

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

REVISED

Location:	Citizens Clean Elections Commission
	1616 West Adams, Suite 110
	Phoenix, Arizona 85007
Date:	Thursday, December 14, 2017
Time:	9:30 a. m.

Pursuant to A.R.S. § 38-431.02, notice is hereby given to the Commissioners of the Citizens Clean Elections Commission and the general public that the Citizens Clean Elections Commission will hold a regular meeting, which is open to the public on December 14, 2017. This meeting will be held at 9:30 a.m., at the Citizens Clean Elections Commission, 1616 West Adams, Suite 110, Phoenix, Arizona 85007. The meeting may be available for live streaming online at www.livestream.com/cleanelections. Members of the Citizens Clean Elections Commission will attend either in person or by telephone, video, or internet conferencing.

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. The agenda for the meeting is as follows:

- I. Call to Order.
- II. Discussion and Possible Action on Commission Minutes for November 16, 2017 meeting.
- III. Discussion and Possible Action on Executive Director's Report.
- IV. Discussion and Possible Action on Selection of Chairman for 2018.
- V. Discussion and Possible Action on Calendar Year 2017 & 2018 Budget and Related Matters.
 - A. Discussion and Possible Action on the 2018 Expenditure CAP
 - B. Discussion and Possible Action on the 4-Yr. Revenue Projections and Excess Monies.
 - C. Discussion and Possible Action on the Commission's 2018 Calendar Year Budget.
 - D. Discussion and Possible Action on CY 2017 Attorney General Office Interagency Service Agreement.

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VI. Discussion and Possible Action on Rule Proposals:

- A. R2-20-106 Distribution of Funds to Certified Candidates (proposed rule change)
- B. R2-20-109 Independent Expenditure Reporting Requirements
- C. R2-20-111 Non-participating Candidate Reporting Requirements & Contribution limits

The Commission may choose to go into executive session on Item VI for discussion or consultation with its attorneys to consider its position and instruct its attorneys regarding the public body's position regarding contracts, in pending or contemplated litigation or in settlement discussions conducted in order to avoid or resolve litigation. A.R.S. § 38-431.03(A)(4).

VII. Discussion and Possible Action on Arizona Advocacy Network, et. al v. State of Arizona, et al.

The Commission may choose to go into executive session on Item VII for discussion or consultation with its attorneys to consider its position and instruct its attorneys regarding the public body's position regarding contracts, in pending or contemplated litigation or in settlement discussions conducted in order to avoid or resolve litigation. A.R.S. § 38-431.03(A)(4).

- VIII. Discussion and Possible Action on Authorization of Staff to Approve Second Payment of CY 2017 ISA with Arizona Secretary of State's Office.
- IX. Discussion and Possible Action on MUR 17-02 and 17-03 American Federation for Children.
- X. 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

XI. 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, 1616 West Adams, Suite 110, Phoenix, Arizona 85007.

Dated this 13th day of December, 2017.

Citizens Clean Elections Commission Thomas M. Collins, Executive Director

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.

Reporter's Transcript of Proceedings - November 16, 2017 Public Session

THE STATE OF ARIZONA

CITIZENS CLEAN ELECTIONS COMMISSION

REPORTER'S TRANSCRIPT OF PUBLIC MEETING

Phoenix, Arizona

November 16, 2017

9:34 a.m.

COASH & COASH, INC. Reporting, Video & Videoconferencing 1802 North 7th Street, Phoenix, AZ 85006 602-258-1440 staff@coashandcoash.com

ITEM II

Prepared by: MERI COASH, RMR Certificate No. 50327

Coash & Coash, Inc. 602-258-1440 www.coashandcoash.com

	Page 2		Page 4
1	PUBLIC MEETING BEFORE THE CITIZENS CLEAN	1	(No response)
2	ELECTIONS COMMISSION convened at 9:34 a.m. on November 16, 2017, at the State of Arizona, Clean Elections Commission,	1	
3	1616 West Adams, Conference Room, Phoenix, Arizona, in the presence of the following members:	3	
4	Mr. Damien Meyer, Acting Chairman	4	
5	Mr. Mark S. Kimble Mr. Galen D. Paton	5	
6	OTHERS PRESENT:	6	
7	Thomas M. Collins, Executive Director Paula Thomas, Executive Officer	7	
8	Sara Larsen, Financial Affairs Officer Mike Becker, Policy Director	8	we want to go through just a few things. It's a little
9	Alec Shaffer, Web Content Manager Stephanie Cooper, Executive Support Specialist	9	more extensive report than we've had from time to time.
10	Jeanne Galvin, Assistant Attorney General Joseph La Rue, Assistant Attorney General	10	But as you may or may not know, under 16-949, the Auditor
11	Kara Karlson, Assistant Attorney General Joseph A. Kanefield, Ballard Spahr, LLP	11	General takes a look at our spending in the Clean
12	Joel Edman, AZ Advocacy Network Morgan Dick, AZ Advocacy Network	12	Elections fund every four years. And as you'll see in the
13	Rivko Knox, LWV/AZ		letter attached to the review, they found no instances of
14			noncompliance or significant deficiencies. And Sara and
15			Paula worked to make sure that all their questions were
16			answered as they came up. So we're pleased with that, and
17			that's good news.
18		18	As you can see, we have a very active voter education calendar. We do have a new "ID at the Polls"
19 20			tool on our website. So if you go to
20			azcleanelections.gov/idatpoll, something well, I think.
22			I should have gotten that URL, but I don't But it is
23			also available on our website at our announcements. You
24		24	don't need to know the URL.
25		25	It's actually really a pretty cool tool.
	Page 3		Page 5
1	Page 3 P R O C E E D I N G		You click through, it asks you what documents you have,
1 2	PROCEEDING	2	You click through, it asks you what documents you have, whether those documents meet the requirements. And then,
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Citi	zens Clean Elections Commission	November 16, 2017	
	Page 6	Page 8	
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24	of the House of Representatives said, "Well, there's no way we could have done anything to the Clean Elections Commission" But the headline, as you see on the thing, is the press uses the advocacy organization thinks this is a believes this is a step necessary to defend what we do. The Speaker of the House said in the news story, "There's no way we could have done that because we didn't get a three-quarter vote for 1516." So in some sense, I guess we're all in agreement, then, because, you know, last year in a vote of four yeses and one abstention, you know, we voted to reject language that said "notwithstanding any law or rule, you shall do this" in our rules. So I guess the Speaker needs to call the chairwoman of GRRC and we can get this all resolved without any further adieu. That was a joke. ACTING CHAIRMAN MEYER: I smiled. MR. COLLINS: You smiled. Well, you're not paying me for the jokes, but, you know That comes free. I want to point out that I think you all know this as well an independent investigator hired by the Attorney General to look at the Secretary of State's	 is called Agency Counsel. My understanding is all the election work will now be in the Agency Counsel except for election-related enforcement actions, which are in another section. I'll be working with Joe and Kara to figure out what, if anything, about this changes the nature of their work. But it's We've been represented by the Solicitor General's office, I think, since the inception of the program, in fact. So that's new. Not necessarily you know, the impact of that is so far has not been discernible, but just FYI. We will be finding out how that changes things, if any. So it's a bit longer report than usual, but a lot of activity in the last two months since we since we met. So I don't know if you have any questions about any of those things. COMMISSIONER KIMBLE: Mr. Chairman? ACTING CHAIRMAN MEYER: Commissioner Kimble. COMMISSIONER KIMBLE: Mr. Collins, I just want to say that I came up to one of the training workshops for participating candidates and was very impressed with the program put on by Sara and Gina and Stephanie. I learned a lot about what it takes to be a participating candidate. But I thought they went through a very complex set of rules and regulations in a way that 	
	distribution of 2016 special election publicity pamphlet	25 was clearly understandable to any candidates.	
	Page 7	Page 9	
	released his report. That's available for you at that	1 ACTING CHAIRMAN MEYER: Any other comments	
2	released his report. That's available for you at that link.	ACTING CHAIRMAN MEYER: Any other comments2 or questions?	
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Ciu	zens Clean Elections Commission	November 16, 2017	
	Page 10		Page 12
1	As you all know, just to kind of bring you	1	941 are 10 times the amount of the violation, so what
	up to speed, we have not heard from Mr. Rubalcava, to the		we've done in each count is aggregated what we think the
	best of my knowledge.		amount of the violation is. We think those numbers are
4	MS. THOMAS: No, sir.		I mean, I think that the briefs outline how we reached
5	MR. COLLINS: I'm going to proceed. We	5	those numbers. When there was You know, as in Count
6	haven't heard from him since I filed this brief, to the	6	One, there was a discrepancy where he either exceeded the
7	best of my knowledge. So just to walk you through the	7	amount by 3,900 or 3,600. We gave him the benefit of the
8	procedure here really quickly, and then we'll get to the	8	doubt there and are only asking for a penalty based on the
	substantive part of the penalties, we've gone through	9	\$3,600 excess contribution.
	essentially this process has gone through really four	10	
	phases, of which we think this is the last one. We		you know, as staff, we think that you have some discretion
	started with a random audit that Mr. Rubalcava was		
			to adjust these penalties. We think you can you can
	selected for, gosh, more than a year ago now, I think was		certainly do that. But we do think that the brief
	the primary, right? That random audit came back with		itself given that Mr. Rubalcava has not seen fit to
	enough discrepancies that we recommended a full audit of		provide a defense, let alone a reason why the brief should
	all of his campaign activity, which we completed. It took		have been withdrawn, I don't want to belabor it, but we
17	some time to complete, but that was finally completed. We		think that there is probable cause to believe that the
18	then in the spring, I think May I want to say May of	18	statute that 941(A)(1) and 941(A)(5) and I'm trying
19	this year, we filed a reason-to-believe statement alleging	19	to find the other 940 citation here if we need to for
20	that there was reason to believe violations of the Act may	20	the record.
	have occurred.	21	I'm sorry.
22	In August, we asked you to issue a repayment	22	
23	order for the corpus of the amount of money that we	23	
	believed that Mr. Rubalcava owed the fund, which you did.	24	
25	And now we're at what we think is the		earlier. And I'm just kind of writing down numbers now.
23	This now were at what we drink is the	23	carrier. This fingust kind of writing down numbers now.
	Page 11		Page 13
	Page 11		Page 13
	ultimate resolution of this issue, which is the potential		So there's, I think, six different recommended penalties
2	ultimate resolution of this issue, which is the potential to find probable cause to believe that the violations	2	So there's, I think, six different recommended penalties in here or potential penalties in here?
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Citi	zens Clean Elections Commission		November 16, 2017
	Page 14		Page 16
	primary election and then he received \$1,415 in the general election, and he hasn't repaid any of that at this		course, that's wrong. But these other things, to me, seem like they're legitimate campaign expenses, and I would
	point. So yes, I mean, in terms of Yes.		hate to penalize somebody for spending I mean us
4	ACTING CHAIRMAN MEYER: Commissioner Paton?		penalizing him after he spent this money on items that are
5	COMMISSIONER PATON: But he did repay		legitimate campaign expenses.
	something from the general election?	6	COMMISSIONER KIMBLE: Well Mr. Chairman?
7	MR. COLLINS: No, he did not.	7	ACTING CHAIRMAN MEYER: Commissioner
8	COMMISSIONER PATON: I thought he repaid	-	Kimball.
	you paid him and then	9	COMMISSIONER KIMBLE: I would like to give
10	MR. COLLINS: Oh, well, I'm sorry, yes,	10	him the benefit of the doubt, but I think he has been
11	that's right.		totally irresponsible in refusing to answer any questions.
12	ACTING CHAIRMAN MEYER: Uncontested		He was on a phone call in one meeting and said he would
13	MR. COLLINS: He was issued an amount of		accept whatever we decided.
14	money for the general election that was a mistake, and he	14	And in August, we voted to order him to
15	repaid the money he was not entitled to. And he did that	15	repay \$17,459 within 30 days of the date of this order,
16	in a relatively timely basis.	16	which was August 21st 22nd. No one's heard from the
17	MS. LARSEN: 30 days.		guy since then. I mean, I'd like to give him the benefit
18	MR. COLLINS: 30 days. He took as much time		of the doubt, but he's not being very helpful here. And I
	as he had to repay it.		don't know what more we can do. I think we have As
20	COMMISSIONER PATON: So all these different		the chairman pointed out, the potential penalties are
	things are quite It's amazing all the different things		huge. We asked we agreed that he should repay \$17,459 and he won't even respond to that. How much further
	that don't add up. My concern is like on page 3 here, where you've got he's got these invoices that he		should we go in trying to work with this guy if he won't
	submitted. Do these not count on how much he owes?		even talk to us?
25	MR. COLLINS: That's a good question. We	25	ACTING CHAIRMAN MEYER: Ms. Larsen?
	8		
	Page 15		Page 17
	have certainly considered the possibility that he could	1	MS. LARSEN: Chairman, Commissioner Paton,
2	have certainly considered the possibility that he could have, had he appealed, asked for an offset on the	2	MS. LARSEN: Chairman, Commissioner Paton, to help answer your question a little bit, we actually are
2 3	have certainly considered the possibility that he could have, had he appealed, asked for an offset on the repayment for monies that he could have produced. He	2 3	MS. LARSEN: Chairman, Commissioner Paton, to help answer your question a little bit, we actually are not able to confirm that those were campaign expenses.
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	Page 18		Page 20
1	ACTING CHAIRMAN MEYER: So what I'm trying	1	What that should do, if you read the statute together, is
	to do is look at this big picture. We have ordered		bring someone in for an administrative conciliation. Our
	Mr. Rubalcava to pay \$17,500, which he has not done.		rules provide that he can Mr. Rubalcava can still seek
			that conciliation after this stage. He has an express
4	6		• •
5	ACTING CHAIRMAN MEYER: We are sitting here		right under our rules to ask for that meeting with me to
	today at this penalty stage, I guess we would call it, and		work on some kind of settlement.
	what I am trying to understand is is staff recommending	7	J C /J /J
	the issuance of the \$300,000 fine or is that just a tally		don't I guess, in my view, you don't want to minimize
	of what the ultimate one is and you have a different		this, but on the other hand if, you know, we're saying,
10	number you're recommending?	10	you know, recognizing that there may be some value in
11	MR. COLLINS: Mr. Chairman, Commissioners,		showing at least some leniency, I think that you know,
12	that's a good question. The way I have approached it is	12	I think somewhere in the nature of 3 times the amount he
13	this. The first thing is we do need to establish that	13	owes in repayment is an appropriate general number. So it
14	there is probable cause to believe. So you can take that,	14	would be so 17,000 times 3 is approximately
15	in my view And you have counsel of your own, if I'm	15	ACTING CHAIRMAN MEYER: 51.
16	wrong, who will correct. I'm sure you'll do it correctly.	16	MR. COLLINS: Yeah. Is that right? Yeah.
	But in my view, you can find probable cause to believe	17	-
	based on the entirety of the memo or you can break it down	18	77,000-ish, which I think is a pretty significant number.
	count by count. That's just the probable cause these		I think it has a deterrent effect and might bring him to
	are the facts that there's probable cause to believe. So		the table.
	that's stage one of the penalty phase.	21	
22	Assuming you were to decide that, in fact,	22	•
	there was probable cause to believe the facts as we	23	-
	presented them, you know, it's incumbent on us to give		think, issue fines in the amount we have identified.
	notice to Mr. Rubalcava of the available penalties.	25	
2.5	notice to Mi. Rubalcava of the available penantes.	2.5	COMMISSIONER RIMBLE. II I Could say one
	Page 19		Page 21
	Page 19		Page 21
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2	You know, I think that in the past, the		thing, Mr. Chairman? ACTING CHAIRMAN MEYER: Of course.
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CII	izens Clean Elections Commission		November 16, 2017
	Page 22		Page 24
1	total in penalties and repayments. 69,836.	1	somebody paid up kind of thing, which is not atypical, I
2			think, in that kind of situation.
	include the 17,5.	3	
4		4	
5			How was Mr. Rubalcava notified of this? In other words,
6			how could he say, "Well, I didn't know about this?"
7		7	
8	amount.	8	he could say he didn't know about this.
9		9	
10		10	notified? And how do we know he was notified?
11	also Well, so we could do that. We have that option	11	ACTING CHAIRMAN MEYER: He was on the phone
	too.	12	when we did it.
13	The other option we have is to do the	13	MR. COLLINS: That's one way he knows. And
14	probable cause to believe today, make another effort to	14	then we issued an order to him via probably via email,
	reach out to Mr. Rubalcava and say, "Look, this is		mail. We process we served
16	serious, you need to take this seriously," and come back	16	MS. THOMAS: Yeah, we've done everything,
	with a with a recommendation or make even a	17	email, Federal Express, and even process server.
18	conciliation, if that's possible. I don't know if that's	18	COMMISSIONER KIMBLE: And we've gotten some
19	possible, but it's possibly more efficient.	19	kind of confirmation that it was delivered by Federal
20	I mean, ultimately, what happens with these	20	Express?
21	cases when we've had them in the past is we issue a	21	MS. THOMAS: Yes.
22	repayment order, that repayment order goes unpaid or, a	22	ACTING CHAIRMAN MEYER: He was personally
23	penalty order. It goes unpaid, and until that person	23	served by the process server with this order?
24	wants to do something, like run for office again or	24	MS. THOMAS: I think his wife was served,
25	because you have to pay up all your fines to run for	25	but we have that certification.
	Page 23		Page 25
1		1	-
	office again, those kind of things. And then all of a	1	COMMISSIONER KIMBLE: And since this August
2	office again, those kind of things. And then all of a sudden, they say, "Oh, we want to pay." And it ends up	2	COMMISSIONER KIMBLE: And since this August meeting, no one in Clean Elections has heard from him in
2 3	office again, those kind of things. And then all of a	2	COMMISSIONER KIMBLE: And since this August meeting, no one in Clean Elections has heard from him in any form. Is that accurate?
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Citi	zens Clean Elections Commission	November 16, 2017			
	Page 26		Page 28		
1	MR. COLLINS: Right. Right.	1	MS. GALVIN: That's what I recommend, that		
2	And, unfortunately and in our view, just	2	you make the findings, find probable cause, and then go to		
3	getting back to the facts as opposed to the penalty, you		the penalty portion.		
	know, that is itself evidence you can we believe you	4			
	can take an inference that those documents do not exist	5	make that motion.		
6	because he had an obligation, pursuant to our rules in	6	MS. GALVIN: Do you withdraw your		
	deciding to be a candidate that participated in Clean	7			
	Elections funding program, to keep track of that stuff.	8			
	And so we think you can take an adverse inference at this		follow the staff recommendation that probable cause exists		
	point. His admitted dereliction with respect to keeping		for a violation of the Act, as indicated in the		
	those records we think is evidence they don't exist.		November 3, 2014, Probable Cause Recommendation and Notice		
12	COMMISSIONER KIMBLE: So since		of Possible Penalties prepared by Mr. Collins.		
13	September 14th, when he responded to the subpoena, we have	13			
	not heard from him?	14			
15	MR. COLLINS: That's correct. Yes,	15	aye.		
16	Mr. Chairman Commissioner Kimball.	16			
17	ACTING CHAIRMAN MEYER: Commissioner Paton?	17	-		
18	COMMISSIONER PATON: I don't think we should	18	v 11		
19	go any farther with it, I mean, drag this out another	19			
	month. I mean, if people are taking classes now for the	20	So that motion carries three to zero, so we		
	upcoming election, whatever, this will be a good	21	have a quorum of all the commissioners or, the		
22	reinforcer that I mean, it's been a year since the		necessary votes of all the commissioners.		
23	last election, and I don't think dragging it on any longer	23	So now we can move forward with the penalty		
24	is going to be a good thing.	24	phase.		
25	ACTING CHAIRMAN MEYER: Just for the fellow	25	And we can have Commissioner Kimble's motion		
	Page 27		Page 29		
1		1	Page 29 be heard?		
	Page 27 commissioners, my thoughts are I believe there's a reason to believe the factual predicate is there to support	1	be heard?		
2	commissioners, my thoughts are I believe there's a reason	2	be heard?		
2 3	commissioners, my thoughts are I believe there's a reason to believe the factual predicate is there to support	2	be heard? MS. GALVIN: Yes. He's sort of argued it earlier, but if he has anything additional to say.		
2 3 4	commissioners, my thoughts are I believe there's a reason to believe the factual predicate is there to support moving forward with this. And I am I like to think I'm, you know, sympathetic to these types of issues, but I	2 3 4	be heard? MS. GALVIN: Yes. He's sort of argued it earlier, but if he has anything additional to say.		
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Ciu	zens Clean Elections Commission		November 10, 2017
	Page 30		Page 32
1	perspective, we don't need to treat the repayment amount	1	opposition.
	as a penalty. I think the penalty is 52,377. It's true	2	The imposition of the penalty of \$52,377
	that that is in addition, but if		carries unanimously with all commissioners present.
4	MS. GALVIN: I think to phrase it	4	MR. COLLINS: Thank you.
	MR. COLLINS: As long as the record is clear		ACTING CHAIRMAN MEYER: Okay. Moving on to
5	-	5	• •
	that the 52,377 is the penalty, I think that that would be		Agenda Item V, "Discussion and Possible Action on MUR
	what staff recommendation would be.		17-02 and 17-03 American Federation for Children."
8	MS. GALVIN: And in addition, the repayment	8	MR. COLLINS: I hope you all
9	amount, I think, is		Mr. Chairman and Commissioners, you may have received from
10	COMMISSIONER KIMBLE: Right.	10	me an email late last night. We were unable to get all of
11	MS. GALVIN: Okay. Very good, then.	11	the attorneys or, specifically AFC's attorney, who's in
12	COMMISSIONER KIMBLE: Okay. So just to be	12	D.C. today, to get a couple of details nailed down. We
13	clear, my motion is that he be penalized three times the	13	had hoped As you can see in the proposed conciliation,
14	initial amount, which would be 52,377, and also be ordered	14	there's a blank. We are not we weren't able to fill
	to repay the initial amount of 17,459 within 30 days.	15	that in and we weren't able to get that done, so we are
16	MS. GALVIN: Of the effective date of the		holding that until next month.
-	order. Very good.	17	ACTING CHAIRMAN MEYER: So move on to
18	ACTING CHAIRMAN MEYER: Ms. Galvin, are we		Item VI?
	good with that motion?	19	MR. COLLINS: Please, Mr. Chairman.
20	MS. GALVIN: Yes.	20	ACTING CHAIRMAN MEYER: Item Number VI,
	ACTING CHAIRMAN MEYER: I will second that		
21			"Discussion and possible action on Clean Elections
	motion.		Surcharge and related issues with the Arizona
23	All in favor		Administrative Office of the Courts."
24	I'm going to stop that based upon what I was	24	MR. COLLINS: And, Mr. Chairman, for this, I
25	just observing. Do we need to amend this motion or	25	would turn this over to Mr. Kanefield, who has update
	Page 31		Page 33
1	Page 31 MR. COLLINS: I think, again, as I tried to	1	Page 33 you and advise you on this issue.
		1 2	
2	MR. COLLINS: I think, again, as I tried to iterate, it would be helpful for us, for the record, to	2	you and advise you on this issue.
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Citi	zens Clean Elections Commission		November 16, 2017
	Page 34		Page 36
1	request for authorization to enter into an IGA with	1	independent expenditures, but, you know, that could also
	Maricopa County for voter and public education purposes.		
3	MR. COLLINS: Yes. Mr. Chairman,		the election procedures manual gets drafted. Secretary
	Commissioners, this is really, I'm just asking for your		
	permission to go ahead and draw up an agreement with	5	1 5 7
	Maricopa County. What this is going to do is ensure that	6	1 1
	there's a seamlessness between Maricopa County and Clean		campaign finance, and that may itself cause legislative
	Elections with respect to some of the some of the	-	action.
	technological things that we do to provide voters with	9	And then we are aware that at the very least
	voter registration information and other information that		the legislature continues to be interested in campaign
	the county's providing them. The county prefers to do		finance and election-related laws. We've seen in a
	this in the form of an intergovernmental agreement. The		presentation that the election director did to a
	county does not at this point There's no cost		recertification class a list of potential tweaks to his
	associated with this, and so and then, as a matter of		campaign finance bill that he did a couple years ago, so
	statute, the actual document would go through the Attorney		we'll need to continue to weigh in on those. The
16	General's Office as to form.	16	principles continue to be, you know, if it's a ballot
17	What you see in the memo outlines		measure that's misleading or illegal, we continue to
18	essentially what we're going to put into the document in		believe that it's our role and appropriate for us to
19	addition to whatever in addition to sort of the formal	19	oppose those at the legislature and explain why. We
20	boilerplate of an IGA. That's pretty much it. If	20	think, likewise, when the legislature is at risk of
21	something comes up where I think that I need you to look	21	violating the Voter Protection Act, it's appropriate to
22	at the IGA itself, I'm certainly happy to put that back on	22	advise them of that.
23	the agenda, but we decided that the most efficient way to	23	Finally, I want to note and this was in
24	get this done would be to simply ask for authorization to	24	last year's memo as well that we have supported efforts
25	enter into an agreement that is substantially in the terms	25	to enhance voter education and participation, and I think
	Page 35		Page 37
1	Page 35 outlined in the memorandum and move forward from there.	1	Page 37 we will continue to do that. As you know, you'll receive
1			-
2	outlined in the memorandum and move forward from there. So I'd ask for a motion to authorize me to	2	we will continue to do that. As you know, you'll receive
2 3	outlined in the memorandum and move forward from there.	2	we will continue to do that. As you know, you'll receive starting soon because the first bill has actually been filed in the legislature for next year already, which
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2 3 4 5	outlined in the memorandum and move forward from there. So I'd ask for a motion to authorize me to proceed to enter into an agreement on terms substantially the same as those outlined in the memo dated 11-14-17.	2 3 4 5	we will continue to do that. As you know, you'll receive starting soon because the first bill has actually been filed in the legislature for next year already, which should strike terror in the hearts of all.
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	zens Clean Elections Commission		November 16, 2017
	Page 38		Page 40
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	 we're going to we represent you when we're in front of legislative bodies. And so we would ask that if you agree with the legislative agenda, that you approve the 2018 state legislative agenda that is Item VIII in your materials. ACTING CHAIRMAN MEYER: Any questions or comments from the commissioners on the agenda? COMMISSIONER KIMBLE: Mr. Chairman? ACTING CHAIRMAN MEYER: Yes. COMMISSIONER KIMBLE: Mr. Collins, I understand that because of the political nature of the current legislature, the makeup of it, that we're required pretty much to play a strong defense. But is there is there something more that we ought to be doing other than seeking stronger support of our voter education efforts? Even if we don't think we're going to get very far with it, is there You know, we do a lot of sitting around defending ourselves. Is there something we ought to be doing to try to make this program stronger and at least get out there and push it, instead of just saying "Don't kill us"? 	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	the counties have been asking that because 75 percent of the folks in the state vote by mail, that we move to all mail. That's something, if there was a bill introduced, that we might consider weighing in on. There have been discussions about Do you mind if I mention I mean, there have been discussions about changing the way voter registration works to make it more user-friendly. That would promote participation and be consistent with our mandate. So those are issues that we can weigh in on if and we would bring those to you specifically because they might be more controversial. But if you were to look at evaluate the policy and conclude on a bipartisan basis that, hey, this particular program really works, that would have some meaning, I think. And I think it would I think that's where we have our best opportunity to showcase the importance of having a commission like this beyond just don't kill us is the fact that it is bipartisan. We do have I hope that and we'll try to continue to bring you materials that, you know, we think are things that all five of you can agree to and that would be the best place to do it. I mean, I think that the thing the
	first is that, you know, we can we can certainly make more statements to that effect. We have worked with		Commission does and this is just my opinion, for what it's worth that doesn't fit into the legislative
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2 3 4 5	members, particularly in the minority party, to try to get them to when they're drafting their bills, to recognize that the Commission is a more appropriate enforcer for many of their proposals than the Secretary's Office or the Attorney General's Office ever would be. That's something	2 3 4 5	narrative of the world is that we're bipartisan. And in a world where, you know, where everything is partisan, I think that there should be some ways in which we can make that a strength, because it is in the end, that is one of the strengths of the Commission in terms of an
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	members, particularly in the minority party, to try to get them to when they're drafting their bills, to recognize that the Commission is a more appropriate enforcer for many of their proposals than the Secretary's Office or the Attorney General's Office ever would be. That's something we can continue to dialogue with them about. Getting a Republican sponsor on enforcement-related things as far as campaign finance goes is increasingly difficult because this is Whereas 20 years ago, campaign finance was not ideologically was a have/have not issue, not an R-D issue, it's increasingly an R-D issue, except here. This body is unique in its ability to reach conclusions on a unanimous basis or, generally unanimous often unanimous, I should say. So I think that that's a harder challenge finding a sponsor. It's easier to find sponsors and we have found Republican sponsors on the voter education	2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	narrative of the world is that we're bipartisan. And in a world where, you know, where everything is partisan, I think that there should be some ways in which we can make that a strength, because it is in the end, that is one of the strengths of the Commission in terms of an institution. So those are sort of the way That's kind of how I see it. That's a long answer to your question. The short answer is if we don't you know, if you ask any lobbyist, if you don't have a Republican sponsor for the bill, you don't have a bill, which I think you probably know. So ACTING CHAIRMAN MEYER: Any other comments or questions? COMMISSIONER PATON: No. ACTING CHAIRMAN MEYER: All right. There a motion to adopt and approve the 2018 legislative agenda?

Citizens Clean Elections Commission		November 16, 201
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1 to zero.	1	STATE OF ARIZONA)
2 Item Number IX is "Discussion and Possible	2	COUNTY OF MARICOPA)
3 Action on the 2018 Commission meeting dates."	3	I, Meri Coash, hereby certify that the
4 Can I make a motion that we adopt these	4	foregoing pages numbered from 1 to 44, inclusive,
	5	constitute a full, true, and accurate record of the
5 meeting dates? Any questions or issues with those,6 Commissioners?	6	proceedings had in the above matter, all done to the best
	7	of my skill and ability.
7 (No response.)	8	DATED this 20th day of November, 2017.
8 ACTING CHAIRMAN MEYER: All right. I'll	9	
9 move that we adopt and approve the proposed meeting dates	10	
10 for January through June 2018 in our materials today.	11	
 Is there a second? COMMISSIONER KIMBLE: Second. 	12	
	13	Meri Coash
13 ACTING CHAIRMAN MEYER: All in favor say	14	Meri Coash
14 aye.		
15 (Chorus of ayes.)	15	Certified Reporter #50327
16 ACTING CHAIRMAN MEYER: Any opposition?	16	
17 (No response.)	17	
18 ACTING CHAIRMAN MEYER: Motion carries three	18	
19 to zero.	19	
20 Now is the time for public comment. Do we	20	
21 have public comment from anyone?	21	
22 (No response.)	22	
23 ACTING CHAIRMAN MEYER: Okay. No public	23	
24 comment? Last chance before adjournment.	24	
25 Gentlemen?	25	
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-		
1 (No response.)		
2 ACTING CHAIRMAN MEYER: Okay. Motion for		
3 adjourn?		
4 COMMISSIONER KIMBLE: I move we adjourn.		
5 COMMISSIONER PATON: Second.		
6 ACTING CHAIRMAN MEYER: All right. All in		
7 favor of adjourning the meeting?		
8 (Chorus of ayes.)		
9 ACTING CHAIRMAN MEYER: All opposed?		
10 (No response.)		
11 ACTING CHAIRMAN MEYER: Motion carries.		
12 We are adjourned.		
13 (Whereupon, the proceedings concluded at		
14 10:53 a.m.)		
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32:23 32:23 <th< th=""><th>Citizens Clean Elections</th><th></th><th>1</th><th></th><th>November 16, 2017</th></th<>	Citizens Clean Elections		1		November 16, 2017
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unique (1) 39:13	Whereas (1) 39:9	17,5 (1) 22:3		
unpaid (2) 22:22,23	Whereupon (1) 43:13	17-01 (1) 9:21		
up (22) 4:16;7:3;8:19;	who's (1) 32:11	17-02 (1) 32:7		
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11:22;13:9;14:22;19:9;	willing (2) 21:19;23:24			
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URL (2) 4:22,24	work (5) 8:2,6;16:23;	38:3;41:17;42:3,10		
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via (2) 24:14,14	wrote (1) 25:15	30 (4) 14:17,18;16:15;		
view (4) 18:15,17;20:8;	Y	30:15		
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\mathbf{W}	10:38 (1) 33:21	7		
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wants (2) 22:24;27:16	14 (1) 35:9	77,000-ish (1) 20:18		
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21:18;24:7,13;34:23;	15,5 (1) 13:25		1	
40:8;41:7	1516 (2) 5:17;6:8	9:30 (1) 3:5		
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CITIZENS CLEAN ELECTIONS COMMISSION EXECUTIVE DIRECTOR REPORT December 14, 2017

Announcements:

- The public can view Commission meetings live via the internet at <u>www.livestream.com/cleanelections</u>. A link is available on our website.
- Stephanie graduated cum laude from ASU with a bachelor's degree in organizational leadership. Stephanie intends to pursue a master's degree next year.

Voter Education:

- Congressman Trent Franks, Congressional District 8 (Maricopa County), resigned on December 8th. A special primary and general election will be held to fill the vacancy:
 - o Special primary election: Tuesday, February 27, 2018
 - Voter registration deadline: January 29, 2018
 - o Special general election: Tuesday, April 24, 2018
 - Voter registration deadline: March 26, 2018
- The 2017 voter education recap and 2018 voter education plan will be presented at the January commission meeting.
- Gina and Alec met with the Arizona Developmental Disabilities Planning Council staff to discuss voter education and plain language efforts.
- Gina and Stephanie participated in a conference call with a county recorder subcommittee on the state's participation in the Electronic Registration Information Center program and required mailers to eligible but non-registered voters.

2018 Candidate Information:

- Candidates can start applying for 2018 funding as early as January 2, 2018.
- Participating Candidates: 62

Enforcement – 2017:

Complaints Pending: 3

- MUR 17-02 Federation for Children, Inc. Response Received
- MUR 17-03 Federation for Children, Inc. Response Received

Enforcement – 2014:

Complaints Pending: 3

- MUR 14-006, -015 (consolidated/conciliated): Horne pending completion of items in conciliation agreement.
 - MUR 14-007: Legacy Foundation Action Fund (LFAF) Oral Argument was held Monday, September 11, 2017.
- MUR 14-027: Veterans for a Strong America (VSA)

Miscellaneous

 A Committee calling itself Outlaw Dirty Money introduced a constitutional amendment via initiative. "The measure would amend the state Constitution to require that people making expenditures to sway campaigns disclose the names of major donors," an article in The Arizona Republic said. Dustin Gardiner, "Should Arizona voters end 'dark money' in state political campaigns?," *The Arizona Republic*, Nov. 30, 2017, *available at* <u>https://www.azcentral.com/story/news/politics/arizona/2017/11/30/should-arizona-votersdecide-ending-dark-money-state-political-campaigns-2018-elections/906549001/</u>. The

According to the summary provided by the group:

The Stop Political Dirty Money Constitutional Amendment establishes your Right to Know the identity of all major contributors who are trying to influence the outcome of Arizona elections. Contributors will no longer be able to hide by transferring their money through intermediaries. Anyone spending more than \$10,000 to oppose or support candidates or ballot measures must disclose everyone who contributed \$2,500 or more promptly, publicly and under penalty of perjury. The money must be tracked back to its original source. Violators will be subject to fines. Rules to implement this Amendment will be written and enforced by a non-partisan commission.

Proposed Initiative C-03-2018, Stop Political Dirty Money Amendment, *available at* <u>http://apps.azsos.gov/election/2018/general/initiatives.htm</u>.

The full amendment identifies the Clean Elections Commission as the enforcing body, and allows for private suits. It is available here: http://apps.azsos.gov/election/2018/general/ballotmeasuretext/C-03-2018.pdf

The Initiative must receive more than 225,000 signatures by July 5, 2018 to be eligible for the ballot.

Doug Ducey Governor

Thomas M. Collins Executive Director



Steve M. Titla Chair

Damien R. Meyer Mark S. Kimble Galen D. Paton Amy B. Chan Commissioners

State of Arizona Citizens Clean Elections Commission

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MEMORANDUM

To: Commissioners

From: Thomas Collins, Executive Director and Sara A. Larsen, Financial Affairs & Compliance Officer

Date: December 12, 2017

Subject: Proposed 2018 Calendar Year Budget

The Commission operates under system of caps that operate on a calendar year basis. We are asking the Commission to approve:

- **1.** the 2018 expenditure cap (\$20,668,270);
- 2. the 2018 administration and enforcement expenditure cap (\$2,066,827);
- **3.** the 2018 public education (paid media) expenditure cap (\$2,066,827);
- 4. the projection of 2018 candidate funding disbursements in the amount of \$8,973,613; and
- 5. the projection of no excess funds in the Clean Elections Fund in 2018.

Expenditure Cap on Total Expenses

In compliance with A.R.S. § 16-949, the Commission projects an expenditure cap for each calendar year for all expenses under the Act, including candidate funding. *Id.* That expenditure cap, in turn, may be exceeded during a four year period so long as the difference is made up by a cap reduction in a subsequent year. *Id.*

The Commission's projected expenditure cap for 2018 is \$20,668,270 (spreadsheet pg. 5).

Specific Categories of Expenses

The Commission categorizes operating expenses using four categories under the expenditure cap: Administration/Enforcement, Public Education, Voter Education and Candidate Funding. Our overhead costs are apportioned by a 50/50 split between Administration/Enforcement and Voter Education. Personal Services and Employee Related Expenses are apportioned by allocated staff-time between administration/enforcement and voter education responsibilities.

Administrative/Enforcement

The Clean Elections Act ("Act") permits the Commission to spend up to 10 percent of the calendar year expenditure cap for administrative and enforcement costs (A.R.S. §16-949 (B)). Administrative and Enforcement expenditures are projected at \$1,928,800 (93% of the overall unadjusted expenditure cap \$2,066,827). (spreadsheet pg. 2)

Public Education

The Commission may apply up to ten percent of the yearly expenditure cap for reasonable and necessary expense associated with public education, including participation and the purposes of the Act. A.R.S. §16-949 (C). Public education expenditures are projected at \$2,066,827.

Voter Education and Implementation of the Act

The Commission may make reasonable and necessary expenditures to implement the Act, including expenditures for voter education pursuant to A.R.S. 16-956(A). A.R.S. § 16-949(D) These expenditures are not subject to any cap. Id. Voter Education and Implementation Expenditures are projected at \$4,588,100. (spreadsheet pg. 3)

Candidate Funding

Section 16-954(c) provides that the Commission annually project the "amount of clean elections funding for which all candidates will have qualified. . . for the following calendar year."

We project that 69 candidates will receive funding for the 2018 primary election and 53 candidates will receive funding for the general election for a total of \$8,973,613. All statewide offices, including two corporation commission seats, as well as all 90 legislative seats, are up for election.

Other Projections

The Act provides that the Commission make two projections each year relating to the balance of and availability of funds in the Clean Elections Fund.

Section 16-954(B) provides that the Commission shall project the amount of money that will be collected in the fund over the next four years and the availability of those funds. The statute instructs the Commission to compare that projection to projected expenditures "under the assumption that expected expenses will be at the expenditure limit in § 16-949, subsection A" to determine whether there are "excess monies" in the fund.

This year, staff recommends that the Commission determine that there are no excess monies in the fund. As detailed in the chart below, projected revenue will run about \$54,270,580 below assumed expenses over the next four years.

Calendar Year	2018	2019	2020	2021
Projected Revenue	\$7,237,500	\$7,020,000	\$7,125,000	\$7,020,000
Projected Expenses (Assuming at expenditure limit)	\$20,668,270	\$20,668,270	\$20,668,270	\$20,668,270
Difference	\$(13,430,770)	\$(13,648,270)	\$(13,543,270)	\$(13,648,270)

Section 16-954(C) also provides that the Commission shall annually "announce whether the amount that the [C]ommission plans to spend the following year pursuant to 16-949[A] . . . exceeds the projected about of clean elections funding." The statute continues by stating that if the Commission "determines that the fund contains insufficient monies or the spending cap would be exceeded were all candidates' accounts fully funded," then the commission may take steps to adjust the funding available to candidates.

Staff believes that the fund contains sufficient monies to complete funding participating candidates fully without exceeding the expenditure cap, as adjusted for carryover funds as described above. Therefore staff does not recommend that the Commission take steps to adjust candidate funding.

Citizens Clean Elections Commission 2018 Budget Projections

		2014		2015	2016		2017	20 1	8 Projection
Revenues									
Court Assessments	\$	8,403,460	\$	8,177,696	\$ 7,242,242	\$	6,886,184	\$	7,000,000
Commission Assessments		24,500		-	15,000		6,200		5,000
\$5 Tax Donations		54,986		16,569	295		135		
\$5 Candidate Qualifying Contributions		236,980			96,415		-		207,500
Miscellaneous		34,465		18,862	 81,246		112,583		15,000
Total Revenues	<u>\$</u>	8,754,390	\$	8,212,887	\$ 7,435,198	<u>\$</u>	7,005,103	\$	7,227,500
Expenses									
Personal Services	\$	372,543	\$	499,108	\$ 523,168	\$	519,997	\$	700,000
ERE		120,451		165,375	164,637		169,530		230,000
Professional & Outside Services									
Public Education - Media		1,771,213		1,866,516	1,525,516		312,822		2,066,827
AG Legal Services		45,809		138,100	164,278		61,850		170,000
External Legal Services		362,711		201,618	147,368		218,873		750,000
Other Prof. Services		655,500		269,877	1,659,026		181,737		2,620,000
Travel-In State		6,361		5,195	6,763		6,031		27,500
Travel Out-of-State		745.41		745	-		745		6,000
Other Operating Expenditures		3,187,600		353,541	1,333,458		320,610		1,827,400
Aid to Individual/Organization		18,631		-	16,517		-		30,000
Capital Equipment		35,241		-	-				-
Non-Capital Equipment		26,731		59,544	8,786		11,805		46,000
Transfers (other state agencies)		16,333		-	 -		-		110,000
Total Expenses	<u>\$</u>	6,619,869	\$	3,590,741	\$ 5,549,518	\$	1,804,001	<u>\$</u>	8,583,727
Candidate Funding	<u>\$</u>	5,319,846	<u>\$</u>	-	\$ 2,150,002	\$	-	\$	8,973,613
Total Expenses and Candidate Funding	<u>\$</u>	11,939,715	\$	3,590,741	 7,699,520		1,804,001	\$	17,557,340

*Actuals include invoices and services paid through November 2017.

Citizens Clean Elections Commission 2018 Admin Expenditure Projections

201071		 -
	2017 Actuals	2018 Projections
Expenses		
Personal Services	\$ 259,300	\$ 350,000
ERE	80,132	115,000
Professional & Outside Services		
Attorney General Legal Services	30,925	85,000
External Legal Services	218,873	750,000
Other Professional Outside Services	140,358	420,000
Total Professional & Outside Services	 390,157	 1,255,000
Travel-In State	3,852	7,500
Travel Out-of-State	493	3,000
Other Operating Expenditures		
Risk Management Charges	900	900
Other External Data Processing	6,263	60,000
External Telecomm Charges	-	3,000
Other External Telecom Service	3,797	6,500
Rent Charges to State Agency	27,150	27,150
Rental of Other Machinery & Equip	-	500
Miscellaneous Rent	391	1,000
Internal Acct/Budg/Financial Services	4,250	4,250
Repair & Maintenance - Other Equip	2,337	3,500
Other Repair & Maintenance	300	500
Software Support and Maintenance	-	1,500
Office Supplies	415	3,000
Other Opperating Supplies	36	100
Conference, Education & Training Reg.	70	3,000
Advertising	8,469	5,000
External Printing	6,072	5,000
Postage & Delivery	254	2,000
Awards	113	300
Dues	353	600
Books Subscriptions & Publications	6,820	10,000
Other Miscellaneous Operating	 335	 500
Total Other Operating Expendtiures	 68,322	 138,300
Aid to Individua/Organization	-	30,000
Capital Equipment	-	-
Non-Capital Equipment	8,132	20,000
Transfers (other state agencies)	 -	 10,000
Total Expenses	\$ 810,388	1,928,800

Citizens Clean Elections Commission 2018 Voter Public Education Expenditure Projections

		2017 Actuals	2018	Projectior
penses	_			
Personal Services	\$	260,697	\$	350,000
ERE		89,398		115,000
Professional & Outside Services				
Public Ed- Paid Media		247,914		2,066,82
Attorney General Legal Services		30,925		85,00
Other Professional Outside Services		41,379		2,200,00
Total Professional & Outside Services		320,218		4,351,82
Travel-In State		2,179		20,00
Travel Out-of-State		252		3,00
Other Operating Expenditures				
Risk Management Charges		900		90
Other External Data Processing		44,112		165,00
External Telecom Charges		-		3,00
Other External Telecom Service		3,963		6,50
Rent Charges to State Agency		27,150		27,15
Rental of Info Tech Equipment		-		30
Miscellaneous Rent		391		10,00
Internal Acct/Budg/Financial Services		4,250		4,25
Repair & Maintenance - Info Tech PCLAN		-		50
Repair & Maintenance - Buildings		-		50
Repair & Maintenance - Other Equip		2,337		3,50
Software Support and Maintenance		-		1,50
Uniforms		-		50
Office Supplies		683		2,00
Other Operating Supplies		111		1,50
Conference Education & Training Reg.		135		8,00
Advertising				4,00
External Printing		865		820,00
Postage & Delivery		105		550,00
Entertainment & Promo Items		11,950		12,00
Other Miscellaneous Operating		150,335		65,00
Dues		340		50
Books, Subscriptions & Publications		1,350		2,50
Total Other Operating Expendtiures		248,976		1,689,10
Capital Equipment				
Non-Capital Equipment		3,673		26,00
Transfers (other state agencies)		-		100,00
tal Expenses	\$	992,239		6,654,92

Citizens Clean Elections Commission Revenue Projections - 4 years

	2017 Actuals	2018	2019	2020	2021
Revenues					
Court Assessments	\$ 6,886,184	\$ 7,000,000	\$ 7,000,000	\$ 7,000,000	\$ 7,000,000
Commission Assessments	6,200	15,000	5,000	15,000	5,000
\$5 Tax Donations	135	-	-	-	-
\$5 Candidate Qualifying Contributions	-	207,500	-	95,000	-
Miscellaneous	 112,583	 15,000	 15,000	 15,000	 15,000
Total Revenues	\$ 7,005,103	\$ 7,237,500	\$ 7,020,000	\$ 7,125,000	\$ 7,020,000

Citizens Clean Elections Commission 2018 Expenditure Caps A.R.S. §16-949

Expenditure Cap	Amount
Total Expenditure Cap	\$20,668,270
Public Ed Paid Media	\$2,066,827
Admin & Enforcement	\$2,066,827

2016 Tax Filers	Spending Limit Coefficient
2,952,610	\$7

Citizens Clean Elections Commission Expenditure Cap Spending and Fund Balance Projection

Calendar Year	E	Beginning Fund Balance	Revenues I	E>	penditure Cap	Ending Fund Balance
2014	\$	9,104,576	\$ 8,754,390 \$,	18,934,524	\$ (1,075,558)
2015	\$	(1,075,558)	\$ 8,212,887 \$,	19,583,662	\$ (12,446,333)
2016	\$	(12,446,333)	\$ 7,435,198 \$,	19,896,471	\$ (24,907,607)
2017	\$	(24,907,607)	\$ 7,227,500 \$,	20,321,063	\$ (38,001,170)
2018	\$	(38,001,170)	\$ 7,237,500		\$20,668,270	\$ (51,431,940)

Citizens Clean Elections Commission Expenditure Cap/Excess Funds Projections - 4 years

Calendar Year	eginning Fund Balance		Projected Revenues	E	Projected xpenditure Cap	Ending Fund Balance
2018	\$ 28,449,900	\$	7,237,500	\$	20,668,270	\$ 15,019,130
2019	\$ 15,019,130	\$	7,020,000	\$	20,668,270	\$ 1,370,860
2020	\$ 1,370,860	\$	7,125,000	\$	20,668,270	\$ (12,172,410)
2021	\$ (12,172,410)	\$	7,020,000	\$	20,668,270	\$ (25,820,680)

Calendar Year	Beginning Fund Balance			Proje Rever			Projected Expenditures		Ending Fund Balance
2018	\$	28,449,900	\$	7,237,	500 \$	5	17,557,340	\$	18,130,060
2019	\$	18,130,060	\$	7,020,	000 \$	5	1,804,001	\$	23,346,059
2020	\$	23,346,059	\$	7,125,	000 \$	5	7,699,520	\$	22,771,539
2021	\$	22,771,539	\$	7,020,	000 \$	5	1,804,001	\$	27,987,537

Citizens Clean Elections Commission 2018 Candidate Funding Projection

Calendar Year	2014	2015	2016	2017	2018 Projection
Candidate Funding	\$5,319,846	\$0	\$2,150,002	\$-	\$8,973,613

Doug Ducey Governor

Thomas M. Collins Executive Director



Steve M. Titla Chair

Damien R. Meyer Mark S. Kimble Galen D. Paton Amy B. Chan Commissioners

State of Arizona Citizens Clean Elections Commission

1616 W. Adams - Suite 110 - Phoenix, Arizona 85007 - Tel (602) 364-3477 - Fax (602) 364-3487 - www.azcleanelections.gov

MEMORANDUM

To: Commissioners

From: Tom Collins

Date: 12.11.2017

Subject: Request for Authorization for CY 2017 Attorney General Interagency Service Agreement

As the Commission may recall the Executive Director's Report noted that the assistant attorneys general who handle the Commission's work and other election matters had been transferred out of the Solicitor General's Office, where they had been housed since the agency's inception.

As part of that process, there will be two Interagency Service Agreements for this Fiscal Year. The first, which I am asking for authorization for today, is to deal with the first half of this Fiscal Year and closer out our calendar year.

I am including a draft ISA that was presented by SGO before the transfer as an example. I am asking for authorization to provide our attorneys' new division with \$86,600 for CY 2017. Exhibit A.

Those dollars are designated to allow the availability of the two assistant attorney general positions working on Clean Elections issues.

ITEM V(D)

opasdig uiopa sdfghjk asdf **EXHIBIT A** ghjklzx dfghj DRAFT ISA FOR FY2018 klzxcvb hjklz xcvbnmqwertyuiopasdfghjklzxcv bnmqwertyuiopasdfghjklzxcvbn mqwertyuiopasdfghjklzxcvbnmq wertyuiopasdfghjklzxcvbnmqwe rtyuiopasdfghjklzxcvbnmqwerty uiopasdfghjklzxcvbnmqwertyuio pasdfghjklzxcvbnmqwertyuiopas dfghjklzxcvbnmqwertyuiopasdfg

qwertyuiopasdfghjklzxcvbnmqw ertyuiopasdfghjklzxcvbnmqwert yuiopasdfghjklzxcvbnmqwertyui

Interagency Service Agreement Between Citizens Clean Elections Commission and the Arizona Office of the Attorney General AG18-0002-052

- THIS AGREEMENT IS MADE as of July 1, 2017, between the state agencies known as Citizens Clean Elections Commission (hereinafter "the Commission") and the DEPARTMENT OF LAW, Arizona Office of the Attorney General, MARK BRNOVICH, ATTORNEY GENERAL (hereinafter referred to as the Attorney General).
 - a) The Commission and the Attorney General enter into this Agreement pursuant to A.R.S. § 35-148(A).
 - b) The Commission has the duty to enforce Title 16, Chapter 6, Article 2, Arizona Revised Statutes and to provide the public and voter education pursuant to Title 16, Chapter 6, Article 2, and has the authority to spend monies in the fund for reasonable and necessary expenses to implement Title 16, Chapter 6, Article 2 as well as the authority to pay reasonable and necessary expenses of administration and enforcement of Title 16, Chapter 6, Article 2, and the authority to make expenditures for voter education and public education under Title 16, Chapter 6, Article 2.
 - c) The Attorney General has the duty pursuant to A.R.S. § 41-192(A)(3) to provide and coordinate legal services for all state agencies.
- 2) THEREFORE, as a result of the Attorney General's duty to provide and coordinate the legal services, and the need of the Commission to receive legal services to perform its duties, the parties agree as follows:
 - a) This Agreement shall take effect on July 1, 2017 and terminate on June 30, 2018.
 - b) The Attorney General will assign to the Commission two assistant attorneys general whose duties shall be to provide legal services to the Commission in return for the provision of funds described in paragraph (g). The assistant attorney general assigned to represent the Commission under this paragraph shall not, without consultation with the Commission, be temporarily assigned to represent or assist in the representation of any other agency if the temporary assignment would involve a substantial commitment of time and have the effect of denying the Commission the legal services being agreed to pursuant to this contract.
 - c) The two assistant attorneys general assigned by the Attorney General to provide legal services to the Commission pursuant to this Agreement shall be subject to the Attorney General's personnel, office management and payroll plans and all policies and procedures of the Attorney General's office. Further, the Attorney General shall have sole and exclusive responsibility for hiring, supervising, evaluating, promoting and demoting, separating from service and fixing the

Interagency Service Agreement Between Citizens Clean Elections Commission and the Arizona Office of the Attorney General AG18-0002-052

compensation of the assistant attorney general and legal secretary that the Attorney General assigns to provide legal services to the Commission, provided that, in hiring and separating an assigned assistant attorney general from service, the Attorney General shall consult with the Commission prior to either decision and provide an opportunity for the Commission or its staff to comment upon the proposed decision. The Attorney General shall provide resume information as to applicants for hire to the Commission.

- d) The Commission acknowledges that it understands and agrees that in the exercise of its authority, the Attorney General, from time to time, at its discretion may change the assigned assistant attorney general. In that event, the Attorney General shall consult with the Commission prior to reaching or implementing a decision to exercise that discretion and provide an opportunity for the Commission or its staff to comment upon the proposed change. The Attorney General shall provide resume information as to the assistant attorney general who would be assigned pursuant to this paragraph. The Attorney General also may assign Commission matters to assistant attorneys general in addition to and other than the assistant attorney general whose primary duties are to represent the Commission.
- e) Legal services provided by the Attorney General under this Agreement will support the Program specified in this Agreement according to the work priority coordinated by the Attorney General, with the Commission's input. Legal support for the client funding this Agreement shall take priority. However, the Attorney General may assign other work to the Attorney General's office personnel paid for by this Agreement as long as the Commission priorities are met. The Commission acknowledges that it understands and agrees that the Attorney General, in the exercise of his authority, may use other office resources to assist in the representation of the Commission, including other assistant attorney generals, office administrators, paralegals and other staff, if deemed appropriate.
- f) The Attorney General shall provide notice to the Commission of the following within one week of it learning of:
 - Non-conflict of interest Attorney General Opinion requests related to election law, and the interpretation of the Arizona Constitution, or the interpretation of the U.S. Constitution that may have an impact on election law issues.
 - ii) Pending election cases involving or relevant to the State of Arizona, the Attorney General, the Secretary of State, or any political subdivision of Arizona.

Interagency Service Agreement Between Citizens Clean Elections Commission and the Arizona Office of the Attorney General AG18-0002-052

- iii) Information relating to enforcement of election laws, including failure to file notices, and reasonable cause determinations.
- iv) Copies of Attorney General Opinion requests shall be provided to the Commission or its staff with the notice.
- g) Pursuant to the provisions of A.R.S. § 35-148, the Commission shall pay \$173,200 to the Attorney General. The Commission shall advance to the Attorney General one-half of the funds (\$86,600) within 15 working days after the execution of this Agreement, and one half of the funds on or before March 31, 2018. Said funds shall be used to pay the actual salary and employee-related expenditures of the two assistant attorneys general identified in 2(b) above. The aforesaid monies may also be used to pay the travel and other expenses incurred through attendance at seminars, conferences or meetings by any assistant attorneys general in connection with the representation of the Commission, and may also be used to legal services to the Commission. Further, upon approval by the Commission, other travel costs, operating costs and other costs incurred by the assistant attorney general rendering legal services to the Commission in connection with legal services provided pursuant to this Agreement may be paid by the Commission.
- h) From and after the date hereof and until June 30, 2018, the Attorney General shall instruct the two assistant attorney generals assigned to provide legal services to the Commission to locate their principal office at the Office of the Attorney General.
- i) Any balance of funds remaining after June 30, 2018 will be returned to the Commission.
- j) In accordance with ARS § 41-2501, *et seq.*, and AAC R2-7-101, *et seq.*, Contract shall be governed and interpreted by the laws of the State of Arizona and the Arizona Procurement Code.
- k) In accordance with ARS § 35-154, every payment obligation of the State under the Contract is conditioned upon the availability of funds appropriated or allocated for payment of such obligation. If funds are not allocated and available for the continuance of this Contract, this Contract may be terminated by the State at the end of the period for which funds are available. No liability shall accrue to the State in the event this provision is exercised, and the State shall not be obligated or liable for any future payments or for any damages as a result of termination under this paragraph.

Interagency Service Agreement Between Citizens Clean Elections Commission and the Arizona Office of the Attorney General AG18-0002-052

- In accordance with A.R.S. § 35-214, both parties shall retain all data, books and other records ("records") relating to this Contract for a period of five years after completion of the Contract. All records shall be subject to inspection and audit by the State at reasonable times. Upon request, the Contractor shall produce the original of any or all such records.
- m) In accordance with A.R.S. § 38-511, the State may within three years after execution cancel the Contract, without penalty or further obligation, if any person significantly involved in initiating, negotiating, securing, drafting or creating the Contract on behalf of the State, at any time while the Contract is in effect, becomes an employee or agent or any other party to the Contract in any capacity or a consultant to any other party of the Contract with respect to the subject matter of the Contract.
- n) In accordance with ARS § 41-1461, *et seq.*, the parties shall provide equal employment opportunities for all persons, regardless of race, color, creed, religion, sex, age, national origin, disability or political affiliation. The parties shall comply with the Americans with Disabilities Act.
- o) In accordance with ARS § 41-4401, the parties warrant compliance with all Federal immigration laws and regulations relating to employees and warrants its compliance with A.A.C. Section A.R.S. § 23-214, Subsection A.
- p) In accordance with ARS § 12-1518, the parties to agree to resolve all disputes arising out of or relating to this Contract through arbitration, after exhausting applicable administrative review except as may be required by other applicable statutes.
- 3) IN WITNESS WHEREOF, the parties have executed this Interagency Service Agreement under the Authority of A.R.S. § 35-148(A) upon execution by signature of the parties.

Citizens Clean Elections Commission

Office of the Arizona Attorney General

Thomas M. Collins Executive Director Date: Jerry Connolly Procurement Manager Date:

NOTICES OF PROPOSED EXEMPT RULEMAKING

This section of the *Arizona Administrative Register* contains Notices of Proposed Exempt Rulemaking. An agency may be exempt from rulemaking standards outlined in the Arizona Administrative Procedures Act (APA).

An agency's exemption is listed in the Preamble of the rulemaking as specified under: A.R.S. §§ 41-1005 or 41-1057; or a specific statute; or if a rule is promulgated by the Corporation Commission, it is exempt from Attorney General review under a court decision as determined by the Commission.

If an agency determines it is exempt under the law or court decision, the law may still require publication of the Proposed Exempt Rulemaking in this section to solicit and review public comments on the rulemaking. Some agencies, even though completely exempt, may still elect to follow certain provisions of the APA, such as circulating its exempt rulemaking for comment. If an agency chooses this option, our office encourages filing the notice with our office for publication in the *Register*.

Please note, if a statute dictates that an agency is completely exempt from the rulemaking process, the agency is authorized to file a Notice of Exempt Rulemaking.

In all cases, an agency must still follow the procedures as established by our office in order to have its rulemaking package published.

The Office of the Secretary of State is the filing office and publisher of these rules. Questions about the interpretation of the proposed exempt rule should be directed to the agency proposing them. Refer to Item #5 of the Preamble to contact the person charged with the rulemaking.

NOTICE OF PROPOSED EXEMPT RULEMAKING TITLE 2. ADMINISTRATION CHAPTER 20. CITIZENS CLEAN ELECTIONS COMMISSION

[R17-203]

PREAMBLE

<u>1.</u> <u>Article. Part. or Section Affected (as applicable)</u> R2-20-106 Rulemaking Action Amend

2. Citations to the agency's statutory rulemaking authority to include the authorizing statute (general) and the implementing statute (specific), and the statute or session law authorizing the exemption: Authorizing statute: A.R.S. § 16-940, et seq.

Implementing statute and statute authorizing the exemption: A.R.S. § 16-956(C).

The Citizens Clean Elections Commission is exempt from Executive Order 15-01.

- 3. <u>The effective date of the rule and the agency's reason it selected the effective date:</u> Not applicable
- <u>4. A list of all previous notices published in the Register as specified in R1-1-409(A) that pertain to the record of the exempt rulemaking:</u> Not applicable

5. The name and address of agency personnel with whom persons may communicate regarding the rulemaking: Name: Thomas M. Collins, Executive Director

Address:Citizens Clean Elections Commission
1616 W. Adams St., Suite 110
Phoenix, AZ 85007Telephone:(602) 364-3477Fax:(602) 364-3487E-mail:thomas.collins@azcleanelections.gov

6. <u>An agency's justification and reason why a rule should be made, amended, repealed, or renumbered to include</u> an explanation about the rulemaking:

On September 28, 2017, the Commission approved for publication proposed amendments to Commission rule R2-20-106. Commissioners would like to solicit public feedback on the proposed amendments allowing commission staff to address bank fees candidates get charged post-election, the cost of collecting the return of funds when there are de minimis amounts owed to the fund, and how to address post-return of funds demands by participating candidates that receive late bills. The following are the proposed amendments to the rule at issue.

Amends R2-20-106 to require candidates to return funds to the Clean Elections Fund with a cashier's check, to reconcile outstanding expenditures with personal monies, and allows the Commission staff to determine and waive de minimis return of fund amounts.

ITEM VI(A-C)

1

- 7. A reference to any study relevant to the rule that the agency reviewed and either relied on or did not rely on in its evaluation of or justification for the rule, where the public may obtain or review each study, all data underlying each study, and any analysis of each study and other supporting material: Not applicable
- 8. A showing of good cause why the rulemaking is necessary to promote a statewide interest if the rulemaking will diminish a previous grant of authority of a political subdivision of this state: Not applicable
- 9. The summary of the economic. small business. and consumer impact, if applicable: Not applicable
- 10. A description of any changes between the proposed rulemaking, including any supplemental proposed rulemaking, and the final rulemaking package (if applicable): Not applicable
- 11. An agency's summary of the public or stakeholder comments made about the rulemaking and the agency response to the comments. if applicable: On September 28, 2017, the Commission approved the proposed amendments publication on the Commission's website and in the

On September 28, 2017, the Commission approved the proposed amendments publication on the Commission's website and in the *Administrative Register*. The Commission is soliciting public comment for 60 days. No action has been taken on the proposed amendments.

- 12. Any other matters prescribed by statute that are applicable to the specific agency or to any specific rule or class of rules. When applicable, matters shall include but not be limited to:

 a. Whether the rule requires a permit, whether a general permit is used and if not, the reasons why a general permit is used and if not.
 - a. Whether the rule requires a permit, whether a general permit is used and if not, the reasons why a general permit is not used: Not applicable
 - b. Whether a federal law is applicable to the subject of the rule, whether the rule is more stringent than federal law and if so, citation to the statutory authority to exceed the requirements of federal law: Not applicable
 - <u>c.</u> Whether a person submitted an analysis to the agency that compares the rule's impact of the competitiveness of business in this state to the impact on business in other states: Not applicable
- 13. A list of any Incorporated by reference material and its location in the rules: Not applicable
- 14. Whether the rule was previously made, amended, repealed or renumbered as an emergency rule. If so, the agency shall state where the text changed between the emergency and the exempt rulemaking packages: The rule was not previously made, amended, repealed, or renumbered as an emergency rule.
- 15. The full text of the rules follows:

TITLE 2. ADMINISTRATION

CHAPTER 20. CITIZENS CLEAN ELECTIONS COMMISSION

ARTICLE 1. GENERAL PROVISIONS

Section

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

ARTICLE 1. GENERAL PROVISIONS

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

- A. No change
 - 1. No change
 - a. No change
 - b. No change
 - 2. No change
 - 3. No change
- **B.** No change
- C. No change
- **D.** No change
- E. No change
- F. No change
- G. Pursuant to A.R.S. § 16-953(A), a participating candidate shall return to the Fund:
 - all<u>All</u> of his or her primary election funds not committed to expenditures (1) during the primary election period; and (2) for goods or services directed to the primary election. A candidate shall not be deemed to have violated A.R.S. § 16-953(A) or this subsection on account of failure to use all materials purchased with primary election funds prior to the primary election, provided such candidate exercises good faith and diligent efforts to comply with the requirement that goods and services purchased

with primary election funds be directed to the primary election. Subject to A.R.S. § 16-953(A) and this subsection, a candidate may continue to use goods purchased with primary election funds during the general election period.

- All general funds not committed to expenditures (1) during the general election period; and (2) for goods or services directed to 2. the general election.
- H. All funds returned to the Commission pursuant to subsection (G) of this rule, shall be returned to the Fund by a cashier's check drawn on the candidate's campaign bank account. Any fee associated with the issuance of a cashier's check shall be deemed a direct campaign expenditure and reported on the candidate's campaign finance report.
- If a participating candidate does not account for any outstanding expenditures in the amount of the funds returned to the Commission, I. the participating candidate must reconcile the outstanding expenditures with personal monies. Once funds have been returned to the Commission, no further reimbursements from the Clean Elections Fund shall be permitted. Participating candidates may not exceed the primary or general election spending limits.
- Commission staff may waive the return of funds if: <u>J.</u>
 - <u>1.</u> 2. The Commission staff determines the amount to be returned is de minimus;
 - The Commission staff determines the cost of recovery exceeds the amount of the return;
 - The funds to be returned shall not exceed \$25; and <u>3.</u>
 - 4. The Commission is notified of any waiver of the return of funds.

NOTICE OF PROPOSED EXEMPT RULEMAKING **TITLE 2. ADMINISTRATION**

CHAPTER 20. CITIZENS CLEAN ELECTIONS COMMISSION

[R17-204]

PREAMBLE

- 1. Article, Part or Section Affected (as applicable) R2-20-109
- **Rulemaking Action** Amend
- Citations to the agency's statutory rulemaking authority to include the authorizing statute (general) and the <u>2.</u> implementing statute (specific), and the statute or session law authorizing the exemption: Authorizing statute: A.R.S. §§ 16-940, 16-941, 16-942, 16-956, 16-957, 16-958.

Implementing statute and statute authorizing the exemption: A.R.S. § 16-956(C).

The Citizens Clean Elections Commission is exempt from Executive Order 15-01.

The effective date of the rule and the agency's reason it selected the effective date: <u>3.</u>

The rule "proposed" herein is currently in effect. The Commission proposes to reenact and republish this for the purpose of public notice and clarity.

A list of all previous notices published in the Register as specified in R1-1-409(A) that pertain to the record of the <u>4.</u> exempt rulemaking:

Not applicable

The name and address of agency personnel with whom persons may communicate regarding the rulemaking: <u>5.</u> Name: Thomas M. Collins, Executive Director

Address:	Citizens Clean Elections Commission 1616 W. Adams St., Suite 110 Phoenix, AZ 85007
Telephone:	(602) 364-3477
Fax:	(602) 364-3487
E-mail:	thomas.collins@azcleanelections.gov

6. An agency's justification and reason why a rule should be made, amended, repealed, or renumbered to include an explanation about the rulemaking:

R2-20-109. Independent Expenditure Reporting Requirements

This action is being taken because of an invalid notice from the Governor's Regulatory Review Council (GRRC). The rule, which remains in effect, provides guidance and explanation of the application of the Clean Elections Act to persons who make independent expenditures in state and legislative races. See Clean Elections Institute v. Brewer, 99 P. 3d 570, 574 (Ariz, 2004) (explaining that the Commission is "require[d]" to enforce laws related to independent expenditures). The rule thus:

- provides that all persons are to file reports required subject to penalty pursuant to Chapter 6, Article 2 shall do so with the with the Arizona Secretary of State's online system.
- provides for the Executive Director to take steps to implement a substitute reporting process for independent expenditures when the system provided by the Secretary of State is unavailable or a portion is unavailable or when directed by another Commission rule;
- provides that persons who make independent expenditures in state and legislative races are subject to the terms of A.R.S. 16-941 and 16-942. The rule also provides explanation of how such penalties shall be applied pursuant to A.R.S.t 16-957 (providing procedures for application of penalties against "persons" who are found in violation of the Clean Elections Act).



- provides explanation for the application of 16-942(B) to any entity that fails to file reports pursuant to Chapter 6 pursuant to A.R.S. 16-957 (providing procedures for application of penalties against "persons" who are found in violation of the Clean Elections Act); *see also* A.R.S. 16-901(defining entity as "a corporation, limited liability company, labor organization, partnership, trust, association, organization, joint venture, cooperative, unincorporated organization or association or other organized group that consists of more than one individual.")
- provides that an entity shall not be found to be a political committee unless certain criteria are met. Provides that an entity may argue that, by a preponderance of the evidence, it is not a political committee pursuant to any definition in Title 16 and that the Commission may, in such case, determine the entity is not a committee.

The Commission's rulemakings are exempt from Title 41, Ch. 6, Article 3, pursuant to A.R.S. § 16-956. Some provisions of these rules are primarily the result of SB1516 (2016). SB 1516 contains provisions that raise serious questions under the Arizona and U.S. Constitutions. Among other things, SB 1516 includes provisions that attempt to preempt the Commission's rulemaking authority (A.R.S.§ 16-901(42)), narrow the definitions of expenditure and contribution and eliminate the definition of political committee adopted by the Clean Elections Act in 1998, raising serious constitutional questions under the Voter Protection Act of the Arizona Constitution.

The Commission does not, by adopting these rules, waive any legal objection to the enactment of laws that violate the Voter Protection Act. Rather, it adopted these rules in the interest of harmonizing the Commission's rules with the existing statutes in order to avoid confusion within the regulated community and encourage consistency between the Commission's rules and the policies of other election-related offices.

In addition to the VPA issues, the provisions of SB 1516 raise questions of equal protection regarding the treatment of corporations registered in Arizona that also have 501 status with the IRS and questions under Article 7, §. 16 of the Arizona Constitution regarding the publication of campaign contributions and expenditures. The Commission notes these issues for the record, but again, seeks as much as possible to harmonize its rules. The Commission retains its full authority to enforce Article 2 of Chapter 6 of Title 16 consistent with the terms of the statute, as well as the court interpretations which confirm its straightforward terms.

- 7. A reference to any study relevant to the rule that the agency reviewed and either relied on or did not rely on in its evaluation of or justification for the rule, where the public may obtain or review each study, all data underlying each study, and any analysis of each study and other supporting material: Not applicable
- 8. A showing of good cause why the rulemaking is necessary to promote a statewide interest if the rulemaking will diminish a previous grant of authority of a political subdivision of this state: Not applicable
- 9. The summary of the economic, small business, and consumer impact, if applicable: Not applicable
- 10. A description of any changes between the proposed rulemaking, including any supplemental proposed rulemaking, and the final rulemaking package (if applicable): Not applicable.
- 11. An agency's summary of the public or stakeholder comments made about the rulemaking and the agency response to the comments, if applicable:
 - The Commission solicits public comment throughout the rulemaking process.
- 12. Any other matters prescribed by statute that are applicable to the specific agency or to any specific rule or class of rules. When applicable, matters shall include, but not be limited to:
 - a. Whether the rule requires a permit, whether a general permit is used and if not, the reasons why a general permit is not used: Not applicable
 - b. Whether a federal law is applicable to the subject of the rule, whether the rule is more stringent than the federal law and if so, citation to the statutory authority to exceed the requirements of the federal law: Not applicable
 - c. Whether a person submitted an analysis to the agency that compares the rule's impact of the competitiveness of business in this state to the impact on business in other states: Not applicable
- **<u>13.</u>** <u>A list of any incorporated by reference material and its location in the rules:</u> Not applicable
- 14. Whether the rule was previously made, amended, repealed or renumbered as an emergency rule. If so, the agency shall state where the text changed between the emergency and the exempt rulemaking packages: The rule was not previously made, amended, repealed, or renumbered as an emergency rule.
- <u>15.</u> <u>The full text of the rules follows:</u>

TITLE 2. ADMINISTRATION

CHAPTER 20. CITIZENS CLEAN ELECTIONS COMMISSION

ARTICLE 1. GENERAL PROVISIONS

Section

R2-20-109. Independent Expenditure Reporting Requirements

ARTICLE 1. GENERAL PROVISIONS

R2-20-109. Independent Expenditure Reporting Requirements

- A. In accordance with A.R.S. § 16-958(E), all persons obligated to file any campaign finance report under any provisions of Chapter 6, Article 2 of the Arizona Revised Statutes shall file such reports using the Secretary of State's Internet-based finance-reporting system, except if:
 - 1. Expressly provided otherwise by another Commission rule; or
 - 2. That system, or the necessary function on the system, is unavailable, in which case the executive director shall implement a suitable process.
- **B.** Independent Expenditure Reporting Requirements.
 - Any person making independent expenditures cumulatively exceeding the amount prescribed in A.R.S. § 16-941(D) in an election cycle shall file campaign finance reports in accordance with A.R.S. § 16-958 and Commission rules.
 - 2. Any person who fails to file a timely campaign finance report pursuant to A.R.S. § 16-941(D), A.R.S. §16-958, shall be subject to a civil penalty as prescribed in A.R.S. § 16-942(B). Subsection R2-20-109(B)(4) does not apply to reports pursuant to A.R.S. §§ 16-941(D) and -958 or this subsection. Any expenditure advocating against one or more candidates shall be considered an expenditure on behalf of any opposing candidate(s). Penalties shall be assessed as follows:
 - a. For an election involving a candidate for statewide office, the civil penalty shall be \$300 per day.
 - b. For an election involving a legislative candidate, the civil penalty shall be \$100 per day.
 - c. The penalties in (a) and (b) shall be doubled if the amount not reported for a particular election cycle exceeds ten (10%) percent of the applicable adjusted primary election spending limit or adjusted general election spending limit.
 - d. The dollar amounts in items (a) and (b), and the spending limits in item (c) are subject to adjustment of A.R.S. § 16-959.
 - e. Penalties imposed pursuant to this subsection shall not exceed twice the amount of expenditures not reported.
 - 3. A.R.S. § 16-942(B) applies to any entity including political committees that accepts contributions or makes expenditures on behalf of any candidate regardless of any other contributions taken or expenditures made and fails to timely file a campaign finance report under Chapter 6 of Title 16, Arizona Revised Statutes. Any expenditure advocating against one or more candidates shall be considered an expenditure on behalf of any opposing candidate(s). Penalties shall be assessed as follows:
 - a. For an election involving a candidate for statewide office, the civil penalty shall be \$300 per day.
 - b. For an election involving a legislative candidate, the civil penalty shall be \$100 per day.
 - c. The penalties in (a) and (b) shall be doubled if the amount not reported for a particular election cycle exceeds ten (10%) percent of the applicable adjusted primary election spending limit or adjusted general election spending limit.
 - d. The dollar amounts in items (a) and (b), and the spending limits in item (c) are subject to adjustment of A.R.S. § 16-959.
 - e. <u>Penalties imposed pursuant to this subsection shall not exceed twice the amount of expenditures not reported.</u>
 - 4. For purposes of A.A.C. R2-20-109(B)(3):
 - a. An entity shall not be found to have the predominant purpose of influencing elections unless, a preponderance of the evidence establishes that during a two-year legislative election cycle, the total reportable contributions made by the entity, in any combination, in a calendar year exceeds \$1,000 and is more than fifty percent (50%) of the entity's total spending during the election cycle.
 - i. For purposes of this provision, a "reportable contribution" or "reportable expenditure" shall be limited to a contribution or expenditure, as defined in title 16 of the Arizona revised statutes, that must be reported to the Arizona secretary of state, the Arizona citizens clean elections commission, or local filing officer in Arizona. A contribution or expenditure that must be reported to the federal election commission or to the election authority of any other state, but not to the Arizona secretary of state, the Arizona citizens clean elections commission or a local filing officer in Arizona, shall not be considered a reportable contribution or reportable expenditure.
 - ii. For purposes of this provision, "total spending" shall not include volunteer time or fundraising and administrative expenses but shall include all other spending by the organization.
 - iii. For purposes of this provision, grants to other organizations shall be treated as follows:
 - (1) A grant made to a political committee or an organization organized under section 527 of the internal revenue code shall be counted in total spending and as a reportable contribution or reportable expenditure, unless expressly designated for use outside Arizona or for federal elections, in which case such spending shall be counted in total spending but not as a reportable contribution or reportable expenditure.
 - (2) If the entity making a grant takes reasonable steps to ensure that the transferee does not use such funds to make a reportable contribution or reportable expenditure, such a grant shall be counted in total spending but not as a reportable contribution or reportable

expenditure.

- iv. If the entity making a grant earmarks the grant for reportable contributions or reportable expenditures, knows the grant will be used to make reportable contributions or reportable expenditures, knows that a recipient will likely use a portion of the grant to make reportable contributions or reportable expenditures, or responds to a solicitation for reportable contributions or reportable expenditures, or responds to a solicitation for reportable contributions or reportable expenditures, and the relevant portion of the grant as set forth in subsection (v) of this section shall count as a reportable contribution or reportable expenditure.
- <u>v.</u> Notwithstanding subsections (iii) and (iv) the amount of a grant counted as a reportable contribution or reportable expenditure shall be limited to the lesser of the grant or the following:

 The amount that the recipient organization spends on reportable contributions and reportable expenditures plus
 - (1) The amount that the recipient organization spends on reportable contributions and reportable expenditures, plus
 - (2) The amount that the recipient organization gives to third parties but not more than the amount that such third par-

ties fund reportable contributions or reportable expenditures.

Notwithstanding section a above, the commission may nonetheless determine that an entity is not a political committee if, b. taking into account all the facts and circumstances of grants made by an entity, it is not persuaded that the preponderance of the evidence establishes that the entity is a political committee as defined in title 16 of Arizona Revised Statutes.

NOTICE OF PROPOSED EXEMPT RULEMAKING

TITLE 2. ADMINISTRATION

CHAPTER 20. CITIZENS CLEAN ELECTIONS COMMISSION

PREAMBLE

- Article, Part or Section Affected (as applicable) **Rulemaking Action** <u>1.</u> R2-20-111 Amend
- Citations to the agency's statutory rulemaking authority to include the authorizing statute (general) and the <u>2.</u> implementing statute (specific), and the statute or session law authorizing the exemption: Authorizing statute: A.R.S. §§ 16-940, 16-941, 16-942, 16-956, 16-957, 16-958.

Implementing statute and statute authorizing the exemption: A.R.S. § 16-956(C).

The Citizens Clean Elections Commission is exempt from Executive Order 15-01.

The effective date of the rule and the agency's reason it selected the effective date: <u>3.</u> The rule "proposed" herein is currently in effect. The Commission proposes to reenact and republish this for the purpose of public

notice and clarity.

A list of all previous notices published in the Register as specified in R1-1-409(A) that pertain to the record of the <u>4.</u> exempt rulemaking: Not applicable

The name and address of agency personnel with whom persons may communicate regarding the rulemaking: <u>5.</u>

Name:	Thomas M. Collins, Executive Director
Address:	Citizens Clean Elections Commission 1616 W. Adams St., Suite 110 Phoenix, AZ 85007
Telephone:	(602) 364-3477
Fax:	(602) 364-3487
E-mail:	thomas.collins@azcleanelections.gov

6. An agency's justification and reason why a rule should be made, amended, repealed, or renumbered to include an explanation about the rulemaking:

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

This action is being taken because of an invalid notice from Governor's Regulatory Review Council (GRRC). The rule, which remains in effect, provides guidance and explanation of statutory provisions the commission is "require[d]" to enforce. Clean Elections Institute v. Brewer, 99 P. 3d 570, 574 (Ariz. 2004); see also Horne v. Citizens Clean Elections Commission, CV 2014-009404 (8/19/2014) (dismissing case challenging the Commission's jurisdiction to resolve complaints against a non-participating candidate.).

- provides that complaints maybe filed with the Commission alleging violations of Commission alleging violations of A.R.S. § 16-941(B) and that penalties authorized by A.R.S. § 16-942(B) and (C) may be assessed and removes language that is superfluous to the operation of this rule;
- provides that the twenty percent reduction in A.R.S. § 16-941(B) applies to all campaign contributions limits on contributions that are permitted to be accepted by candidates;
- provides that contribution limits as adjusted by A.R.S. § 16-931 shall be the base level contribution limits subject to reduction pursuant to A.R.S. § 16-941(B).

This rule includes provisions that are primarily the result of SB1516 (2016). SB 1516 contains provisions that raise serious questions under the Arizona and U.S. Constitutions. Among other things, SB 1516 includes provisions that attempt to preempt the Commission's rulemaking authority (A.R.S.§ 16-901(42)), narrow the definitions of expenditure and contribution and eliminate the definition of political committee adopted by the Clean Elections Act in 1998, raising serious constitutional questions under the Voter Protection Act of the Arizona Constitution. The Commission does not, by adopting these rules, waive any legal objection to the enactment of laws that violate the Voter Protection Act. Rather, it adopted these rules in the interest of harmonizing the Commission's rules with the existing statutes in order to avoid confusion within the regulated community and encourage consistency between the Commission's rules and the policies of other election-related offices.

In addition to the VPA issues, the provisions of SB 1516 raise questions of equal protection regarding the treatment of corporations registered in Arizona that also have 501 status with the IRS and questions under Article 7, §. 16 of the Arizona Constitution regarding the publication of campaign contributions and expenditures. The Commission notes these issues for the record, but again, seeks as much as possible to harmonize its rules. The Commission retains its full authority to enforce Article 2 of Chapter 6 of Title 16 consistent with the terms of the statute, as well as the court interpretations which confirm its plain terms. The Commission's rulemakings are exempt from Title 41, Ch. 6, Article 3, pursuant to A.R.S. § 16-956.

[R17-205]

- 7. A reference to any study relevant to the rule that the agency reviewed and either relied on or did not rely on in its evaluation of or justification for the rule, where the public may obtain or review each study, all data underlying each study, and any analysis of each study and other supporting material: Not applicable
- A showing of good cause why the rulemaking is necessary to promote a statewide interest if the rulemaking will <u>8.</u> diminish a previous grant of authority of a political subdivision of this state: Not applicable
- The summary of the economic, small business, and consumer impact, if applicable: 9. Not applicable
- 10. A description of any changes between the proposed rulemaking, including any supplemental proposed rulemaking, and the final rulemaking package (if applicable): Not applicable
- **<u>11.</u>** An agency's summary of the public or stakeholder comments made about the rulemaking and the agency response to the comments, if applicable: The Commission solicits public comment throughout the rulemaking process.

- 12. Any other matters prescribed by statute that are applicable to the specific agency or to any specific rule or class of rules. When applicable, matters shall include, but not be limited to:
 - Whether the rule requires a permit, whether a general permit is used and if not, the reasons why a general permit is not used: Not applicable
 - Whether a federal law is applicable to the subject of the rule, whether the rule is more stringent than the fed-<u>b.</u> eral law and if so, citation to the statutory authority to exceed the requirements of the federal law: Not applicable
 - Whether a person submitted an analysis to the agency that compares the rule's impact of the competitive-<u>c.</u> ness of business in this state to the impact on business in other states: Not applicable
- 13. A list of any incorporated by reference material and its location in the rule: Not applicable
- 14. Whether the rule previously made, amended, repealed or renumbered as an emergency rule. If so, the agency shall state where the text changed between the emergency and the exempt rulemaking packages: The rule was not previously made, amended, repealed, or renumbered as an emergency rule.
- 15. The full text of the rules follows:

TITLE 2. ADMINISTRATION

CHAPTER 20. CITIZENS CLEAN ELECTIONS COMMISSION

ARTICLE 1. GENERAL PROVISIONS

Section

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

ARTICLE 1. GENERAL PROVISIONS

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

- A. Any person may file a complaint with the Commission alleging that any non-participating candidate or that candidate's campaign committee has failed to comply with or violated A.R.S. § 16-941(B). Complaints shall be processed as prescribed in Article 2 of these rules. In addition to those penalties outlined in R2-20-222(B), a non-participating candidate or candidate's campaign committee violating A.R.S. § 16-941(B) shall be subject to penalties prescribed in A.R.S. § 16-941(B) and A.R.S. § 16-942(B) and (C) as applicable.
- **B.** Penalties under A.R.S. § 16-942(B), for a violation by or on behalf of any non-participating candidate or that candidate's campaign committee of any reporting requirement imposed by chapter 6 of title 16, Arizona Revised Statutes, in association with any violation of A.R.S. § 16-941(B):
 - For an election involving a candidate for statewide office, the civil penalty shall be \$300 per day. 1.
 - 2. For an election involving a legislative candidate, the civil penalty shall be \$100 per day.
 - <u>3.</u> The penalties in (a) and (b) shall be doubled if the amount not reported for a particular election cycle exceeds ten percent (10%) of the applicable one of the adjusted primary election spending limit or adjusted general election spending limit.
 - The dollar amounts in items (a) and (b), and the spending limits in item (c) are subject to adjustment of A.R.S. § 16-959.
- C. Penalties under A.R.S. § 16-942(C): Where a campaign finance report filed by a non-participating candidate or that candidate's campaign committee indicates a violation of A.R.S. § 16-941(B) that involves an amount in excess of ten percent (10%) of the sum of the adjusted primary election spending limit and the adjusted general election spending limits specified by A.R.S. § 16-961(G) and (H) as
- adjusted pursuant to A.R.S. § 16-959, that violation shall result in disqualification of a candidate or forfeiture of office. **D.** Penalties under A.R.S. § 16-941(B): Regardless of whether or not there is a violation of a reporting requirement, a person who violates A.R.S. § 16-941(B) is subject to a civil penalty of three times the amount of money that has been received, expended, or prom-



ised in violation of A.R.S. § 16-941(B) or three times the value in money for an equivalent of money or other things of value that have been received, expended, or promised in violation of A.R.S. § 16-941(B).

- E. The twenty percent reduction in A.R.S. § 16-941(B) applies to all campaign contributions limits on contributions that are permitted to <u>be accepted by nonparticipating candidates.</u>
 <u>F.</u> Contribution limits as adjusted by A.R.S. § 16-931 shall be the base level contribution limits subject to reduction pursuant to A.R.S. §
- <u>16-941(B).</u>

Alec Shaffer

From:	Alice <alice@karlandalice.name></alice@karlandalice.name>	
Sent:	Saturday, November 11, 2017 7:39 AM	
То:	CCEC Mailbox	
Subject:	Comment on Proposed Rules R20-109 and R20-111	

Hello,

Here is a supporting comment from LWVAZ.

Alice Stambaugh co-President, LWVAZ

Comment from LWVAZ on R20-109 and R20-111:

The League of Women Voters of AZ was instrumental in the passage of the Initiatives that created the Citizens Clean Elections Commission (CCEC) and subsequently the Voters' Protection Act (VPA) because of the League's long standing position in favor of disclosure of the original source of all funds expended on behalf of candidates and ballot measures in order to allow voters to make the most informed decisions possible. During the past year or two, partially as a result of the passage of SB1516, which significantly changed various elements of the Arizona's election laws, the CCEC has revised some of its rules – with ample opportunity for public comment – in an attempt to harmonize its rules with the language in SB1516. However, the Governor's Regulatory Review Commission (GRRC) has questioned many of the CCEC's recent rules and then declared them invalid. As a result the CCEC is republishing two significant rules relating to disclosure of independent expenditures, and campaign contribution reporting and limits for nonparticipating candidates.

LWVAZ wishes to support these rules and the CCEC's decision to republish them after appropriate public comment, as a way for the CCEC to maintain its Constitutionally protected requirement to enforce specific statutes and all the provisions of the original Initiative adopted by the voters of AZ in 1998.

ITEM VI - PUBLIC COMMENT

Israel G. Torres (#020303) James E. Barton II (#023888) Saman J. Golestan (# 031710) TORRES LAW GROUP, PLLC 2239 West Baseline Road Tempe, Arizona 85283 480.588.6120 James@TheTorresFirm.com

Attorneys for Plaintiffs

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ARIZONA SUPERIOR COURT

MARICOPA COUNTY

ARIZONA ADVOCACY NETWORK: SEN. DAVID BRADLEY; SEN. OLIVIA CAJERO-BEDFORD; SEN. LUPE CONTRERAS; SEN. ANDREA DALESSANDRO; SEN. STEVE FARLEY; SEN. KATIE HOBBS; SEN. CATHERINE MIRANDA; SEN. MARTIN QUEZADA; SEN. ANDREW SHERWOOD; REP. RICHARD C. ANDRADE; REP. LELA ALSTON; REP. MARK A. CARDENAS; REP. KEN CLARK; REP. DIEGO ESPINOZA; **REP. CHARLENE R. FERNANDEZ;** REP. RANDALL FRIESE; REP. ROSANNA GABALDON; REP. ALBERT HALE; REP. STEFANIE MACH; REP. MATTHEW KOPEC; REP. JUAN JOSE MENDEZ; REP. REBECCA RIOS; REP. MACARIO SALDATE; REP. CECI VELASQUEZ; REP. BRUCE WHEELER; and BRICKLAYERS AND ALLIED CRAFTWORKERS LOCAL UNION #3 AZ-NM;

Plaintiffs,

v.

THE STATE OF ARIZONA, a body politic; MICHELE REAGAN, in her official capacity as Secretary of State; and THE CITIZENS CLEAN ELECTIONS COMMISSION; GOVERNOR'S

No. CV2017-096705

SUMMONS

if you would like legal advice from a lawyer, Contact the Lawyer Referral Service at 602-257-4434

> or <u>www.maricopalawvers.org</u> Sponsored by the Maricopa County Bar Association

ITEM VII

REGULATORY REVIEW COUNCIL;

Defendants.

Warning: This is an official document from the court that affects your rights. Read this carefully. If you do not understand it, contact a lawyer for help.

FROM THE STATE OF ARIZONA TO:

THE CITIZENS CLEAN ELECTIONS COMMISSION 1616 W. Adams, Suite 110 Phoenix, AZ 85007

- 1. A lawsuit has been filed against you. A copy of the lawsuit and other court papers are served on you with this "Summons".
- 2. If you do not want a judgment or order taken against you without your input, you must file an "Answer" or a "Response" in writing with the court, and pay the filing fee. If you do not file an "Answer" or "Response" the other party may be given the relief requested in his/her Petition or Complaint. To file your "Answer" or "Response" take, or send, the "Answer" or "Response" to the Office of the Clerk of the Superior Court, 201 West Jefferson Street, Phoenix, Arizona 85003-2205 or Office of the Clerk of the Superior Court, 18380 North 40th Street, Phoenix, Arizona 85032 or Office of the Clerk of Superior Court, 222 East Javelina Drive, Mesa, Arizona 85210-6201 or
- 3. Office of the Clerk of Superior Court, 14264 West Tierra Buena Lane, Surprise, Arizona, 85374. Mail a copy of your "Response" or "Answer" to the other party at the address listed on the top of this Summons.
- 4. If this "Summons" and the other court papers were served on you by a registered process server or the Sheriff, within the State of Arizona, your "Response" or "Answer" must be filed within TWENTY (20) CALENDAR DAYS from the date you were served, not counting the day you were served. If this "Summons" and the other papers were served on you by a registered process server or the Sheriff outside the State of Arizona, your Response must be filed within THIRTY (30) CALENDAR DAYS from the date you were served. Service by a registered process server or the Sheriff is complete when made. Service by Publication is complete thirty (30) days after the date of the first publication.
- 5. You can get a copy of the court papers filed in this case from the Petitioner at the address listed at the top of the preceding page, from the Clerk of the Superior Court's Customer Service Center at: 601 West Jackson, Phoenix, Arizona 85003,

or 18380 North 40th Street, Phoenix, Arizona 85032 222 East Javelina Drive, Mesa, Arizona 85210 14264 West Tierra Buena Lane, Surprise, Arizona, 85374.

- 6. If this is an action for dissolution (divorce), legal separation or annulment, either or both spouses may file a Petition for Conciliation for the purpose of determining whether there is any mutual interest in preserving the marriage or for Mediation to attempt to settle disputes concerning custody and parenting time issues regarding minor children.
- 7. Requests for reasonable accommodation for persons with disabilities must be made to the office of the judge or commissioner assigned to the case, at least ten (10) days before your scheduled court date.

SIGNED AND SEALED this date NOV 1 52017 MICHAEL JEANES, CLERK OF COURT

By: HUM Deputy Clerk T. Harney **Deputy Clerk**

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Israel G. Torres (#020303) James E. Barton II (#023888) Saman J. Golestan (# 031710) TORRES LAW GROUP, PLLC 2239 West Baseline Road Tempe, Arizona 85283 602.626.8805 James@TheTorresFirm.com

NOV 1 5 2017 COURT MICHAEL K. JEANES, CLERK T. HARNEY DEPUTY CLERK

Attorneys for Plaintiffs

ARIZONA SUPERIOR COURT MARICOPA COUNTY

ARIZONA ADVOCACY NETWORK; SEN. DAVID BRADLEY; SEN. OLIVIA CAJERO-BEDFORD; SEN. LUPE CONTRERAS; SEN. ANDREA DALESSANDRO; SEN. STEVE FARLEY; SEN. KATIE HOBBS; SEN. CATHERINE MIRANDA; SEN. MARTIN QUEZADA; SEN. ANDREW SHERWOOD; REP. RICHARD C. ANDRADE; REP. LELA ALSTON; REP. MARK A. CARDENAS; REP. KEN CLARK; REP. DIEGO ÉSPINOZA; REP. CHARLENE R. FERNANDEZ; REP. RANDALL FRIESE; REP. ROSANNA GABALDÓN: REP. ALBERT HALE; REP. STEFANIE MACH; REP. MATTHEW KOPEC; REP. JUAN JOSE MENDEZ; REP. REBECCA RIOS; REP. MACARIO SALDATE; REP. CECI VELASQUEZ; **REP. BRUCE WHEELER; and** BRICKLAYERS AND ALLIED CRAFTWORKERS LOCAL UNION #3 AZ-NM:

Plaintiffs,

ν.

No. CV2017-096705

VERIFIED COMPLAINT FOR DECLARATORY AND INJUCNTIVE RELIEF THE STATE OF ARIZONA, a body politic; MICHELE REAGAN, in her official capacity as Secretary of State; and THE CITIZENS CLEAN ELECTIONS COMMISSION; GOVERNOR'S REGULATORY REVIEW COUNCIL;

Defendants.

Plaintiffs, by and through their attorneys, hereby allege as follows:

NATURE OF THE ACTION

1. This action seeks a Declaration of unconstitutionality and Injunctive Relief against enforcement of portions of Senate Bill 1516 enacted by the Fifty-second Legislature, Second Regular Session 2016 ("S.B. 1516"), which are unconstitutional because they violate the Voter Protection Act, Ariz. Const. art. IV, 1 § 1(6), the Equal Protection Clause of the United States Constitution, U.S. Const. amend. XIV, Equal Protection under the Arizona Constitution, Ariz. Const. art. II, § 13, and Article VII, § 16 of Arizona Constitution.

PARTIES, JURISDICTION, AND VENUE

2. Plaintiff Arizona Advocacy Network is a non-profit organization with its principal place of business located in the State of Arizona.

3. Plaintiffs David Bradley, Olivia Cajero-Bedford, Lupe Contreras, Andrea Dalessandro, Steve Farley, Katie Hobbs, Catherine Miranda, Martin Quezada, and Andrew Sherwood, collectively known as Senate Plaintiffs, resided within the State of Arizona during the time of SB 1516's passage, and were members of the Arizona State Senate who opposed S.B. 1516 or refused to vote.

4. Plaintiffs, Richard C. Andrade, Lela Alston, Mark A. Cardenas, Ken Clark, Diego Espinoza, Charlene Fernandez, Randall Friese, Rosanna Gabaldon, Albert Hale, Matthew A. Kopec, Stefanie Mach, Juan Mendez, Rebecca Rios, Macario Saldate, Ceci Velasquez, and Bruce Wheeler, collectively, House Plaintiffs, resided within the State of Arizona during the time of the action, and were members of the Arizona House of Representatives who opposed S.B. 1516.

5. Plaintiff Bricklayers and Allied Craftworkers Local Union #3 AZ-NM ("Local 3") is a labor union organized under Section 501(c)(5) of the Internal Revenue Code and not registered with the Arizona Corporation Commission, They represent bricklayers, sstonemasons, tile layers and finishers, restoration masons and caulkers, marble masons and finisher, terrazzo mechanics and finishers, and refractory bricklayers who work in the State of Arizona.

6. Defendant State of Arizona is a body politic.

 Defendant Michele Reagan is the Secretary of State, and is named in her official capacity.

8. The Citizens Clean Elections Commission is the body tasked by the Clean Elections Act with enforcing the Act.

9. The Governor's Regulatory Review Council is a State agency.

10. This action arises under state law, the Arizona Constitution, and the U.S. Constitution. This Court has jurisdiction pursuant to A.R.S. §§ 12-123 and 12-1831 et seq.

11. Venue is proper in Maricopa County pursuant to A.R.S. § 12-401.

STATEMENT OF FACTS

The Citizens Clean Elections Act

12. The Citizens Clean Elections Act (the "CEA") was initiated by citizens and was passed by voters in November 1998. Proposition 200, was approved at election Nov. 3, 1998, eff. Nov. 23, 1998.

13. Under the CEA:

The people of Arizona declare[d] our intent to create a clean elections system that will improve the integrity of Arizona state government by diminishing the influence of special-interest money, will encourage citizen participation in the political process, and will promote freedom of speech under the U.S. and Arizona Constitutions. Campaigns will become more issue-oriented and less negative because there will be no need to challenge the sources of campaign money.

A.R.S. § 16-940(A).

14. The CEA addressed numerous grievances against the campaign finance system at that time, including that it "[h]inder[ed] communication to voters by many qualified candidates; [e]ffectively suppresse[d] the voices and influence of the vast majority of Arizona citizens in favor of a small number of wealthy special interests; [and] [u]ndermine[d] public confidence in the integrity of public officials." A.R.S. § 16-940(B).

15. The CEA established a system for contributions made to all legislative and statewide candidates. A.R.S. § 16-941 (limiting contributions for participating and nonparticipating candidates).

16. The CEA established the new contribution limits by tying them to those from Article 1 of Chapter 6 of Arizona Revised Statutes and refers to the enforcement procedure from Article 1. *Id.* (B).

17. The CEA required and continues to require that any person who makes independent expenditures beyond a certain threshold "shall file reports with the secretary of state." A.R.S. § 16-941(D).

18. The CEA required and continues to require that "[a]ny person who has previously reached the dollar amount specified in § 16-941, subsection D for filing an original report shall file a supplemental report each time previously unreported independent expenditures specified by that subsection exceeds one thousand dollars." A.R.S. § 16-958(A).

19. The CEA incorporated several definitions by reference to A.R.S. § 16-901 as it was written in 1998, the date of CEA's enactment. A.R.S. § 16-961(A).

20. The CEA enacted these by reference, not as a component in a formula.

21. Among the definitions enacted by CEA was that of political committee as follows:

"Political committee" means a candidate or any association or combination of persons that is organized, conducted or combined for the purpose of influencing the result of any election or to determine whether an individual will become a candidate for election in this state or in any county, city, town, district or precinct in this state, that engages in political activity in behalf of or against a candidate for election or retention or in support of or opposition to an initiative, referendum or recall or any other measure or proposition and that applies for a serial number and circulates petitions and, in the case of a candidate for public office except those exempt pursuant to section 16–903, that receives contributions or makes expenditures in connection therewith, notwithstanding that the association or combination of persons may be part of a larger association, combination of persons or sponsoring organization not primarily organized, conducted or combined for the purpose of influencing the result of any election in this state or in any county, city, town or precinct in this state. Political committee includes the following types of committees:

(a) A candidate's campaign committee.

(b) A separate, segregated fund established by a corporation or labor organization pursuant to section 16–920, subsection A, paragraph 3.

(c) A committee acting in support of or opposition to the qualification, passage or defeat of a ballot measure, question or proposition.

(d) A committee organized to circulate or oppose a recall petition or to influence the result of a recall election.

(e) A political party.

(f) A committee organized for the purpose of making independent expenditures.

(g) A committee organized in support of or opposition to one or more candidates.

(h) A political organization.

(i) An exploratory committee.

A.R.S. § 16-901(19) (West 1998).

22. The CEA provided the Citizens Clean Elections Commission (the "Commission") with broad authority to "adopt rules to carry out the purposes of this article," which includes receiving reports on independent expenditures. A.R.S. § 16-956(B).

23. The Commission has adopted Rule R2-20-109, Independent Expenditure Reporting Requirements, which carries out the purpose of the CEA as related to independent expenditures. A.A.C. R2-20-109.

24. The Commission has adopted Rule R2-20-111, Non-participating Candidate Reporting Requirements and Contribution Limits, which carries out the purpose of the CEA as related to non-participating candidate regulation. A.A.C. R2-20-111.

25. Thus, the CEA was intended to address the statewide problems of corruption, and did so in a variety of ways directed at candidates who agreed to the limitations associated with public funding, those who did not, and any person or entity that chose to spend money to influence Arizona elections.

26. Furthermore, the Commission has taken steps to enact rules to further these purposes.

The Clean Elections Institute

27. The Clean Elections Institute has sued to protect the integrity of the Clean Elections Act. See, e.g., Clean Elections Inst., Inc. v. Brewer, 209 Ariz. 241, 99 P.3d 570 (2004).

28. The Clean Elections Institute has intervened to defend the act when the State sought nominal party status in challenges to the CEA. See, e.g., Arizona Free Enter. Club's Freedom Club PAC v. Bennett, 564 U.S. 721, 131 S. Ct. 2806, 2813, 180 L. Ed. 2d 664 (2011); Ass'n of Am. Physicians & Surgeons v. Brewer, 363 F. Supp. 2d 1197 (D. Ariz. 2005), aff'd in part, rev'd in part and remanded, 494 F.3d 1145 (9th Cir. 2007).

29. Arizona Advocacy Network has taken on the responsibility of protecting the CEA in the absence of the Clean Elections Institute.

Senate Bill 1516

30. On March 8, 2016, S.B. 1516 passed in the Arizona Senate with eighteen ayes, ten nays, and two members not voting.

31. On March 29, 2016, the measure passed in the Arizona House of Representatives with thirty-one ayes, twenty-seven nays, and two members not voting.

32. On March 30, 2016, the Governor signed S.B. 1516 into law.

33. The bill was chaptered as Laws 2016, ch. 79.

34. Section 12 of S.B. 1516 provided *inter alia* that "a filing officer is the sole public officer who is authorized to initiate an investigation into alleged violations of this article and articles 1, 1.1, 1.2, 1.3, 1.4, 1.5 and 1.6 of this chapter, including the alleged failure to register as a committee." 2016 Ariz. Legis. Serv. Ch. 79, § 12 (S.B. 1516) (codified at A.R.S. § 16-938(A)).

35. S.B. 1516 provided no exceptions for reports that are required to be filed with the Secretary of State's office by the CEA at A.R.S. §§ 16-941-958 or elsewhere.

36.S.B. 1516 created a blanket exception from the reporting requirements for certain entities from being regulated as political committees.

37. Under S.B. 1516, to be a political action committee, an entity must (a) be "organized for the primary purpose of influencing the result of an election," and (b) receive contributions or make expenditures above a certain threshold. 2016 Ariz. Legis. Serv. Ch. 79, § 12 (S.B. 1516).

38. Section 11 of S.B. 1516 defines primary purpose as "an entity's predominant purpose. Notwithstanding any other law or rule, an entity is not organized for the primary purpose of influencing an election if all of the following apply at the time the contribution or expenditure is made:

- a. The entity has tax exempt status under section 501(a) of the internal revenue code.
- b. Except for a religious organization, assembly or institution, the entity has properly filed a form 1023 or form 1024 with the internal revenue service or the equivalent successor form designated by the internal revenue service.
- c. The entity's tax exempt status has not been denied or revoked by the internal revenue service.
- d. The entity remains in good standing with the corporation commission.
- e. The entity has properly filed a form 990 with the internal revenue service or the equivalent successor form designated by the internal revenue service in compliance with the most recent filing deadline established by internal revenue service regulations or policies."

2016 Ariz. Legis. Serv. Ch. 79, § 11 (S.B. 1516) (codified at A.R.S. § 16-901(43)).

39. Thus, an entity behaving in all ways as a political committee and making independent expenditures, but registered with the Arizona Corporation Commission ("ACC") and in good standing with the Internal Revenue Service cannot be regulated as a political committee.

40. S.B. 1516 does not provide for any exception for rules passed by the Commission concerning independent expenditures made by such groups.

41. S.B. 1516 limits this exemption from regulation to tax-exempt entities that are registered with the ACC.

42. S.B. 1516 originally contained sections 13 through 19 and 31 that were not enacted because (1) they amended the CEA and (2) the bill lacked sufficient votes to satisfy the VPA's requirement for supermajority in order to enact.

43. The legislature enacted the remaining sections of S.B. 1516, including those sections that attempted to indirectly amend the CEA in violation of the VPA.

44. Upon information and belief, based on its interpretation of S.B. 1516, the Governor's Regulatory Review Council ("GRRC") has determined that Rules R2-20-109 & 111 are invalid, expired or otherwise unenforceable.

45. The GRRC is a division of the Arizona Department of Administration and is responsible for reviewing proposed administrative rules and compiling reports on the rulemaking processes of various agencies.

46. In its recent Notice of Proposed Exempt Rulemaking for its re-issue of Rules 109 and 111 respectively, the Commission explained:

> **R2-20-109.** Independent Expenditure Reporting Requirements This action is being taken because of an invalid notice from the Governor's Regulatory Review Council (GRRC). The rule, which remains in effect, provides guidance and explanation of the application of the Clean Elections Act to persons who make independent expenditures in state and legislative races. See Clean Elections Institute v. Brewer, 99 P. 3d 570, 574 (Ariz. 2004) (explaining that the Commission is "require[d]" to enforce laws related to independent expenditures).

> > - 10 -

R2-20-111. Non-participating Candidate Reporting Requirements and Contribution Limits This action is being taken because of an invalid notice from Governor's Regulatory Review Council (GRRC). The rule, which remains in effect, provides guidance and explanation of statutory provisions the commission is "require[d]" to enforce. Clean Elections Institute v. Brewer, 99 P. 3d 570, 574 (Ariz. 2004); see also Horne v. Citizens Clean Elections Commission, CV 2014-009404 (8/19/2014) (dismissing case challenging the Commission's jurisdiction to resolve complaints against a non-participating candidate.).

47. The above rules published by the Commission reinforce the protections put in place by the CEA.

FIRST CLAIM FOR RELIEF (Voter Protection Act)

48. Plaintiffs incorporate by reference the above paragraphs as though fully set forth herein.

49. Under Ariz. Const. art. IV, Pt. 1 § 1(6)(B), "The legislature shall not have the power to amend an initiative measure approved by a majority of the votes cast thereon, or to amend a referendum measure decided by a majority of the votes cast thereon, unless the amending legislation furthers the purposes of such measure and at least three-fourths of the members of each house of the legislature, by a roll call of ayes and nays, vote to amend such measure."

50. The provisions of S.B. 1516 conflict with the CEA and violate the VPA (i) by restricting the enforcement of disclosure requirements under the authority of the Clean Elections Commission as applied to certain political actors, (ii) restricting the enforcement of the CEA as applied to certain types of expenditures and contributions, and, (iii) by removing the Commission's authority to enforce certain components of the Act against anyone.

Redefining Political Committee Using "Primary Purpose"

51. S.B. 1516 excludes entities that do not have a "primary purpose" of influencing elections from the definition of "political action committee." A.R.S. §§ 16-901(43) - 905(C) as added by S.B. 1516 §§ 11, and 12.

52. It then defines "primary purpose" in such a way as to exclude a class of actors from regulation as a political action committee: those entities in good standing with the Arizona Corporation Commission and registered as a tax-exempt entity with the Internal Revenue Service. *Id.*

53. The CEA specifically requires the Commission to monitor reports made to the Secretary of State's office concerning independent expenditures.

54. A.R.S. § 16-941(D), added by the CEA, requires "any person who makes independent expenditures" to report such spending to the Secretary of State's Office.

55. The CEA requires the Commission to make rules to enable enforcing its reporting requirements for independent expenditures, including those made by political committees. A.R.S. § 16-956; *Clean Elections Institute v. Brewer*, 99 P. 3d 570, 574 (Ariz. 2004) (explaining the Commission's duty to enforce laws related to independent expenditures).

56. The Commission has adopted rules to enforce reporting requirements on those who make independent expenditures, including political committees as defined in A.R.S. § 16-961(A), enacted by the CEA.

57. Rule R2-20-109(B)(4)(b) provides: "Notwithstanding section a above, the commission may nonetheless determine that an entity is not a political committee if, taking into account all the facts and circumstances of grants made by an entity, it is not

persuaded that the preponderance of the evidence establishes that the entity is a political committee as defined in title 16 of Arizona Revised Statutes."

58. S.B. 1516 deletes the definition of "political committee" from title 16, and thus amends the CEA by eliminating its cross-reference.

59. Furthermore, by amending A.R.S. § 16-901 to eliminate certain tax-exempt organizations in good standing, regardless of the entity's actual conduct, from the definition of political action committee, A.R.S. § 16-901(43), S.B. 1516 attempts to prevent the Commission from carrying out its mandate under the CEA to monitor independent expenditure reporting required of certain political committees.

60. The CEA requires the Commission to take enforcement action against such entities that fail to comply with the Act.

61. A.R.S. § 16-957(A), added by the CEA, details the enforcement procedures the Commission follows when it "finds that there is reason to believe that a person has violated any provision of [the CEA]." S.B. 1516 purports to allow certain entities to bypass these procedures.

62. By creating a blanket exception for certain entities from being organized for the primary purpose of influencing the outcome of elections for entities exempted under A.R.S. § 16-901(43), S.B. 1516 attempts to remove such entities from regulation by state election regulators including the Commission.

Redefining "Contribution" and "Expenditure"

63. A.R.S. § 16-911(B), added by S.B. 1516, defines exemptions from the definition of contribution, one of which is "the payment by a political party to support its nominee...including [c]oordinated political party expenditures." A.R.S. § 16-911(B)(4).

Here 'coordinated party expenditures' means those expenditures that are made by a political party to directly pay for goods or services on behalf of its nominee. A.R.S. § 16-901(14).

64. A.R.S. § 16-911(B)(5) exempts "the payment by any person to defray a political party's operating expenses or party-building activities" from the definition of contribution. Additionally, A.R.S. § 16-921 of S.B. 1516, exempts that same category of payments from the definition of expenditure.

65. These conflict with A.R.S. § 16-961 of the CEA, which relies on the former definitions of "contribution" and "expenditure."

66. Furthermore, by exempting what would otherwise be in-kind contributions from the definition of expenditure and contribution, it amends the contribution limits found in A.R.S. § 16-941, and permits unlimited contributions to political parties, who can in turn spend unlimited amounts in support of their nominees.

Restricting Enforcement

67. By limiting enforcement to only filing officers, A.R.S. § 16-938, S.B. 1516 further attempts to explicitly remove all but participating candidates from regulation by the Commission.

68. Because A.R.S. § 16-938 allows for complaints related to failures to make filings with the Secretary to be filed *only with the Secretary*, S.B. 1516 stands in conflict with A.R.S. § 16-943(C) in which the CEA establishes a violation for "[a]ny person who knowingly provides false or incomplete information on a report filed under § 16-958," to be enforced by the Commission, A.R.S. § 16-957.

69. S.B. 1516 also conflicts with A.R.S. § 16-941(D), which applies to "any person who makes independent expenditures." This section requires the disclosure of independent expenditures cumulatively exceeding \$500 per election cycle. By preventing the Commission from enforcing this provision, and instead vesting complete authority with the Secretary of State, S.B. 1516 skirts around these requirements also.

70. The above identified sections of S.B. 1516 attempt to amend the CEA without satisfying the constitutional requirements to do so and are, therefore, unenforceable.

SECOND CLAIM FOR RELIEF

(Supermajority Requirement)

71. Plaintiffs incorporate by reference the above paragraphs as though fully set forth herein.

72. Under Ariz. Const. art. IV, Pt. 1 § 1(6)(B), "The legislature shall not have the power to amend an initiative measure approved by a majority of the votes cast thereon, or to amend a referendum measure decided by a majority of the votes cast thereon, unless the amending legislation furthers the purposes of such measure and at least three-fourths of the members of each house of the legislature, by a roll call of ayes and nays, vote to amend such measure."

73. The above paragraph applies to S.B. 1516 because it amended the CEA, which was passed on November 3, 1998.

74. Because enough legislators, specifically House Plaintiffs, voted against S.B. 1516 in the Arizona House of Representatives to deny its passage with a three-fourths supermajority, the bill cannot become law under Ariz. Const. art. IV, Pt. 1 § 1(6)(B). The signing of S.B. 1516 into law effectively denied representation to the constituents of those legislators.

75. Because enough legislators, specifically Senate Plaintiffs, voted against S.B. 1516 in the Arizona Senate to deny its passage with a three-fourths supermajority, the bill cannot become law under Ariz. Const. art. IV, Pt. 1 § 1(6)(B). The signing of S.B. 1516 into law effectively denied representation to the constituents of those legislators.

76. Because S.B. 1516 did not further the purpose of the CEA, which it was amending, the bill cannot become law under Ariz. Const. art. IV, Pt. 1 § 1(6)(B).

77. Because S.B. 1516 was not properly approved according to Ariz. Const. art. IV, Pt. 1 § 1(6), the bill is unconstitutional.

THIRD CLAIM FOR RELIEF

(Equal Protection)

78. Plaintiffs incorporate by reference the above paragraphs as though fully set forth herein.

79. S.B. 1516 exempts some tax-exempt groups from the reporting requirements associated with activities to influence Arizona elections.

80. S.B. 1516 therefore impacts the fundamental right of free speech.

81. When an equal protection claim implicates a fundamental right, such as the First Amendment, the standard in analyzing that unequal treatment is strict scrutiny. This remains true regardless of whether or not the unequal treatment is based on membership in a protected class. U.S. v. Hancock, 231 F.3d 557.

82. When various 501(c) groups make expenditures to influence Arizona elections, S.B. 1516 treats those that are registered with the Arizona Corporation Commission differently than those that are not.

83. Nonprofit, 501(c) groups are exempt from being classified as "political committees" under S.B. 1516 despite the fact that the I.R.S. does not have the same exemption, as there are 501(c) groups who may still influence elections even if it is not their primary purpose.

84. For example, if an entity that was tax-exempt under I.R.C. 501(c)(4) and was registered with the Arizona Corporation Commission, spent 100% of its funds on political ads, there would be no Arizona elections regulator who could require them to register and report as a political committee.

85. In stark contrast, if a 501(c)(5) organization like Local 3, which is not registered with the Arizona Corporation Commission, spent 100% of its funds on political ads, S.B. 1516 requires it to register as a political action committee and file campaign finance reports.

86. There is no governmental interest in this unequal treatment, much less a compelling one. Thus, S.B. 1516's exemption from classification as a political action committee for some tax-exempt groups is unenforceable.

FOURTH CLAIM FOR RELIEF

(Article VII § 16 of Arizona Constitution)

87. Plaintiffs incorporate by reference the above paragraphs as though fully set forth herein.

88. The Arizona Constitution has a built-in disclosure requirement. It reads: "The legislature, at its first session, shall enact a law providing for a general publicity, before and after election, of all campaign contributions to, and expenditures of campaign committees and candidates for public office." Ariz. Const. Art 7, § 16.

89. This applies to A.R.S. § 16-911(4)-(5), A.R.S. § 16-901(43), and A.R.S. § 16-905(C) added by S.B. 1516, which respectively allow for the exemption of political party monies to candidates under expenditures and contributions, and for the allowance of PAC status for tax-exempt organizations based on tax-exempt status, both of which ultimately allow for unpublicized contributions and expenditures.

90. As a result of S.B. 1516, any non-profit corporation or similar entity will be able to make unlimited monetary contributions to a political party committee. In turn that committee may then make unlimited expenditures in support of, and in coordination with, its nominee.

91. Since the reporting of these particular contributions are not required, the built-in disclosure safeguards are broken. This essentially allows for candidates to make expenditures themselves without meeting the "general publicity" requirement of campaign contributions.

WHEREFORE, Plaintiffs request that this Court

a. Declare that S.B. 1516 violates Article 4, Part 1, § 1(6) of the Arizona Constitution.

b. Declare that S.B. 1516 violates the Equal Protection Clause of both the Arizona and U.S. Constitutions.

c. Declare that S.B. 1516 violates Article 7 § 16 of the Arizona Constitution.

d. Permanently enjoin enforcement of S.B. 1516 sections as codified at A.R.S §§ 16-901(7), -901(8), -901(43), -905(C), -911(4), -911(5), -921, and -938.

- e. Grant Plaintiffs their costs and attorneys' fees.
- f. Grant further relief as the Court deems appropriate.

RESPECTFULLY SUBMITTED this 15th day of November, 2017

ama E. B-I By:

James E. Barton, II (#023888) TORRES LAW GROUP, PLLC 2239 West Baseline Road Tempe, Arizona 85283 480.588.6120 James@TheTorresFirm.com Attorneys for Plaintiff

		COPY	
1	Israel G. Torres (#020303)	NOV 1 5 2017	
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5	480.588.6120 James@TheTorresFirm.com		
6	Attorneys for Plaintiffs		
7			
8	ARIZONA SUPERIOR COURT MARICOPA COUNTY		
9		x	
10	ARIZONA ADVOCACY NETWORK, et	No. CV2017-096705	
11	al.,		
12	Plaintiffs,	Notice of Claim of Unconstitutionality	
13	V.	(A.R.S. § 12-1841)	
14	THE STATE OF ARIZONA, et al.,		
15	Defendants.		
16			
17	Plaintiffs submit this Notice of Cla	im of Unconstitutionality regarding Senate Bill	
18	1516, as detailed in the attached Verified	Complaint, under Section 1841 of the Uniform	
19	Declaratory Judgments Act to Arizona At	torney General Mark Brnovich, Speaker of the	
20	House of Representatives Javan D. Mesna	ard, and President of the Senate Steve	
21	Yarbrough.		
22	1. Plaintiff is represented by the following	ng attorneys:	
23	Israel G. Torres (#020303)		
24	James E. Barton II (#023888)		
25	Saman J. Golestan (# 031710) TORRES LAW GROUP, PLLC	9	
26	2239 West Baseline Road		
27	Tempe, Arizona 85283 480.588.6120		
28	James@TheTorresFirm.com		

1	2.	The case name, court name, caption and case number are found on the first two	
2		pages of the attached Verified Complaint.	
3	3.	Plaintiffs filed the attached Verified Complaint on November 15, 2017.	
4	4.	Senate Bill 1516 amends Title 16 of Arizona Revised Statutes in such a way as to	
5		remove from the Citizens Clean Election Commission enforcement authority	
6	granted to the Commission by the Clean Elections Act. As the Clean Elections Act		
7	was passed by voter initiative, this violates the Voter Protection Act of the Arizona		
8		Constitution. Senate Bill 1516 also provides a blank exemption from the definition	
9		of political committee for some but not all nonprofit, tax-exempt organizations in	
10		violation of the Equal Protection Clause of the Arizona and U.S. Constitutions.	
11		Finally, by permitting contributions to candidates that evade disclosure, Senate Bill	
12		1516 violates Article VII § 16 of Arizona Constitution.	
13	5.	No next hearing is scheduled as of this notice.	
14		Respectfully Submitted on November 15, 2017.	
15		D. EB-TT	
16		By: s/ James E. Barton II	
17		James E. Barton II (#023888)	
18		Saman J. Golestan (#031710) TORRES LAW GROUP, PLLC	
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21		James@TheTorresFirm.com	
22		Attorneys for Plaintiffs	
23			
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_			
		-2-	

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November 15, 2017

Today, Torres Law Group filed two verifications along with the verified complaint in CV 2017-096705. We did not obtain a conformed copy of these filings, however, copies of the signature block for Joel Edman, on behalf of Arizona Advocacy Network, and James Cahill, on behalf of the Bricklayers and Allied Craft Workers Local Union #3 AZ-NM, are attached hereto.

If you have any questions, please contact our office.

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1	Israel G. Torres (#020303) James E. Barton II (#023888) Saman J. Golestan (# 031710)	
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5	602.626.8805 James@TheTorresFirm.com	
6	Attorneys for Plaintiffs	
7		
8	ARIZONA	SUPERIOR COURT
9	4 F	OPA COUNTY
10		
11	ARIZONA ADVOCACY NETWORK; SEN. DAVID BRADLEY; SEN. OLIVIA	No.
12	CAJERO-BEDFORD; SEN. LUPE CONTRERAS; SEN. ANDREA	VERIFICATION
13	DALESSANDRO; SEN. STEVE FARLEY; SEN. KATIE HOBBS; SEN.	
14	CATHERINE MIRANDA; SEN. MARTIN QUEZADA; SEN. ANDREW SHERWOOD; REP. RICHARD C.	
15	ANDRADE; REP. LELA ALSTON; REP. MARK A. CARDENAS; REP. KEN	
16	CLARK; REP. DIEGO ÉSPINOZA; REP. CHARLENE R. FERNANDEZ;	
17	REP. RANDALL FRIESE; REP. ROSANNA GABALDÓN; REP. ALBERT HALE; REP. STEFANIE	
18	MACH; REP. MATTHEW KOPEC; REP. JUAN JOSE MENDEZ; REP.	
19	REBECCA RIOS; REP. MACARIO SALDATE; REP. CECI VELASQUEZ;	
20	REP. BRUCE WHEELER; and BRICKLAYERS AND ALLIED CRAFTWORKERS LOCAL UNION	
21	#3 AZ-NM;	
22	Plaintiffs,	
23	v.	
24		
		- 1 -

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γ. THE STATE OF ARIZONA, a body politic; MICHELE REAGAN, in her official capacity as Secretary of State; and THE CITIZENS CLEAN ELECTIONS COMMISSION; GOVERNOR'S REGULATORY REVIEW COUNCIL; Defendants. I, Joel Edman, on behalf of Arizona Advocacy Network, do state and swear under penalty of perjury and as permitted by Rule 80(c), Ariz. R. P. Civ. P., as follows: . I am a plaintiff in this action. I have read the above captioned Verified Complaint and, to the best of my knowledge, information and belief, the statements made therein are true and correct. I declare under penalty of perjury that the foregoing is true and correct. Executed this date: W7/17 -2-

٧. THE STATE OF ARIZONA, a body politic; MICHELE REAGAN, in her official capacity as Secretary of State; and THE CITIZENS CLEAN ELECTIONS COMMISSION; GOVERNOR'S REGULATORY REVIEW COUNCIL; Defendants. I, James Cahill, on behalf of Bricklayers and Allied Craftworkers Local Union #3 AZ-NM, do state and swear under penalty of perjury and as permitted by Rule 80(c), Ariz. R. P. Civ. P., as follows: I am a plaintiff in this action. I have read the above captioned Verified Complaint and, to the best of my knowledge, information and belief, the statements made therein are true and correct. I declare under penalty of perjury that the foregoing is true and correct. Executed this date: -2-

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	MARIA ARIZONA ADVOCACY NETWORK; SEN. DAVID BRADLEY; SEN. OLIVIA CAJERO-BEDFORD; SEN. LUPE CONTRERAS; SEN. ANDREA DALESSANDRO; SEN. STEVE FARLEY; SEN. KATIE HOBBS; SEN. CATHERINE MIRANDA; SEN. MARTIN QUEZADA; SEN. ANDREW SHERWOOD; REP. RICHARD C. ANDRADE; REP. LELA ALSTON; REP. MARK A. CARDENAS; REP. KEN CLARK; REP. DIEGO ESPINOZA; REP. CHARLENE R. FERNANDEZ; REP. CHARLENE R. FERNANDEZ; REP. RANDALL FRIESE; REP. ROSANNA GABALDON; REP. ALBERT HALE; REP. STEFANIE MACH; REP. MATTHEW KOPEC; REP. JUAN JOSE MENDEZ; REP. REBECCA RIOS; REP. MACARIO SALDATE; REP. CECI VELASQUEZ; REP. BRUCE WHEELER; and BRICKLAYERS AND ALLIED CRAFT WORKERS LOCAL UNION #3 AZ-NM; Plaintiffs,	NOV 1 5 2017 MICHAEL K. JEANES, CLERK HARNEY DEPUTY CLERK	C
	Plaintiffs, v.		
-	THE STATE OF ARIZONA, a body politic; MICHELE REAGAN, in her official capacity as Secretary of State; and THE CITIZENS CLEAN ELECTIONS		
	[Plead	ling Title] - 1	

COMMISSION; GOVERNOR'S REGULATORY REVIEW COUNCIL;

Defendants.

Now Comes the Plaintiffs herein, by and through counsel undersigned, and hereby file their

Certificate of Compulsory Arbitration.

The undersigned certifies that there is no monetary relief sought. Accordingly, this case is

not subject to the Uniform Rules of Procedure for Arbitration.

Dated: November 8, 2017

TORRES LAW GROUP, PLLC

By: James E. Barton II Saman J. Golestan 2239 West Baseline Road Tempe, Arizona 85283

Attorneys for Plaintiffs

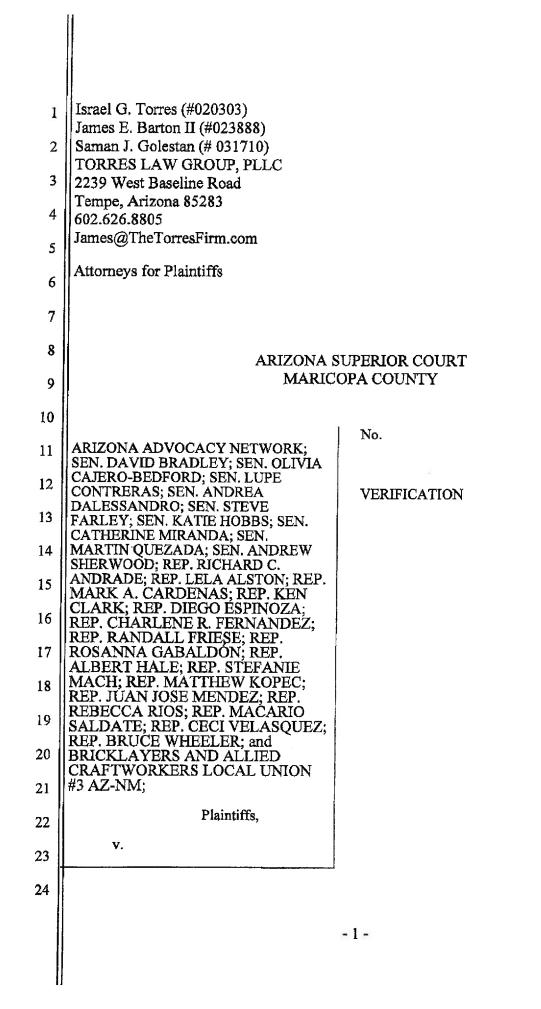


November 15, 2017

Today, Torres Law Group filed two verifications along with the verified complaint in CV 2017-096705. We did not obtain a conformed copy of these filings, however, copies of the signature block for Joel Edman, on behalf of Arizona Advocacy Network, and James Cahill, on behalf of the Bricklayers and Allied Craft Workers Local Union #3 AZ-NM, are attached hereto.

If you have any questions, please contact our office.

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٧. THE STATE OF ARIZONA, a body politic; MICHELE REAGAN, in her official capacity as Secretary of State; and THE CITIZENS CLEAN ELECTIONS COMMISSION; GOVERNOR'S REGULATORY REVIEW COUNCIL; б Defendants. I, Joel Edman, on behalf of Arizona Advocacy Network, do state and swear under penalty of perjury and as permitted by Rule 80(c), Ariz. R. P. Civ. P., as follows: . I am a plaintiff in this action. I have read the above captioned Verified Complaint and, to the best of my knowledge, information and belief, the statements made therein are true and correct. I declare under penalty of perjury that the foregoing is true and correct. Executed this date: _____/7/17

Ĩ ٧. 2 THE STATE OF ARIZONA, a body 3 politic; MICHELE REAGAN, in her official capacity as Secretary of State; and 4 THE CITIZEN'S CLEAN ELECTIONS 5 COMMISSION; GOVERNOR'S REGULATORY REVIEW COUNCIL; 6 Defendants. 7 8 I, James Cahill, on behalf of Bricklayers and Allied Craftworkers Local Union #3 AZ-NM, do 9 state and swear under penalty of perjmy and as permitted by Rule 80(c), Ariz. R. P. Civ. P., as 10 11 follows: I am a plaintiff in this action. I have read the above captioned Verified Complaint and, to the best 12 13 of my knowledge, information and belief, the statements made therein are true and correct. 14 I declare under penalty of perjury that the foregoing is true and correct. 15 16 Executed this date: 11-7-17 17 18 19 20 21 22 23 24 25 26 27 28 -2-