly to the Fund. Any taxpayer making a donation shall receive a dollar-for-dollar tax credit not to exceed 20 percent of the tax amount on the return or \$680 per taxpayer, whichever is higher (NOTE: As of August 2, 2012, the Commission no longer accepts donations for the dollar-for-dollar tax credit.);
- Qualifying contributions received by participating candidates; and
- Civil penalties assessed against violators of the Citizens Clean Elections Act.

**7. Analysis Submitted by Another Person Regarding the Rules' Impact on this State's Business Competitiveness as Compared to the Competitiveness of Businesses in Other States**

No analysis has been submitted to the Commission.

**8. Completion of the Previous Five-Year –Review Report Process**

The last five-year-review report was completed and did not identify any needed course of action.

**9. Probable Benefits Outweigh Probable Costs / Rules Impose Least Burden on Regulated Persons**

In the process of preparing this report, the Commission has determined that the rules achieve their regulatory objectives with the least burden and cost possible, and the probable benefits of the rules outweigh the probable costs.

**10. Corresponding federal law**

There are no corresponding federal laws.

**11. Compliance with A.R.S. § 41-1037**

Commission rules do not require the issuance of a regulatory permit, license, or agency authorization.

**12. Course of action the agency proposes to take regarding each rule**

The Commission does not propose any course of action for the rules.

## Part II: Analysis of Individual Rules

### ARTICLE 1 – GENERAL PROVISIONS

#### **R2-20-101. Definitions**

##### **1. Objective**

Supplement the definitions provided in A.R.S. §§16-901 and 16-961 for Chapter 20 of the Arizona Administrative Code, which includes the Commission rules, to define terms used in the rules to make the rules understandable to the reader, achieve clarity in the rules without needless repetition, and afford consistent interpretation.

##### **2. Written Criticism**

In response to a complaint by the Executive Director, respondents argued that the application of a R2-20-101(4) defining candidates to include agents is invalid. Response to Complaint, In re The Power of 5s, Arizona Citizens Clean Elections Commission, MUR 21-01 (Oct. 13, 2021) (Response filed by Tim La Sota, Attorney for The Power of 5s), available at <https://storage.googleapis.com/core.usgovcloudapi.net/public/docs/746-December-21-Meeting-Packet.pdf> at 72. Respondents also filed a lawsuit against the Commission based in part on that provision. Complaint, *Power of Fives LLC v. Arizona Citizens Clean Elections Commission*, No. CV 2021-015826 (Ariz. Super. Ct., Maricopa Cty. Oct. 7, 2021).

The Commission filed a motion for summary judgement on June 22, 2025 explaining the validity of the rule.

#### **R2-20-103. Communications: Time and Method**

##### **1. Objective**

Clarify procedures for computing periods of time and methods of communicating between the candidate and the Commission.

#### **R2-20-104. Certification as a Participating Candidate**

##### **1. Objective**

Provide guidance on filing an application for certification and electronic campaign finance reports; accepting contributions and making expenditures; and requirements for a nonparticipating candidate to be eligible for participating candidate status.

#### **R2-20-105. Certification for Funding**

##### **1. Objective**

Provide the process for certifying clean elections candidates.

**R2-20-106. Distribution of Funds to Certified Candidates**

**1. Objective**

Provide the process and criteria for the Commission to evaluate a candidate's application for funding.

**R2-20-107. Candidate Debates**

**1. Objective**

Provide procedures for conducting debates, for candidates seeking to be excused from participation in the debates and the penalty for failing to participate in the debates.

**2. Written Criticism**

In a letter dated October 1, 2024, Senator Jake Hoffman criticized the Executive Director's application of this rule to a debate for candidates for the U. S. Senate, arguing that the rule should have been applied to mandate the participation of a Green Party candidate at a Commission sponsored debate.

The letter came in response to the Executive Director letter explaining Commission statutes and rules in an inquiry commenced by Senator Hoffman.

**R2-20-108. Termination of Participating Candidate Status**

**1. Objective**

Provide a method for candidates to withdraw their application for certification or funding.

**R2-20-109. Independent Expenditure Reporting Requirements**

**1. Objective**

Provide the requirements for the submission of independent expenditure reports.

**R2-20-110. Participating Candidate Reporting Requirements**

**1. Objective**

Provide the reporting requirements of participating candidates.

**R2-20-111. Non-participating Candidate Reporting Requirements and Contribution Limits**

**1. Objective**

Provide the reporting requirements of non-participating candidates.

**R2-20-112. Political Party Exceptions**

**1. Objective**

Provide guidance on the scope of the political party exceptions in A.R.S. § 16-911(B)(4) to the definitions of contributions and expenditures in A.R.S. § 16-901(5), (8).

**R2-20-113. Candidate Statement Pamphlet**

**1. Objective**

Provide procedures for candidate eligibility and submission of statements for the Commission's primary and general election candidate statement pamphlets in accordance with A.R.S. § 16-956.

**R2-20-114. Candidate Campaign Bank Account**

**1. Objective**

Specify the method for maintaining campaign accounts.

**R2-20-115. Books and Records Requirements**

**1. Objective**

Specify the manner for keeping records and giving the public access to campaign records.

**ARTICLE 2 – COMPLIANCE AND ENFORCEMENT PROCEDURES**

**R2-20-201. Scope**

**1. Objective**

Specify the scope of the rules.

**R2-20-202. Initiation of Compliance Matters**

**1. Objective**

Describe methods for initiating an enforcement matter.

**R2-20-203. Complaints**

**1. Objective**

Provide the process for filing a complaint.

**R2-20-204. Initial Complaint Processing; Notification**

**1. Objective**

Specify the procedures for processing complaints.

**R2-20-205. Opportunity for No Action on Complaint-Generated Matters**

**1. Objective**

Specify the method and time period allowed for an alleged violator to respond to a complaint.

**R2-20-206. Executive Director's Recommendation on Complaint-Generated Matters**

**1. Objective**

Specify the Executive Director's and complainant's role prior to bringing a reason-to-believe recommendation to the Commission.

**8. Completion of the Previous Five-Year –Review Report Process**

The 2015 report described a proposal to amend this rule to require the Executive Director to first receive Commission approval to initiate an inquiry if a person making an independent expenditure in an election without a participating candidate faces penalties under A.R.S. § 16-942(B). The proposal, however, is not consistent with the Clean Elections Act and the Commission took no action on it.

**R2-20-207. Internally Generated Matters; Referrals**

**1. Objective**

Provide the Executive Director with authority to generate an internal complaint.

**R2-20-208. Complaint Processing; Notification**

**1. Objective**

Provide the process for notifying the complainant and the respondent of a reason-to-believe determination.

## **8. Completion of the Previous Five-Year –Review Report Process**

The 2015 report described a proposal to amend this rule to clarify processing procedures when a complaint alleges an “Article 1” violation involving an independent expenditure. That amendment was not completed because the proposed course of action would result in a rule inconsistent with the Clean Elections Act. This was noted in the 2020 report as well.

### **R2-20-209. Investigation**

#### **1. Objective**

Specify the methods used by the Commission to investigate following a reason-to-believe determination.

### **R2-20-210. Written Questions Under Order**

#### **1. Objective**

Allow the Commission to issue an order requiring any person to submit sworn, written answers to written questions.

### **R2-20-211. Subpoenas and Subpoenas Duces Tecum; Depositions**

#### **1. Objective**

Allow the Commission to authorize the Administrative Counsel or Assistant Attorney General to issue subpoenas for a deposition or issue a subpoena *duces tecum* during its investigation.

### **R2-20-213. Motions to Quash or Modify a Subpoena**

#### **1. Objective**

Allow any person to whom a subpoena is directed to apply to the Commission to quash or modify the subpoena.

### **R2-20-214. The Probable Cause to Believe Recommendation: Briefing Procedures**

#### **1. Objective**

Specify the procedure for the Commission’s determination of probable cause to believe that a violation of the statute or rule has occurred or is about to occur.



**R2-20-215. The Probable Cause to Believe Finding; Notification**

**1. Objective**

Provide the process for notifying the respondent of a probable cause finding.

**R2-20-216. Conciliation**

**1. Objective**

Provide the process for settling matters informally.

**R2-20-217. Enforcement Proceedings**

**1. Objective**

Provide the process for assessing civil penalties.

**R2-20-220. Ex Parte Communications**

**1. Objective**

Prohibit ex parte communications with the Commission staff or Commissioner.

**R2-20-221. Representation by Counsel; Notification**

**1. Objective**

Specify the extent of a respondent's right to be represented.

**R2-20-222. Civil Penalties**

**1. Objective**

Designate potential civil penalties.

**R2-20-223. Notice of Appealable Agency Action**

**1. Objective**

Specify the Commission's notice requirement after making a probable cause finding.

**R2-20-224. Request for Administrative Hearing**

**1. Objective**

Designate the timeline and process for a respondent to request a hearing.

**R2-20-225. Informal Settlement Conference**

**1. Objective**

Provide the process for a respondent to request an informal settlement conference.

**R2-20-226. Administrative Hearing**

**1. Objective**

Specify the timeline and process for conducting administrative hearings.

**R2-20-227. Review of Administrative Decision by Commission**

**1. Objective**

Specify the Commission's responsibilities when it receives notice of an administrative decision.

**R2-20-228. Judicial Review**

**1. Objective**

Provide the process for exhausting administrative remedies prior to seeking judicial review.

**ARTICLE 3 - STANDARD OF CONDUCT FOR COMMISSIONERS AND EMPLOYEES**

**R2-20-301. Purpose and Applicability**

**1. Objective**

Indicate the purpose and scope of this article.

**R2-20-302. Definitions**

**1. Objective**

Define terms for this article to make the rules understandable to the reader, achieve clarity in the rules without needless repetition, and afford consistent interpretation.

**R2-20-303. Notification to Commissioners and Employees**

**1. Objective**

Specify material to be made available to each employee and Commissioner upon revision or entrance of new employment.

**R2-20-304. Interpretation and Advisory Service**

**1. Objective**

Specify the process for seeking advice on questions of conflict of interest.

**R2-20-305. Reporting Suspected Violations**

**1. Objective**

Provide the procedure for reporting suspected violations of conflict of interest requirements.

**R2-20-306. Disciplinary and Other Remedial Action**

**1. Objective**

Specify the disciplinary action for violating this Article.

**R2-20-307. General Prohibited Conduct**

**1. Objective**

Specify conduct that is prohibited for Commissioners or employees.

**R2-20-308. Outside Employment or Activities**

**1. Objective**

Specify the prohibited conduct related to employment and other activities for Commissioners or employees.

**R2-20-309. Financial Interests**

**1. Objective**

Specify financial conflicts of interest requirements.

**R2-20-310. Political and Organizational Activity**

**1. Objective**

Specify conflicts of interest related to express advocacy.

**R2-20-311. Membership in Associations**

**1. Objective**

Specify potential conflicts of interest related to membership in nongovernmental associations or organizations.

**R2-20-312. Use of State Property**

**1. Objective**

Specify limitations on using state property.

**ARTICLE 4 – AUDITS**

**R2-20-401. Purpose and Scope**

**1. Objective**

Provide the purpose and scope of the article.

**R2-20-402. General**

**1. Objective**

Establish the tools available to the Commission in conducting audits.

**R2-20-402.01. Audits of Participating Legislative Candidates**

**1. Objective**

Authorize Commission staff to conduct audits of legislative candidates.

**R2-20-402.02. Audits of Participating Statewide Candidates**

**1. Objective**

Provide for audits of participating statewide legislative candidates.

**R2-20-403. Conduct of Fieldwork**

**1. Objective**

Establish candidate responsibilities during an audit.

#### **R2-20-404. Preliminary Audit Report**

##### **1. Objective**

Provide the procedures for the first phase of the audit process.

#### **R2-20-405. Final Audit Report**

##### **1. Objective**

Provide the procedures for the final phase of the audit process.

#### **R2-20-406. Release of Audit Report**

##### **1. Objective**

Provide details on how an audit report is made available to the public.

### **ARTICLE 5 – RULEMAKING**

#### **R2-20-501. Purpose and Scope**

##### **1. Objective**

Specify the purpose and scope of the Commission's rulemaking.

#### **R2-20-502. Procedural Requirements**

##### **1. Objective**

Provide the process for filing a written petition regarding the issuance, amendment or repeal of an administrative rule.

#### **R2-20-503. Processing of Petitions**

##### **1. Objective**

Provide the process for reviewing petitions related to issuing, amending, or repealing rules.

#### **R2-20-504. Disposition of Petitions**

##### **1. Objective**

Provide the process for disposition of petitions related to rulemaking.

#### **R2-20-505. Commission Considerations**

**1. Objective**

Specify a nonexclusive list of criteria the Commission may consider in disposing of a petition for rulemaking.

**R2-20-506. Administrative Record**

**1. Objective**

Designate which records compose the administrative record.

**ARTICLE 6 – EX PARTE COMMUNICATIONS**

**R2-20-601. Purpose and Scope**

**1. Objective**

Specify the purpose and scope of the article.

**R2-20-602. Definitions**

**1. Objective**

Define terms as used in the article.

**R2-20-603. Audits, Investigations & Litigation**

**1. Objective**

Prohibit ex parte communications with the Commission during audits, investigations or litigation.

**R2-20-604. Sanctions**

**1. Objective**

Specify the process for sanctioning those who violate this article.

**ARTICLE 7 – AUDITS AND REPAYMENT**

**R2-20-701. Purpose and Scope**

**1. Objective**

Specify the purpose and scope of the article.

## **R2-20-702. Use of Campaign Funds**

### **1. Objective**

Specify legal uses of campaign funds.

## **R2-20-702.01. Use of Assets**

### **1. Objective**

Provide a method for a candidate to use campaign materials from prior elections.

## **R2-20-703. Documentation for Direct Campaign Expenditures**

### **1. Objective**

Specify the process by which a participating candidate may ensure that campaign expenditures satisfy the direct campaign expenditure requirement.

## **R2-20-703.01. Campaign Consultants**

### **1. Objective**

Specify how a participating candidate may engage the services of a campaign consultant.

## **R2-20-704. Repayment**

### **1. Objective**

Designate the process for repaying distributed funds to the Clean Elections fund and specify that the Commission may require such repayment.

## **R2-20-705. Additional Audits or Repayment Determination**

### **1. Objective**

Authorize additional audits or examinations of campaign activity when new facts are available.

# ARIZONA CITIZEN'S CLEAN ELECTIONS COMMISSION

2025 Five-Year Review, Title 2, Chapter 20

## All Articles

Rule No.	Title	Last Revision	Eff.	Enf.	C	CCU	PB/LB	ARS Authority	EIS Comp.	2015 PCA and Current PCA
R2-20-101	Definitions	2/7/22	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-103	Communications: Time and Method	8/27/07	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-104	Certification as a Participating Candidate	12/15/16	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-105	Certification for Funding	1/1/17	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-106	Distribution of Funds to Certified Candidates	12/14/17	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-107	Candidate Debates	12/15/16	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-108	Termination of Participating Candidate Status	8/25/11	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-109	Independent Expenditure Reporting Requirements	9/14/21	Y	Y	Y	Y	Y	A.R.S. §§ 16-940 through 16-943; 16-955; 16-956 through 16-958; and 16-961	No change	None and None
R2-20-110	Participating Candidate Reporting Requirements	1/1/17	Y	Y	Y	Y	Y	A.R.S. §§ 16-940 through 16-943; 16-955; 16-956 through 16-958; and 16-961	No change	None and None
R2-20-111	Non-participating Candidate Reporting Requirements and Contribution Limits	12/14/17	Y	Y	Y	Y	Y	A.R.S. §§ 16-940 through 16-943; 16-955; 16-956 through 16-958; and 16-961	No change	None and None



# ARIZONA CITIZEN'S CLEAN ELECTIONS COMMISSION

2025 Five-Year Review, Title 2, Chapter 20

## All Articles

R2-20-112	Political Party Exceptions	1/1/17	Y	Y	Y	Y	Y	A.R.S. §§ 16-901(5) and (8); 16-956(C);	No change	None and None
R2-20-113	Candidate Statement Pamphlet	2/4/20	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(A)(7); 16-941(A)(1)	No change	None and None
R2-20-114	Candidate Campaign Bank Account	7/23/15	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-115	Books and Records Requirements	1/1/17	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-201	Scope	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-202	Initiation of Compliance Matters	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-203	Complaints	5/28/05	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-204	Initial Complaint Processing; Notification	7/23/15	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-205	Opportunity for No Action on Complaint-Generated Matters	7/23/15	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-206	Executive Director's Recommendation on Complaint-Generated Matters	7/23/15	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-207	Internally Generated Matters; Referrals	1/1/08	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-208	Complaint Processing; Notification	2/15/06	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None

# ARIZONA CITIZEN'S CLEAN ELECTIONS COMMISSION

2025 Five-Year Review, Title 2, Chapter 20

## All Articles

R2-20-209	Investigation	3/9/20	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-210	Written Questions Under Order	5/21/02	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-211	Subpoenas and Subpoenas Duces Tecum; Depositions	1/1/08	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-213	Motions to Quash or Modify a Subpoena	1/1/08	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-214	The Probable Cause to Believe Recommendation : Briefing Procedures	2/15/06	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-215	The Probable Cause to Believe Finding; Notification	1/1/08	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-216	Conciliation	5/21/02	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-217	Enforcement Proceedings	2/15/06	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-220	Ex Parte Communications	6/17/23	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-221	Representation by Counsel; Notification	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-222	Civil Penalties	9/27/13	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-223	Notice of Appealable Agency Action	6/17/23	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-224	Request for Administrative Hearing	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None

# ARIZONA CITIZEN'S CLEAN ELECTIONS COMMISSION

2025 Five-Year Review, Title 2, Chapter 20

## All Articles

R2-20-225	Informal Settlement Conference	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-226	Administrative Hearing	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-227	Review of Administrative Decision by Commission	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-228	Judicial Review	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-301	Purpose and Applicability	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-302	Definitions	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-303	Notification to Commissioners and Employees	1/1/08	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-304	Interpretation and Advisory Service	1/1/08	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-305	Reporting Suspected Violations	8/13/23	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-306	Disciplinary and Other Remedial Action	8/13/23	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-307	General Prohibited Conduct	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-308	Outside Employment or Activities	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-309	Financial Interests	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-310	Political and Organizational Activity	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None

# ARIZONA CITIZEN'S CLEAN ELECTIONS COMMISSION

2025 Five-Year Review, Title 2, Chapter 20

## All Articles

R2-20-311	Membership in Associations	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-312	Use of State Property	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-401	Purpose and Scope	10/6/11	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-402	General	5/28/05	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-402.01	Audits of Participating Legislative Candidates	9/28/17	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-402.02	Audits of Participating Statewide Candidates	12/15/16	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-403	Conduct of Fieldwork	5/28/05	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-404	Preliminary Audit Report	2/28/08	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-405	Final Audit Report	5/28/05	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-406	Release of Audit Report	5/28/05	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-501	Purpose and Scope	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-502	Procedural Requirements	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-503	Processing of Petitions	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-504	Disposition of Petitions	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-505	Commission Considerations	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-506	Administrative Record	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-601	Purpose and Scope	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None

# ARIZONA CITIZEN'S CLEAN ELECTIONS COMMISSION

2025 Five-Year Review, Title 2, Chapter 20

## All Articles

R2-20-602	Definitions	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-603	Audits, Investigations & Litigation	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-604	Sanctions	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-701	Purpose and Scope	6/4/20	Y	Y	N	N	Y	A.R.S. §§ 16-956(A)(6) and (A)(7); 16-948(C)	No change	None and None
R2-20-702	Use of Campaign Funds	5/11/20	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-702.01	Use of Assets	6/4/20	Y	Y	N	N	Y	A.R.S. §§ 16-956(A)(6) and (A)(7); 16-948(C)	No change	None and None
R2-20-703	Documentation for Direct Campaign Expenditures	1/1/17	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-703.01	Campaign Consultants	6/4/20	Y	Y	N	N	Y	A.R.S. §§ 16-956(A)(6) and (A)(7); 16-948(C)	No change	None and None
R2-20-704	Repayment	2/4/20	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(A)(7); 16-941(A)-(B); 16-953	No change	None and None
R2-20-705	Additional Audits or Repayment Determination	5/28/05	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None



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

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

**Date:** Thursday, June 26, 2025

**Time:** 10:00 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 June 26, 2025. This meeting will be held at 10:00 a.m. **This meeting will be held in person and virtually. The meeting location will be open by 9:45 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@azcleanelections.gov](mailto:ccec@azcleanelections.gov).

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

**Join Zoom Meeting**

**<https://us02web.zoom.us/j/82191015647>**

***Meeting ID: 821 9101 5647***

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**One tap mobile**

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Please note that members of the public that choose to use the Zoom video link must keep their microphone muted for the duration of the meeting. If a member of the public wishes to speak, they may use the Zoom raise hand feature and once called on, unmute themselves on Zoom once the meeting is open for public comment.

Members of the public may participate via Zoom by computer, tablet or telephone. A dial-in option is also available but you will not be able to use the Zoom raise hand feature, so the meeting administrator will assist phone attendees. Please keep yourself muted unless you are prompted to speak.

The Commission may allow time for public comment on any item on the agenda. 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 May 22, 2025.
- 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 the regulatory agenda. The legislative update includes bills that have or may be considered for action by the Arizona legislature or the Governor. Materials are included in the Commission packet available on its website or by request at [ccec@azcleelections.gov](mailto:ccec@azcleelections.gov).

- IV. Discussion and Possible Action on Advisory Opinion Requested by Fair Democracy Regarding Application of the Definition of Campaign Media Spending to Public Communications.
- V. Discussion and Possible Action on 5-year Rule Review Report for Submission to the Governor's Regulatory Review Council.

VI. 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

VII. 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 24th day of June, 2025  
Citizens Clean Elections Commission  
Thomas M. Collins, Executive Director



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THE STATE OF ARIZONA  
CITIZENS CLEAN ELECTIONS COMMISSION  
  
REPORTER'S TRANSCRIPT OF PUBLIC MEETING

Phoenix, Arizona  
May 22, 2025  
10:00 a.m.

By: Kathryn A. Blackwelder, RPR  
Certified Reporter  
Certificate No. 50666

**CERTIFIED  
TRANSCRIPT**

Page 2	Page 4
<p>1 PUBLIC MEETING BEFORE THE CITIZENS CLEAN 2 ELECTIONS COMMISSION convened at 10:00 a.m. on May 22, 3 2025, at the State of Arizona, Clean Elections 4 Commission, 1110 West Washington, Conference Room, 5 Phoenix, Arizona, in the presence of the following 6 Board Members: 7 8 Mr. Mark Kimble, Chairman 9 Mr. Galen Paton 10 Ms. Amy Chan 11 Ms. Christina Werther 12 Mr. Steve Titla 13 14 OTHERS PRESENT: 15 Thomas M. Collins, Executive Director 16 Mike Becker, Policy Director 17 Avery Xola, Voter Education Manager 18 Alec Shaffer, Web Content Manager 19 Mary O'Grady, Osborn Maledon 20 Shayna Stuart, Taft Law 21 Cathy Herring, Meeting Planner, KCA 22 Yasmin Alvarado, Member of the Public 23 Commissioner Galen Paton's Brother, Member 24 of the Public 25</p>	<p>1 Is there a second? 2 COMMISSIONER PATON: I'll second. 3 CHAIRMAN KIMBLE: It's been moved and 4 seconded that we approve the minutes. I'll call the 5 roll. 6 Commissioner Chan. 7 COMMISSIONER CHAN: Aye. 8 CHAIRMAN KIMBLE: Commissioner Werther. 9 COMMISSIONER WERTHER: Aye. 10 CHAIRMAN KIMBLE: Commissioner Paton. 11 COMMISSIONER PATON: Aye. 12 CHAIRMAN KIMBLE: Chair votes aye. 13 The minutes are approved 4-to-nothing. 14 Item III, discussion and possible action on 15 the Executive Director's Report. 16 Tom. 17 MR. COLLINS: Yes. Thank you, Commissioners. 18 I just wanted to hit some of the highlights here. Our 19 primary -- special primary election for Congressional 20 District 7, that process is under way and we will be 21 holding debates for the Republican and Democratic 22 primaries in Tucson at the Arizona Public Media 23 studios. And we have all -- confirmation from all the 24 candidates for that, and we'll have a -- and we are -- 25 also will have a digital Voter Education Guide</p>
Page 3	Page 5
<p>1 P R O C E E D I N G 2 CHAIRMAN KIMBLE: Good morning. Agenda 3 Item I is the call to order. It's 10:00 a.m. on 4 May 22nd, 2025. I call this meeting of the Citizens 5 Clean Elections Commission to order. 6 With that, we will take attendance. 7 Commissioners, please identify yourselves for the 8 record. 9 COMMISSIONER WERTHER: Christina Werther. 10 COMMISSIONER PATON: Galen Paton. 11 COMMISSIONER CHAN: Amy Chan. 12 CHAIRMAN KIMBLE: And I'm Mark Kimble. We 13 have a quorum. Four of the five of us are here. 14 Item II, discussion and possible action on 15 the minutes from the April 24th, 2025 meeting. 16 Commissioners, you have the minutes from our 17 April meeting in your packets. Is there any 18 discussion? 19 (No response.) 20 CHAIRMAN KIMBLE: Hearing none, is there a 21 motion to approve the minutes? 22 COMMISSIONER WERTHER: I motion to approve 23 the minutes for April 24th, 2025. 24 CHAIRMAN KIMBLE: Thank you, 25 Commissioner Werther.</p>	<p>1 available for that. So we are pretty excited about the 2 opportunity there. And that will, as in our debates in 3 the regular election years, that will be available to 4 be distributed widely to newspapers, radio stations, 5 television stations, and the like. 6 The -- 7 COMMISSIONER PATON: I have a couple 8 questions. 9 MR. COLLINS: Sure, please. 10 CHAIRMAN KIMBLE: Commissioner Paton. 11 COMMISSIONER PATON: So that's where PBS 12 is -- 13 MR. COLLINS: Correct. 14 COMMISSIONER PATON: -- in Tucson? 15 MR. COLLINS: Yes. Yes. 16 COMMISSIONER PATON: And are the primary 17 ones, is it on the same night, Republican and Democrat? 18 MR. COLLINS: They're on the -- I believe 19 they're on the 8th and 9th, so -- and I think it's 20 Republicans 8th, Democrats 9th. 21 COMMISSIONER PATON: Okay. 22 MR. COLLINS: And if you're interested, I 23 mean, Gina will be able to -- she's -- we'll be able to 24 follow up with you about attending -- 25 COMMISSIONER PATON: Okay.</p>


Page 6	Page 8
<p>1 MR. COLLINS: -- if you're interested.</p> <p>2 CHAIRMAN KIMBLE: Thank you,</p> <p>3 Commissioner Paton.</p> <p>4 Tom.</p> <p>5 MR. COLLINS: Okay. Related to the voter</p> <p>6 education, I want to highlight this -- that the</p> <p>7 Governor signed HB2376, which will expand the Voter</p> <p>8 Education Guide that's mailed to registered voters to</p> <p>9 include county-wide and county supervisors candidates.</p> <p>10 I think this is a really good bill. It will fill in a</p> <p>11 gap that exists, and in -- especially in those</p> <p>12 non-statewide years, the voters routinely call us or</p> <p>13 call the counties and say, you know, where do I find</p> <p>14 that information. So that will -- I think that's a</p> <p>15 good addition to fill out the materials that folks are</p> <p>16 looking for there. And it passed unanimously and --</p> <p>17 and we didn't have to testify.</p> <p>18 I wanted to highlight one other bill. The</p> <p>19 Governor is going through, I don't know how many bills</p> <p>20 she has, and there are a number that are being vetoed,</p> <p>21 but this one was interesting, and it doesn't deal with</p> <p>22 us directly, but it's a bill that would -- creates a</p> <p>23 180-day deadline for filing officers to act on campaign</p> <p>24 finance complaints. So acting on them, you know, I'm</p> <p>25 not sure I know precisely what that means under the</p>	<p>1 got selected as a Flinn-Brown Fellow, so I'm going to</p> <p>2 highlight that. Deference to Gina writing this for me</p> <p>3 and -- but I'm excited about it, you know, I --</p> <p>4 COMMISSIONER CHAN: Mr. -- Mr. Chairman and</p> <p>5 Tom.</p> <p>6 If I could just congratulate you on that,</p> <p>7 Tom. That is such an accomplishment and an honor and</p> <p>8 well deserved. And I know that Gina has been a</p> <p>9 proponent of this, and it's a wonderful opportunity,</p> <p>10 and so wanted to recognize that as well. It's just</p> <p>11 exciting for -- that she has been a part of it for so</p> <p>12 long, and that now you'll be able to -- to be a part of</p> <p>13 it as well. So congrats.</p> <p>14 CHAIRMAN KIMBLE: Yeah. And I join that,</p> <p>15 Amy. And it's worth pointing out that -- that the</p> <p>16 office has had several previous recipients, including</p> <p>17 Gina and Avery.</p> <p>18 MR. COLLINS: Yeah. And I --</p> <p>19 COMMISSIONER CHAN: Oh, my gosh. Did not</p> <p>20 mean to leave out Avery. My apologies. Thank you,</p> <p>21 Mr. Chairman.</p> <p>22 MR. COLLINS: Yeah. No, that's right. And I</p> <p>23 assume we'll have more in the future too.</p> <p>24 It looks like Commissioner Titla has his hand</p> <p>25 up.</p>
Page 7	Page 9
<p>1 statute, but the effect of it is that if the -- if a</p> <p>2 filing officer just doesn't do anything with the</p> <p>3 complaint within a certain period of time, then it</p> <p>4 essentially -- it gets dismissed by operation of law.</p> <p>5 It also allows the filing officer to keep that clock</p> <p>6 going, extend that clock if they need to. So it</p> <p>7 doesn't affect us directly, but it is kind of</p> <p>8 interesting.</p> <p>9 For purposes of what we do under the Clean</p> <p>10 Elections Act, we have -- our deadlines operate</p> <p>11 differently. We have a -- if we don't take action on a</p> <p>12 Clean Elections Act complaint or we don't take action</p> <p>13 on a -- at all on a -- and when I say "action," we</p> <p>14 don't -- we -- staff action on a voter protection -- a</p> <p>15 voter --</p> <p>16 MR. BECK: Right to Know.</p> <p>17 MR. COLLINS: -- Voters' Right to Know Act</p> <p>18 complaint, then some people -- or, in the case of a</p> <p>19 voter -- Voters' Right to Know Act, any -- any voter</p> <p>20 can file an action against the Commission for not</p> <p>21 acting. So it was a little different incentive</p> <p>22 structure there. But it also -- it also applies to all</p> <p>23 filing officers, not just the Secretary of State's</p> <p>24 Office.</p> <p>25 Gina was nice enough to write up this -- I</p>	<p>1 COMMISSIONER TITLA: Yeah. Chairman, this is</p> <p>2 Steve Titla. I just joined. Tried to get on earlier,</p> <p>3 but -- thanks.</p> <p>4 CHAIRMAN KIMBLE: Thank you, Commissioner</p> <p>5 Titla. The record will show that you've joined us now</p> <p>6 and we have all five Commissioners present.</p> <p>7 Tom, do you want to continue?</p> <p>8 MR. COLLINS: Yeah. Yeah. I wanted to also</p> <p>9 highlight the other voter education work that is</p> <p>10 happening. And we just got through the last local</p> <p>11 election, so we'll be transitioning to the CD7, so</p> <p>12 that one -- that one had some interesting results, if</p> <p>13 anybody is paying attention to the Glendale Resort</p> <p>14 vote, if anyone has that -- that's undecided, I think,</p> <p>15 as of now. But Alec has been managing to -- that and</p> <p>16 keeping that up.</p> <p>17 And then Gina and Avery have been working</p> <p>18 with a variety of civics partners to work on how</p> <p>19 everyone can kind of coordinate the various events that</p> <p>20 are coming on the calendar.</p> <p>21 And the second episode of Beyond the Ballot</p> <p>22 AZ is up, and it's really kind of an interesting one,</p> <p>23 if you get a chance to listen to it. I -- I recommend</p> <p>24 all of you -- I mandate, if I can, and urge those who I</p> <p>25 can't to -- to listen to it and subscribe. This one is</p>

Page 10	Page 12
<p>1 great because it's a -- and I didn't know this. But</p> <p>2 prior to 1988 in Arizona, the Arizona Constitution</p> <p>3 specified that a statewide officeholder had to be a</p> <p>4 man. And the Legislature put on, with the backing of</p> <p>5 the Arizona Chamber, a measure to take that language</p> <p>6 out, even though it was already essentially obviated by</p> <p>7 other aspects of the Constitution, to recognize that</p> <p>8 Governor Mofford had become Governor.</p> <p>9 And it -- and it's really kind of a thing I</p> <p>10 didn't know. And we did an interview with an ASU law</p> <p>11 professor named Erin Scharff, who is very good at</p> <p>12 talking about this content and -- I -- I don't know.</p> <p>13 It's very nerdy, but -- but -- you didn't know that,</p> <p>14 did you?</p> <p>15 CHAIRMAN KIMBLE: I don't believe I did.</p> <p>16 I --</p> <p>17 MR. COLLINS: See.</p> <p>18 CHAIRMAN KIMBLE: It sounds vaguely familiar,</p> <p>19 but I --</p> <p>20 MR. COLLINS: I didn't believe it. When</p> <p>21 the -- when the -- when the production team brought it</p> <p>22 to us, I -- I didn't believe them.</p> <p>23 CHAIRMAN KIMBLE: Astounding.</p> <p>24 MR. COLLINS: Anyway, the biennial</p> <p>25 adjustments are out from the Secretary's Office,</p>	<p>1 confidentiality, essentially, happening, that the --</p> <p>2 and so a lot of the argument spent -- one of the -- the</p> <p>3 sort of most engaged sort of interlocutor on the -- on</p> <p>4 the panel spent a lot of time sort of talking about,</p> <p>5 well, what if somebody puts money -- X-dollars into</p> <p>6 a -- into some organization, and that money later ends</p> <p>7 up in -- with an organization they don't like and that</p> <p>8 becomes revealed.</p> <p>9 And sort of the issue is, well, on the one</p> <p>10 hand -- their argument that the AFP makes is that</p> <p>11 that's somehow forced association. But the association</p> <p>12 has happened. You know, that's the -- it's the</p> <p>13 question of whether or not they have a right to have</p> <p>14 that association remain private, right. The fact it</p> <p>15 gets revealed is a fact that exists. So, anyways, it's</p> <p>16 kind of an interesting argument. I thought it was -- I</p> <p>17 thought -- I think if you want to understand the</p> <p>18 statute and the issues, the First Amendment issues,</p> <p>19 it's worth watching.</p> <p>20 And that's -- I believe that completes the</p> <p>21 report.</p> <p>22 COMMISSIONER PATON: I have a question about</p> <p>23 the biennial --</p> <p>24 MR. COLLINS: Oh, sure.</p> <p>25 COMMISSIONER PATON: -- adjustments.</p>
Page 11	Page 13
<p>1 that's -- and that's important.</p> <p>2 And then -- and then the only -- I think the</p> <p>3 other thing that I wanted to mention directly is that</p> <p>4 we had the oral argument in the 9th Circuit on the Prop</p> <p>5 211 case. That -- that's a much more straightforward</p> <p>6 First Amendment claim by the -- a group called</p> <p>7 Americans for Prosperity. You know, essentially</p> <p>8 they -- it's a wide-ranging legal complaint and, you</p> <p>9 know, the argument in the, you know --</p> <p>10 You know, it's hard -- it's hard to predict</p> <p>11 and we couldn't -- you know, and we won't know for some</p> <p>12 time what the -- what the 9th Circuit will do, but, you</p> <p>13 know, I -- I watched it, and Commissioner Kimble</p> <p>14 attended as well, and, I mean, I felt very comfortable</p> <p>15 with -- with how our attorney, Eric Fraser, presented</p> <p>16 our arguments. And so we'll see -- we'll see -- we'll</p> <p>17 see what happens there.</p> <p>18 Just to spend a second more on this, there's</p> <p>19 a -- this is really a case about whether or not you</p> <p>20 have a First Amendment right to just basically have</p> <p>21 your donors be essentially confidential and whether or</p> <p>22 not the donors have a right to have their relationship</p> <p>23 with the upstream users of their money confidential,</p> <p>24 right.</p> <p>25 So there's two -- there's two types of</p>	<p>1 CHAIRMAN KIMBLE: Commissioner Paton.</p> <p>2 COMMISSIONER PATON: When -- when is the</p> <p>3 Lieutenant Governor going to happen?</p> <p>4 MR. COLLINS: So -- so this is interesting.</p> <p>5 So, Mr. Chairman, Commissioner Paton, the Lieutenant</p> <p>6 Governor doesn't have a -- an office identified in the</p> <p>7 Commission -- in the -- in the statute. And the</p> <p>8 assumption -- and I've got to be honest with you.</p> <p>9 That's a really good question, because we may have to</p> <p>10 look -- may have to find the answer. I don't know how</p> <p>11 the regular campaign finance system is going to assume</p> <p>12 that.</p> <p>13 In the federal system, the President and Vice</p> <p>14 President are part of the same account. It's a</p> <p>15 presidential campaign account, and when the Vice</p> <p>16 President becomes -- is identified as the Vice</p> <p>17 President, they're essentially just wrapped up in the</p> <p>18 President's account. And I assume that that's -- that</p> <p>19 that's the case.</p> <p>20 Although, you know, now that you mention it,</p> <p>21 I suspect that, if there's an opportunity for people to</p> <p>22 raise additional funds and get an extra limit, they</p> <p>23 might try to do that. So -- so I will follow up on</p> <p>24 that. I don't know the answer. But for Clean</p> <p>25 Elections purposes, there's not additional money</p>

<p style="text-align: right;">Page 14</p> <p>1 because of the --</p> <p>2 COMMISSIONER PATON: Well, when is -- when</p> <p>3 are we voting for them, the next time or --</p> <p>4 MR. COLLINS: Oh, 2026, yeah. Yeah, there</p> <p>5 will be --</p> <p>6 COMMISSIONER PATON: So you would think that</p> <p>7 would be in there.</p> <p>8 MR. COLLINS: Well, we'd have -- they'd have</p> <p>9 to amend the Clean Elections Act, which they are</p> <p>10 unlikely to do for that purpose. But I think it's an</p> <p>11 interesting question in general that I hadn't thought</p> <p>12 about, so we can -- we can look at that, because it'll</p> <p>13 be interesting to find out.</p> <p>14 CHAIRMAN KIMBLE: Interesting point.</p> <p>15 Any other questions or discussions from the</p> <p>16 Commission?</p> <p>17 (No response.)</p> <p>18 CHAIRMAN KIMBLE: Thank you, Tom.</p> <p>19 Item IV is discussion and possible action on</p> <p>20 MUR 25-03 and proposed repayment order from Monica</p> <p>21 Timberlake, 2024 participating candidate for State</p> <p>22 Legislature.</p> <p>23 The next item is the Executive Director's</p> <p>24 request that the Commission issue an order requiring a</p> <p>25 candidate to repay Clean Elections funds and make a</p>	<p style="text-align: right;">Page 16</p> <p>1 view on why we are where we are. I'm going to share</p> <p>2 this with you and then -- for you to review. It's two</p> <p>3 pages.</p> <p>4 CHAIRMAN KIMBLE: Tom, can you briefly</p> <p>5 summarize --</p> <p>6 MR. COLLINS: Yeah, I will.</p> <p>7 CHAIRMAN KIMBLE: -- this for people who</p> <p>8 don't have a copy of it?</p> <p>9 MR. COLLINS: Sure. Sure. So, you know,</p> <p>10 the -- the e-mail we got basically outlines that the</p> <p>11 candidate, respondent has had some health issues of a</p> <p>12 variety of kinds and -- and is -- therefore, was not</p> <p>13 able to, in their view, communicate with us over the</p> <p>14 past, I want to say, six months maybe.</p> <p>15 MR. BECK: At least six months.</p> <p>16 MR. COLLINS: Yeah, six months. So we -- and</p> <p>17 she also, you know, says that she will be able to start</p> <p>18 working on getting everything filed and turned in as</p> <p>19 soon -- starting at the beginning of June. So that's</p> <p>20 -- that's the upshot.</p> <p>21 From a staff perspective, the way we think</p> <p>22 about this is we've had -- you know, we've had</p> <p>23 situations that have come up where folks have ignored</p> <p>24 us, not sent us an e-mail ahead of the meeting, we have</p> <p>25 had a situation where people filed something before the</p>
<p style="text-align: right;">Page 15</p> <p>1 reason to believe determination related to a</p> <p>2 participating candidate's financial reports and</p> <p>3 records. We'll hear first from the Executive Director,</p> <p>4 followed by Monica Timberlake or her representative, if</p> <p>5 either are present.</p> <p>6 Tom.</p> <p>7 Oh, let me just mention one other thing.</p> <p>8 Shayna Stuart is here and will serve as the</p> <p>9 Commission's independent advisor for this matter. So</p> <p>10 if any of you have any legal questions, please direct</p> <p>11 them to Shayna.</p> <p>12 Okay, Tom.</p> <p>13 MR. COLLINS: Commissioners, thank you. I --</p> <p>14 just as a -- as a -- you probably had a chance to read</p> <p>15 over the memo and the proposed repayment order. The --</p> <p>16 excuse me. The factual template here is essentially --</p> <p>17 it's similar to what we've had with some of the -- with</p> <p>18 some other matters. The candidate didn't -- received</p> <p>19 funding, stopped filing campaign finance reports, and</p> <p>20 then declined to communicate effectively with either</p> <p>21 the auditors or the staff.</p> <p>22 I will say, just to -- just for your</p> <p>23 purposes, and I have it for you if you would like, we</p> <p>24 have an e-mail we received this morning from</p> <p>25 Ms. Timberlake where she sort of outlines her point of</p>	<p style="text-align: right;">Page 17</p> <p>1 meeting. And this is sort of in a -- we've got a --</p> <p>2 where we've got an e-mail saying, here is what's going</p> <p>3 on, but no -- and no filing of any kind associated with</p> <p>4 this. So the staff inclination is that the framework</p> <p>5 we have facilitates us moving ahead, regardless, and</p> <p>6 gives us, I think, the mechanism to ensure that we're</p> <p>7 able to hold the candidate to a schedule.</p> <p>8 So our inclination is -- I mean, based on</p> <p>9 where we are at, is that we don't have any filing, any</p> <p>10 representation around the -- at all around the use of</p> <p>11 the funds. We don't have a firm -- you know, we have a</p> <p>12 -- we have a statement along the lines of, I'm going to</p> <p>13 work on this starting this day for as long as it takes,</p> <p>14 but that's not like a I will have this done by X date.</p> <p>15 And then I think that, as sympathetic as we want to be</p> <p>16 to candidates who have issues of various kinds, you</p> <p>17 know, it just doesn't amount to, for us, a sufficient</p> <p>18 basis for us to sort of ask you to pause on this.</p> <p>19 What we instead would like to do is to have</p> <p>20 -- we would -- we would ask that you make -- determine</p> <p>21 that there is reason to believe, as outlined in the</p> <p>22 memo, on the failure to file and the -- and the various</p> <p>23 accounting issues and that you approve the repayment</p> <p>24 order. You know, I mean, those are -- the repayment</p> <p>25 order is a real thing. I mean, it's -- I mean, I don't</p>

<p style="text-align: right;">Page 18</p> <p>1 want to -- I don't want to leave you with the 2 impression that it's not a real action. It is, and 3 it's an appealable agency action. That's a serious 4 thing. But I don't -- I just don't feel that we're in 5 a position as staff members to just kind of hope that 6 we hear something in a month at this point. 7 CHAIRMAN KIMBLE: And just -- just to be 8 clear -- just to be clear, according to the time stamp 9 on this, this e-mail was received 8:00 this morning, 10 two hours before the start of the -- of the meeting -- 11 MR. COLLINS: Yeah. 12 CHAIRMAN KIMBLE: -- after not hearing from 13 her for months? 14 MR. COLLINS: Correct. 15 CHAIRMAN KIMBLE: Okay. Any questions or 16 comments from Members of the Commission? 17 COMMISSIONER PATON: I would just say that 18 this is -- I'm -- I'm beyond frustrated with these 19 different instances. And the time of no getting back 20 to us, dealing with the auditors, anything, is quite 21 frustrating to me and I think we should proceed with 22 this. 23 CHAIRMAN KIMBLE: Let me -- 24 COMMISSIONER CHAN: Mr. Chairman. 25 CHAIRMAN KIMBLE: Let me just say,</p>	<p style="text-align: right;">Page 20</p> <p>1 issue. And when they just ghost us or send incomplete 2 material or just vanish, it's totally unacceptable. 3 Any other comments or -- 4 COMMISSIONER PATON: Yes. 5 CHAIRMAN KIMBLE: Commissioner Paton. 6 COMMISSIONER PATON: I mean, the election was 7 November 5th, and this is the middle of May, and -- 8 and, you know, I guess I've said what I needed to say. 9 CHAIRMAN KIMBLE: Any other Members of the 10 Commission wish to make any comments? 11 (No response.) 12 CHAIRMAN KIMBLE: Any Member of the 13 Commission wish to make a motion? 14 Commissioner Werther. 15 COMMISSIONER WERTHER: I move to approve the 16 Executive Director's recommendation that a reason to 17 believe violation of the Clean Elections Act and rules 18 has occurred in the action MUR 25-03 and also approve 19 the proposed repayment order. 20 CHAIRMAN KIMBLE: Thank you very much, 21 Commissioner Werther. 22 Is there a second? 23 COMMISSIONER PATON: I'll second it. 24 CHAIRMAN KIMBLE: Thank you, 25 Commissioner Paton.</p>
<p style="text-align: right;">Page 19</p> <p>1 Commissioner Paton, I completely agree with you. It's 2 very frustrating. 3 Commissioner Chan. 4 COMMISSIONER CHAN: Thanks, Mr. Chairman. I 5 echo Commissioner Paton's comments and yours. I have 6 been dismayed to see that people ignore staff's 7 attempts to help them come into compliance and only 8 respond when it becomes more of a legal liability for 9 them. I don't recall this being so common years ago. 10 Maybe -- maybe I've got rainbow colored glasses on with 11 my memories, but -- and while I sympathize with the, 12 you know, reasons presented by this particular 13 participating candidate, I -- I support going forward 14 with the vote today and support approving the repayment 15 order. 16 CHAIRMAN KIMBLE: Thank you, 17 Commissioner Chan. And I -- I agree with you. It 18 seems like this is something that's -- I don't know if 19 it's gotten worse, but it's certainly gotten more 20 frequent in this past election. 21 We have contracts, essentially, with 22 candidates that we will provide them public funds, and 23 in return they will use those funds in an appropriate 24 manner in their campaign and -- and account to us on 25 how they spent it, and it's kind of a black and white</p>	<p style="text-align: right;">Page 21</p> <p>1 It's been moved and seconded that we approve 2 the Commissioner -- the Executive Director's 3 recommendation in MUR 25-03 and the proposed repayment 4 order. I will call the roll. 5 Commissioner Werther. 6 COMMISSIONER WERTHER: Aye. 7 CHAIRMAN KIMBLE: Commissioner Paton. 8 COMMISSIONER PATON: Aye. 9 CHAIRMAN KIMBLE: Commissioner Chan. 10 COMMISSIONER CHAN: Aye. 11 CHAIRMAN KIMBLE: Commissioner Titla. 12 COMMISSIONER TITLA: Aye. 13 CHAIRMAN KIMBLE: Chair votes aye. 14 The motion is approved unanimously, 15 5-to-nothing. 16 Thank you, Tom. 17 Item V, discussion and possible action on 18 rulemaking related to participating candidate campaign 19 finance reporting, repayment, and release of Clean 20 Elections funds to participating candidates. 21 Commissioners, before you is a rulemaking 22 proposal developed by staff. It is designed to 23 emphasize participating candidates' obligations to file 24 timely and accurate campaign finance reports by, 25 number one, requiring candidates to submit an</p>

<p style="text-align: right;">Page 22</p> <p>1 additional attestation regarding the completeness and 2 accuracy of their reports before receiving funds, and 3 number two, placing candidates on notice that failure 4 to file timely reports after receiving funding may 5 result in a presumption that the funds have not been 6 used in accordance with the Act and rules. 7 Tom, is there anything you want to add to 8 this? 9 MR. COLLINS: Mr. Chairman, Commissioners, I 10 just want to add, you know, so this is designed -- one 11 of -- one of other -- and there may be others, but this 12 is our initial stab at trying to address the concerns 13 that you all have expressed, and correctly expressed. 14 From our perspective as staff members, the 15 issues with reporting, and particularly the audit, are 16 new. You know, if someone was late, usually the audit 17 will get them, you know -- you know, get them -- get 18 their attention. And for whatever reason, and we don't 19 know the reason, that has not been the case. You know, 20 I'm really not in a position where I can talk too much 21 about the merits of the cases we have, obviously, but 22 I -- but I -- but nevertheless, I think that, broadly 23 speaking, there are different reasons in every case, 24 and that's interesting in itself. I mean, so there's 25 not like a -- we're not aware of like a -- I can't</p>	<p style="text-align: right;">Page 24</p> <p>1 affirm that their reporting to that point is correct 2 and they understand everything, I think -- you know, 3 they do sign the contract at the beginning of the 4 process. You know, I'm just -- I'm hopeful that, you 5 know, an additional, essentially, certification, you 6 know, which amounts to -- it really amounts to -- when 7 you -- it would amount to, when you get the check 8 itself, you're signing off -- I mean, before you get 9 the check, you're just signing off, just so you know, 10 this is what you agreed to. If you've forgotten what 11 you agreed to back in -- 12 And also, the way we've written the rule, it 13 has specific points of emphasis that we are concerned 14 about, particularly, you know, the -- an issue we have 15 worked on on and off for decades is how to address, you 16 know, the -- how to address the role that consultants 17 play as sort of umbrella, you know, spenders. And 18 we've done several iterations of that over the years, 19 but this one at least wants to bring that up again and 20 say, hey, you know, if you're going to use a 21 consultant, you need to make sure that -- a complete 22 report will be a report that will make sure that all of 23 the related expenses that should be reported under that 24 consultant's expenditures are there, so... 25 CHAIRMAN KIMBLE: Thank you.</p>
<p style="text-align: right;">Page 23</p> <p>1 divine, from the information we have, some -- some 2 specific theme. 3 But systemically, you know, one of the -- one 4 of the issues is that the Clean Elections funding is 5 not distributed on a timeline that accords with the 6 campaign finance reports. So if you qualify on Monday, 7 and the report was -- or, I should say this another 8 way. If the period -- if the -- if the reporting 9 period closes on Monday and you are funded on Tuesday, 10 we're not going to hear from you until -- until, you 11 know, some weeks later. And it -- and it's -- and so 12 by the time -- you know, so essentially time will have 13 lapsed. 14 Anyways, and so the presumption we're putting 15 in place here would do two -- would serve to, A, 16 provide a clear notice to the candidates that, you 17 know, these -- these failure to files are -- are going 18 to have meaning in the context of Clean Elections, and 19 we think that itself may remedy the situation. In 20 other words, because the last thing I would think a 21 candidate would want to do in the middle of a -- in the 22 middle of a campaign is have to deal with a repayment 23 order. I mean, that would be a serious -- it's not a 24 meaningless thing. 25 And then I think that asking them to sort of</p>	<p style="text-align: right;">Page 25</p> <p>1 Are there any comments or questions from 2 Members of the Commission? 3 (No response.) 4 CHAIRMAN KIMBLE: Hearing none, do we have a 5 motion to publish this proposed rulemaking for public 6 comment? 7 COMMISSIONER WERTHER: I move to publish this 8 proposed rulemaking for comment. 9 CHAIRMAN KIMBLE: Thank you, 10 Commissioner Werther. 11 Is there a second? 12 COMMISSIONER PATON: Second it. 13 CHAIRMAN KIMBLE: It's been moved and 14 seconded that we propose this proposed -- publish this 15 proposed rulemaking for public comment. I will call 16 the roll. 17 Commissioner Werther. 18 COMMISSIONER WERTHER: Aye. 19 CHAIRMAN KIMBLE: Commissioner Paton. 20 COMMISSIONER PATON: Aye. 21 CHAIRMAN KIMBLE: Commissioner Chan. 22 COMMISSIONER CHAN: Aye. 23 CHAIRMAN KIMBLE: Commissioner Titla. 24 COMMISSIONER TITLA: Aye. 25 CHAIRMAN KIMBLE: Chair votes aye.</p>

Page 26	Page 28
<p>1 The motion is approved 5-to-nothing.</p> <p>2 Item VI, public comment. This is the time</p> <p>3 for consideration of comments and suggestions from the</p> <p>4 public. Action taken as a result of public comment</p> <p>5 will be limited to directing staff to study the matter</p> <p>6 or rescheduling the matter for further consideration</p> <p>7 and decision at a later date or responding to</p> <p>8 criticism. Please limit your comment to no more than</p> <p>9 two minutes.</p> <p>10 Does any member of the public wish to make</p> <p>11 comments at this time? Anyone on Zoom?</p> <p>12 (No response.)</p> <p>13 CHAIRMAN KIMBLE: Hearing none, the public</p> <p>14 may also send comments to the Commission by e-mail at</p> <p>15 ccec@azccleanelections.gov.</p> <p>16 Before we move to adjourn, Tom has an</p> <p>17 addition that we need to make to the motion on the</p> <p>18 rulemaking.</p> <p>19 MR. COLLINS: No. No. No. I'm sorry. It's</p> <p>20 just the dates that -- the proposed dates.</p> <p>21 COMMISSIONER WERTHER: We just skipped them.</p> <p>22 MR. COLLINS: Yeah.</p> <p>23 CHAIRMAN KIMBLE: Oh, we skipped them. Okay.</p> <p>24 Proposed meeting dates for the Commission</p> <p>25 from July through December. First of all, we are</p>	<p>1 Commissioner Werther.</p> <p>2 COMMISSIONER WERTHER: Aye.</p> <p>3 CHAIRMAN KIMBLE: Commissioner Paton.</p> <p>4 COMMISSIONER PATON: Aye.</p> <p>5 CHAIRMAN KIMBLE: Commissioner Chan.</p> <p>6 COMMISSIONER CHAN: Aye.</p> <p>7 CHAIRMAN KIMBLE: Commissioner Titla.</p> <p>8 COMMISSIONER TITLA: Aye.</p> <p>9 CHAIRMAN KIMBLE: Chair votes aye.</p> <p>10 We are adjourned. Thank you.</p> <p>11 (The meeting concluded at 10:32 a.m.)</p>
Page 27	Page 29
<p>1 meeting in June on -- what day are we meeting in June?</p> <p>2 COMMISSIONER WERTHER: That's a good</p> <p>3 question. The 26th.</p> <p>4 CHAIRMAN KIMBLE: We're meeting June 26th,</p> <p>5 and then after that we will be meeting on July 17th,</p> <p>6 August 28th, September 25th, October 23rd,</p> <p>7 November 20th, and December 11th, so mark your</p> <p>8 calendars. The Commission meetings will be held always</p> <p>9 on Thursday and scheduled to begin at 10:00 a.m. The</p> <p>10 schedule is subject to change, but this is the dates we</p> <p>11 now have.</p> <p>12 Okay. Is there a motion to adjourn?</p> <p>13 COMMISSIONER WERTHER: Do we need to take a</p> <p>14 motion on those or no?</p> <p>15 MR. COLLINS: We -- we have, but, you know,</p> <p>16 there's not actually a -- there's not actually a strict</p> <p>17 requirement.</p> <p>18 COMMISSIONER WERTHER: Okay. I motion to</p> <p>19 adjourn.</p> <p>20 CHAIRMAN KIMBLE: Thank you,</p> <p>21 Commissioner Werther.</p> <p>22 Is there a second?</p> <p>23 COMMISSIONER PATON: I'll second.</p> <p>24 CHAIRMAN KIMBLE: There's been a motion to</p> <p>25 adjourn that's been seconded. I will call the roll.</p>	<p>1 STATE OF ARIZONA )</p> <p>2 ) ss.</p> <p>3 COUNTY OF MARICOPA )</p> <p>4</p> <p>5 BE IT KNOWN that the foregoing proceedings</p> <p>6 were taken by me; that I was then and there a Certified</p> <p>7 Reporter of the State of Arizona; that the proceedings</p> <p>8 were taken down by me in shorthand and thereafter</p> <p>9 transcribed into typewriting under my direction; that</p> <p>10 the foregoing pages are a full, true, and accurate</p> <p>11 transcript of all proceedings had and adduced upon the</p> <p>12 taking of said proceedings, all to the best of my skill</p> <p>13 and ability.</p> <p>14</p> <p>15 I FURTHER CERTIFY that I am in no way related</p> <p>16 to nor employed by any of the parties hereto nor am I</p> <p>17 in any way interested in the outcome hereof.</p> <p>18</p> <p>19 DATED at Tempe, Arizona, this 23rd day of</p> <p>20 May, 2025.</p> <p>21</p> <p>22 </p> <p>23 Kathryn A. Blackwelder, RPR</p> <p>24 Certified Reporter #50666</p> <p>25</p>



<hr/> <p><b>1</b></p> <p><b>10:00</b> 3:3</p> <p><b>180-day</b> 6:23</p> <p><b>1988</b> 10:2</p> <hr/>	<p>19:24</p> <p><b>accounting</b> 17:23</p> <p><b>accuracy</b> 22:2</p> <p><b>accurate</b> 21:24</p> <p><b>act</b> 6:23 7:10,12,17,19 14:9 20:17 22:6</p> <hr/>	<p><b>approved</b> 4:13 21:14</p> <p><b>approving</b> 19:14</p> <p><b>April</b> 3:15,17,23</p> <p><b>argument</b> 11:4,9 12:2,10, 16</p> <p><b>arguments</b> 11:16</p> <p><b>Arizona</b> 4:22 10:2,5</p> <p><b>aspects</b> 10:7</p> <p><b>association</b> 12:11,14</p> <p><b>assume</b> 8:23 13:11,18</p> <hr/>	<p><b>biennial</b> 10:24 12:23</p> <p><b>bill</b> 6:10,18,22</p> <p><b>bills</b> 6:19</p> <p><b>black</b> 19:25</p> <p><b>briefly</b> 16:4</p> <p><b>bring</b> 24:19</p> <p><b>broadly</b> 22:22</p> <p><b>brought</b> 10:21</p> <hr/>
<hr/> <p><b>2</b></p> <p><b>2024</b> 14:21</p> <p><b>2025</b> 3:4,15,23</p> <p><b>2026</b> 14:4</p> <p><b>211</b> 11:5</p> <p><b>22nd</b> 3:4</p> <p><b>24th</b> 3:15,23</p> <p><b>25-03</b> 14:20 20:18 21:3</p> <hr/>	<p><b>acting</b> 6:24 7:21</p> <p><b>action</b> 3:14 4:14 7:11,12, 13,14,20 14:19 18:2,3 20:18 21:17</p> <p><b>add</b> 22:7,10</p> <p><b>addition</b> 6:15</p> <p><b>additional</b> 13:22,25 22:1 24:5</p> <p><b>address</b> 22:12 24:15,16</p> <p><b>adjustments</b> 10:25 12:25</p> <hr/>	<p><b>astounding</b> 10:23</p> <p><b>ASU</b> 10:10</p> <p><b>attempts</b> 19:7</p> <p><b>attendance</b> 3:6</p> <p><b>attended</b> 11:14</p> <p><b>attending</b> 5:24</p> <p><b>attention</b> 9:13 22:18</p> <p><b>attestation</b> 22:1</p> <p><b>attorney</b> 11:15</p> <p><b>audit</b> 22:15,16</p> <p><b>auditors</b> 15:21 18:20</p> <p><b>Avery</b> 8:17,20 9:17</p> <p><b>aware</b> 22:25</p> <p><b>aye</b> 4:7,9,11,12 21:6,8,10, 12,13</p> <p><b>AZ</b> 9:22</p> <hr/>	<hr/> <p><b>C</b></p> <p><b>calendar</b> 9:20</p> <p><b>call</b> 3:3,4 4:4 6:12,13 21:4</p> <p><b>called</b> 11:6</p> <p><b>campaign</b> 6:23 13:11,15 15:19 19:24 21:18,24 23:6,22</p> <p><b>candidate</b> 14:21,25 15:18 16:11 17:7 19:13 21:18 23:21</p> <p><b>candidate's</b> 15:2</p> <p><b>candidates</b> 4:24 6:9 17:16 19:22 21:20,25 22:3 23:16</p> <p><b>candidates'</b> 21:23</p> <p><b>case</b> 7:18 11:5,19 13:19 22:19,23</p> <p><b>cases</b> 22:21</p> <p><b>CD7</b> 9:11</p> <p><b>certification</b> 24:5</p> <hr/>
<hr/> <p><b>4</b></p> <p><b>4-to-nothing</b> 4:13</p> <hr/>	<p><b>advisor</b> 15:9</p> <p><b>affect</b> 7:7</p> <p><b>affirm</b> 24:1</p> <p><b>AFP</b> 12:10</p> <p><b>agency</b> 18:3</p> <p><b>Agenda</b> 3:2</p> <hr/>	<p><b>back</b> 18:19 24:11</p> <p><b>backing</b> 10:4</p> <p><b>Ballot</b> 9:21</p> <p><b>based</b> 17:8</p> <p><b>basically</b> 11:20 16:10</p> <p><b>basis</b> 17:18</p> <p><b>BECK</b> 7:16 16:15</p> <p><b>beginning</b> 16:19 24:3</p> <hr/>	<p><b>Chair</b> 4:12 21:13</p> <p><b>Chairman</b> 3:2,12,20,24 4:3,8,10,12 5:10 6:2 8:4, 14,21 9:1,4 10:15,18,23 13:1,5 14:14,18 16:4,7 18:7,12,15,23,24,25 19:4, 16 20:5,9,12,20,24 21:7,9, 11,13 22:9 24:25</p> <p><b>Chamber</b> 10:5</p> <p><b>Chan</b> 3:11 4:6,7 8:4,19 18:24 19:3,4,17 21:9,10</p> <p><b>chance</b> 9:23 15:14</p> <hr/>
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<hr/> <p><b>8</b></p> <p><b>8:00</b> 18:9</p> <p><b>8th</b> 5:19,20</p> <hr/>	<p><b>agree</b> 19:1,17</p> <p><b>agreed</b> 24:10,11</p> <p><b>ahead</b> 16:24 17:5</p> <p><b>Alec</b> 9:15</p> <p><b>amend</b> 14:9</p> <p><b>Amendment</b> 11:6,20 12:18</p> <p><b>Americans</b> 11:7</p> <p><b>amount</b> 17:17 24:7</p> <p><b>amounts</b> 24:6</p> <p><b>Amy</b> 3:11 8:15</p> <p><b>apologies</b> 8:20</p> <p><b>appealable</b> 18:3</p> <p><b>applies</b> 7:22</p> <p><b>approve</b> 3:21,22 4:4 17:23 20:15,18 21:1</p> <hr/>	<hr/> <p><b>B</b></p> <p><b>back</b> 18:19 24:11</p> <p><b>backing</b> 10:4</p> <p><b>Ballot</b> 9:21</p> <p><b>based</b> 17:8</p> <p><b>basically</b> 11:20 16:10</p> <p><b>basis</b> 17:18</p> <p><b>BECK</b> 7:16 16:15</p> <p><b>beginning</b> 16:19 24:3</p> <hr/>	<p><b>candidate's</b> 15:2</p> <p><b>candidates</b> 4:24 6:9 17:16 19:22 21:20,25 22:3 23:16</p> <p><b>candidates'</b> 21:23</p> <p><b>case</b> 7:18 11:5,19 13:19 22:19,23</p> <p><b>cases</b> 22:21</p> <p><b>CD7</b> 9:11</p> <p><b>certification</b> 24:5</p> <hr/>
<hr/> <p><b>9</b></p> <p><b>9th</b> 5:19,20 11:4,12</p> <hr/>	<p><b>agree</b> 19:1,17</p> <p><b>agreed</b> 24:10,11</p> <p><b>ahead</b> 16:24 17:5</p> <p><b>Alec</b> 9:15</p> <p><b>amend</b> 14:9</p> <p><b>Amendment</b> 11:6,20 12:18</p> <p><b>Americans</b> 11:7</p> <p><b>amount</b> 17:17 24:7</p> <p><b>amounts</b> 24:6</p> <p><b>Amy</b> 3:11 8:15</p> <p><b>apologies</b> 8:20</p> <p><b>appealable</b> 18:3</p> <p><b>applies</b> 7:22</p> <p><b>approve</b> 3:21,22 4:4 17:23 20:15,18 21:1</p> <hr/>	<hr/> <p><b>B</b></p> <p><b>back</b> 18:19 24:11</p> <p><b>backing</b> 10:4</p> <p><b>Ballot</b> 9:21</p> <p><b>based</b> 17:8</p> <p><b>basically</b> 11:20 16:10</p> <p><b>basis</b> 17:18</p> <p><b>BECK</b> 7:16 16:15</p> <p><b>beginning</b> 16:19 24:3</p> <hr/>	<p><b>candidate's</b> 15:2</p> <p><b>candidates</b> 4:24 6:9 17:16 19:22 21:20,25 22:3 23:16</p> <p><b>candidates'</b> 21:23</p> <p><b>case</b> 7:18 11:5,19 13:19 22:19,23</p> <p><b>cases</b> 22:21</p> <p><b>CD7</b> 9:11</p> <p><b>certification</b> 24:5</p> <hr/>
<hr/> <p><b>A</b></p> <p><b>a.m.</b> 3:3</p> <p><b>accomplishment</b> 8:7</p> <p><b>accordance</b> 22:6</p> <p><b>accords</b> 23:5</p> <p><b>account</b> 13:14,15,18</p> <hr/>	<p><b>agree</b> 19:1,17</p> <p><b>agreed</b> 24:10,11</p> <p><b>ahead</b> 16:24 17:5</p> <p><b>Alec</b> 9:15</p> <p><b>amend</b> 14:9</p> <p><b>Amendment</b> 11:6,20 12:18</p> <p><b>Americans</b> 11:7</p> <p><b>amount</b> 17:17 24:7</p> <p><b>amounts</b> 24:6</p> <p><b>Amy</b> 3:11 8:15</p> <p><b>apologies</b> 8:20</p> <p><b>appealable</b> 18:3</p> <p><b>applies</b> 7:22</p> <p><b>approve</b> 3:21,22 4:4 17:23 20:15,18 21:1</p> <hr/>	<hr/> <p><b>B</b></p> <p><b>back</b> 18:19 24:11</p> <p><b>backing</b> 10:4</p> <p><b>Ballot</b> 9:21</p> <p><b>based</b> 17:8</p> <p><b>basically</b> 11:20 16:10</p> <p><b>basis</b> 17:18</p> <p><b>BECK</b> 7:16 16:15</p> <p><b>beginning</b> 16:19 24:3</p> <hr/>	<p><b>candidate's</b> 15:2</p> <p><b>candidates</b> 4:24 6:9 17:16 19:22 21:20,25 22:3 23:16</p> <p><b>candidates'</b> 21:23</p> <p><b>case</b> 7:18 11:5,19 13:19 22:19,23</p> <p><b>cases</b> 22:21</p> <p><b>CD7</b> 9:11</p> <p><b>certification</b> 24:5</p> <hr/>

<b>check</b> 24:7,9	<b>completeness</b> 22:1	<b>dealing</b> 18:20	<b>effectively</b> 15:20
<b>Christina</b> 3:9	<b>completes</b> 12:20	<b>debates</b> 4:21 5:2	<b>election</b> 4:19 5:3 9:11 19:20 20:6
<b>Circuit</b> 11:4,12	<b>compliance</b> 19:7	<b>decades</b> 24:15	<b>Elections</b> 3:5 7:10,12 13:25 14:9,25 20:17 21:20 23:4,18
<b>Citizens</b> 3:4	<b>concerned</b> 24:13	<b>declined</b> 15:20	<b>emphasis</b> 24:13
<b>civics</b> 9:18	<b>concerns</b> 22:12	<b>Deference</b> 8:2	<b>emphasize</b> 21:23
<b>claim</b> 11:6	<b>confidential</b> 11:21,23	<b>Democrat</b> 5:17	<b>ends</b> 12:6
<b>Clean</b> 3:5 7:9,12 13:24 14:9,25 20:17 21:19 23:4, 18	<b>confidentiality</b> 12:1	<b>Democratic</b> 4:21	<b>engaged</b> 12:3
<b>clear</b> 18:8 23:16	<b>confirmation</b> 4:23	<b>Democrats</b> 5:20	<b>ensure</b> 17:6
<b>clock</b> 7:5,6	<b>congrats</b> 8:13	<b>deserved</b> 8:8	<b>episode</b> 9:21
<b>closes</b> 23:9	<b>congratulate</b> 8:6	<b>designed</b> 21:22 22:10	<b>Eric</b> 11:15
<b>COLLINS</b> 4:17 5:9,13,15, 18,22 6:1,5 7:17 8:18,22 9:8 10:17,20,24 12:24 13:4 14:4,8 15:13 16:6,9, 16 18:11,14 22:9	<b>Congressional</b> 4:19	<b>determination</b> 15:1	<b>Erin</b> 10:11
<b>colored</b> 19:10	<b>Constitution</b> 10:2,7	<b>determine</b> 17:20	<b>essentially</b> 7:4 10:6 11:7, 21 12:1 13:17 15:16 19:21 23:12 24:5
<b>comfortable</b> 11:14	<b>consultant</b> 24:21	<b>developed</b> 21:22	<b>events</b> 9:19
<b>comments</b> 18:16 19:5 20:3,10	<b>consultant's</b> 24:24	<b>differently</b> 7:11	<b>excited</b> 5:1 8:3
<b>Commission</b> 3:5 7:20 13:7 14:16,24 18:16 20:10,13	<b>consultants</b> 24:16	<b>digital</b> 4:25	<b>exciting</b> 8:11
<b>Commission's</b> 15:9	<b>content</b> 10:12	<b>direct</b> 15:10	<b>excuse</b> 15:16
<b>Commissioner</b> 3:9,10, 11,22,25 4:2,6,7,8,9,10,11 5:7,10,11,14,16,21,25 6:3 8:4,19,24 9:1,4 11:13 12:22,25 13:1,2,5 14:2,6 18:17,24 19:1,3,4,5,17 20:4,5,6,14,15,21,23,25 21:2,5,6,7,8,9,10,11,12	<b>context</b> 23:18	<b>directly</b> 6:22 7:7 11:3	<b>Executive</b> 4:15 14:23 15:3 20:16 21:2
<b>Commissioners</b> 3:7,16 4:17 9:6 15:13 21:21 22:9	<b>continue</b> 9:7	<b>Director</b> 15:3	<b>exists</b> 6:11 12:15
<b>common</b> 19:9	<b>contract</b> 24:3	<b>Director's</b> 4:15 14:23 20:16 21:2	<b>expand</b> 6:7
<b>communicate</b> 15:20 16:13	<b>contracts</b> 19:21	<b>discussion</b> 3:14,18 4:14 14:19 21:17	<b>expenditures</b> 24:24
<b>complaint</b> 7:3,12,18 11:8	<b>coordinate</b> 9:19	<b>discussions</b> 14:15	<b>expenses</b> 24:23
<b>complaints</b> 6:24	<b>copy</b> 16:8	<b>dismayed</b> 19:6	<b>expressed</b> 22:13
<b>complete</b> 24:21	<b>correct</b> 5:13 18:14 24:1	<b>dismissed</b> 7:4	<b>extend</b> 7:6
<b>completely</b> 19:1	<b>correctly</b> 22:13	<b>distributed</b> 5:4 23:5	<b>extra</b> 13:22
	<b>counties</b> 6:13	<b>District</b> 4:20	
	<b>county</b> 6:9	<b>divine</b> 23:1	
	<b>county-wide</b> 6:9	<b>donors</b> 11:21,22	
	<b>couple</b> 5:7		
	<b>creates</b> 6:22		
		<b>E</b>	<b>F</b>
	<b>D</b>	<b>e-mail</b> 15:24 16:10,24 17:2 18:9	<b>facilitates</b> 17:5
	<b>date</b> 17:14	<b>earlier</b> 9:2	<b>fact</b> 12:14,15
	<b>day</b> 17:13	<b>echo</b> 19:5	<b>factual</b> 15:16
	<b>deadline</b> 6:23	<b>education</b> 4:25 6:6,8 9:9	<b>failure</b> 17:22 22:3 23:17
	<b>deadlines</b> 7:10	<b>effect</b> 7:1	<b>familiar</b> 10:18
	<b>deal</b> 6:21 23:22		<b>federal</b> 13:13

<b>feel</b> 18:4	<b>glasses</b> 19:10	<b>ignore</b> 19:6	15,23,25 19:16 20:5,9,12, 20,24 21:7,9,11,13 24:25
<b>Fellow</b> 8:1	<b>Glendale</b> 9:13	<b>II</b> 3:14	
<b>felt</b> 11:14	<b>good</b> 3:2 6:10,15 10:11 13:9	<b>III</b> 4:14	<b>kind</b> 7:7 9:19,22 10:9 12:16 17:3 18:5 19:25
<b>file</b> 7:20 17:22 21:23 22:4	<b>gosh</b> 8:19	<b>important</b> 11:1	<b>kinds</b> 16:12 17:16
<b>filed</b> 16:18,25	<b>Governor</b> 6:7,19 10:8 13:3,6	<b>impression</b> 18:2	
<b>files</b> 23:17	<b>great</b> 10:1	<b>incentive</b> 7:21	<b>L</b>
<b>filing</b> 6:23 7:2,5,23 15:19 17:3,9	<b>group</b> 11:6	<b>inclination</b> 17:4,8	<b>language</b> 10:5
<b>fill</b> 6:10,15	<b>guess</b> 20:8	<b>include</b> 6:9	<b>lapsed</b> 23:13
<b>finance</b> 6:24 13:11 15:19 21:19,24 23:6	<b>Guide</b> 4:25 6:8	<b>including</b> 8:16	<b>late</b> 22:16
<b>financial</b> 15:2		<b>incomplete</b> 20:1	<b>law</b> 7:4 10:10
<b>find</b> 6:13 13:10 14:13	<b>H</b>	<b>independent</b> 15:9	<b>leave</b> 8:20 18:1
<b>firm</b> 17:11	<b>hand</b> 8:24 12:10	<b>information</b> 6:14 23:1	<b>legal</b> 11:8 15:10 19:8
<b>Flinn-brown</b> 8:1	<b>happen</b> 13:3	<b>initial</b> 22:12	<b>Legislature</b> 10:4 14:22
<b>folks</b> 6:15 16:23	<b>happened</b> 12:12	<b>instances</b> 18:19	<b>liability</b> 19:8
<b>follow</b> 5:24 13:23	<b>happening</b> 9:10 12:1	<b>interested</b> 5:22 6:1	<b>Lieutenant</b> 13:3,5
<b>forced</b> 12:11	<b>hard</b> 11:10	<b>interesting</b> 6:21 7:8 9:12, 22 12:16 13:4 14:11,13,14 22:24	<b>limit</b> 13:22
<b>forgotten</b> 24:10	<b>HB2376</b> 6:7	<b>interlocutor</b> 12:3	<b>lines</b> 17:12
<b>forward</b> 19:13	<b>health</b> 16:11	<b>interview</b> 10:10	<b>listen</b> 9:23,25
<b>framework</b> 17:4	<b>hear</b> 15:3 18:6 23:10	<b>issue</b> 12:9 14:24 20:1 24:14	<b>local</b> 9:10
<b>Fraser</b> 11:15	<b>hearing</b> 3:20 18:12	<b>issues</b> 12:18 16:11 17:16, 23 22:15 23:4	<b>long</b> 8:12 17:13
<b>frequent</b> 19:20	<b>hey</b> 24:20	<b>item</b> 3:3,14 4:14 14:19,23 21:17	<b>lot</b> 12:2,4
<b>frustrated</b> 18:18	<b>highlight</b> 6:6,18 8:2 9:9	<b>iterations</b> 24:18	<b>M</b>
<b>frustrating</b> 18:21 19:2	<b>highlights</b> 4:18	<b>IV</b> 14:19	<b>mailed</b> 6:8
<b>funded</b> 23:9	<b>hit</b> 4:18		<b>make</b> 14:25 17:20 20:10, 13 24:21,22
<b>funding</b> 15:19 22:4 23:4	<b>hold</b> 17:7		<b>makes</b> 12:10
<b>funds</b> 13:22 14:25 17:11 19:22,23 21:20 22:2,5	<b>holding</b> 4:21	<b>J</b>	<b>man</b> 10:4
<b>future</b> 8:23	<b>honest</b> 13:8	<b>join</b> 8:14	<b>managing</b> 9:15
	<b>honor</b> 8:7	<b>joined</b> 9:2,5	<b>mandate</b> 9:24
<b>G</b>	<b>hope</b> 18:5	<b>June</b> 16:19	<b>manner</b> 19:24
<b>Galen</b> 3:10	<b>hopeful</b> 24:4		<b>Mark</b> 3:12
<b>gap</b> 6:11	<b>hours</b> 18:10	<b>K</b>	<b>material</b> 20:2
<b>general</b> 14:11	<b>I</b>	<b>keeping</b> 9:16	<b>materials</b> 6:15
<b>ghost</b> 20:1	<b>identified</b> 13:6,16	<b>Kimble</b> 3:2,12,20,24 4:3, 8,10,12 5:10 6:2 8:14 9:4 10:15,18,23 11:13 13:1 14:14,18 16:4,7 18:7,12,	<b>matter</b> 15:9
<b>Gina</b> 5:23 7:25 8:2,8,17 9:17	<b>identify</b> 3:7		<b>matters</b> 15:18
			<b>meaning</b> 23:18

<b>meaningless</b> 23:24	<b>nice</b> 7:25	<b>Paton</b> 3:10 4:2,10,11 5:7, 10,11,14,16,21,25 6:3 12:22,25 13:1,2,5 14:2,6 18:17 19:1 20:4,5,6,23,25 21:7,8	<b>professor</b> 10:11
<b>means</b> 6:25	<b>night</b> 5:17		<b>Prop</b> 11:4
<b>measure</b> 10:5	<b>non-statewide</b> 6:12		<b>proponent</b> 8:9
<b>mechanism</b> 17:6	<b>notice</b> 22:3 23:16		<b>proposal</b> 21:22
<b>Media</b> 4:22	<b>November</b> 20:7	<b>Paton's</b> 19:5	<b>proposed</b> 14:20 15:15 20:19 21:3
<b>meeting</b> 3:4,15,17 16:24 17:1 18:10	<b>number</b> 6:20 21:25 22:3	<b>pause</b> 17:18	<b>Prosperity</b> 11:7
<b>Member</b> 20:12	<hr/> <b>O</b> <hr/>	<b>paying</b> 9:13	<b>protection</b> 7:14
<b>members</b> 18:5,16 20:9 22:14	<b>obligations</b> 21:23	<b>PBS</b> 5:11	<b>provide</b> 19:22 23:16
<b>memo</b> 15:15 17:22	<b>obviated</b> 10:6	<b>people</b> 7:18 13:21 16:7, 25 19:6	<b>public</b> 4:22 19:22
<b>memories</b> 19:11	<b>occurred</b> 20:18	<b>period</b> 7:3 23:8,9	<b>purpose</b> 14:10
<b>mention</b> 11:3 13:20 15:7	<b>office</b> 7:24 8:16 10:25 13:6	<b>perspective</b> 16:21 22:14	<b>purposes</b> 7:9 13:25 15:23
<b>merits</b> 22:21	<b>officeholder</b> 10:3	<b>place</b> 23:15	<b>put</b> 10:4
<b>middle</b> 20:7 23:21,22	<b>officer</b> 7:2,5	<b>placing</b> 22:3	<b>puts</b> 12:5
<b>minutes</b> 3:15,16,21,23 4:4,13	<b>officers</b> 6:23 7:23	<b>play</b> 24:17	<b>putting</b> 23:14
<b>Mofford</b> 10:8	<b>operate</b> 7:10	<b>point</b> 14:14 15:25 18:6 24:1	<hr/> <b>Q</b> <hr/>
<b>Monday</b> 23:6,9	<b>operation</b> 7:4	<b>pointing</b> 8:15	<b>qualify</b> 23:6
<b>money</b> 11:23 12:5,6 13:25	<b>opportunity</b> 5:2 8:9 13:21	<b>points</b> 24:13	<b>question</b> 12:13,22 13:9 14:11
<b>Monica</b> 14:20 15:4	<b>oral</b> 11:4	<b>position</b> 18:5 22:20	<b>questions</b> 5:8 14:15 15:10 18:15
<b>month</b> 18:6	<b>order</b> 3:3,5 14:20,24 15:15 17:24,25 19:15 20:19 21:4 23:23	<b>precisely</b> 6:25	<b>quorum</b> 3:13
<b>months</b> 16:14,15,16 18:13	<b>organization</b> 12:6,7	<b>predict</b> 11:10	<hr/> <b>R</b> <hr/>
<b>morning</b> 3:2 15:24 18:9	<b>outlined</b> 17:21	<b>present</b> 9:6 15:5	<b>radio</b> 5:4
<b>motion</b> 3:21,22 20:13 21:14	<b>outlines</b> 15:25 16:10	<b>presented</b> 11:15 19:12	<b>rainbow</b> 19:10
<b>move</b> 20:15	<hr/> <b>P</b> <hr/>	<b>President</b> 13:13,14,16,17	<b>raise</b> 13:22
<b>moved</b> 4:3 21:1	<b>packets</b> 3:17	<b>President's</b> 13:18	<b>read</b> 15:14
<b>moving</b> 17:5	<b>pages</b> 16:3	<b>presidential</b> 13:15	<b>real</b> 17:25 18:2
<b>MUR</b> 14:20 20:18 21:3	<b>panel</b> 12:4	<b>presumption</b> 22:5 23:14	<b>reason</b> 15:1 17:21 20:16 22:18,19
<hr/> <b>N</b> <hr/>	<b>part</b> 8:11,12 13:14	<b>pretty</b> 5:1	<b>reasons</b> 19:12 22:23
<b>named</b> 10:11	<b>participating</b> 14:21 15:2 19:13 21:18,20,23	<b>previous</b> 8:16	<b>recall</b> 19:9
<b>needed</b> 20:8	<b>partners</b> 9:18	<b>primaries</b> 4:22	<b>received</b> 15:18,24 18:9
<b>nerdy</b> 10:13	<b>passed</b> 6:16	<b>primary</b> 4:19 5:16	<b>receiving</b> 22:2,4
<b>newspapers</b> 5:4	<b>past</b> 16:14 19:20	<b>prior</b> 10:2	<b>recipients</b> 8:16
		<b>private</b> 12:14	
		<b>proceed</b> 18:21	
		<b>process</b> 4:20 24:4	
		<b>production</b> 10:21	

<b>recognize</b> 8:10 10:7	<b>revealed</b> 12:8,15	<b>staff</b> 7:14 15:21 16:21 17:4 18:5 21:22 22:14	<b>testify</b> 6:17
<b>recommend</b> 9:23	<b>review</b> 16:2	<b>staff's</b> 19:6	<b>theme</b> 23:2
<b>recommendation</b> 20:16 21:3	<b>role</b> 24:16	<b>stamp</b> 18:8	<b>thing</b> 10:9 11:3 15:7 17:25 18:4 23:20,24
<b>record</b> 3:8 9:5	<b>roll</b> 4:5 21:4	<b>start</b> 16:17 18:10	<b>thought</b> 12:16,17 14:11
<b>records</b> 15:3	<b>routinely</b> 6:12	<b>starting</b> 16:19 17:13	<b>Timberlake</b> 14:21 15:4, 25
<b>registered</b> 6:8	<b>rule</b> 24:12	<b>State</b> 14:21	<b>time</b> 7:3 11:12 12:4 14:3 18:8,19 23:12
<b>regular</b> 5:3 13:11	<b>rulemaking</b> 21:18,21	<b>State's</b> 7:23	<b>timeline</b> 23:5
<b>related</b> 6:5 15:1 21:18 24:23	<b>rules</b> 20:17 22:6	<b>statement</b> 17:12	<b>timely</b> 21:24 22:4
<b>relationship</b> 11:22	<hr/> <b>S</b> <hr/>	<b>statewide</b> 10:3	<b>Titla</b> 8:24 9:1,2,5 21:11,12
<b>release</b> 21:19	<b>Scharff</b> 10:11	<b>stations</b> 5:4,5	<b>today</b> 19:14
<b>remain</b> 12:14	<b>schedule</b> 17:7	<b>statute</b> 7:1 12:18 13:7	<b>Tom</b> 4:16 6:4 8:5,7 9:7 14:18 15:6,12 16:4 21:16 22:7
<b>remedy</b> 23:19	<b>seconded</b> 4:4 21:1	<b>Steve</b> 9:2	<b>totally</b> 20:2
<b>repay</b> 14:25	<b>Secretary</b> 7:23	<b>stopped</b> 15:19	<b>transitioning</b> 9:11
<b>repayment</b> 14:20 15:15 17:23,24 19:14 20:19 21:3,19 23:22	<b>Secretary's</b> 10:25	<b>straightforward</b> 11:5	<b>Tucson</b> 4:22 5:14
<b>report</b> 4:15 12:21 23:7 24:22	<b>selected</b> 8:1	<b>structure</b> 7:22	<b>Tuesday</b> 23:9
<b>reported</b> 24:23	<b>send</b> 20:1	<b>Stuart</b> 15:8	<b>turned</b> 16:18
<b>reporting</b> 21:19 22:15 23:8 24:1	<b>serve</b> 15:8 23:15	<b>studios</b> 4:23	<b>types</b> 11:25
<b>reports</b> 15:2,19 21:24 22:2,4 23:6	<b>share</b> 16:1	<b>submit</b> 21:25	<hr/> <b>U</b> <hr/>
<b>representation</b> 17:10	<b>Shayna</b> 15:8,11	<b>subscribe</b> 9:25	<b>umbrella</b> 24:17
<b>representative</b> 15:4	<b>show</b> 9:5	<b>sufficient</b> 17:17	<b>unacceptable</b> 20:2
<b>Republican</b> 4:21 5:17	<b>sign</b> 24:3	<b>summarize</b> 16:5	<b>unanimously</b> 6:16 21:14
<b>Republicans</b> 5:20	<b>signed</b> 6:7	<b>supervisors</b> 6:9	<b>undecided</b> 9:14
<b>request</b> 14:24	<b>signing</b> 24:8,9	<b>support</b> 19:13,14	<b>understand</b> 12:17 24:2
<b>requiring</b> 14:24 21:25	<b>similar</b> 15:17	<b>suspect</b> 13:21	<b>upshot</b> 16:20
<b>Resort</b> 9:13	<b>situation</b> 16:25 23:19	<b>sympathetic</b> 17:15	<b>upstream</b> 11:23
<b>respond</b> 19:8	<b>situations</b> 16:23	<b>sympathize</b> 19:11	<b>urge</b> 9:24
<b>respondent</b> 16:11	<b>sort</b> 12:3,4,9 15:25 17:1, 18 23:25 24:17	<b>system</b> 13:11,13	<b>users</b> 11:23
<b>response</b> 3:19 14:17 20:11	<b>sounds</b> 10:18	<b>systemically</b> 23:3	<hr/> <b>V</b> <hr/>
<b>result</b> 22:5	<b>speaking</b> 22:23	<hr/> <b>T</b> <hr/>	<b>vaguely</b> 10:18
<b>results</b> 9:12	<b>special</b> 4:19	<b>takes</b> 17:13	<b>vanish</b> 20:2
<b>return</b> 19:23	<b>specific</b> 23:2 24:13	<b>talk</b> 22:20	<b>variety</b> 9:18 16:12
	<b>spend</b> 11:18	<b>talking</b> 10:12 12:4	
	<b>spenders</b> 24:17	<b>team</b> 10:21	
	<b>spent</b> 12:2,4 19:25	<b>television</b> 5:5	
	<b>stab</b> 22:12	<b>template</b> 15:16	

**vetoed** 6:20

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**Y**

**Vice** 13:13,15,16

**view** 16:1,13

**years** 5:3 6:12 19:9 24:18

**violation** 20:17

**vote** 9:14 19:14

**voter** 4:25 6:5,7 7:14,15,  
19 9:9

**voters** 6:8,12

**Voters'** 7:17,19

**votes** 4:12 21:13

**voting** 14:3

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**W**

**wanted** 4:18 6:18 8:10  
9:8 11:3

**watched** 11:13

**watching** 12:19

**weeks** 23:11

**Werther** 3:9,22,25 4:8,9  
20:14,15,21 21:5,6

**white** 19:25

**wide-ranging** 11:8

**widely** 5:4

**wonderful** 8:9

**words** 23:20

**work** 9:9,18 17:13

**worked** 24:15

**working** 9:17 16:18

**worse** 19:19

**worth** 8:15 12:19

**wrapped** 13:17

**write** 7:25

**writing** 8:2

**written** 24:12

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**X**

**X-DOLLARS** 12:5

**CITIZENS CLEAN ELECTIONS COMMISSION  
EXECUTIVE DIRECTOR REPORT  
June 26, 2025**

**Announcements:**

**July 15<sup>th</sup> CD7 Special Primary Election:**

- Early voting is underway for the CD7 July 15<sup>th</sup> Special Primary Election.
- Republican and Democratic debates were held on June 9<sup>th</sup> and June 10<sup>th</sup>. All eligible candidates participated. See the attached memo for metrics on the debates.
- An English and Spanish digital Voter Education Guide is available on the website.

**August 5<sup>th</sup> Local Elections:**

Alec has been working with the counties to update the CCEC website with voting information for the August 5<sup>th</sup> local elections.

- Tucson and the City of South Tucson, San Tan Valley, and Prescott are conducting elections.
- The voter registration deadline is July 7<sup>th</sup> and early voting begins July 9<sup>th</sup>.

**Other announcements:**

- As of Tuesday, June 24, the Legislature was still working on the state budget for the fiscal year beginning July 1. If there are developments that effect the Commission we will brief you at the meeting and provide any supplemental information.

**Voter Education and Outreach:**

- Gina and Avery presented to the Arizona Municipal Clerks Association on elections in Arizona and the role of Clean Elections.
- Tom, Gina, and Avery attended the 14th Annual African American Conference on Disabilities (AACD), where Tom participated in the panel “Access to the Electoral Process in a Partisan Environment.”
- The Voter Education team launched the second issue of Captain Activate! and The Future Voters at the 2025 Phoenix Fan Fusion to promote civic engagement and voter education.
- Avery tabled at the Greer Days event, hosted by the Greer Civic Association, to share Clean Elections resources and promote voter participation.
- Commissioner Werther, Gina, Tom, and Avery attended the Elections Officials of Arizona conference. Commissioner Werther was a panelist on city elections, Avery was a panelist on voter outreach, and Gina led a breakout session on pamphlets and voter guides.

- Avery met with Gilbert Castillo, Field Director for Arizona Asian American Native Hawaiian and Pacific Islander for Equity, to discuss a potential civic engagement partnership.
- Additional outreach included attending the AZSOS Native Voting Hour and ASU's "Meet the 2025 Mandela Washington Fellows" to support global civic connection.
- Staff is working on the production of an "Education Roundtable". This is a part of Clean Elections' efforts to engage Arizonans in policy discussions on the state's top issues so they may vote informed and participate in the debate process. The roundtable is tentatively scheduled to air live on a local broadcast station near the end of August. Staff is working with media partners and education experts on the production.
- The most recent Beyond the Ballot AZ podcast episode has been published. Senator J.D. Mesnard and former Senator Sean Bowie were guests to speak about the new Lieutenant Governor executive office that voters will see on the 2026 general election ballot.
- Alec and Mike have been updating candidate training videos for the website.
- Avery continues to serve on the Youth Committee for the Arizona African American Legislative Council, actively participates in the AZSOS Engagement Advisory Board, and leads a Voter Outreach Workgroup.

#### **Legal:**

- Center for Arizona Policy v. Arizona Secretary of State, Arizona Supreme Court No. CV-24-0295-PR.
  - The Court accepted the Petition for Review and the case is set for oral argument September 11, 2025. This is a state constitutional challenge to Proposition 211.
- Americans for Prosperity v. Meyer, No. 24-2933 (9th Cir.).
  - Pending at the Ninth Circuit following May Oral Argument.
- Montenegro v. Fontes, Arizona Supreme Court No. CV-24-0166-PR.
  - This case is pending a decision from the Arizona Supreme Court.
- 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. The Commission's attorneys filed a motion for summary judgement on June 20, 2025.
- Branch et al. v. Collins, et al., CV2024-004136 in Superior Court for Maricopa County. The Commission's attorneys will file a reply in support of our motion to dismiss this week.

#### **Appointments:**

- No additional information.



### **Complaints:**

- MUR 24-01, Barnett
- MUR 24-05, Roberts
- MUR 24-07, Arizona Solutions PAC
- MUR 25-01, Jaramillo
- MUR 25-02, Abeytia
- MUR 25-03, Timberlake

### **2025 Regulatory Agenda:**

The Commission may conduct a rulemaking even if the rulemaking is not included on the annual regulatory agenda. Staff will be taking a look at Proposition 211 implementation rules for improvement.

The Governor's Regulatory Review Council has issued its 90-day notice for the Commission's Five-Year Rule Review. Barring an extension, that review is due on or before June 30, 2025. See this agenda item for details.

The following information is provided under A.R.S. § 41-1021.02:

- Notice of Docket Opening: \_\_\_\_ A.A.R. \_\_\_\_ (revision and addition of funding rules).
- Notice of Proposed Rulemaking: \_\_\_\_ A.A.R. \_\_\_\_ (revision and addition of funding rules).
- Federal funds for proposed rulemaking: **None**
- Review of existing rules: **Five Year Report Pending**
- Notice of Final Rulemaking: **None.**
- Rulemakings terminated: **None.**
- Privatization option or nontraditional regulatory approach considered: **None Applicable.**

# Memorandum

Client CCEC  
Project Primary Debates  
Date June 23, 2025

Attached are the final "How to Watch" documents for last week's primary debates. In all, they indicate that:

- Six TV stations in Southern Arizona aired each debate live in English and one aired each debate live in Spanish. Telemundo Tucson and Phoenix both aired each debate on-delay as well.
- Six radio stations (four in Southern Arizona and two in Phoenix) aired each debate live in English and two radio stations aired each debate live in Spanish.

\*Note: Each of these debates surpasses the general election debate in Congressional District 6 in 2024 (a very close, highly contested race between Rep. Juan Ciscomani and his opponent, Kirsten Engel) in live TV & radio participation.


- 18 groups from across the state aired the Republican primary debate live on digital platforms in English and 19 groups aired the Democratic party primary debate live on digital platforms in English. Seven groups from across the state aired each debate live on digital platforms in Spanish.
- Additionally, there has been 80 hours of watch time from 337 views on the AMA YouTube channel for the primary debates.
- CCEC's YouTube page shows 778 views and 114.1 hours of watch time.
- 14 members of the media attended the Republican party primary debate in-person, and 17 attended the Democratic party primary debate in-person, for 31 total.
  - This rivals all 2024 debates besides the Senate debate. Most attending media members were based in Southern Arizona.

PR Coverage Report Highlights (Full report can be found attached)

- Links: 25
- Total Engagement: 27
- Avg. Engagement: 1
- UVM (Unique Visitors per Month): 19,231,750
- Total AVE (Advertising Value Equivalency): \$178,837.92

# CCEC - Tucson Debates Monitoring

Generated on June 11, 2025 at 12:52 PM ET


LINKS	TOTAL ENGAGEMENT	AVG. ENGAGEMENT	JOURNALIST SHARES
25	27	1	0
JOURNALIST REACH	UVM	TOTAL AVE	
0	19,231,750	\$178,837.92	
	Insights by  similarweb		

## ARTICLES


### Watch 5 Arizona Democrats face off in congressional debate

 KTAR-FM (Phoenix, AZ) | By Kevin Stone | June 10, 2025


The Arizona **Citizens Clean Elections Commission** is hosting the 7th Congressional District Democratic primary debate from 6 p.m. to 7 p.m. in Tucson.

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
465,446	0	0	0
SENTIMENT	LOCATION	AVE	
Neutral	Phoenix, AZ, United States	\$4,305.38	

# WATCH: Congressional candidates debate ahead of special Arizona CD7 election

 KNXV-TV (Phoenix, AZ) | June 10, 2025


The **Citizens Clean Elections Commission** and Arizona Media Association are hosting **debates** for the Republican and Democratic candidates. Republican candidates for CD7 are Daniel Butierez, Jorge Rivas, and Jimmy Rodriguez.

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
1,143,779	0	0	0
SENTIMENT	LOCATION	AVE	
Positive	Phoenix, AZ, United States	\$10,579.96	

## Republicans debate their primary points for CD 7

KOLD-TV (Tucson, AZ) | By J.D. Wallace | June 10, 2025


While all three Republican CD 7 candidates agreed on the use of tariffs, each had at least one or two points to distinguish themselves during the **Citizens' Clean Elections Commission** debate for the CD 7 Republican primary. Rivas called for a death penalty for drug smugglers and drug dealers.

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
—	0	0	2
SENTIMENT	LOCATION	AVE	
Neutral	Tucson, AZ, United States	\$239.08	

# Democrats aiming to replace Rep. Rau’l Grijalva will debate on TV ahead of early voting

 The Arizona Republic | By Laura Gersony | June 10, 2025


The debate is hosted by Arizona's publicly funded **Citizens Clean Elections Commission**. It will air for about an hour without commercial breaks starting at 6 p.m. A Republican debate aired the night before. News alerts in your inbox: Don't miss the important news of the day.

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
5,513,688	0	0	0
SENTIMENT	LOCATION	AVE	
Neutral	Phoenix, AZ, United States	\$51,001.61	

## WATCH LIVE: Democratic Debate for Arizona Congressional District 7

Arizona Public Media | June 10, 2025


The debate will be moderated by Steve Goldstein and Nohelani Graf and is produced by the **Citizens Clean Elections Commission** and the Arizona Media Association. This debate is part of the lead-up to the special election to fill the seat left vacant by the late Rep. Raúl Grijalva.

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
—	0	0	0
SENTIMENT	LOCATION	AVE	
Positive	Tucson, AZ, United States	\$23.23	

# Republican candidates debate in Tucson for late Rep. Rau’l Grijalva's seat for Arizona's CD7

 The Arizona Republic | June 9, 2025


Republican candidate Jorge Rivas speaks to the media after a debate on June 9, 2025, for CD7 hosted by Arizona's publicly funded **Citizens Clean Elections Commission** at the University of Arizona in Tucson.

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
5,513,688	0	0	0
SENTIMENT	LOCATION	AVE	
Positive	Phoenix, AZ, United States	\$51,001.61	

# US Election News: Longshot GOP candidates to square off in TV debate for special election to fill Grijalva congressional seat

 Global News Report | June 9, 2025


., Jorge Rivas, and Jimmy Rodriguez will square off in a forum hosted June 9 by Arizona's publicly funded **Citizens Clean Elections Commission**. They are running to ...

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
361	0	0	0
SENTIMENT	LOCATION	AVE	
Positive	Bothell, WA, United States	\$3.34	

# Elections News: Longshot GOP candidates to square off in TV debate for special election to fill Grijalva congressional seat

 Global News Report | June 9, 2025


., Jorge Rivas, and Jimmy Rodriguez will square off in a forum hosted June 9 by Arizona's publicly funded **Citizens Clean Elections Commission**. They are running to ...

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
361	0	0	0
SENTIMENT	LOCATION	AVE	
Positive	Bothell, WA, United States	\$3.34	

## Branscomb’s Tucson reprieve

Tucson Agenda | By Joe Ferguson, Hank Stephenson | June 9, 2025


A glitchy phone-based voting system, fiery audience outbursts, and drawn-out **debates** set the tone for a chaotic Arizona State Democratic Party Committee meeting in Tucson on Saturday. But the real drama? It never made it to the floor. ... And remember: The Arizona **Citizens Clean Elections Commission** Republican primary debate in this deep blue district is today at 6 p.m. Democrats will debate tomorrow at 6 p.m. You can stream either debate on the Clean Elections YouTube page or on Arizona Public Media. “Are they trustworthy?

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
363	0	0	24
SENTIMENT	LOCATION	AVE	
Negative	Tucson, AZ, United States	\$3.36	

# Here's what you need to know about this week's Arizona CD7 primary debates

 Dnyuz | June 9, 2025


The Arizona **Citizens Clean Elections Commission** is hosting the **debates**, which are scheduled to run from 6 p.m. to 7 p.m. KTAR News will stream live broadcasts of the **debates** on its YouTube channel and air playbacks on 92.3 FM and the station's audio streams at 7 p.m.

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
614,930	0	0	0
SENTIMENT	LOCATION	AVE	
Negative	New York, NY, United States	\$5,688.10	

## Debates for Arizona CD7 primaries set for this week

 KTAR-FM (Phoenix, AZ) | By Kevin Stone | June 9, 2025

Raúl Grijalva will face off in **debates** this week. Republicans will make their arguments to 7th Congressional District voters on Monday, and Democrats will take the stage in Tucson the next day. ... The Arizona **Citizens Clean Elections Commission** is hosting the **debates**, which are scheduled to run from 6 p.m. to 7 p.m. KTAR News will stream live broadcasts of the **debates** on its YouTube channel and air playbacks on 92.3 FM and the station's audio streams at 7 p.m.


SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
465,446	0	0	0
SENTIMENT	LOCATION	AVE	
Negative	Phoenix, AZ, United States	\$4,305.38	



# Longshot GOP candidates to square off in TV debate for special election to fill Grijalva congressional seat

 The Arizona Republic | By Laura Gersony | June 9, 2025


., Jorge Rivas, and Jimmy Rodriguez will square off in a forum hosted June 9 by Arizona's publicly funded **Citizens Clean Elections Commission**. They are running to succeed the late U.S. Rep. Rau'l Grijalva, a long-serving Arizona Democrat who died in March after a battle with lung cancer.

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
5,513,688	0	0	0
SENTIMENT	LOCATION	AVE	
Positive	Phoenix, AZ, United States	\$51,001.61	

## WATCH LIVE: Republican Debate for Arizona Congressional District 7

Arizona Public Media | June 9, 2025


Jorge Rivas Jimmy Rodriguez Daniel Butierez The debate will be moderated by Steve Goldstein and Nohelani Graf and is produced by the **Citizens Clean Elections Commission** and the Arizona Media Association.

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
—	0	0	0
SENTIMENT	LOCATION	AVE	
Positive	Tucson, AZ, United States	\$23.23	

## WATCH LIVE: Republican Debate for Arizona Congressional District 7

Arizona Public Media | June 9, 2025


Jorge Rivas Jimmy Rodriguez Daniel Butierez The debate will be moderated by Steve Goldstein and Nohelani Graf and is produced by the **Citizens Clean Elections Commission** and the Arizona Media Association.

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
—	0	0	0
SENTIMENT	LOCATION	AVE	
Neutral	Tucson, AZ, United States	\$23.23	

# Letter: Clean Elections Commission is not nonpartisan

 Arizona Daily Star | By Richard S. Grayson | June 4, 2025


The Arizona **Citizens Clean Elections Commission** purports to be a strictly nonpartisan organization that "seeks to improve the integrity of Arizona state government and promote public confidence in the Arizona political process." Yet on its website of the current candidates running for U.S.

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
—	0	0	0
SENTIMENT	LOCATION	AVE	
Positive	Tucson, AZ, United States	\$317.73	

## Tucson Speaks Out: June 4

 Arizona Daily Star | June 4, 2025

Uwe Manthei Midtown **Clean Elections Commission** The Arizona **Citizens Clean Elections Commission** purports to be a strictly nonpartisan organization that "seeks to improve the integrity of Arizona state government and promote public confidence in the Arizona political process."

SIMILARWEB UVM 	JOURNALIST SHARES	JOURNALIST REACH	TOTAL ENGAGEMENT
—	0	0	1
SENTIMENT	LOCATION	AVE	
Neutral	Tucson, AZ, United States	\$317.73	

KTAR-AM (Phoenix, AZ)

News/Talk 92.3 KTAR | June 10, 2025

the most accessible in Arizona history. that means this debate will air on a long list of local TV stations, radio stations and digital platforms, including support from local newspapers. Now we have tried to keep the rules. Candidates have drawn straws to determine the order of each of those portions of this debate. Throughout the debate, we will pose questions to each candidate, allow them to answer and then make sure the other candidates have...

MEDIA TYPE	STATION	NETWORK	LOCATION
Radio	KTAR-AM (Phoenix, AZ)	---	Phoenix, AZ, United States
DATE AIRED	NATIONAL AUDIENCE	LOCAL AUDIENCE	NATIONAL AD VALUE
June 10, 2025 7:05 PM MST	70,500	---	---
	LOCAL AD VALUE		
	---		

KTAR-AM (Phoenix, AZ)

News/Talk 92.3 KTAR | June 10, 2025

account. Wow, that's a keeper. So where are you heading? I'm off the spray the good news that capital helps people keep more money in their wallet with no overdrawn our fees. You're the best Capital one bank guy. Hey, mind if I get a selfie sure, say Capital one w. what's in your wallet terms apply see capital .com /bank for details capital and a member fdic it's macey's friends and family sale which means if you're shopping for summer you can get...

MEDIA TYPE	STATION	NETWORK	LOCATION
Radio	KTAR-AM (Phoenix, AZ)	---	Phoenix, AZ, United States
DATE AIRED	NATIONAL AUDIENCE	LOCAL AUDIENCE	NATIONAL AD VALUE
June 10, 2025 7:00 PM MST	70,500	---	---
	LOCAL AD VALUE		
	---		

KVOA-TV (Tucson, AZ) - News 4 Tucson at 6pm

KVOA (NBC) | June 10, 2025

southern arizona congressman raul grijalva, arizona media association is hosting tonight's event on campus of the republican candidates took the stage last night. If you recall, if you missed it, you can watch that debate on our website at koaa t com slash decision 2025. >> And right now we're going to take you live to the campus of for the democratic debate. >> Welcome to this special primary election debate for arizona's congressional district....

MEDIA TYPE	STATION	NETWORK	LOCATION
Television	KVOA-TV (Tucson, AZ)	NBC	Tucson, AZ, United States
DATE AIRED	NATIONAL AUDIENCE	LOCAL AUDIENCE	NATIONAL AD VALUE
June 10, 2025 6:00 PM MST	1,571,287	21,106	\$34,034.08
	LOCAL AD VALUE		
	\$429.54		

KOLD (CBS) - News 13 at 4pm

KOLD (CBS) | June 10, 2025

seven will have a full stage tonight. Five candidates are running to be the democratic candidate for a seat held by democratic congressman raul grijalva for more than two decades. 13 news reporter J.D. wallace is live at the university of arizona, where the debate will start in less than two hours. The debate will be less than an hour long& and time management will be important. From left to right: adelita grijalva& deja fox& patrick harris senior&...

MEDIA TYPE	STATION	NETWORK	LOCATION
Television	KOLD (CBS)	CBS	Tucson, AZ, United States
DATE AIRED	NATIONAL AUDIENCE	LOCAL AUDIENCE	NATIONAL AD VALUE
June 10, 2025 4:00 PM MST	463,887	9,956	---
	LOCAL AD VALUE		
	\$189.20		

KTAR-AM (Phoenix, AZ)

News/Talk 92.3 KTAR | June 9, 2025

draft fees you're the best capital one bank guy hey mind if i get a selfie sure he say capital one what's in your wallet terms apply see capital bank for details capital and a member fdic ibly b 21 now there's a new way to take charge Of your blood sugar, introducing new garlic, healthy blood sugar formula from the makers at the nation's bestselling garlic supplement new garlic helps maintain healthy blood sugar levels with clinically supported levels...

MEDIA TYPE	STATION	NETWORK	LOCATION
Radio	KTAR-AM (Phoenix, AZ)	---	Phoenix, AZ, United States
DATE AIRED	NATIONAL AUDIENCE	LOCAL AUDIENCE	NATIONAL AD VALUE
June 9, 2025 7:00 PM MST	70,500	---	---
	LOCAL AD VALUE		
	---		

KVOA-TV (Tucson, AZ) - News 4 Tucson at 6pm

KVOA (NBC) | June 9, 2025

district seven's congressional seat. >> Of course, left vacant by the passing of longtime southern arizona congressman raul grijalva. >> The arizona media asciation are the ones hosting tonight's event taking place on campus. And don't forget that tomorrow night, it's going to be the democratic candidates. But right now it's the republicans. We tataka you live to the u of a for the distrirct. 7 coressional debate. >> After the recent death of representative...

MEDIA TYPE	STATION	NETWORK	LOCATION
Television	KVOA-TV (Tucson, AZ)	NBC	Tucson, AZ, United States
DATE AIRED	NATIONAL AUDIENCE	LOCAL AUDIENCE	NATIONAL AD VALUE
June 9, 2025 6:00 PM MST	1,422,361	20,151	\$30,808.34
	LOCAL AD VALUE		
	\$432.64		

KOLD (CBS) - News 13 at 4pm

KOLD (CBS) | June 9, 2025

highway and alvernon. Mary coleman joins us now - to tell us the latest developments from the crash. Tucson police tell us this is a semi versus motorcycle crash. The motorcycle rider has life threatening injuries - after that collision with a semi. The intersection of south alvernon way and east benson highway has been shut down because of the crash. Authorities tell us that this closure could be in place for the next several hours. This is a live...

MEDIA TYPE Television	STATION KOLD (CBS)	NETWORK CBS	LOCATION Tucson, AZ, United States
DATE AIRED June 9, 2025 4:00 PM MST	NATIONAL AUDIENCE 1,559,133	LOCAL AUDIENCE 6,431	NATIONAL AD VALUE ---
	LOCAL AD VALUE \$89.32		

KVOA-TV (Tucson, AZ) - News 4 Tucson at 4PM

KVOA (NBC) | June 9, 2025

is hot outside. We're going to check in with stormtracker 4 chief meteorologist matt brbrode and what you need to know as we continue to monitor those triple digits. News. 4, tucson at 4 starts right now. >> Live from kvoa. This is news 4, tucson live at 4. >> We are learning more about an officer-involved shooting in downtown nogales over the weekend that left a state trooper injured. Good afternoon. I am monica garcia, our news 4 tucson, steve...

MEDIA TYPE Television	STATION KVOA-TV (Tucson, AZ)	NETWORK NBC	LOCATION Tucson, AZ, United States
DATE AIRED June 9, 2025 4:00 PM MST	NATIONAL AUDIENCE 531,666	LOCAL AUDIENCE 8,420	NATIONAL AD VALUE ---
	LOCAL AD VALUE \$175.74		

KOLD (CBS) - News 13 at 3pm

KOLD (CBS) | June 9, 2025

legislative immunity. 13 news reporter tom powell explains. << january 22nd ... Along the u-s 60. Body cam video shows a state trooper pull over state senator jake hoffman driving a tesla cybertruck with the word freedom on the back. 00:39 trooper says, "pulled you over for speeding, picked you up at 89 ... It's 65." senator hoffman is cooperative. He does\*not tell the trooper he's a lawmaker.... Or ask for immunity. But.... The trooper figures that...

MEDIA TYPE	STATION	NETWORK	LOCATION
Television	<a href="#">KOLD (CBS)</a>	CBS	Tucson, AZ, United States
DATE AIRED	NATIONAL AUDIENCE	LOCAL AUDIENCE	NATIONAL AD VALUE
June 9, 2025 3:36 PM MST	4,438,872	7,687	\$28,808.28
	LOCAL AD VALUE		
	\$161.60		

# How to watch the Arizona Congressional District 7 Special Election Democratic Party Primary debate Tuesday, June 10 at 6 p.m.:

<b>LIVE TV - ENGLISH</b>	AZPM (ch. 6 Tucson) Cox YurView (ch. 4 Phoenix) KOLD (CBS ch. 13 Tucson) KVOA (NBC ch. 4 Tucson) KWBA (CW ch. 58 Tucson) KYMA (CBS/NBC ch. 13, Yuma)
<b>LIVE TV - SPANISH</b>	KESE (Telemundo ch. 35, Yuma) KHRR (Telemundo ch. 40 Tucson) (on-delay) KTAZ (Telemundo ch. 39 Phoenix) (on-delay)
<b>LIVE RADIO - ENGLISH</b>	AZPM 89.1FM (NPR Tucson) KAWC/KAWP 88.9FM (NPR Yuma/Parker) KBRP-LP 96.1FM (Bisbee Radio Project, Bisbee) KFNX 1100AM (KFNX Phoenix) KTAR 92.3FM (KTAR Phoenix) KVOI 1030AM (Bustos Media, Tucson)
<b>LIVE RADIO - SPANISH</b>	KOFA 1320AM (NPR Yuma) La Onda 1190AM (KNUV Tolleson)
<b>LIVE STREAMING - ENGLISH</b>	<a href="http://12news.com">12news.com</a> (12News, Phoenix) <a href="http://abc15.com">abc15.com</a> (ABC15, Phoenix) <a href="http://azcentral.com">azcentral.com</a> (The Arizona Republic, statewide) <a href="http://azfamily.com">azfamily.com</a> (Arizona's Family, Phoenix) <a href="http://azluminaria.org">azluminaria.org</a> (Arizona Luminaria, Tucson) <a href="http://azpm.org">azpm.org</a> (AZPM, Tucson) <a href="http://cw7az.com">cw7az.com</a> (CW7, Phoenix) <a href="http://fox10phoenix.com">fox10phoenix.com</a> (FOX10, Phoenix) <a href="http://kgun9.com">kgun9.com</a> (KGUN, Tucson) <a href="http://kjzz.org">kjzz.org</a> (KJZZ, Phoenix) <a href="http://kold.com">kold.com</a> (KOLD, Tucson) <a href="http://ktar.com">ktar.com</a> (KTAR Phoenix) <a href="http://kvoa.com">kvoa.com</a> (KVOA, Tucson) <a href="http://kyma.com">kyma.com</a> (KYMA, Yuma) <a href="http://ltdmedia.net/live-broadcasts">ltdmedia.net/live-broadcasts</a> (Live the Dream Media, Tucson/Marana) <a href="http://patagoniaregionaltimes.org">patagoniaregionaltimes.org</a> (Patagonia Regional Times, Patagonia) <a href="http://realrydazonlyradio.com">realrydazonlyradio.com</a> (Real Rydaz Only) <a href="http://telemundoarizona.com">telemundoarizona.com</a> (KTAZ, Phoenix) <a href="http://thecentersquare.com">thecentersquare.com</a> (The Center Square, National)



<b>LIVE STREAMING - SPANISH</b>	<a href="http://azcentral.com">azcentral.com</a> (The Arizona Republic, statewide) <a href="http://azluminaria.org">azluminaria.org</a> (Arizona Luminaria, Tucson) <a href="http://azpm.org">azpm.org</a> (AZPM, Tucson) <a href="http://tucsonsentinel.com">tucsonsentinel.com</a> (Tucson Sentinel) <a href="http://kyma.com">kyma.com</a> (KYMA, Yuma) <a href="http://onda1190am.com">onda1190am.com</a> (La Onda 1190AM, Tolleson) <a href="http://univision.com/local/arizona-ktvw">univision.com/local/arizona-ktvw</a> (Univisión Arizona)
<b>RECORDING FOR NON- LIVE AIRING IN FULL OR PART</b>	Cronkite News (Phoenix) Green Valley News (Green Valley) Sahuarita Sun (Sahuarita)

# How to watch the Arizona Congressional District 7 Special Election Republican Party Primary debate Monday, June 9 at 6 p.m.:

<b>LIVE TV - ENGLISH</b>	AZPM (ch. 6 Tucson) Cox YurView (ch. 4 Phoenix) KOLD (CBS ch. 13 Tucson) KVOA (NBC ch. 4 Tucson) KWBA (CW ch. 58 Tucson) KYMA (CBS/NBC ch. 13, Yuma)
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<b>LIVE STREAMING - ENGLISH</b>	<a href="http://12news.com">12news.com</a> (12News, Phoenix) <a href="http://abc15.com">abc15.com</a> (ABC15, Phoenix) <a href="http://azcentral.com">azcentral.com</a> (The Arizona Republic, statewide) <a href="http://azfamily.com">azfamily.com</a> (Arizona's Family, Phoenix) <a href="http://azluminaria.org">azluminaria.org</a> (Arizona Luminaria, Tucson) <a href="http://azpm.org">azpm.org</a> (AZPM, Tucson) <a href="http://cw7az.com">cw7az.com</a> (CW7, Phoenix) <a href="http://fox10phoenix.com">fox10phoenix.com</a> (FOX10, Phoenix) <a href="http://kgun9.com">kgun9.com</a> (KGUN, Tucson) <a href="http://kjzz.org">kjzz.org</a> (KJZZ, Phoenix) <a href="http://kold.com">kold.com</a> (KOLD, Tucson) <a href="http://kvoa.com">kvoa.com</a> (KVOA, Tucson) <a href="http://kyma.com">kyma.com</a> (KYMA, Yuma) <a href="http://ltdmedia.net/live-broadcasts">ltdmedia.net/live-broadcasts</a> (Live the Dream Media, Tucson/Marana) <a href="http://patagoniaregionaltimes.org">patagoniaregionaltimes.org</a> (Patagonia Regional Times, Patagonia) <a href="http://realrydazonlyradio.com">realrydazonlyradio.com</a> (Real Rydaz Only) <a href="http://telemundoarizona.com">telemundoarizona.com</a> (KTAZ, Phoenix) <a href="http://thecentersquare.com">thecentersquare.com</a> (The Center Square, National)
<b>LIVE STREAMING - SPANISH</b>	<a href="http://azcentral.com">azcentral.com</a> (The Arizona Republic, statewide) <a href="http://azluminaria.org">azluminaria.org</a> (Arizona Luminaria, Tucson)

	<a href="http://azpm.org">azpm.org</a> (AZPM, Tucson) <a href="http://tucsonsentinel.com">tucsonsentinel.com</a> (Tucson Sentinel) <a href="http://kyma.com">kyma.com</a> (KYMA, Yuma) <a href="http://onda1190am.com">onda1190am.com</a> (La Onda 1190AM, Tolleson) <a href="http://univision.com/local/arizona-ktvw">univision.com/local/arizona-ktvw</a> (Univisión Arizona)
<b>RECORDING FOR NON-LIVE AIRING IN FULL OR PART</b>	Cronkite News (Phoenix) Green Valley News (Green Valley) Sahuarita Sun (Sahuarita)

# 2025 Legislative Update

## HB2004 - Voter registration cards; mailing limitation

### Sponsor

Rep. John Gillette (R)

### Summary

Prohibits the county recorders from providing an initial or updated voter registration card to a person whose mailing address is outside the state of Arizona, except for absent uniformed services voters or overseas voters as defined in the Uniformed and Overseas Citizens Absentee Voting Act, and persons who are residents of Arizona and who are not served by a United States Post Office.

### Action Taken

Passed House Federalism, Military Affairs, and Elections 5-2

Passed the House 32-27 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-11 and was sent to the Governor

Vetoed by the Governor

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## HB2005 - Voter registrations; recorder; inactive status

### Sponsor

Rep. John Gillette (R)

### Summary

Permits the county recorders to place a person's voter registration information in inactive status and provide the person with notice of the action, if the County Recorder believes the person provided fraudulent or incorrect voter registration information

### Action Taken

Passed House Federalism, Military Affairs, and Elections 4-3

Passed the House 32-26 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

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## **HB2006 - Election mailings; third-party disclosures**

### **Sponsor**

Rep. John Gillette (R)

### **Summary**

Requires a nongovernmental person or entity that mails or delivers by hand an official election-related document or a document that resembles an official election-related document from the county recorder, county officer in charge of elections, or the Secretary of State, including a voter registration application or an early ballot request to include the words "not from a government agency" in boldfaced, clearly legible print on the outside of the envelope.

### **Action Taken**

Passed House Federalism, Military Affairs, & Elections 5-2

Passed the House 37-19 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

Passed the Senate 16-12 and was sent back to the House

Sent to the Governor

Vetoed by the Governor

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## **HB2007 - Voter registrations; payment prohibited**

### **Sponsor**

Rep. John Gillette (R)

### **Summary**

Prohibits a person from paying or receiving money or any other thing of value based on the number of voter registrations or voter registration forms collected, completed or submitted.

### **Action Taken**

Passed House Federalism, Military Affairs, & Elections 5-2

Passed the House 34-23 and was sent to the Senate

Passed Senate Judiciary and Elections 5-2

Passed the Senate 17-12 and was sent back to the House

Sent to the Governor

Vetoed by the Governor

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## **HB2017 - Voting centers ban; precinct size**

### **Sponsor**

Rep. Rachel Jones (R)

### **Summary**

Prohibits a designated election precinct from containing more than 1,000 registered voters at the time County Board of Supervisors designate precincts. Prohibits the Board from authorizing the use of voting centers in place of or in addition to specifically designated polling places and repeals all other associated mandates and prohibitions.

### **Action Taken**

Passed House Federalism, Military Affairs, & Elections 4-3

Passed the House 32-26 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-12 and was sent to the Governor

Vetoed by the Governor

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## **HB2021 - Early ballots; early voting; identification**

### **Sponsor**

Rep. Selina Bliss (R)

### **Summary**

Prohibits early ballot distribution from beginning more than 30 days before an election and stipulates that if an early ballot request is received on or before the 34th day before the election, the early ballot may not be distributed earlier than the 30th day before the election. Requires the county recorder to mail an early ballot within 48 hours of the receipt of an early ballot request, if the request is complete and correct, and made within 30 days of an election. Modifies the required wording that must be printed on the backside of an official early ballot return envelope, and the official instructions included with the early ballot. Defines the criteria an early ballot submission must meet, beginning in 2026, to be counted as an official vote. Requires that a county recorder or other officer in charge of elections provide to a qualified elector who appears at the electors designated polling location, an on-site early voting location, or any other voting location after 7:00 PM on the Friday before Election Day proof that their ballot has been tabulated, provided that elector provide identification pursuant to state law.

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## **HB2045 - Ballot order; names; parties; rotation**

### **Sponsor**

Rep. Alexander Kolodin (R)

### **Summary**

Removes the exclusion for alternating the names of candidates on ballots in listed elections and during listed election related activities. Requires that beginning in 2027, the parties are to be alternated on the ballots used in each election precinct so that each party appears substantially in equal number of times at the top, bottom, and in each intermediate place of the list or group of parties in which they belong.

### **Action Taken**

Passed House Federalism, Military Affairs, & Elections 7-0

Passed the House 59-0 and was sent to the Senate

Passed Senate Judiciary and Elections 7-0

Failed In the Senate 14-15

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## **HB2046 - Audits; precincts; voting centers**

### **Sponsor**

Rep. Alexander Kolodin (R)

### **Summary**

Adds voting centers in with precincts for hand counts and defines when hand counts are to begin in listed election scenarios.

### **Action Taken**

Passed House Federalism, Military Affairs, & Elections 7-0

Passed the House 59-0 and was sent to the Senate

Passed Senate Judiciary and Elections 4-2

Passed the Senate 17-12 and was sent to the Governor

Vetoed by the Governor

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## **HB2050 - Provisional ballots; cure data**

### **Sponsor**

Rep. Alexander Kolodin (R)

### **Summary**

Adds electors that voted with a provisional ballot to the list of voter signatures that are to be sent to political parties after specified elections by the county recorder or other officer in charge of elections.

### **Action Taken**

Passed House Federalism, Military Affairs, & Elections 6-1

Passed the House 36-23 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-12 and was sent to the Governor

Vetoed by the Governor

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## **HB2051 - Governor; question time**

### **Sponsor**

Rep. Alexander Kolodin (R)

### **Summary**

Requires the Governor to appear before the legislature to answer questions posed by members of the legislature on the third Wednesday of every month the legislature is in session and lists the criteria for holding this special session. Stipulates that if the Governor is not present in the state, the Lieutenant Governor shall pose as a substitute and permits the Governor to designate that person, with approval from the presiding officer of the body to be attended, to appear for them. Presents the legislative intent that the Arizona legislature would like to emulate question and answer sessions that occur in the United Kingdom between Parliament and the Prime Minister.

### **Action Taken**

Passed House Government 4-3

Passed the House 32-26 and was sent to the Senate

Passed Senate Government 4-3

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## **HB2060 - State sovereign authority; elections**

### **Sponsor**

Rep. Lisa Fink (R)

### **Summary**

Requires that elections held in Arizona for federal offices adhere to the same rules and laws as elections held in Arizona for state and local offices, including statutes that cover voter registration and proof of citizenship, residency and identification.

### **Action Taken**

Passed House Federalism, Military Affairs, and Elections 4-3

Passed the House 32-27 and was sent to the Senate

Passed Senate Judiciary and Election 4-3

Passed the Senate 17-11 and was sent to the Governor

Vetoed by the Governor

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## **HB2072 - Voter registration; same day**

### **Sponsor**

Rep. Stacey Travers (D)

### **Summary**

A person who is otherwise qualified to register to vote may register during the 28 days immediately preceding an election and is eligible to vote in that election if the person has been a resident of the county and the precinct in which the person resides for at least 29 days immediately preceding the election. A person who is otherwise qualified to register to vote may register on election day by appearing at the polling place, completing a registration form, and providing proof of residence. A person registering in this manner may vote using a provisional ballot per state law. Registration under these circumstances does not qualify a person to vote in a partisan primary election.

## HB2096 - Permanent early voting list

### Sponsor

Rep. Seth Blattman (D)

### Summary

Replaces “Active” early voter list with “Permanent” Early Voter list. Except in a special taxing district that is authorized to conduct its own election and a special district mail ballot election, a voter is no longer removed automatically from being sent an early ballot if the voter fails to vote an early ballot in all “elections” (formerly defined) for two consecutive election cycles. Removes several exceptions to removing a voter from the permanent early voter list. Removes the definition of “election cycle” for this section.

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## HB2097 - Voting rights; restoration

### Sponsor

Rep. Seth Blattman (D)

### Summary

A person's right to vote is automatically restored on the person's completion of probation or the receipt of an absolute discharge from imprisonment.

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## HB2129 - Write-in candidates; filings; ballots

### Sponsor

Rep. Selina Bliss (R)

### Summary

Changes the deadline for a write-in candidate to file nomination paperwork to the 70th day before an election. Modifies the ballot format to accommodate as many blank lines as there are qualified write-in candidates, plus one additional blank line for each office, up to the total number of offices to be filled. Requires that there be one blank line for write-in candidates if no write-in candidates have qualified for an office and that each blank line will have a space for an elector to put a mark.

### Action Taken

Passed House Federalism, Military Affairs, and Federalism 7-0

Passed the House 53-0 and was sent to the Senate

Passed Senate Judiciary and Elections 7-0

Passed the Senate 30-0 and was sent back to the House

Passed the House 56-2 and was sent to the Governor

Signed by the Governor

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## **HB2153 - Voting locations; political party observers**

### **Sponsor**

Rep. Rachel Keshel (R)

### **Summary**

Permits the county chairman of each political party to designate for each precinct or voting location a party representative and alternate for polling places including on site early voting locations, emergency early voting locations, or any other early voting location. Prohibits party challengers from entering a voting booth except to mark the challenger's ballot.

### **Action Taken**

Passed House Federalism, Military Affairs, & Elections 4-3

Passed the House 32-26 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-13 and was sent to the Governor

Vetoed by the Governor

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## **HB2154 - Early voting list; undeliverable ballots**

### **Sponsor**

Rep. Rachel Keshel (R)

### **Summary**

Requires the county recorder or other election officer in charge to move a voter whose election notice is returned as undeliverable to inactive status, pursuant to state law, and from the active early voting list. Removes the requirement for follow up to determine the voter's new residence address.

### **Action Taken**

Passed Federalism, Military Affairs, and Elections 4-3

Passed the House 32-26 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-12 and was sent to the Governor

Vetoed by the Governor

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## **HB2205 - Election procedures manual; authority**

### **Sponsor**

Rep. James Taylor (R)

### **Summary**

States that the use of the Elections Procedures Manual does not constitute a delegation of the Legislature's power.

**Action Taken**

Passed House Federalism, Military Affairs, and Elections 4-3

Passed the House 33-26 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-12 and was sent to the Governor

Vetoed by the Governor

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## **HB2206 - Multistate voter registration system; prohibition**

**Sponsor**

Rep. James Taylor (R)

**Summary**

Prohibits Arizona from entering or being a member of any multi state voter registration, or voter registration lists maintenance organization, that requires Arizona to provide the organization with information derived from voter registration records.

**Action Taken**

Passed House Federalism, Military Affairs, and Elections 4-3

Passed the House 31-27 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-12 and was sent back to the House

Passed the House 33-25 and was sent to the Governor

Vetoed by the Governor

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## **HB2368 - Auditor general; records; financial institutions**

**Sponsor**

Rep. Matt Gress (R)

**Summary**

Requires the Auditor General or their authorized representative, in the performance of official duties, to have access to specific, listed information of financial institutions or financial enterprises, or any other information relating to any state agency, board, Commission, department, institution, program, Advisory Council, or committee or political subdivision of Arizona. Requires the affected financial institutions to provide requested information from the Auditor General, or their official representative, in a thorough and timely manner. Requires an authorized representative of the financial institution or enterprise to certify all information provided. Stipulates that the cost of complying with an Auditor General's request is to be covered by the state agency, board, Commission, department, institution, program, Advisory Council, or committee or political subdivision the Auditor General is reviewing. Stipulates that a financial institution or enterprise is not liable to the entity whose information it is turning over to the Auditor General, pursuant to state law.

**Action Taken**

Passed House Government 4-0

Passed the House 60-0 and was sent to the Senate

Passed Senate Regulatory Affairs and Government Efficiency 6-1

Passed the Senate 28-0 and was sent to the Governor

Signed by the Governor

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## **HB2376 - County candidates; clean elections pamphlet**

**Sponsor**

Rep. Pamela Carter (R)

**Summary**

Includes candidate names for county wide offices in the document that is delivered to eligible voters before the primary and general election, whether the candidate is participating or not participating. Stipulates that this legislation is effective only on the affirmative vote of at least three-fourths of the members of each House of the legislature.

**Action Taken**

Passed House Federalism, Military Affairs, and Elections 7-0

Passed the House 55-0 and was sent to the Senate

Passed Senate Judiciary and Elections 7-0

Passed the Senate 28-0 and was sent back to the House

Passed the House 58-0 and was sent to the Governor

Signed by the Governor

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## **HB2390 - Justices of the peace; online signature**

**Sponsor**

Rep. Neal Carter (R)

**Summary**

Allows Justice of the Peace candidates to use the Equal system to collect nomination petition signatures

**Action Taken**

Passed House Federalism, Military Affairs, and Elections 7-0

Passed the House 59-0 and was sent to the Senate

Passed Senate Judiciary and Elections 7-0  
Passed the Senate 26-1 and was sent back to the House  
Passed the House 56-1 and was sent to the Governor  
Signed by the Governor

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## **HB2391 - JPs; constables; signatures**

### **Sponsor**

Rep. Neal Carter (R)

### **Summary**

Adds that to run for Justice of the Peace, or constable, in a county with a population of one million or more people, petition requirements are that at least 1%, but not more than 10% of the number of qualified signers in a precinct. Adds that in a county of less than one million people, for the position of Justice of the Peace, a candidate qualifies if they produce 300 signatures from a precinct.

### **Action Taken**

Passed House Federalism, Military Affairs, & Elections 4-2  
Passed the House 33-25 and was sent to the Senate  
Passed Senate Judiciary and Elections 5-2  
Passed the Senate 18-12 and was sent to Conference Committee  
Passed the House 41-16 and was sent to the Governor  
Signed by the Governor

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## **HB2425 - Voter registration information; registers; violations**

### **Sponsor**

Rep. Alexander Kolodin (R)

### **Summary**

Repeals the classification as a Class 6 Felony any person who allows a precinct list of registered voters, or any other list of registered voters to be used in any other manner than for officially approved purposes.

### **Action Taken**

Passed House Federalism, Military Affairs, Elections 4-3  
Passed the House 33-26 and was sent to the Senate

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## **HB2448 - Voting locations; emergency designation; electioneering**

### **Sponsor**

Rep. Michael Carbone (R)

### **Summary**

Removes the following requirements that delineate that the county recorder or election officer must post a public list of any sites designated as emergency polling places—along with the reasons for that designation and attempts made to secure alternatives—at least two weeks before election day, and that if a site is not on the emergency-designation list, the facility must allow political activity outside the seventy-five-foot zone, and that should an emergency arise after the initial posting, the county recorder or election officer is required to update the list promptly with the relevant details.

### **Action Taken**

Passed House Federalism, Military Affairs, Elections 4-1

Passed the House 39-19 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

Passed Senate 17-13 and sent to the House

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## **HB2521 - Elections; foreign money**

### **Sponsor**

Rep. Michael Way (R)

### **Summary**

Prohibits any Arizona government entity from using monies or in-kind goods or services that are donated, directly or indirectly, by a foreign government, or any “foreign nongovernmental source” (defined) for election administration. Requires any “person” (defined) or vendor that provides services to an Arizona government entity to provide a dated and sworn statement, under penalty of perjury, that they are not knowingly the recipient, directly or indirectly, of donations from a foreign source. This certification is to be updated annually and the person signing the statement shall update and amend their certification upon learning any new information pertaining to the above prohibitions. Lists the reports and records that must be submitted by government entities pertaining to verifying that no foreign influences have provided donations, directly or indirectly, from the individuals or vendors those agencies maintain a relationship with. Prescribes specific penalties for an individual for vendor who provides false information to the Arizona Secretary of State. Stipulates that for this legislation federally recognized sovereign tribal nations are not considered to be foreign governments. Prohibits any foreign government from aiding an individual or organization to help influence the outcome of an election or ballot measure. Requires any person, entity, or committee that is required to file campaign finance reports pursuant to state law, to certify under penalty of perjury in those reports that the person, entity or committee has not accepted or used monies or in-kind goods or services in violation of this legislation.

### **Action Taken**

Passed House Federalism, Military Affairs, and Elections 4-3

Passed House 33-25 and was sent to the Senate

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## **HB2623 - Campaign finance; candidate committee transfers**

### **Sponsor**

Rep. Jeff Weninger (R)

### **Summary**

Permits a candidate committee for a city or town candidate to transfer contributions to that same candidate's statewide or legislative campaign, provided the aggregate amount of contributions from any individual that are transferred do not exceed the legal contribution limitations of the office for which the candidate is running. Requires that any ordinance, rule, resolution or regulation a county, city or town adopts that mandates a candidate's financial disclosure also require the candidate or campaign disclosure also be accessible to the public on the county, city or town website.

### **Action Taken**

Passed House Federalism, Military Affairs, and Elections 4-0

Passed the House 37-21 and was sent to the Senate

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## **HB2630 - Governor nominations; agency position; eligibility**

### **Sponsor**

Rep. Alexander Kolodin (R)

### **Summary**

Modifies a reference to "his" to "the incumbent's." Stipulates that if the Senate rejects the nomination of a director made by the Governor pursuant to this legislation, the nominee is not eligible for any position within the same state agency for which the nominee was nominated.

### **Action Taken**

Passed House Regulatory Oversight 3-2

Passed the House 33-27 and was sent to the Senate

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## **HB2632 - Regulatory costs; rulemaking; legislative ratification**

### **Sponsor**

Rep. Alexander Kolodin (R)

### **Summary**

Requires an Arizona agency to submit to the Arizona Office of Economic Opportunity (AOEO) any proposed "rule" (defined) that is projected to increase regulatory costs in Arizona by more than \$100,000 within five years of implementation. Prohibits a submitted proposed rule from becoming effective unless approved by the legislature, if the AOEO, finds that the rule will likely cost more than \$500,000 within five years after implementation. Requires the AOEO to submit the proposed rule to the Administrative Rules Oversight Committee (Committee) no later than 30 days before the next regular legislative session and requires the Committee to submit the proposed rule to the legislature



as soon as practicable. Permits any member of the legislature to submit legislation to ratify the proposed rule and exempts it from any statutes regarding the time and manner of rulemaking. Prohibits an agency from filing the final rule with the Arizona Secretary of State without legislative approval and stipulates that if the legislature does not ratify the proposed rule during the current legislative session, the agency shall terminate the proposed rule by publishing a notice of termination in the register. Allows a person that is regulated by an agency that is proposing a rule, to request the AOEO review the proposed rule, and the legislature to be able to request the AOEO to review any proposed rule. Stipulates that this legislation does not apply to emergency rules, or the Arizona Corporation Commission. Provides for severability.

Action Taken

Passed House Regulatory Oversight 3-2

Passed the House 32-26 and was sent to the Senate

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## **HB2649 - Electoral college; support**

### **Sponsor**

Rep. Steve B. Montenegro (R)

### **Summary**

Affirms that the legislature recognizes the importance of the electoral college and provides the reasoning behind that support.

### **Action Taken**

Passed House Federalism, Military Affairs, & Elections 4-2

Passed the House 33-27 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-12 and was sent to the Governor

Vetoed by the Governor

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## **HB2651 - Voting equipment; requirements; origin**

### **Sponsor**

Rep. Steve B. Montenegro (R)

### **Summary**

Beginning January 1, 2029, the Secretary of State is prohibited from certifying a vote recording and vote tabulating machine or device used for elections for federal, state or county offices unless 100% of all the machine's or device's parts and components were sourced from the United States, and 100% of all the machine's or device's manufacturing and assembly was performed in the United States. Vote recording and vote tabulating machines and devices that were acquired before January 1, 2029 would have been exempt.

### **Action Taken**

Passed House Federalism, Military Affairs, & Elections 4-3

Passed the House 33-27 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-11 and was sent to the Governor

Vetoed by the Governor

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## **HB2666 - Campaign finance; third-party complaints**

### **Sponsor**

Rep. Laurin Hendrix (R)

### **Summary**

Prohibits a filing officer from accepting a complaint from a third party unless the third party submits evidence that the individual is an identifiable human being.

### **Action Taken**

Passed House Federalism, Military Affairs, and Elections 7-0

Passed 57-0 and was sent to the Senate

Passed Senate Judiciary and Elections 7-0

Passed the Senate 27-0 and was sent to the Governor

Signed by the Governor

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## **HB2667 - Campaign finance complaints; resolution**

### **Sponsor**

Rep. Laurin Hendrix (R)

### **Summary**

For every complaint that is filed pursuant to this legislation related to campaign finance, that is not resolved, extended or ruled on within 180 days after the complaint is filed, the complaint is deemed dismissed.

### **Action Taken**

Passed House Federalism, Military Affairs, and Elections 7-0

Passed the House 57-0 and was sent to the Senate

Passed Senate Judiciary and Elections 5-2

Passed the Senate 23-4 and was sent back to the House

Passed the House 52-3 and was sent to the Governor

Signed by the Governor

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## HB2673 - Early ballots; deadlines; foreign money

### Sponsor

Rep. Alexander Kolodin (R)

### Summary

Prohibits any Arizona government entity from using monies or in-kind goods or services that are donated, directly or indirectly, by a foreign government, or any “foreign nongovernmental source” (defined) for election administration. Requires any “person” (defined) or vendor that provides services to an Arizona government entity to provide a dated and sworn statement, under penalty of perjury, that they are not knowingly the recipient, directly or indirectly, of donations from a foreign source. Prescribes specific penalties for an individual for vendor who provides false information to the Arizona Secretary of State. Permits a qualified elector to bring an action pertaining to specific, listed law and violations and outlines what they are entitled to if they prevail. Requires a unique early voter ID number to be issued to each voter on the early voter list and stipulates that the early voter record does not constitute a public record and enjoys protections of personally identifying information. Defines the process for verifying early voter identifications and the process for handling voters whose identity or address cannot be identified. Permits a voter to remain on the early voter list if they confirm their address once every election cycle by telephone, in writing, or online, and they provide at least 2 methods of confirmation. Outlines the process and requirements for a mailed ballot to be counted, and the process by which submitted ballots shall be handled prior to, on, and after Election Day.

### Action Taken

Passed House Federalism, Military Affairs, and Elections 4-3

Passed the House 33-27 and was sent to the Senate

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## HB2703 - Early voting; tabulation; ballot deadlines

### Sponsor

Rep. Laurin Hendrix (R)

### Summary

Strikes the ability of a county Board of Supervisors to authorize by specific resolution the County Recorder or other election official to use emergency voting centers, and the ability of a principal of a school to deny a request to provide space for polling stations. Shifts the deadline for an early voter to cast a vote at an early voting location from Friday before an election to the Monday before an election. Strikes the ability of a qualified elector to request an emergency voting accommodation and a County Recorder or election official to grant an emergency accommodation. Outlines instructions that must be given to early voters up to 2026, and from 2026 forward. Defines ways an early voter can deliver their ballot to the County Recorder or Officer in Charge of elections, including identification requirements, locations and methods of delivery. Strikes the requirement of a County Recorder or election official to count and report early voting totals. Exempts early voters who show up in person from having their mail affidavit verified. Eliminates the ability of an elector that does not present identification to put their ballot in a drop box.

### Action Taken

Passed House Federalism, Military Affairs, and Elections 4-3

Passed the House 32-27 and was sent to the Senate

Passed the Senate 16-10 and was sent to the Governor

Vetoed by Governor

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## **HB2705 - Nomination petitions; counties; strict compliance**

### **Sponsor**

Rep. Alma Hernandez (D)

### **Summary**

Provides wording for partisan and nonpartisan nominations for elected public office. Permits signatures from multiple counties in a specific district, if the office they are running for spans multiple counties. Requires a nominee for elected public office to comply with all statutory requirements for seeking office.

### **Action Taken**

Failed House Federalism, Military Affairs, and Elections 3-4

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## **HB2722 - Public resources; expenditures; prohibition**

### **Sponsor**

Rep. Neal Carter (R)

### **Summary**

Requires that all use of public monies by a “public entity” (defined) must benefit the public by intent and be for a “public purpose” (defined), is supported by “consideration” (defined), and the public entity must retain continuing control over the funds. Allows the Arizona Attorney General or a taxpayer in Arizona to file an action in a court of general jurisdiction to challenge an expenditure, loan or use of “public resources” (defined). Outlines how a plaintiff in that situation would prevail in court. Entitles this legislation the “Taxpayers Protection Act.” Modifies the chapter heading of Title 1, Chapter 5, ARS, from “Public Programs” to “Public Resources”.

### **Action Taken**

Passed House Ways and Means 5-4

Passed the House 32-28 and was sent to the Senate

Passed Senate Government 4-3

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## **HB2735 - Ballot receptacles; electioneering limits**

### **Sponsor**

Rep. Brian Garcia (D)

### **Summary**

Prohibits a person from staying inside the 75-foot limit for each voting location except for the purposes of voting. Requires the Board of Supervisors to provide for each 75-foot zone for a designated ballot receptacle three notices expressing the 75-foot limit. Prohibits interfering with a voter, or electioneering, within the 75-foot limit for a designated ballot receptacle.

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## **HB2767 - Voter registrations; transportation department; recorders**

### **Sponsor**

Rep. Rachel Keshel (R)

### **Summary**

Requires the Arizona Department of Transportation (ADOT) to transmit simultaneously and directly any voter registration information received pursuant to state law, to the Arizona Secretary of State, and other listed, appropriate parties. Effective January 1, 2026. Provides for severability.

### **Action Taken**

Passed House Federalism, Military Affairs, and Elections 3-2

Passed the House 31-26 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-11 and was sent to the Governor

Vetoed by the Governor

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## **HB2794 - Polling places; accessible equipment**

### **Sponsor**

Rep. Brian Garcia (D)

### **Summary**

Requires that any accessible device place at a precinct-based polling place or voting center be programmed and prepared so that all ballot styles for that jurisdiction or county are available from each device without regard to precinct or other locations in which the device is used.

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## **HB2796 - Politically engaged persons; criminal charges**

### **Sponsor**

Rep. Alexander Kolodin (R)

### **Summary**

Requires that criminal charges against a “politically engaged person” (defined) be pre-approved by a majority of the Attorney General and all county attorneys using standard prosecutorial criteria. Requires, if the approval of all required parties is not given, a court to dismiss charges unless prosecutors prove they were unaware of the defendant’s political status. Extends to prosecutors three months to refile charges after securing approval. Requires a motion to dismiss to be filed within 30 days of the charges.

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## **HB2804 - Sample ballots; mailing date**

### **Sponsor**

Rep. Nick Kupper (R)

### **Summary**

Requires a county Board of Supervisors print mailers of sample ballots 14 days before a primary or general election.

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## **HB2844 - Multiple nonpartisan candidates; primary**

### **Sponsor**

Rep. Lupe Diaz (R)

### **Summary**

Defines how nonpartisan candidates may appear on the ballot. Covers how to handle multiple nonpartisan candidates in an election and their assigned position on a nonpartisan ballot for consideration in the primary election. Stipulates that for the nonpartisan ballot, the candidate who receives the most votes advances to the general election as the nonpartisan nominee for that office. Addresses placement of nonpartisan candidates on the general election ballot. Requires the Legislative Council to prepare proposed legislation conforming the ARS to the provisions of this legislation, if needed.

### **Action Taken**

Failed House Federalism, Military Affairs, and Elections 0-5

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## **HB2927 - Public meetings; records; requirements; penalties**

### **Sponsor**

Rep. Michael Carbone (R)

### **Summary**

Requires minutes or recordings of a public meeting be posted online within three working days of the meeting and remain available online for at least five years after their posting, except as provided by law. Requires a public body that meets regularly to once a month, at least, make an open call to the public and stipulates that the open call must occur in the first 30 minutes of a public meeting and stay open for at least 30 minutes once commenced, unless each person who indicated a desire to speak has spoken within that 30 minutes window. Covers public notice for executive sessions unless the public body complies with other notice requirements required by this legislation. Requires public access if a public meeting occurs via technical devices via technical devices and a physical location where the public may view the meeting. Requires the Arizona Attorney General or applicable County Attorney to investigate and respond to written complaints pertaining to public meetings and public access within 120 days after receipt of the complaint. Requires electronic copies of records to be provided on request and limits charges to just the cost of materials. Requires the court to review de novo any question of law related to this legislation. Lists information that must be included in any request for information and penalties for willfully and intentionally refusing to honor part of this legislation.

### **Action Taken**

Passed House Government 4-2

Passed the House 36-20 and was sent to the Senate

Passed Senate Government 4-3

Passed the Senate 17-13 and was sent back to the House

Passed the House 39-18 and was sent to the Governor

Vetoed by the Governor

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## **HCR2002 - Voting centers; precinct voting**

### **Sponsor**

Rep. Rachel Jones (R)

### **Summary**

The 2026 general election ballot is to carry the question of whether to amend Arizona State law to require that election precincts not contain more than 1,000 registered voters at the time precincts are designated, and to prohibit the use of voting centers in place of or in addition to specifically designated polling places.

### **Action Taken**

Passed House Federalism, Military Affairs, & Elections 4-3

Passed the House 32-26 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

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## **HCR2013 - Early ballots; deadlines; foreign money**

### **Sponsor**

Rep. Alexander Kolodin (R)

### **Summary**

The 2026 general election ballot is to carry the question of whether to amend Arizona state statute to prohibit a government entity in Arizona from using money or in-kind goods or services that are donated, directly or indirectly, by foreign government, or any foreign nongovernmental source, for election administration. Asks voters to approve the issuance have a unique early voter ID number to each voter on the early voting list, defines the information that must be on an early voter ballot request, as well as rules to require a county recorder or other election officer to reject a voter's early ballot application if all required information is not submitted, and the process and wording that must be included on the issuance of early voting materials. Asks voters to approve the process and evaluator must follow to verify the information submitted by an early voter.

### **Action Taken**

Passed House Federalism, Military Affairs, and Elections 4-3

Passed the House 33-26 and was sent to the Senate

Passed Senate Judiciary and Elections 4-3

Failed in the Senate 11-18

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## **HCR2014 - House of representatives; designated seats**

### **Sponsor**

Rep. Rachel Jones (R)

### **Summary**

The 2024 general election ballot is to carry the question of whether to amend the Arizona Constitution to require the seats for the House of Representatives be designated "A" and "B" in the alphabetic order of the surnames, then first names of elected members of each district and thereafter candidates shall run for and be elected from either seat "A" or "B" in a legislative district, beginning with the Inauguration of the Members of the fifty-seventh legislature in 2027.

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## **HCR2038 - Rulemaking; legislative ratification; regulatory costs**

### **Sponsor**

Rep. Alexander Kolodin (R)

### **Summary**

The 2024 general election ballot is to carry the question of whether to amend the Arizona Revised Statutes related to rule making that would require an Arizona agency to submit to the Arizona Office



of Economic Opportunity (AOEO) any proposed “rule” (defined) that is projected to increase regulatory costs in Arizona by more than \$100,000 within five years of implementation. The measure would prohibit a submitted proposed rule from becoming effective unless approved by the legislature if the AOEO finds that the rule will likely cost more than \$500,000 within five years after implementation. Sets a deadline for submitting the rule for review to the Administrative Rules Oversight Committee (Committee) and requires the Committee to submit the proposed rule to the legislature as soon as practicable. Permits any member of the legislature to submit legislation to ratify the proposed rule and exempts it from any statutes regarding the time and manner of rulemaking. Prohibits an agency from filing the final rule with the Arizona Secretary of State without legislative approval and stipulates that if the legislature does not ratify the proposed rule during the current legislative session, the agency shall terminate the proposed rule by publishing a notice of termination in the register. Allows a person that is regulated by an agency that is proposing a rule, to request the AOEO review the proposed rule, and the legislature to be able to request the AOEO to review any proposed rule. Stipulates that this legislation does not apply to emergency rules, or the Arizona Corporation Commission. Provides for severability.

#### **Action Taken**

Passed House Regulatory Oversight 3-2

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### **SB1001 - Early ballots; identification; tabulation**

#### **Sponsor**

Sen. J.D. Mesnard (R)

#### **Summary**

Prohibits a County Recorder or other Officer in Charge of Elections from operating an on-site early voting location after 7:00 P.M. on the Friday preceding an election if the official in question is not able to revise precinct registrations and other election materials for use on election day to help identify which voters have requested and early ballot, voted, or are on the inactive voter list. Revises the effective date of this legislation to be upon enactment and defines early voting procedures, including voter identification, roll signature, ballot mailing, delivery, ballot handling, processing, and security requirements, and timeframes for accepting early ballots.

#### **Action Taken**

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-10 and was sent to the House

Passed House Federalism, Military, and Elections 4-2

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### **SB1011 - Early voting; ballot deadlines; certificates**

#### **Sponsor**

Sen. Warren Petersen (R)

#### **Summary**

Repeals provisions for a County Board of Supervisors to set up Emergency Voting Centers, for electors to request Emergency Voting Centers in the event of an emergency between 7 p.m. on the Friday and 5 p.m. on the Monday preceding an election, and for electors to deliver ballots to polling places on election day. Mandates that any early voting locations be open and available for use on the Saturday and Monday before an election, and details the requirements for an early voting elector to

vote up until 7 p.m. the Monday before an election. Requires voters showing up at an early voting location to be given a ballot upon verification of their identification and provides wording for the early voting certification form and procedures for processing that elector and his or her ballot.

#### **Action Taken**

Passed Senate Judiciary and Elections 4-3

Failed in the Senate 10-16 – was replaced by HB 2703.

HB 2703 was vetoed by the Governor.

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## **SB1013 - Municipalities; counties; fee increases; vote**

#### **Sponsor**

Sen. Warren Petersen (R)

#### **Summary**

Prohibits a Common Council or County Board of Supervisors from imposing or increasing any assessment, tax or fee without a two-thirds vote of the governing body. Stipulates a municipality's or county's ability to do such, provided the two-thirds vote authorizes the imposition or increase in any assessment, tax or fee, is not subject to further regulation by the applicable municipality or county.

#### **Action Taken**

Passed Senate Government 4-3

Passed the Senate 17-12 and was sent to the House

Failed in the House 26-30

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## **SB1019 - Photo enforcement systems; prohibition**

#### **Sponsor**

Sen. Wendy Rogers (R)

#### **Summary**

Prohibits the use of "photo enforcement systems" (defined) by law enforcement and local authorities to enforce traffic laws. Contains a legislative intent clause.

#### **Action Taken**

Passed Senate Public Safety 4-3

Passed the Senate 16-13 and was sent to the House

Passed House Transportation and Infrastructure 4-1

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## **SB1024 - State agencies; payments; cryptocurrency**

### **Sponsor**

Sen. Wendy Rogers (R)

### **Summary**

State agencies are authorized to accept “cryptocurrency” (defined) as a payment method for taxes, fees, fines, civil penalties, financial obligations, and special assessments by entering into an agreement with a “cryptocurrency service provider” (defined) to provide a method to accept cryptocurrency as a payment for any amount due to that agency or the state. Requirements for the agreement are listed. Effective January 1, 2026.

### **Action Taken**

Passed Senate Finance 4-3

Passed the Senate 17-11 and was sent to the House

Passed House Commerce 6-4

Passed the House 31-26 and was sent to the Governor

Vetoed by the Governor

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## **SB1036 - Public resources; influencing elections; penalties**

### **Sponsor**

Sen. John Kavanagh (R)

### **Summary**

Establishes penalties for a municipality or county found to be guilty of using municipal resources to influence an election and provides that the penalties be paid to the Arizona Attorney General, County Attorney or resident, as is appropriate based on the entity that brought the complaint and the entity or entities found guilty of violating the prohibition. Permits a resident to file an action in Superior Court pertaining to a violation of this prohibition.

### **Action Taken**

Passed Senate Government 4-3

Passed the Senate 17-12 and was sent to the House

Passed House Federalism, Military Affairs, and Elections 4-2

Passed the House 31-27 and was sent back to the Senate

Passed the Senate 17-9 and was sent to the Governor

Vetoed by the Governor

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## **SB1040 - Recall elections; procedures; timeline**

### **Sponsor**

Sen. John Kavanagh (R)

### **Summary**

Increases to 75 days after receiving the front and back of recall signature sheets the time the county recorder must determine the number of signatures or affidavits of individuals whose names were included on the sheets that must be disqualified. Increases to 120 days, or more, the time frame between when a recall election order is issued and the recall election held. Requires any person who desires to be a candidate for the office associated with the recall election to file a Statement of Interest with the appropriate filing officer in the form prescribed by state law. Stipulates that any nomination petition signatures that are collected before the Statement of Interest and the recall application are filed are invalid and subject to challenge.

### **Action Taken**

Passed Senate Judiciary and Elections 6-0

Passed the Senate 28-0 and was sent to the House

Passed House Federalism, Military Affairs, and Elections 7-0

Passed the House 58-0 and sent to the Governor

Signed by the Governor

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## **SB1052 - Voter registration; temporary absence**

### **Sponsor**

Sen. Wendy Rogers (R)

### **Summary**

Repeals the ability of a United States citizen who has never resided in the United States and whose parent is a United States citizen who is registered to vote in Arizona, to register to vote and vote in Arizona using a federal write-in early ballot.

### **Action Taken**

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-11 and was sent to the House

Passed House Federalism, Military Affairs, and Elections 4-3

Passed the House 32-25 and was sent to the Governor

Vetoed by the Governor

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## **SB1064 - Voting; equipment; internet; custody; violation**

### **Sponsor**

Sen. Mark Finchem (R)

### **Summary**

Requires the Arizona Secretary of State verify vote recording and tabulating machines approved for use pursuant to state law, have the appropriate level security, per industry best practices, not have hardware installed that supports any form of remote access, or software that allows any change to results in files or database, support the usage and tracking of users based on unique credentials that are changed at least once per election cycle, log deletions of ballot information, and maintain election data for 22 months after the election. Prohibits voting equipment used in a polling place or voting center from having Internet access and access by any means to any data or results, and if the equipment has an accessible port, the port must be locked with tamper proof sealing and logged in a chain of custody document when broken or accessed. Requires the same security, logging and management for tabulation equipment and permits only authorized personnel, including political party observers, to be present at the tabulation of votes. Requires two observers who are not members of the same political party be present when a removable storage device is employed, including during the insertion, removal, and transportation of the device. Requires activities at the counting center be included in a nonstop video, pursuant to state law, that is posted to the county's website. Stipulates that a person who violates this legislation is guilty of a Class 1 misdemeanor.

### **Action Taken**

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-11 and was sent to the House

Passed House Federalism, Military Affairs, and Elections 3-2

Passed the House 32-25 and was sent to the Governor

Vetoed by the Governor

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## **SB1097 - Elections; voting centers; polling places**

### **Sponsor**

Sen. Jake Hoffman (R)

### **Summary**

Requires district schools to close on a primary election day and a general election day but requires teachers and staff to receive in-service training or development and prohibits them from using personal, vacation or other leave excepting a school district from allowing an employee time off to vote. Allows voting centers to be created on a specific resolution of the Board of Supervisors. Requires a state, county, city, town or school district office to provide sufficient space for use as a polling place upon request of the Officer in charge of elections for any state, county, city or town elections and exempts district schools with a "gymnasium" (defined) from any state, local or school district requirements that would otherwise prevent or limit the use of the school or its gymnasium as a polling place. Removes the ability of the principal of a district or charter school to deny a request to provide space for use as a polling place for an election by providing a written statement indicating that space is not available at the school; or the safety or welfare of the children would be jeopardized.

### **Action Taken**

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-12 and was sent to the House

Passed House Federalism, Military Affairs, and Elections 4-2

Passed the House 31-23 and was sent to the Governor

Vetoed by the Governor

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## **SB1098 - Early ballot drop off; identification**

### **Sponsor**

Sen. Jake Hoffman (R)

### **Summary**

For any voter or voter's agent who delivers one or more voted early ballots in affidavit envelopes at any polling place or voting center, the election board must require the person to present valid identification that meets statutory requirements for his/her own early ballot or for another person's ballot, and to attest in writing that he/she is the voter's family member, household member or caregiver for another person's early ballot. Knowing violations are a class 5 (second-lowest) felony.

### **Action Taken**

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-12 and was sent to the House

Passed House Federalism, Military Affairs, and Elections 4-2

Passed the House 32-25 and was sent to the Governor

Vetoed by the Governor

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## **SB1100 - Maricopa county; division; new counties**

### **Sponsor**

Sen. Jake Hoffman (R)

### **Summary**

Defines the boundaries of Gila, Maricopa, Pinal, Yavapai, Yuma, and La Paz Counties. Requires legislative council staff to prepare proposed legislation to conform Arizona State Statutes to this legislation for the 57th legislature, second regular session. Effective date is January 1, 2026.

### **Action Taken**

Passed Senate Government 4-3

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## **SB1101 - Maricopa county; new counties; division**

### **Sponsor**

Sen. Jake Hoffman (R)

### **Summary**

Divides Maricopa County into four counties by modifying the Maricopa County boundaries and adding three new counties: Hohokam County, Mogollon County, and O'odham County. Maricopa County operations will continue in their existing form through a transition period of up to three years after the effective date of this legislation. The boards of supervisors of Hohokam, Mogollon, and O'odham Counties will be elected at a special election held within 120 days after the effective date of this legislation. Currently elected Maricopa County Supervisors continue in their capacity for the remainder of their term in whichever county their supervisory district is located. The elected boards of supervisors in the three new counties will determine an application process for municipalities to apply to be the county seat, which will be determined at a special election to be held within 120 days from the election of the boards of supervisors. The four counties are authorized to enter into a ten-year shared use agreement for the use of existing shared capital assets. The four counties are required to enter into an intergovernmental agreement for the continued operation of community colleges for at least ten years after the effective date of this legislation. Effective January 1, 2026.

### **Action Taken**

Passed Senate Government 4-3

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## **SB1142 - Elections; foreign contributions; prohibition**

### **Sponsor**

Sen. Mark Finchem (R)

### **Summary**

Prohibits monetary contributions or in-kind donations of any type from any foreign corporation or person and for any the person, entity, or committee to accept either. Requires any person, entity or committee that is required to file campaign finance reports pursuant to state law to certify under penalty of perjury that no prohibited form of contribution has been accepted by the person, entity or committee. Exempts federally recognized sovereign tribal nations.

### **Action Taken**

Passed Senate Judiciary and Elections 5-2

Passed the Senate 19-7 and was sent to the House

Passed House Federalism, Military Affairs, and Elections 4-2

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## **SB1237 - State employees; remote work; prohibition (Agency accounts; technical correction)**

### **Sponsor**

Sen. Warren Petersen (R)

### **Summary**

Prohibits full-time state employees from working remotely.

### **Action Taken**

Passed Senate Regulatory Affairs and Government Efficiency 4-2

Passed the Senate 17-12 and was sent to the House

Passed House Regulatory Oversight 3-2

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## **SB1243 - Open meetings; call to public**

### **Sponsor**

Sen. John Kavanagh (R)

### **Summary**

Outlines the process, permissions, mandatory schedule, Prohibitions, and management of open calls that a public body makes at a public meeting. Stipulates that official business does not include a prayer, pledge, or recognition of a person or organization.

### **Action Taken**

Passed Senate Government 4-3

Passed the Senate 17-12 and was sent to the House

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## **SB1289 - Elections; canvass; certification; acknowledgment**

### **Sponsor**

Sen. John Kavanagh (R)

### **Summary**

Requires that various governing bodies acknowledge without prejudice certain actions pertaining to an election, pursuant to state law.

### **Action Taken**

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-12 and was sent to the House

Failed in House Federalism, Military Affairs, and Elections 3-3



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## **SB1334 - Voting locations; emergency designation; electioneering.**

### **Sponsor**

Sen. Janae Shamp (R)

### **Summary**

Removes the following requirements that delineate that the county recorder or election officer must post a public list of any sites designated as emergency polling places—along with the reasons for that designation and attempts made to secure alternatives—at least two weeks before election day, and that if a site is not on the emergency-designation list, the facility must allow political activity outside the seventy-five-foot zone, and that should an emergency arise after the initial posting, the county recorder or election officer is required to update the list promptly with the relevant details.

### **Action Taken**

Passed Senate Judiciary and Elections 4-2

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## **SB1375 - Voter registration rolls; internet access**

### **Sponsor**

Sen. Mark Finchem (R)

### **Summary**

Strikes previous management arrangements to receive voter registration rolls and requires that the County Recorder provide free access to voter rolls via an internet portal that is accessible to the public and allows data to be downloaded. Requires any voter or precinct lists to be used as authorized.

### **Action Taken**

Passed Senate Judiciary and Elections 4-3

Passed the Senate 17-12 and was sent to the House

Passed House Federalism, Military Affairs, and Elections 4-3

Passed the House 32-25 and was sent back to the Senate

Passed the Senate 17-12 and was sent to the Governor

Vetoed by the Governor

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## **SB1376 - State elections; contest; technical correction**

### **Sponsor**

Sen. J.D. Mesnard (R)

### **Summary**

Minor change in Title 16 (Elections and Electors) related to the conduct of elections. Apparent striker bus.

### **Action Taken**

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## **SB1378 - Political signs; homeowners' associations**

### **Sponsor**

Sen. J.D. Mesnard (R)

### **Summary**

Adds to the definition of “political sign” for condominium and homeowner’s associations that a sign can be a flag and that except for a candidate prescribed in this legislation, without regard to whether the person supported or opposed is on the ballot at the next upcoming election.

### **Action Taken**

Passed Senate Government 5-2

Passed the Senate 21-7 and was sent to the House

Passed House Government 4-3

Passed the House 32-25 and was sent back to the Senate

Passed the Senate 29-0 and was sent to the Governor

Signed by the Governor

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## **SCR1002 - Photo enforcement systems; prohibition**

### **Sponsor**

Sen. Wendy Rogers (R)

### **Summary**

Bans local authorities and state agencies from using automated photo enforcement systems (defined) to identify excessive speed violations or failures to obey traffic control devices.

### **Action Taken**

Passed Senate Public Safety 4-3

Passed the Senate 16-13 and was sent to the House

Passed House Transportation and Infrastructure 4-1

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## SCR1022 - Legislative districts; population; census; citizenship

### Sponsor

Sen. Jake Hoffman (R)

### Summary

The 2026 general election ballot is to carry the question of whether to amend Article 4, Part 2, Section 1 of the Constitution of Arizona to require that during each year that ends in zero, the Independent Redistricting Commission, or other office or body as designated by the legislature, to take a census to adjust its federal and state legislative districts. The language in the proposed amendment outlines how the census is to work and creates the State Census Fund for the purposes of taking the census required by this amendment modification. Stipulates that state legislative districts must have equal citizenship population apportionment. Grants any member of the legislature standing to initiate an action or proceedings to enforce this change. **Takes \$5,000,000 from the Clean Elections Fund yearly and places it in the Census Fund.**

### Action Taken

Passed Senate Government 4-3

Passed the Senate 16-11 and was sent to the House

May 8, 2025

**BY EMAIL**

Arizona Citizens Clean Elections Commission  
1110 W. Washington St., Suite 250  
Phoenix, AZ 85007  
Email: [ccec@azcleelections.gov](mailto:ccec@azcleelections.gov)

**Re: Advisory Opinion Request**

**Dear Commissioners:**

Pursuant to Ariz. Admin. Code R2-20-808 adopted by the Arizona Citizens Clean Elections Commission (“**Commission**”), we seek an advisory opinion on behalf of Fair Democracy (“**FD**”). FD seeks clarification on whether certain public communications qualify as “campaign media spending” under the Voters’ Right to Know Act (“**VRKA**”).

**I. Background**

FD is a 501(c)(4) social welfare organization that is registered with the Internal Revenue Service. FD “works to ensure that the roots of American Democracy are healthy with strong voting rights and access, an engaged and informed electorate, an open and accountable government and trusted messengers engaging Americans in civil discourse.”<sup>1</sup> One such project in furtherance of its social welfare mission is the “Policy Information Center,” a website where FD provides educational content about legislative issues and officeholders. FD also sponsors digital issue advertisements to inform the public about these legislative issues, which typically link to the Policy Information Center website.

FD wishes to sponsor public communications in Arizona that discuss policy issues. The communications may refer to Arizona elected officials and/or candidates, as well as Arizona political parties. FD seeks guidance whether the following public communications qualify as “campaign media spending” if sponsored between 6 months and 90 days before a primary election. Each communication would link to an article posted on FD’s “Policy Information Center” website.

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<sup>1</sup> Internal Revenue Service, 2021 Form 990 (Fair Democracy), [https://apps.irs.gov/pub/epostcard/cor/822747849\\_202206\\_990O\\_2023060821409792.pdf](https://apps.irs.gov/pub/epostcard/cor/822747849_202206_990O_2023060821409792.pdf).

## Public Communication 1:



The following text would accompany the graphic: “Arizona Republicans are considering new restrictions on abortion medication. Supporters say the measures provide additional regulations, while critics argue they conflict with Proposition 139, which was approved by voters to protect abortion rights in the state constitution.

What are your thoughts on this ongoing discussion? 💬 #AZPolitics #ReproductiveRights #Legislation

Story at: [hyperlink]”

## Public Communication 2a:

Public Communications 2a, 2b, and 2c include the same graphic and text. However, each version contains a different call to action – Public Communication 2a asks viewers to share their thoughts; Public Communication 2b asks viewers to follow FD on Facebook; and Public Communication 2c asks viewers to join FD’s email list.



The following text would accompany the graphic: “📢 Arizona Democrats have pledged to curb waste, fraud and abuse in the state’s universal school voucher program! They’re pushing for stronger oversight to ensure funds are used properly and not at the expense of our public schools.

📖💰 Do you think the program needs more accountability? Share your thoughts! ⬇️  
#AZPolitics #EducationMatters #SchoolFunding

Story at: [hyperlink]”

### Public Communication 2b:



The following text would accompany the graphic: 📢 Arizona Democrats have pledged to curb waste, fraud and abuse in the state’s universal school voucher program! They’re pushing for stronger oversight to ensure funds are used properly and not at the expense of our public schools.

📖💰 Follow us on Facebook to learn more. ⬇️ #AZPolitics #EducationMatters #SchoolFunding”

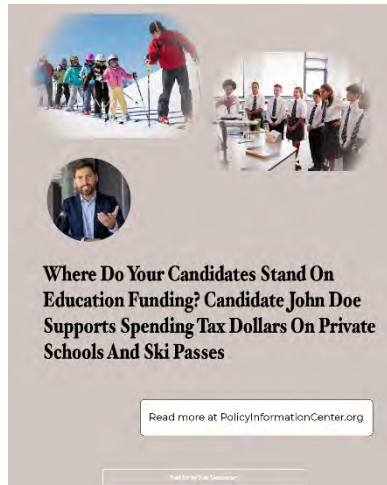
### Public Communication 2c:



The following text would accompany the graphic: 🗣️ Arizona Democrats have pledged to curb waste, fraud and abuse in the state’s universal school voucher program! They’re pushing for stronger oversight to ensure funds are used properly and not at the expense of our public schools.

📧💰 Join our email list to learn more. 📌 #AZPolitics #EducationMatters #SchoolFunding”

### Public Communication 3a:



The following text would accompany the graphic: “John Doe, a candidate for LD 31, supports Arizona’s universal school voucher program, which cost the state \$444 million in 2024. Doe opposes efforts to add oversight or prevent misuse of funds and describes himself as an ‘outspoken school choice advocate.’”

### Public Communication 3b:



The following text would accompany the graphic: John Doe supports Arizona’s universal school voucher program, which cost the state \$444 million in 2024. Doe opposes efforts to add oversight or prevent misuse of funds and describes himself as an “outspoken school choice advocate.”

## Public Communication 4



The following text would accompany the graphic: “🚨 Ethics Under Fire in State Politics 🚨

State Rep. Robert Jacobs is facing backlash after introducing a bill that would *slash taxes* for HighPrairie Energy — one of his biggest donors. While not illegal, critics say it’s a clear case of donor influence over public interest.

Jacobs claims the bill will boost jobs and help the energy sector, but watchdogs aren’t buying it. They say the timing and the direct benefit to his top donor raise serious red flags. ⚠️

Now, calls are growing for stronger ethics and transparency reforms. Voters and advocacy groups are watching closely. 👁️👁️


Should lawmakers be allowed to push bills that benefit their biggest campaign donors? 💰😞

Share your thoughts! 📌 #EthicsMatter #FollowTheMoney #StatePolitics #TransparencyNow”

## Public Communication 5





The following text would accompany the graphic: “NEW REPORT: Rep. Jacobs failed to file his taxes on time — again. If we’re expected to follow the rules, why can’t our elected officials? Arizonans deserve accountability, not excuses.  #HoldThemAccountable #RepJacobs”

## **II. Relevant Legal Provisions**

Under the VRKA, campaign media spending includes “a public communication that promotes, supports, attacks or opposes a candidate within six months preceding an election involving that candidate.”<sup>2</sup>

Campaign media spending also includes a “public communication that supports the election or defeat of candidates of an identified political party or the electoral prospects of an identified political party [...]” regardless of when the communication is disseminated.<sup>3</sup>

## **III. Discussion**

None of FD’s proposed examples qualify as campaign media spending.

In Advisory Opinion 2024-03, the Commission determined that a public communication “that is focused on a particular policy view of an elected official but does not mention their candidacy” is not campaign media spending.<sup>4</sup> In making its determination, the Commission examined how the terms “promote, support, oppose, or attack” (“*PASO*”) bear on the word “candidate.”<sup>5</sup> The definition “uses verbs that speak to an action that involves not just the person who is a candidate, but the candidacy itself.”<sup>6</sup>

The Commission also concluded that communications that refer to a political party as “means to another end” were not campaign media spending.<sup>7</sup> According to the Commission, an “end” can include “providing context for a call to action to contact a legislature, seeking to bring more people into association with the organization, or facilitating direct communication with a particular elected official.”<sup>8</sup>

### **Public Communication 1:**

The advertisement refers to a current public official’s support of a specific policy – restricting the abortion pill. The advertisement does not express opposition to, or attack, the official’s candidacy. As such, the advertisement does not PASO a candidate under the VRKA.

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<sup>2</sup> Ariz. Rev. Stat. § 16-971(2)(a)(ii).

<sup>3</sup> *Id.* § 16-971(2)(a)(vi).

<sup>4</sup> Ariz. Clean Elections Commission, Adv. Op. 2024-03 at 6, [https://storage.googleapis.com.usgovcloudapi.net/public/docs/1009-1035AdvisoryOpinion24\\_03AOR24\\_01FinalapprovedApril18\\_2024.pdf](https://storage.googleapis.com.usgovcloudapi.net/public/docs/1009-1035AdvisoryOpinion24_03AOR24_01FinalapprovedApril18_2024.pdf).

<sup>5</sup> *Id.*

<sup>6</sup> *Id.*

<sup>7</sup> *Id.* at 10.

<sup>8</sup> *Id.*

### **Public Communications 2a, 2b, and 2c:**

The advertisements refer to a political party's desire to cut waste and abuse in school voucher spending. The language accompanying the graphic asks viewers whether they think the voucher program needs more accountability. The advertisements do not support the electoral prospects of a party. Instead, the advertisements aim to facilitate discussion on a particular issue.

The conclusion should be the same with respect to Public Communication 2a, Public Communication 2b, and Public Communication 2c. All three advertisements are "means to an[] end" other than voting, with Public Communication 2a inviting viewers to share their thoughts, Public Communication 2b asking viewers to follow FD on Facebook to learn more, and Public Communication 2c asking viewers to join FD's mailing list.

As such, the advertisements do not support the electoral prospects of a political party under the VRKA.

### **Public Communications 3a and 3b:**

The advertisements refer to an individual who supports spending Arizona tax dollars on private schools and ski passes. The individual referenced is not a current officeholder but is a candidate for office in Arizona.

Public Communication 3a identifies John Doe as a candidate for office, while Public Communication 3b does not identify John Doe as a candidate. Nonetheless, neither advertisement expresses opposition to or attacks the individual's candidacy but instead explains the individual's support of a particular policy. As such, the advertisements do not PASO a candidate under the VRKA.

### **Public Communication 4:**

The advertisement refers to a current public official's support of a tax bill that would benefit the energy sector. The advertisement mentions that the legislation would benefit a major donor to the legislator's campaign, to build opposition to this tax bill. The advertisement is a "means to an[] end" other than voting by building opposition to the substantive policy *and* asking voters to share their opinions on ethics and policy. The advertisement does not express opposition to, or attack, the official's candidacy. As such, the advertisement does not PASO a candidate under the VRKA.

### **Public Communication 5:**

The advertisement highlights a current public official's failure to timely file taxes and asks whether public officials are held to a different standard than other Arizonans. The advertisement does not reference or express opposition to, or attack, the official's candidacy. As such, the advertisement does not PASO a candidate under the VRKA.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jon S. Berkon". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Jonathan S. Berkon  
Emma R. Anspach  
*Counsel to Fair Democracy*

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  
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June 26, 2025  
Advisory Opinion 2025-01

Jonathan S. Berkon  
Emma R. Anspach  
Elias Law Group  
250 Massachusetts Ave. NW, Suite 400  
Washington, D.C. 20001

Re: Advisory Opinion Request of Fair Democracy

Dear Mr. Berkon and Ms. Anspach:

We are responding to your advisory opinion request (“AOR”) on behalf of Fair Democracy (“FD”). The request asks the Commission to evaluate public communications that would be made during a particular window prior to the primary election to determine whether those communications would constitute “campaign media spending” under the Voters’ Right to Know Act (“the Act” or “VRKA”).

***Question Presented***

How should covered persons evaluate public communications to determine whether they constitute campaign media spending between 6 months and 90 days before a primary election?

***Summary Answer***

Spenders should consider several factors when evaluating whether a communication constitutes campaign media spending under A.R.S. § 16-971. For the “promote, support, oppose or attack” (“PASO”) standard in § 16-971(2)(a)(ii), relevant considerations include whether the communication identifies a candidate within six months of an election; whether it includes language that praises, criticizes,

or otherwise addresses the candidate, the targeting of the communication, its overall presentation and tone; and whether it would reasonably be understood as seeking to influence the outcome of that candidate's election or whether, if issue advocacy, it identifies and advocates for a position on the issue. Under § 16-971(2)(a)(vi), communications that reference political parties are not campaign media spending unless they, in context, support or oppose the electoral success of that party's candidates. This may include partisan calls to action, voter mobilization efforts, or messaging that advocates for or against a party's role in an upcoming election. Context remains central to both analyses.

## **I. Background**

FD is an organization that is registered with the Internal Revenue Service as a 501(c)(4) nonprofit organization. AOR at 1. It describes itself as nonpartisan and focused on advancing transparency and accountability in government. *Id.* It states that its core activities include public education and advocacy on policy issues. It is not formed for the purpose of supporting or opposing political candidates, and it does not engage in electoral campaigning.

FD proposes to disseminate several public communications related to public policy issues and seeks clarification on whether any such communications it sponsors, i.e., pays for or produces with in-kind contributions, would be campaign media spending.<sup>1</sup>

## **II. Legal Analysis**

Section 16-971(2)(a) defines “campaign media spending” to include, among other things:

A public communication that “promotes, supports, attacks or opposes a candidate within six months preceding an election involving that candidate.”

A. R. S. § 16-971(2)(a)(ii).

“An activity or public communication that supports the election or defeat of candidates of an identified political party or the electoral prospects of an identified political party, including partisan voter registration, partisan get-out-the-vote activity or other partisan campaign activity.”

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<sup>1</sup> The window the request identifies excludes the time period covered by A.R.S. § 16-971(2)(a)(iii)(referring to a clearly identified candidate beginning 90 days before a primary election).

A.R.S. § 16-971(2)(a)(vi).

In Advisory Opinion 2024-03, the Commission explained that the PASO verbs (“promote, support, attack, oppose”) relate to the candidacy of the elected official, not only their public office or policy positions. Ariz. Citizens Clean Elections Comm’n, Advisory Op. 2024-03, at 6 (Apr. 18, 2024), [https://storage.googleapis.com/core.usgovcloudapi.net/public/docs/1009-1035AdvisoryOpinion24\\_03AOR24\\_01FinalapprovedApril18\\_2024.pdf](https://storage.googleapis.com/core.usgovcloudapi.net/public/docs/1009-1035AdvisoryOpinion24_03AOR24_01FinalapprovedApril18_2024.pdf).

Similarly, the Commission explained that:

“[M]ention[ing] [a] party as a means to another end, whether providing context for a call to action to contact a legislature, seeking to bring more people into association with the organization, or facilitating direct communication with a particular elected official” does not “involve the electoral prospects of candidates of a particular party or the party itself.” *Id.* at 10.

As a general matter, communications that address pending issues or legislation without referencing candidacy or electoral consequences, or that mention a political party in connection with issue-based or civic engagement purposes, are likely not subject to the definition of campaign media spending under the Act.

### **III. Proposed Communications**

FD has submitted several proposed public communications that it may disseminate in Arizona. Each communication addresses matters of public concern, ranging from education and taxation to reproductive rights and government transparency. The messages vary in tone and format, and some identify elected officials or candidates by name. The communications are as follows:

#### **Public Communication 1**

This communication addresses proposed restrictions on abortion medication by Republican lawmakers in Arizona. The message contrasts supporter and critic perspectives and references Proposition 139, a voter-approved constitutional amendment on abortion rights. The communication invites the audience to weigh in on the policy debate with a prompt—“What are your thoughts on this ongoing discussion?”—accompanied by hashtags such as #AZPolitics and #ReproductiveRights. The post links to a more detailed article on FD’s website.

## Public Communication 2a

This advertisement focuses on Arizona Democrats’ legislative efforts to advocate for more oversight and accountability in the state’s Empowerment Scholarship (“ESA”) program that provides students with money to obtain educational services outside of the public school system. The message highlights the Democratic members’ commitment to curbing what they see as waste, fraud, and abuse, and concludes with an open-ended call for viewers to “share your thoughts.” The communication includes hashtags that frame the content as part of a broader conversation on education policy and school funding, and links to an article with further information.

## Public Communication 2b

Identical in content to 2a, this version of the advertisement includes a different call to action: “Follow us on Facebook to learn more.” The focus remains on Democratic lawmakers’ stance on ESA oversight, but the call to action is designed to build social media engagement with FD rather than solicit policy input directly.

## Public Communication 2c

This version matches the narrative content of 2a and 2b, highlighting Democratic efforts to reform the ESA program with more oversight. The call to action here asks viewers to “Join our email list to learn more,” suggesting the communication’s purpose is to grow FD’s audience and newsletter subscriber base.

## Public Communication 3a

This advertisement names John Doe as a candidate for Arizona Legislative District 31 and criticizes his support for the state’s ESA program, noting the program’s cost and Doe’s resistance to oversight reforms. It refers to him as an “outspoken school choice advocate” and implies a policy-based critique of his stance.

## Public Communication 3b

Nearly identical in content to 3a, this version does not identify John Doe as a candidate. It focuses on the same policy positions and uses the same phrasing (“outspoken school choice advocate”) but without expressly referencing his electoral status.

## Public Communication 4

This communication criticizes State Representative Robert Jacobs for introducing a tax bill that would benefit High Prairie Energy, a major donor to his campaign. While acknowledging the proposal is not illegal, the message suggests donor influence and raises concerns about legislative ethics. It ends by encouraging stronger transparency reforms and includes a question asking the public whether lawmakers should be permitted to advance bills that benefit their biggest donors.

## Public Communication 5

This final communication reports that Representative Jacobs failed to file his taxes on time again, questioning whether elected officials are held to the same standards as ordinary citizens. It uses a critical tone and hashtags like #HoldThemAccountable, but does not reference Jacobs' status as a candidate.

### **IV. Analysis of Proposed Communications under A.R.S. § 16-971(2)(a)(ii) (PASO candidate)**

The Commission begins by considering whether any of the proposed communications constitute campaign media spending under A.R.S. § 16-971(2)(a)(ii), which applies to a public communication that “promotes, supports, attacks or opposes a candidate within six months preceding an election involving that candidate.” In Advisory Opinion 2024-03, the Commission detailed that “a public communication that is focused on a particular policy view of an elected official but does not mention their candidacy is not contributing to the growth of or advertising the candidate, even if it might refer to the candidate” and therefore did not “promote” that candidate. Advisory Op. 2024-03 at 6. Consequently, whether a communication meets this definition depends in part on whether the individual is identified as a candidate, but also the language used to praise or criticize them and the targeting and presentation of the message. *Id.* at 6 and fn. 4.

Communications 1 and 4 do not identify any individual as a candidate or include content that promotes or opposes their election. These communications mention political parties or elected officials, they do so in the context of ongoing public policy debates. For example, Communication 1 discusses abortion medication access in connection with a particular Republican lawmaker as representative of the party position the communication describes, but does not reference any election. Communication 4 likewise highlights criticism of a current lawmaker's legislative activities.



Communication 3a and 3b differ and fall within the PASO standard because they attack the candidate. Communication 3a identifies an individual as a candidate for Legislative District 31 and criticizes his policy position by framing it negatively. The communication draws an inference that the candidate supports particular spending decisions by ESA users that have been held out for public scorn because the candidate “opposes effort to add oversight or prevent misuse of funds” and labels himself an “outspoken school choice advocate.” *See, e.g.,* Laurie Roberts, ESA’s universal school voucher reform is flailing in Arizona, *The Arizona Republic* (June 18, 2025), <https://www.azcentral.com/story/opinion/op-ed/laurieroberts/2025/06/18/esa-universal-school-voucher-reform-arizona/84261748007/> (noting that “12 News’ Craig Harris reports that taxpayers are shelling out \$20 million this year for such academic imperatives as dance, piano and private swimming lessons.”). Although the communication does not expressly call for the candidate’s defeat or use campaign slogans, the combination of candidate identification, negative framing within a period designated by the statute may reasonably be interpreted as opposing the candidate’s election. A.R.S. § 16-971(2)(a)(ii).

Communication 3b differs effectively only in that it does not use the term “candidate.” That distinction alone does not meaningfully differentiate Communication 3a. The candidate is not, apparently, an office holder, nor is there any suggestion that a viewer or reader of the communication take any steps relevant to a current policy discussion.

Communication 5 similarly constitutes campaign media spending. It identifies a representative by name, but does not indicate candidacy. It highlights his repeated failure to file his taxes on time, placing him in a negative light. The tagline is “#HoldThem Accountable,” and elections are a way of holding elected officials accountable. This falls within the definition by attacking a candidate. A.R.S. § 16-971(2)(a)(ii).<sup>2</sup>

## **V. Analysis of A.R.S. § 16-971(2)(a)(vi) (party support)**

The Commission next considers whether any of the proposed communications support or oppose the electoral prospects of an identified political party under A.R.S. § 16-971(2)(a)(vi). This provision applies to communications that, in context,

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<sup>2</sup> Because we reach this conclusion, we do not analyze whether these communications otherwise constitute express advocacy. *See* A.R.S. § 16-971(A)(2)(i); *see also Comm. for Justice & Fairness v. Ariz. Sec’y of State’s Office*, 235 Ariz. 347 (App. 2014), A.R.S. § 16-901.01.

promote the electoral success or failure of a political party or its candidates—such. *Id.*

In Advisory Opinion 2024-03, the Commission explained that mere references to political parties are insufficient. *Id.* at 10. The communication must connect the party to an electoral outcome. *Id.* For example, identifying a party in the course of legislative criticism or policy debate does not, on its own, meet this standard. *Id.*

Here, communications 1 and 2a, 2b and 2c mention political parties in connection with specific legislative issues. Communication 1 references Republican lawmakers in the context of restrictions on abortion medication, while communications 2a, 2b and 2c refer to Democrats when discussing ESA oversight. None of these messages include calls to vote, endorse partisan outcomes, or link the policy positions to electoral success. The references are incidental to issue advocacy and do not serve to advance or oppose the *electoral* prospects of either party.<sup>3</sup>

Accordingly, the Commission finds that these proposed communications would not constitute campaign media spending under A.R.S. § 16-971(2)(a)(vi).<sup>4</sup>

## **V. Conclusion**

This advisory opinion is issued pursuant to Ariz. Admin. Code R2-20-808 and is based on the facts presented in the request. A Commission advisory opinion “may be relied upon by any person involved in the specific transaction or activity with respect to which such advisory opinion is rendered, and any person involved in any specific transaction or activity which is indistinguishable in all its material aspects

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<sup>3</sup> The distinction among calls to action in Communications 2a, 2b, and 2c similarly do not convert these communications to campaign media spending. For example, the statute states that social media and mailing list “acquisition” in preparation for other campaign media spending can constitute campaign media spending. But generally building a list is not acquisition of, i.e., “to get as one’s own” the list. <https://www.merriam-webster.com/dictionary/acquire>.

To the extent that the taglines here are intended to develop campaign media spending, a covered person or other party contemplating the statute should consider whether the activity contemplated falls within Ariz. Admin. Code § R2-20-801(B).

<sup>4</sup> Communications 3a, 3b, 4 and 5 do not mention political parties so this section is not relevant to the analysis of those communications.

from the transaction or activity with respect to which such advisory opinion is rendered.” Ariz. Admin. Code R2-20-808(C)(3). A “person who relies upon an advisory opinion and who acts in good faith in accordance with that advisory opinion shall not, as a result of any such act, be subject to any sanction provided in Chapter 6.1 of Title 16.” *Id.* § R2-20-808(C)(4). Advisory opinions may be affected by later events, including judicial opinions and changes in law.

Sincerely,

DRAFT

Katie Hobbs  
Governor

Thomas M. Collins  
Executive Director



Mark S. Kimble  
Chair

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

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***MEMORANDUM***

**To: Commissioners**

**From: Thomas Collins**

**Date: June 23, 2025**

**Subject: 2025 5 Year Review Report for Governor's Regulatory Review Council**

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I am asking for approval to finalize and submit the Commission's 5 year rule review report.

Every five years the Commission submits a report to the Governor's Regulatory Review Council (GRRC) regarding its rules under the Clean Elections Act.

According to GRRC,

The reports are intended to be a concise written analysis of an agency's administrative rules that covers the previous 5 years. Council staff reviews the report according to the criteria provided in A.R.S. § 41-1056(A) and A.A.C. R1-6-301. Staff then prepares a memorandum that recommends approval or return of the report. Council staff presents the memorandum to the Council at a Study Session for consideration. The Council may vote to approve or return the report at the subsequent Council Meeting.

Our last report was approved in 2020 with little discussion.

The report covers the following aspects of our administrative rules:

1. The rule's effectiveness in achieving its objectives, including a summary of any available data supporting the conclusions reached.
2. Written criticisms of the rule received during the previous five years, including any written analyses submitted to the agency questioning whether the rule is based on valid scientific or reliable principles or methods.
3. Authorization of the rule by existing statutes.
4. Whether the rule is consistent with statutes or other rules made by the agency and current agency enforcement policy.
5. The clarity, conciseness and understandability of the rule.
6. The estimated economic, small business and consumer impact of the rules as compared to the economic, small business and consumer impact statement prepared on the last making of the rules.
7. Any analysis submitted to the agency by another person regarding the rule's impact on this state's business competitiveness as compared to the competitiveness of businesses in other states.
8. If applicable, that the agency completed the previous five-year review process.
9. A determination that the probable benefits of the rule outweigh within this state the probable costs of the rule, and the rule imposes the least burden and costs to persons regulated by the rule, including paperwork and other compliance costs, necessary to achieve the underlying regulatory objective.
10. A determination that the rule is not more stringent than a corresponding federal law unless there is statutory authority to exceed the requirements of that federal law.

A.R.S. § 41-1056(A)(1)-(10). GRRC Staff reviews these items before making a recommendation to the council.

The Voters' Right to Know Act rules are excluded from this review by A.R.S. § 16-974(D).

*FIVE YEAR REVIEW REPORT*  
*Citizens Clean Elections Commission*  
*A.A.C. Title 2, Chapter 20, Articles 1-7*

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This report covers all rules in A.A.C. Title 2, Chapter 20, all articles. The Citizens Clean Elections Commission (the “Commission”) adopted these rules to further the goals of the Citizens Clean Elections Act (“Act”). The Act was passed by the voters in 1998 and created the clean elections system to diminish the influence of special-interest money, including the opportunities for and appearance of *quid pro quo* corruption, and thereby to promote the integrity of Arizona state government. The Act promotes freedom of speech under the United States and Arizona Constitutions. It also created a voluntary system wherein participating candidates receive public funds to finance campaigns. To qualify for funding, participating candidates must follow the rules and reporting requirements adopted by the Commission. The Act also applies to candidates who are nonparticipating candidates and independent spenders in elections. The Rules implement the provisions of the Act. All rules created or amended prior to June 25, 2013 have been “pre-cleared” by the U.S. Department of Justice pursuant to Section Five of the Federal Voting Rights Act.

The Commission reports the following analysis of its rules in the order required by Arizona Administrative Code (“A.A.C.”) R1-6-301. Pursuant to A.A.C. R1-6-301(B), Part I includes information pertaining to all, or a great number, of the rules. Part II reports information unique to individual rules.

Part I: Analysis Which Is Identical for all Rules

**1. Effectiveness of the rule in achieving the objective**

All the rules are effective in achieving their objectives as stated below.

**2. Written criticisms of the Rules Received in the Past Five Years**

To the extent that the Commission has received written criticisms of the rules in the past five years it has come in the form of responses to ongoing enforcement actions and related litigation and regarding the application of a Commission rules to candidates debates.

- A. In its response to a complaint by the Executive Director, respondents argued that the Commission’s definition of candidate, Ariz. Admin. Code R2-20-101(4), to include agents of the candidate is invalid. *See, e.g.,* Response to Complaint, In re The Power of 5s, Arizona Citizens Clean Elections Commission, MUR 21-01 (Oct. 13, 2021) (Response filed by Tim La Sota, Attorney for The Power of 5s), available at <https://storageccec.blob.core.usgovcloudapi.net/public/docs/746-December-21-Meeting-Packet.pdf> at 72; *see also* Complaint, *Power of Fives LLC v. Arizona Citizens Clean Elections Commission*, No. CV 2021-015826 (Ariz. Super. Ct., Maricopa Cty. Oct. 7, 2021).

- B. In a letter to the Executive Director, Senator Jake Hoffman explained his objection to the Executive Director's application of Ariz. Admin. Code § R2-20-107(C). *Jake Hoffman, Ariz. State Sen., Letter to Thomas M. Collins, Exec. Dir., Ariz. Citizens Clean Elections Comm'n* (Oct. 1, 2024) (on file with the Ariz. Citizens Clean Elections Comm'n).

### **3. Authorization of the Rules by Existing Statutes**

The Commission's general rulemaking authority is found in A.R.S. §§ 16-940 through 16-961 and A.R.S. § 16-956 (C) gives the Commission specific authority to adopt rules to carry out the purposes of the Article and to govern procedures of the Commission.

### **4. Consistency of the rule with state and federal statutes and rules and enforcement**

In the process of preparing this report the rules have been compared against each other and A.R.S. §§ 16-940 through 16-961 and the Commission has determined the rules are consistent and enforced as written.

### **5. Clarity, conciseness, and understandability of the rule**

All the rules are clear, concise, and understandable.

### **6. Economic, Small Business, and Consumer Impact Comparison**

The economic impact has not differed from that projected when the rules were adopted/amended. The rules create no discernible economic impact for small businesses or consumers. For small businesses or consumers who make expenditures subject to the rules' reporting requirements, compliance with the rules imposes zero economic impact because the reporting requirement is simple and may be filed without any filing fee. To the extent that the obligation to file a report itself imposes an economic impact, that impact comes from the statutory reporting requirement and not from the rules. A failure to abide by any of the statutes or rules may create an economic impact on those subject to the penalties the Commission may impose.

The main costs are born by the Commission and include staff time to process reports. The Commission receives funds from the following sources:

- A 10% surcharge imposed on all civil and criminal fines and penalties collected pursuant to A.R.S. § 12-116.01;
- A \$5 voluntary contribution per taxpayer (\$10 when married and filing jointly) who files an Arizona state income tax return and marks an optional check-off box on the first page of the form. A taxpayer who checks this box receives a \$5 reduction in tax liability and \$5 goes to the Clean Elections Fund (NOTE: As of August 2, 2012, the Commission only receives \$5 voluntary taxpayer contributions from individuals filing tax returns for tax years 2012 and earlier.);

- A voluntary donation to the Clean Elections Fund by designating the Fund on an income tax return form filed by the individual or business entity, or by making a payment directly to the Fund. Any taxpayer making a donation shall receive a dollar-for-dollar tax credit not to exceed 20 percent of the tax amount on the return or \$680 per taxpayer, whichever is higher (NOTE: As of August 2, 2012, the Commission no longer accepts donations for the dollar-for-dollar tax credit.);
- Qualifying contributions received by participating candidates; and
- Civil penalties assessed against violators of the Citizens Clean Elections Act.

**7. Analysis Submitted by Another Person Regarding the Rules' Impact on this State's Business Competitiveness as Compared to the Competitiveness of Businesses in Other States**

No analysis has been submitted to the Commission.

**8. Completion of the Previous Five-Year –Review Report Process**

The last five-year-review report was completed and did not identify any needed course of action.

**9. Probable Benefits Outweigh Probable Costs / Rules Impose Least Burden on Regulated Persons**

In the process of preparing this report, the Commission has determined that the rules achieve their regulatory objectives with the least burden and cost possible, and the probable benefits of the rules outweigh the probable costs.

**10. Corresponding federal law**

There are no corresponding federal laws.

**11. Compliance with A.R.S. § 41-1037**

Commission rules do not require the issuance of a regulatory permit, license, or agency authorization.

**12. Course of action the agency proposes to take regarding each rule**

The Commission does not propose any course of action for the rules.



## Part II: Analysis of Individual Rules

### ARTICLE 1 – GENERAL PROVISIONS

#### **R2-20-101. Definitions**

##### **1. Objective**

Supplement the definitions provided in A.R.S. §§16-901 and 16-961 for Chapter 20 of the Arizona Administrative Code, which includes the Commission rules, to define terms used in the rules to make the rules understandable to the reader, achieve clarity in the rules without needless repetition, and afford consistent interpretation.

##### **2. Written Criticism**

In response to a complaint by the Executive Director, respondents argued that the application of a R2-20-101(4) defining candidates to include agents is invalid. Response to Complaint, In re The Power of 5s, Arizona Citizens Clean Elections Commission, MUR 21-01 (Oct. 13, 2021) (Response filed by Tim La Sota, Attorney for The Power of 5s), available at <https://storage.googleapis.com/core.usgovcloudapi.net/public/docs/746-December-21-Meeting-Packet.pdf> at 72. Respondents also filed a lawsuit against the Commission based in part on that provision. Complaint, *Power of Fives LLC v. Arizona Citizens Clean Elections Commission*, No. CV 2021-015826 (Ariz. Super. Ct., Maricopa Cty. Oct. 7, 2021).

The Commission filed a motion for summary judgement on June 22, 2025 explaining the validity of the rule.

#### **R2-20-103. Communications: Time and Method**

##### **1. Objective**

Clarify procedures for computing periods of time and methods of communicating between the candidate and the Commission.

#### **R2-20-104. Certification as a Participating Candidate**

##### **1. Objective**

Provide guidance on filing an application for certification and electronic campaign finance reports; accepting contributions and making expenditures; and requirements for a nonparticipating candidate to be eligible for participating candidate status.

#### **R2-20-105. Certification for Funding**

##### **1. Objective**

Provide the process for certifying clean elections candidates.

**R2-20-106. Distribution of Funds to Certified Candidates**

**1. Objective**

Provide the process and criteria for the Commission to evaluate a candidate's application for funding.

**R2-20-107. Candidate Debates**

**1. Objective**

Provide procedures for conducting debates, for candidates seeking to be excused from participation in the debates and the penalty for failing to participate in the debates.

**2. Written Criticism**

In a letter dated October 1, 2024, Senator Jake Hoffman criticized the Executive Director's application of this rule to a debate for candidates for the U. S. Senate, arguing that the rule should have been applied to mandate the participation of a Green Party candidate at a Commission sponsored debate.

The letter came in response to the Executive Director letter explaining Commission statutes and rules in an inquiry commenced by Senator Hoffman.

**R2-20-108. Termination of Participating Candidate Status**

**1. Objective**

Provide a method for candidates to withdraw their application for certification or funding.

**R2-20-109. Independent Expenditure Reporting Requirements**

**1. Objective**

Provide the requirements for the submission of independent expenditure reports.

**R2-20-110. Participating Candidate Reporting Requirements**

**1. Objective**

Provide the reporting requirements of participating candidates.

**R2-20-111. Non-participating Candidate Reporting Requirements and Contribution Limits**

**1. Objective**

Provide the reporting requirements of non-participating candidates.

**R2-20-112. Political Party Exceptions**

**1. Objective**

Provide guidance on the scope of the political party exceptions in A.R.S. § 16-911(B)(4) to the definitions of contributions and expenditures in A.R.S. § 16-901(5), (8).

**R2-20-113. Candidate Statement Pamphlet**

**1. Objective**

Provide procedures for candidate eligibility and submission of statements for the Commission's primary and general election candidate statement pamphlets in accordance with A.R.S. § 16-956.

**R2-20-114. Candidate Campaign Bank Account**

**1. Objective**

Specify the method for maintaining campaign accounts.

**R2-20-115. Books and Records Requirements**

**1. Objective**

Specify the manner for keeping records and giving the public access to campaign records.

**ARTICLE 2 – COMPLIANCE AND ENFORCEMENT PROCEDURES**

**R2-20-201. Scope**

**1. Objective**

Specify the scope of the rules.

**R2-20-202. Initiation of Compliance Matters**

**1. Objective**

Describe methods for initiating an enforcement matter.

**R2-20-203. Complaints**

**1. Objective**

Provide the process for filing a complaint.

**R2-20-204. Initial Complaint Processing; Notification**

**1. Objective**

Specify the procedures for processing complaints.

**R2-20-205. Opportunity for No Action on Complaint-Generated Matters**

**1. Objective**

Specify the method and time period allowed for an alleged violator to respond to a complaint.

**R2-20-206. Executive Director's Recommendation on Complaint-Generated Matters**

**1. Objective**

Specify the Executive Director's and complainant's role prior to bringing a reason-to-believe recommendation to the Commission.

**8. Completion of the Previous Five-Year –Review Report Process**

The 2015 report described a proposal to amend this rule to require the Executive Director to first receive Commission approval to initiate an inquiry if a person making an independent expenditure in an election without a participating candidate faces penalties under A.R.S. § 16-942(B). The proposal, however, is not consistent with the Clean Elections Act and the Commission took no action on it.

**R2-20-207. Internally Generated Matters; Referrals**

**1. Objective**

Provide the Executive Director with authority to generate an internal complaint.

**R2-20-208. Complaint Processing; Notification**

**1. Objective**

Provide the process for notifying the complainant and the respondent of a reason-to-believe determination.

## **8. Completion of the Previous Five-Year –Review Report Process**

The 2015 report described a proposal to amend this rule to clarify processing procedures when a complaint alleges an “Article 1” violation involving an independent expenditure. That amendment was not completed because the proposed course of action would result in a rule inconsistent with the Clean Elections Act. This was noted in the 2020 report as well.

### **R2-20-209. Investigation**

#### **1. Objective**

Specify the methods used by the Commission to investigate following a reason-to-believe determination.

### **R2-20-210. Written Questions Under Order**

#### **1. Objective**

Allow the Commission to issue an order requiring any person to submit sworn, written answers to written questions.

### **R2-20-211. Subpoenas and Subpoenas Duces Tecum; Depositions**

#### **1. Objective**

Allow the Commission to authorize the Administrative Counsel or Assistant Attorney General to issue subpoenas for a deposition or issue a subpoena *duces tecum* during its investigation.

### **R2-20-213. Motions to Quash or Modify a Subpoena**

#### **1. Objective**

Allow any person to whom a subpoena is directed to apply to the Commission to quash or modify the subpoena.

### **R2-20-214. The Probable Cause to Believe Recommendation: Briefing Procedures**

#### **1. Objective**

Specify the procedure for the Commission’s determination of probable cause to believe that a violation of the statute or rule has occurred or is about to occur.

**R2-20-215. The Probable Cause to Believe Finding; Notification**

**1. Objective**

Provide the process for notifying the respondent of a probable cause finding.

**R2-20-216. Conciliation**

**1. Objective**

Provide the process for settling matters informally.

**R2-20-217. Enforcement Proceedings**

**1. Objective**

Provide the process for assessing civil penalties.

**R2-20-220. Ex Parte Communications**

**1. Objective**

Prohibit ex parte communications with the Commission staff or Commissioner.

**R2-20-221. Representation by Counsel; Notification**

**1. Objective**

Specify the extent of a respondent's right to be represented.

**R2-20-222. Civil Penalties**

**1. Objective**

Designate potential civil penalties.

**R2-20-223. Notice of Appealable Agency Action**

**1. Objective**

Specify the Commission's notice requirement after making a probable cause finding.

**R2-20-224. Request for Administrative Hearing**

**1. Objective**

Designate the timeline and process for a respondent to request a hearing.

**R2-20-225. Informal Settlement Conference**

**1. Objective**

Provide the process for a respondent to request an informal settlement conference.

**R2-20-226. Administrative Hearing**

**1. Objective**

Specify the timeline and process for conducting administrative hearings.

**R2-20-227. Review of Administrative Decision by Commission**

**1. Objective**

Specify the Commission's responsibilities when it receives notice of an administrative decision.

**R2-20-228. Judicial Review**

**1. Objective**

Provide the process for exhausting administrative remedies prior to seeking judicial review.

**ARTICLE 3 - STANDARD OF CONDUCT FOR COMMISSIONERS AND EMPLOYEES**

**R2-20-301. Purpose and Applicability**

**1. Objective**

Indicate the purpose and scope of this article.

**R2-20-302. Definitions**

**1. Objective**

Define terms for this article to make the rules understandable to the reader, achieve clarity in the rules without needless repetition, and afford consistent interpretation.

**R2-20-303. Notification to Commissioners and Employees**

**1. Objective**

Specify material to be made available to each employee and Commissioner upon revision or entrance of new employment.

**R2-20-304. Interpretation and Advisory Service**

**1. Objective**

Specify the process for seeking advice on questions of conflict of interest.

**R2-20-305. Reporting Suspected Violations**

**1. Objective**

Provide the procedure for reporting suspected violations of conflict of interest requirements.

**R2-20-306. Disciplinary and Other Remedial Action**

**1. Objective**

Specify the disciplinary action for violating this Article.

**R2-20-307. General Prohibited Conduct**

**1. Objective**

Specify conduct that is prohibited for Commissioners or employees.

**R2-20-308. Outside Employment or Activities**

**1. Objective**

Specify the prohibited conduct related to employment and other activities for Commissioners or employees.

**R2-20-309. Financial Interests**

**1. Objective**

Specify financial conflicts of interest requirements.

**R2-20-310. Political and Organizational Activity**

**1. Objective**

Specify conflicts of interest related to express advocacy.



**R2-20-311. Membership in Associations**

**1. Objective**

Specify potential conflicts of interest related to membership in nongovernmental associations or organizations.

**R2-20-312. Use of State Property**

**1. Objective**

Specify limitations on using state property.

**ARTICLE 4 – AUDITS**

**R2-20-401. Purpose and Scope**

**1. Objective**

Provide the purpose and scope of the article.

**R2-20-402. General**

**1. Objective**

Establish the tools available to the Commission in conducting audits.

**R2-20-402.01. Audits of Participating Legislative Candidates**

**1. Objective**

Authorize Commission staff to conduct audits of legislative candidates.

**R2-20-402.02. Audits of Participating Statewide Candidates**

**1. Objective**

Provide for audits of participating statewide legislative candidates.

**R2-20-403. Conduct of Fieldwork**

**1. Objective**

Establish candidate responsibilities during an audit.

#### **R2-20-404. Preliminary Audit Report**

##### **1. Objective**

Provide the procedures for the first phase of the audit process.

#### **R2-20-405. Final Audit Report**

##### **1. Objective**

Provide the procedures for the final phase of the audit process.

#### **R2-20-406. Release of Audit Report**

##### **1. Objective**

Provide details on how an audit report is made available to the public.

### **ARTICLE 5 – RULEMAKING**

#### **R2-20-501. Purpose and Scope**

##### **1. Objective**

Specify the purpose and scope of the Commission's rulemaking.

#### **R2-20-502. Procedural Requirements**

##### **1. Objective**

Provide the process for filing a written petition regarding the issuance, amendment or repeal of an administrative rule.

#### **R2-20-503. Processing of Petitions**

##### **1. Objective**

Provide the process for reviewing petitions related to issuing, amending, or repealing rules.

#### **R2-20-504. Disposition of Petitions**

##### **1. Objective**

Provide the process for disposition of petitions related to rulemaking.

#### **R2-20-505. Commission Considerations**

**1. Objective**

Specify a nonexclusive list of criteria the Commission may consider in disposing of a petition for rulemaking.

**R2-20-506. Administrative Record**

**1. Objective**

Designate which records compose the administrative record.

**ARTICLE 6 – EX PARTE COMMUNICATIONS**

**R2-20-601. Purpose and Scope**

**1. Objective**

Specify the purpose and scope of the article.

**R2-20-602. Definitions**

**1. Objective**

Define terms as used in the article.

**R2-20-603. Audits, Investigations & Litigation**

**1. Objective**

Prohibit ex parte communications with the Commission during audits, investigations or litigation.

**R2-20-604. Sanctions**

**1. Objective**

Specify the process for sanctioning those who violate this article.

**ARTICLE 7 – AUDITS AND REPAYMENT**

**R2-20-701. Purpose and Scope**

**1. Objective**

Specify the purpose and scope of the article.

**R2-20-702. Use of Campaign Funds**

**1. Objective**

Specify legal uses of campaign funds.

**R2-20-702.01. Use of Assets**

**1. Objective**

Provide a method for a candidate to use campaign materials from prior elections.

**R2-20-703. Documentation for Direct Campaign Expenditures**

**1. Objective**

Specify the process by which a participating candidate may ensure that campaign expenditures satisfy the direct campaign expenditure requirement.

**R2-20-703.01. Campaign Consultants**

**1. Objective**

Specify how a participating candidate may engage the services of a campaign consultant.

**R2-20-704. Repayment**

**1. Objective**

Designate the process for repaying distributed funds to the Clean Elections fund and specify that the Commission may require such repayment.

**R2-20-705. Additional Audits or Repayment Determination**

**1. Objective**

Authorize additional audits or examinations of campaign activity when new facts are available.

# ARIZONA CITIZEN'S CLEAN ELECTIONS COMMISSION

2025 Five-Year Review, Title 2, Chapter 20

## All Articles

Rule No.	Title	Last Revision	Eff.	Enf.	C	CCU	PB/LB	ARS Authority	EIS Comp.	2015 PCA and Current PCA
R2-20-101	Definitions	2/7/22	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-103	Communications: Time and Method	8/27/07	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-104	Certification as a Participating Candidate	12/15/16	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-105	Certification for Funding	1/1/17	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-106	Distribution of Funds to Certified Candidates	12/14/17	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-107	Candidate Debates	12/15/16	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-108	Termination of Participating Candidate Status	8/25/11	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-109	Independent Expenditure Reporting Requirements	9/14/21	Y	Y	Y	Y	Y	A.R.S. §§ 16-940 through 16-943; 16-955; 16-956 through 16-958; and 16-961	No change	None and None
R2-20-110	Participating Candidate Reporting Requirements	1/1/17	Y	Y	Y	Y	Y	A.R.S. §§ 16-940 through 16-943; 16-955; 16-956 through 16-958; and 16-961	No change	None and None
R2-20-111	Non-participating Candidate Reporting Requirements and Contribution Limits	12/14/17	Y	Y	Y	Y	Y	A.R.S. §§ 16-940 through 16-943; 16-955; 16-956 through 16-958; and 16-961	No change	None and None

# ARIZONA CITIZEN'S CLEAN ELECTIONS COMMISSION

2025 Five-Year Review, Title 2, Chapter 20

## All Articles

R2-20-112	Political Party Exceptions	1/1/17	Y	Y	Y	Y	Y	A.R.S. §§ 16-901(5) and (8); 16-956(C);	No change	None and None
R2-20-113	Candidate Statement Pamphlet	2/4/20	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(A)(7); 16-941(A)(1)	No change	None and None
R2-20-114	Candidate Campaign Bank Account	7/23/15	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-115	Books and Records Requirements	1/1/17	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-201	Scope	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-202	Initiation of Compliance Matters	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-203	Complaints	5/28/05	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-204	Initial Complaint Processing; Notification	7/23/15	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-205	Opportunity for No Action on Complaint-Generated Matters	7/23/15	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-206	Executive Director's Recommendation on Complaint-Generated Matters	7/23/15	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-207	Internally Generated Matters; Referrals	1/1/08	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-208	Complaint Processing; Notification	2/15/06	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None

# ARIZONA CITIZEN'S CLEAN ELECTIONS COMMISSION

2025 Five-Year Review, Title 2, Chapter 20

## All Articles

R2-20-209	Investigation	3/9/20	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-210	Written Questions Under Order	5/21/02	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-211	Subpoenas and Subpoenas Duces Tecum; Depositions	1/1/08	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-213	Motions to Quash or Modify a Subpoena	1/1/08	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-214	The Probable Cause to Believe Recommendation : Briefing Procedures	2/15/06	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-215	The Probable Cause to Believe Finding; Notification	1/1/08	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-216	Conciliation	5/21/02	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-217	Enforcement Proceedings	2/15/06	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-220	Ex Parte Communications	6/17/23	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-221	Representation by Counsel; Notification	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-222	Civil Penalties	9/27/13	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-223	Notice of Appealable Agency Action	6/17/23	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-224	Request for Administrative Hearing	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None

# ARIZONA CITIZEN'S CLEAN ELECTIONS COMMISSION

2025 Five-Year Review, Title 2, Chapter 20

## All Articles

R2-20-225	Informal Settlement Conference	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-226	Administrative Hearing	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-227	Review of Administrative Decision by Commission	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-228	Judicial Review	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-301	Purpose and Applicability	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-302	Definitions	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-303	Notification to Commissioners and Employees	1/1/08	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-304	Interpretation and Advisory Service	1/1/08	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-305	Reporting Suspected Violations	8/13/23	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-306	Disciplinary and Other Remedial Action	8/13/23	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-307	General Prohibited Conduct	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-308	Outside Employment or Activities	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-309	Financial Interests	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-310	Political and Organizational Activity	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None



# ARIZONA CITIZEN'S CLEAN ELECTIONS COMMISSION

2025 Five-Year Review, Title 2, Chapter 20

## All Articles

R2-20-311	Membership in Associations	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-312	Use of State Property	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-401	Purpose and Scope	10/6/11	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-402	General	5/28/05	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-402.01	Audits of Participating Legislative Candidates	9/28/17	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-402.02	Audits of Participating Statewide Candidates	12/15/16	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-403	Conduct of Fieldwork	5/28/05	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-404	Preliminary Audit Report	2/28/08	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-405	Final Audit Report	5/28/05	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-406	Release of Audit Report	5/28/05	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-501	Purpose and Scope	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-502	Procedural Requirements	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-503	Processing of Petitions	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-504	Disposition of Petitions	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-505	Commission Considerations	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-506	Administrative Record	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-601	Purpose and Scope	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None

# ARIZONA CITIZEN'S CLEAN ELECTIONS COMMISSION

2025 Five-Year Review, Title 2, Chapter 20

## All Articles

R2-20-602	Definitions	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-603	Audits, Investigations & Litigation	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-604	Sanctions	11/27/01	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-701	Purpose and Scope	6/4/20	Y	Y	N	N	Y	A.R.S. §§ 16-956(A)(6) and (A)(7); 16-948(C)	No change	None and None
R2-20-702	Use of Campaign Funds	5/11/20	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-702.01	Use of Assets	6/4/20	Y	Y	N	N	Y	A.R.S. §§ 16-956(A)(6) and (A)(7); 16-948(C)	No change	None and None
R2-20-703	Documentation for Direct Campaign Expenditures	1/1/17	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None
R2-20-703.01	Campaign Consultants	6/4/20	Y	Y	N	N	Y	A.R.S. §§ 16-956(A)(6) and (A)(7); 16-948(C)	No change	None and None
R2-20-704	Repayment	2/4/20	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(A)(7); 16-941(A)-(B); 16-953	No change	None and None
R2-20-705	Additional Audits or Repayment Determination	5/28/05	Y	Y	Y	Y	Y	A.R.S. §§ 16-956(C);	No change	None and None