

THE STATE OF ARIZONA
CITIZENS CLEAN ELECTIONS COMMISSION

REPORTER'S TRANSCRIPT OF SPECIAL MEETING

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<p style="text-align: right;">Page 2</p> <p>1 SPECIAL MEETING BEFORE THE CITIZENS CLEAN 2 ELECTIONS COMMISSION convened at 10:33 a.m. on 3 August 22, 2017, at the State of Arizona, Clean 4 Elections Commission, 1616 West Adams, Conference Room, 5 Phoenix, Arizona, in the presence of the following Board 6 members: 7 Mr. Steve Titla, Chairman (Telephonic) 8 Mr. Mark S. Kimble (Telephonic) 9 Mr. Damien Meyer (Telephonic) 10 Mr. Galen D. Paton (Telephonic) 11 Ms. Amy B. Chan (Telephonic) 12 13 OTHERS PRESENT: 14 Thomas M. Collins, Executive Director 15 Paula Thomas, Executive Officer 16 Sara Larsen, Financial Affairs Officer 17 Mike Becker, Policy Director 18 Alec Shaffer, Web Content Manager 19 Stephanie Cooper, Executive Support Specialist 20 Kara Karlson, Assistant Attorney General 21 Nathan Arrowsmith, Osborn Maledon, P.A. 22 Lee Miller, AZ Secretary of State's Office 23 Jeanne Galvin, Assistant Attorney General 24 Joseph Larue, Assistant Attorney General 25 Jesus Rubalcava, Self (Telephonic) Dustin Gardiner, Arizona Republic</p>	<p style="text-align: right;">Page 4</p> <p>10:34:54-10:36:10</p> <p>1 And -- 2 CHAIRMAN TITLA: Okay. Why don't -- why 3 don't we go to that then. 4 MR. COLLINS: Yes. I think we should, and 5 then I will preface this by saying that Mr. Miller from 6 the Secretary of State's office is here. He has, I 7 think, some comments respecting the executive 8 director's report which we think it's -- because it's 9 noticed for discussion, it's perfectly reasonable to 10 have him make those comments under this agenda item. 11 So before -- so with your indulgence, after 12 I present my end of the report, Mr. Miller -- I will 13 turn the microphone over to Lee Miller who is the 14 deputy Secretary of State who's present in the room, if 15 that's okay with you, Mr. Chairman. 16 CHAIRMAN TITLA: Yeah. Okay yeah. That's 17 good. 18 MR. COLLINS: Okay. With that, 19 Mr. Chairman, you've all, I hope, had an opportunity to 20 review my executive director's report. As you know, 21 we as staff or I as executive director felt the need to 22 put you on notice that, you know, some changes have 23 been made to the published Administrative Code that we 24 were concerned about. In the 24 hours since that 25 report was published and to be subject to your</p>
<p>10:33:59-10:34:52</p> <p style="text-align: right;">Page 3</p> <p>1 P R O C E E D I N G 2 3 CHAIRMAN TITLA: Okay. Why don't we call 4 this meeting to order. 5 Roll call. 6 MR. COLLINS: Commissioners, if you could 7 announce yourself for the record, that would be 8 helpful. 9 COMMISSIONER PATON: This is Galen Paton. 10 COMMISSIONER MEYER: This is Commissioner 11 Meyer. 12 COMMISSIONER CHAN: Commissioner Chan here 13 too. 14 COMMISSIONER KIMBLE: Mark Kimble. 15 CHAIRMAN TITLA: This is Steve Titla here, 16 chairman of the board. 17 Do we have a quorum? 18 MR. COLLINS: Yes, Mr. Chairman, we do. 19 CHAIRMAN TITLA: Okay. Tom, I'm trying to 20 open the agenda on my computer here. 21 MR. COLLINS: Yeah. 22 CHAIRMAN TITLA: But what's the next item 23 on the agenda? 24 MR. COLLINS: Mr. Chairman, the next item 25 on the agenda is the executive director's report.</p>	<p>10:36:15-10:38:00</p> <p style="text-align: right;">Page 5</p> <p>1 discussion, we have had some -- a couple of exchanges 2 with -- with the Secretary's office. You have in your 3 supplemental materials an email from Mr. Miller to me 4 and to -- to Ms. O'Grady, as well as a letter that 5 Ms. O'Grady sent to the Secretary's office yesterday. 6 As I noted in the executive director's 7 report, to the extent that this ends up being something 8 that we can't handle administratively, we will have 9 more information on the legal front on August 31st; 10 however, what I can tell you is that as an 11 administrative matter, what I plan to do in working 12 with Ms. O'Grady and Mr. Arrowsmith from -- from Osborn 13 Maledon is provide some answers to the question that 14 Mr. Miller raised in his email. 15 Those don't, of course, set aside our -- 16 the concerns we noted in the prior letter, but 17 nevertheless, we welcome the opportunity to provide 18 Mr. Miller with further legal analysis and we do hope 19 to have this matter resolved or at least a better -- a 20 clearer or a sharper understanding of where we stand 21 before our August 31st business meeting. 22 So that's -- that's really the highlights 23 of the report and subsequent action since the report 24 was filed. If you have questions for me, I'll take 25 them now. Otherwise, I would turn it over to</p>

<p>10:38:05-10:39:20 Page 6</p> <p>1 Mr. Miller and then I'm happy to come back for further 2 questions if you have any. 3 So with that, Mr. Chairman and 4 Commissioners, do you have any questions on what I've 5 outlined in the written materials or what I've said 6 here this morning? 7 CHAIRMAN TITLA: Any questions for 8 Mr. Collins? 9 (No response.) 10 CHAIRMAN TITLA: Commissioners? 11 (No response.) 12 CHAIRMAN TITLA: If not, if we can go to 13 the next person, Tom. 14 MR. COLLINS: Yes, sir. 15 MR. MILLER: Mr. Chairman, members, my name 16 is Lee Miller. I serve as the Deputy Secretary of 17 State. Thank you very much for an opportunity to visit 18 with you-all this morning. I will summarize the email 19 that I sent to Tom and Mary O'Grady. 20 Simply put, in this particular instance, 21 the Secretary of State's office simply acts as a 22 printer of notices, of information, of reports, of 23 proposals, of final decisions that we get from boards, 24 commissions and state agencies. We have no legal 25 authority over the content of what's in the code. We</p>	<p>10:41:29-10:43:20 Page 8</p> <p>1 the code that goes forward, I will simply delete that 2 section which GRRC has noticed as expired, and that is 3 exactly what we did in this instance. We did nothing 4 more, nothing less than we do with every single other 5 board, commission and agency. We follow strictly the 6 direction we get from GRRC. We follow strictly the -- 7 our statutory obligations, and we have in no way, shape 8 or form chosen a side, taken a position. Frankly, we 9 believe we have no discretion in -- in the instance of 10 removing these two rules from the code. 11 Now, I fully recognize that the Commission 12 disputes whether GRRC has the authority to do that, 13 whether GRRC had the authority to issue that notice, 14 and we attempted to capture that dispute in an editor's 15 note in the code. In the meantime, I am -- I believe I 16 am bound by the statute in the absence of a resolution, 17 a legal resolution to the Commission's -- GRRC's 18 authority to declare those two rules expired, but 19 having said that, know that in literally 60 seconds I 20 can restore those provisions which were taken out of 21 the code back into the code through the wonder of 22 computers. 23 And so just -- and we have asked the 24 representative from the Attorney General's Office that 25 represents that section of our office. Those attorneys</p>
<p>10:39:26-10:41:24 Page 7</p> <p>1 simply -- to the extent we make edits, it's simply for 2 form and format, but I have no legal authority to 3 change the information sent over to us with the 4 direction to print it in the Arizona Administrative 5 Code. 6 And, specifically, there is a statute which 7 governs what our relationship is with the Governor's 8 Regulatory Review Council, A.R.S. 41-1056. And as I 9 highlighted in the email, it -- that statute 10 articulates a very specific process for the Secretary 11 of State's Office for the publications division of the 12 Secretary of State's Office to adhere to when we 13 receive notices from GRRC. 14 And so what we note that the -- the 15 Commission is attempting to resolve a jurisdictional 16 issue with the Regulatory Review Council: Does the 17 Regulatory Review Council have any authority whatsoever 18 over the Commission? And I earnestly look forward to a 19 rapid resolution of that question. In the meantime, I 20 am bound by statute, and this Statute 41-1056 tells me 21 at Subsection J that if I get a notice from GRRC that a 22 rule has expired, number one, I will publish a notice 23 that -- essentially, I will -- I will transcribe the 24 notice from GRRC and put it in the register. 25 I will after -- and in the next edition of</p>	<p>10:43:27-10:44:52 Page 9</p> <p>1 are different than the attorneys that represent you-all 2 at the AG's office and represent us on election 3 matters, but we have asked them for legal advice. I 4 spoke with your attorney, Mary O'Grady, yesterday about 5 this particular matter and said literally one minute 6 after somebody gives me a legal rationale for getting 7 past the obligations that the Secretary of State has 8 under 41-1056, those rules will go back into the code. 9 And so what I really wanted to leave you 10 with today is an assurance that we didn't choose a 11 side. We're not taking a position. We don't believe 12 one side or another is right or wrong in the Clean 13 Elections Commission's attempting to resolve the 14 jurisdictional issue with GRRC, but in the meantime, 15 I'm stuck with the statute. I'm stuck with the 16 commands and the notices I get from GRRC, and we follow 17 those as we would deal with any other board, commission 18 or agency of the state. 19 And with that, I'm available for any 20 questions. 21 COMMISSIONER CHAN: Mr. Chairman, this is 22 Commissioner Chan. I wanted to thank Lee for coming to 23 talk to us about this. 24 I do have a question for you, Lee, but 25 first, I would just like to make a comment. I mean, I</p>

<p>10:44:55-10:46:20 Page 10</p> <p>1 recognize the role you're in doing these publications, 2 but saying that your office doesn't take a position or 3 a side on this, I think is a little disingenuous just 4 because I believe we're in this position because of 5 some lobbying by your office. So I just want to make 6 that comment. And if I'm incorrect, you can -- you can 7 please feel free to correct me on the record. 8 But I was curious. It seems like there was 9 a little bit of a delay in making this change since 10 GRRRC took their action, and I just wondered if you 11 could go over why that was. I think the GRRRC action 12 took place -- I mean, it was at least a month ago, 13 wasn't it? Does it always take this much to make such 14 a change? Because I believe since there was no change 15 we were under the impression that you guys were not 16 taking a position and were leaving both of the rules 17 in place while we kind of work this out. 18 MR. MILLER: Mr. Chairman, Commissioner 19 Chan, fellow members of the commission, the 20 Administrative Register and the Administrative Code are 21 not -- unlike, for example, the Code of Federal -- Code 22 of Federal Regulations and the Federal Register, unlike 23 those publications, those -- they are not things that 24 are issued daily. 25 They are issued roughly every couple of</p>	<p>10:47:50-10:49:22 Page 12</p> <p>1 CHAIRMAN TITLA: Okay. Okay, Mr. Kimble. 2 Any other questions by -- or comments by 3 the Commission? 4 COMMISSIONER CHAN: Actually, Mr. Chairman, 5 this is Commissioner Chan again, and this is actually a 6 question for Tom. 7 Just knowing -- I'm looking forward to 8 getting an AG opinion. I do have a question because of 9 the issues we had with GRRRC and conflict issues, 10 whether the AG's office can even issue an opinion on 11 this, but I don't want to go too far afield. I just 12 want to throw that out there, Tom. 13 Do you have any comments on that? 14 MR. COLLINS: Mr. Chairman, Commissioner 15 Chan, two thoughts, and I need to -- I want to go back 16 to -- so let me ask you a question and then I have a 17 secondary statement. 18 It is our view that the Attorney General's 19 Office because of the interagency conflict that has 20 spun out from first the Secretary's initial fore into 21 this area at GRRRC and then GRRRC's troublesome and 22 procedurally and constitutionally flawed process and 23 then this additional wrinkle that the Attorney 24 General's Office is probably not the appropriate office 25 to be advising the Secretary's office, but that's</p>
<p>10:46:25-10:47:47 Page 11</p> <p>1 weeks, and as articulated in the statute, first we had 2 to publish a notice that in the next edition of the 3 code GRRRC had identified these two particular rules as 4 expired. And then when -- a couple of weeks after that 5 when the next edition of the code actually was 6 published, you have a version of the code absent those 7 two rules. The code itself is generally published 8 quarterly, but that timeline moves so that depending on 9 the even flow of regulation in the state of Arizona. 10 COMMISSIONER CHAN: Okay. Thank you for 11 that information. 12 I don't have anything further, 13 Mr. Chairman. 14 CHAIRMAN TITLA: Any other questions by the 15 commissioners? 16 COMMISSIONER KIMBLE: Mr. Chairman, this is 17 Mark Kimble. 18 CHAIRMAN TITLA: Okay, Mark. 19 COMMISSIONER KIMBLE: I would just say I've 20 got numerous questions. I've got some substantial 21 disagreements with what Mr. Miller said. I've got some 22 questions about what position we should take in 23 response to this unilateral action by the Secretary of 24 State's Office, but I think I'll hold all that until 25 the meeting on the 31st.</p>	<p>10:49:26-10:51:03 Page 13</p> <p>1 something that the Secretary and the Attorney General's 2 Office, I'm sure, will work out. 3 And I have confidence that the Attorney 4 General's Office, until I hear otherwise, will 5 recognize that those -- those -- those conflicts are 6 not severable -- or separable within the office at this 7 point and will appoint counsel for Mr. Miller. 8 With respect to Mr. Miller's point under 9 41-1056(J), that is the issue on which I plan to 10 administratively, working with our attorneys to address 11 because, in our view, with no disrespect to the many 12 attorneys who work -- as you know, not in attorney 13 capacities, but attorneys who work at the attorney -- 14 at the Secretary of State's Office, it is quite clear 15 from the record that nothing in GRRRC's order falls 16 under 41-1056(J). 17 And we will be working on a communication 18 to that effect administratively and we will let you 19 know what, if any, response we get to that, but suffice 20 it to say, that (J), which is highlighted helpfully in 21 Mr. Miller's email which is the first supplement to 22 your executive director's report, says if an agency 23 fails to submit its report, the following things 24 happen. Well, there is no set of facts in this process 25 where the agency, the Clean Elections Commission, has</p>

<p>10:51:06-10:52:42 Page 14</p> <p>1 failed to submit its report. 2 And so the upshot is that we think that 3 notwithstanding what I believe Mr. Miller is saying in 4 good faith, we think he's -- we think that the analysis 5 that he's done or has been done is incorrect and 6 incorrect as applied to the facts and does put the 7 Secretary in a position where the Secretary's office is 8 taking action on a regulatory matter that is not a 9 statutory matter but is, in fact, a discretionary 10 matter. 11 And that is what raises and continues to 12 raise the contractual issue that sort of brings 13 together what had been two different tracts into one 14 relatively complicated, but still understandable 15 situation where we have certain obligations as the 16 Commission. GRRC had certain obligations it did not 17 fulfill and GRRC had certain actions that it did not 18 take, and Subsection J is not in play because there is 19 no -- the circumstance that is the predicate for that 20 statute, an agency failing to submit its report, has 21 never occurred. 22 And it's important just to not to go too 23 far afield for purposes of the limited discussion we 24 can have on this, but as you know, as a matter of 25 historical record, we have resubmitted reports to GRRC</p>	<p>10:54:19-10:55:18 Page 16</p> <p>1 with our attorneys, that at least with respect to the 2 code that is published by the Secretary of State's 3 Office, we may hit that off. There are other issues 4 that are beyond the scope of the executive director's 5 report that we will inevitably have to discuss on the 6 31st. 7 CHAIRMAN TITLA: Okay. Any other comment? 8 Questions for Tom? 9 (No response.) 10 CHAIRMAN TITLA: If not, this item is up 11 for discussion and possible action. 12 MR. COLLINS: And, Mr. Chairman -- 13 CHAIRMAN TITLA: Anything -- yeah. 14 MR. COLLINS: Mr. Chairman, we don't need 15 any action at this point. We think the discussion is 16 sufficient. 17 CHAIRMAN TITLA: Okay. 18 MR. COLLINS: As staff. That's our staff 19 view. 20 CHAIRMAN TITLA: All right. So any more 21 discussion, commissioners? 22 (No response.) 23 CHAIRMAN TITLA: Okay. If there's no more 24 discussions, why don't we go to the next item then. 25 MR. COLLINS: Sure. Thanks.</p>
<p>10:52:45-10:54:15 Page 15</p> <p>1 time and again. And, in fact, we have a resubmitted 2 report pending with GRRC right this minute. So 3 Subsection J is not in play, and we'll be -- we will 4 try to articulate that in a more formal and legal way 5 to Mr. Miller for his aid in working through this 6 problem. 7 And that's what we're going to do 8 administratively, and our hope is that by the next 9 business meeting we will have -- we will have reached 10 some resolution on that, but that's all I have to say 11 at that point about that, unless you have questions. 12 CHAIRMAN TITLA: Any questions for the 13 director? 14 COMMISSIONER PATON: This is Galen Paton. 15 I'm just concerned that people involved in elections 16 and the public is totally confused by all of this. And 17 that -- and is that going to upset the next election 18 cycle and -- if we don't get this resolved? 19 MR. COLLINS: Mr. Chairman, Commissioner 20 Paton, sort of keeping it to the executive director's 21 report context, I can say that that question in many 22 ways will be the question for us to answer in the 23 main -- at the business meeting on -- regular meeting 24 on August 31st. Our hope is based on the 25 administrative actions that I am taking in conjunction</p>	<p>10:55:19-10:56:42 Page 17</p> <p>1 CHAIRMAN TITLA: Which is Number III, 2 discussion and possible action on MUR 17-01, Jesus 3 Rubalcava, including a proposed repayment order 4 submitted by the executive director. 5 Tom? 6 MR. COLLINS: Yes. Mr. Chairman, a 7 preparatory comment before we get into this. For this 8 matter, because it involves a repayment order, you have 9 outside counsel who is here from the Attorney General's 10 Office licensing division, whose name is Jeanne 11 Galvin -- am I saying that right? 12 So Jeanne Galvin is in the room in the 13 event that you have questions related to what I'm about 14 to say because I am acting in a capacity where I'm 15 asking for an enforcement order. 16 Mr. Rubalcava is on the phone. What I 17 propose is that I take a total of ten minutes to 18 present my case. I'd like to present the main case on 19 this issue in seven minutes and then reserve three or 20 so minutes for rebuttal as necessary. And you should 21 have received two things in the email from Ms. Thomas. 22 One is a PowerPoint that we are going to do in the 23 room -- and Mr. Rubalcava should have also received 24 that -- as well as a revised proposed order that 25 corrects -- that corrects a scrivener's error in the --</p>

<p>10:56:46-10:57:44 Page 18</p> <p>1 that corrects a scrivener's error in the proposed 2 order. 3 So the order that we are asking you to 4 approve is the -- is denominated the revised proposed 5 order and you received it via email, I believe, just 6 before the meeting started. I'm trying to confirm that 7 that happened. 8 MS. THOMAS: Yes, it did. 9 MR. COLLINS: Okay. So I would -- with 10 that -- with your permission, what I would do is I 11 would present my case. We would offer Mr. Rubalcava an 12 opportunity to present whatever material he wishes to 13 present via phone and then I would like to have a 14 couple of minutes for rebuttal, if that is amenable to 15 the Commission. 16 CHAIRMAN TITLA: Is that okay, 17 commissioners? 18 COMMISSIONER CHAN: That's fine by me. 19 Mr. Chairman, Commissioner Chan here. 20 Tom, just a quick question. 21 Is your PowerPoint going to go over why 22 we're here today just a week ahead of our regularly 23 scheduled meeting? 24 MR. COLLINS: My PowerPoint is going to go 25 over what we -- what we are planning to do. If you</p>	<p>10:58:33-10:59:49 Page 20</p> <p>1 As you can see, it's entitled "Citizens 2 Clean Elections Commission Executive Director 3 Recommendation Repayment Order MUR 17-01, Jesus 4 Rubalcava." So just to give you a very quick caveat 5 about this PowerPoint, this PowerPoint is not designed 6 to supplant the proposed order and exhibits -- the 7 revised proposed order and exhibits you received, but 8 rather to highlight the contents of the proposed order 9 in order for you to understand where we're coming from 10 and why we're -- why we think this is an appropriate 11 course of action. 12 As you know, rehearsing history, 13 Mr. Rubalcava was first subject to a random audit and 14 then subject to a comprehensive audit review of his 15 entire campaign -- campaign. He was subject to a 16 complaint that was filed by the executive director. 17 The Commission has found reason to believe violations 18 may have occurred, and the issue today is a proposed 19 repayment order. 20 As you know -- and this is important. The 21 Clean Elections Act, apart from its other features, 22 requires that the Commission shall ensure that money 23 from the Fund is placed in candidate campaign accounts 24 or otherwise spent as specified in this article and not 25 otherwise. And the Commission has passed rules to</p>
<p>10:57:47-10:58:31 Page 19</p> <p>1 have questions about -- about why we are doing this 2 now, I'm happy to answer those. It's really up to you. 3 If you'd like me to get through the -- get through -- 4 COMMISSIONER CHAN: Go ahead. Just -- 5 yeah. 6 MR. COLLINS: Okay. 7 COMMISSIONER CHAN: That's fine. I'm 8 sorry. I don't mean to delay it. 9 MR. COLLINS: Okay. 10 COMMISSIONER CHAN: I'll just -- I have no 11 questions. 12 MR. COLLINS: Okay. And so I will -- 13 Mr. Chairman, with your permission, I'd like to begin 14 my presentation. And I have lost the clicker. So, 15 Stephanie -- 16 CHAIRMAN TITLA: Okay. Why don't we 17 proceed. 18 MR. COLLINS: Okay. So if you have the 19 PowerPoint -- 20 CHAIRMAN TITLA: Okay. Let me get your 21 PowerPoint open. 22 MR. COLLINS: You should have a PDF of the 23 PowerPoint, and then the public who is watching should 24 be able to see the PowerPoint and Mr. Rubalcava should 25 also have a copy of the PDF.</p>	<p>10:59:52-11:01:04 Page 21</p> <p>1 ensure that that happens, and among those rules are 2 Arizona Admin Code 702(A) which states that a 3 participating candidate shall use funds in the 4 candidate's current campaign account to pay for goods 5 and services for direct campaign purposes only. 6 And Arizona Admin Code R2-20-703(C) states 7 that any expenditure made by that candidate or the 8 candidate's committee that cannot be documented as a 9 direct campaign expenditure shall promptly be repaid to 10 the Fund with the candidate's personal money. 11 I would note -- this is not in the 12 PowerPoint, but in your materials at Exhibit 4 to -- or 13 Attachment 4, I should say -- Exhibit 4, rather, to the 14 proposed order, Mr. Rubalcava swore that he would -- 15 under paragraph 8, that he had the burden of proving 16 that expenditures made by or on behalf of the candidate 17 were for direct campaign purposes. So that's in the 18 record and that's -- and that's something that's 19 established. 20 Rule 704(B) provides that the Commission 21 may determine that a participating candidate who has 22 received payments from the Fund must repay the Fund 23 under any of the following circumstances. There are a 24 number of circumstances, and the one we're focused on 25 here today for purposes of -- for purposes of -- well,</p>

<p>11:01:09-11:02:30 Page 22</p> <p>1 for purposes of clarity and alacrity, among other 2 things, is that use of funds not for direct campaign 3 expenses, if the Commission determines any amount 4 was -- was not -- was payment to an eligible candidate, 5 it will notify the candidate of the amount so used, and 6 the candidate shall pay to the fund an amount equal to 7 such amount. 8 So this is a -- what you see next is a 9 screenshot from the comprehensive audit review which is 10 Exhibit 2 to the -- Exhibit 2 to the main order. And 11 there the most important language is that the candidate 12 indicated he was unable to identify or locate any 13 documentation supporting the deposits and withdrawals 14 from the campaign bank statements. 15 Mr. Rubalcava himself in response to the 16 audit stated that he was -- a reason why he was not 17 able to provide that information, but he said that he 18 accepts the report on findings as a way to acknowledge 19 and learn from what was done incorrectly and he's 20 "willing to accept the consequences of my wrongdoing 21 and ask that the Commission allow me to take corrective 22 actions in order to comply; whether this be repaying 23 back any unaccounted monies and fees set forth by the 24 Commission." 25 So not only did Mr. Rubalcava sign in</p>	<p>11:04:09-11:05:35 Page 24</p> <p>1 I'll stand for any questions and then, as I said, I'd 2 like to reserve some time after Mr. Rubalcava speaks 3 to -- to rebut, if necessary. 4 CHAIRMAN TITLA: Are there any questions 5 for the director? 6 (No response.) 7 CHAIRMAN TITLA: Okay. Is there a -- does 8 Mr. Rubalcava want to make a statement? 9 MR. RUBALCAVA: Yes. Thank you, Chairman 10 and commissioners. 11 I do want to make a statement. So I did 12 receive the documents that the Executive Director 13 Collins sent out to you guys, and so in regards to 14 those specific -- what is being asked of, I think, in 15 my opinion, I disagree and I do believe it's unfair, 16 and here is exactly why. 17 I think that I -- if given -- if given the 18 time to do so, but when you're on 10 days or 14 days 19 and trying to submit some of this information -- the 20 district that I was representing is the second largest 21 geographical district in the state, and it encompasses 22 a lot of traveling and mileage. I actually could have 23 easily driven through the state, through that part of 24 the district of the state, to go and collect receipts 25 of the businesses and the individuals that helped me</p>
<p>11:02:34-11:04:04 Page 23</p> <p>1 Exhibit 4 an application where he stated that he had 2 the burden to show that his expenditures were for 3 direct campaign purposes. He then stipulated in his 4 response to the audit that he was unable to show that 5 and that he would, in fact, repay monies unaccounted 6 for and take -- take corrective action as ordered by 7 the Commission. 8 Our recommendation on repayment is that the 9 repayment must be from personal funds, that it reserves 10 expressly additional penalties pursuant to the acts and 11 rules and continues our investigatory activities 12 previously approved. Why is that important? Because 13 as the first slide indicated, this is about securing 14 the Fund against -- against expenditures that are not 15 justified under the Fund. 16 There are additional penalties that we are 17 in the process of doing -- that may result from an 18 ongoing investigation that we are engaged in and we 19 will continue to engage in. This order that we -- the 20 revised proposed order expressly permits appeal by 21 Mr. Rubalcava as permitted by Commission rules and 22 requires repayment within 30 days. 23 So that's really the upshot of it. We 24 think that the revised proposed order is an appropriate 25 action at this time, and we would ask you to do that.</p>	<p>11:05:37-11:07:05 Page 25</p> <p>1 out through that campaign to re -- try to recuperate 2 some of those receipts that were missing. 3 A lot of the receipts were already included 4 in that random audit because when they did the random 5 audit, the first initial five random transactions that 6 they asked for, they went ahead and changed them. So 7 in other words, they asked for five random audit 8 receipts and then when I explained to the individual 9 that was doing the audit what was -- what had happened 10 with my campaign and the transferring of funds from my 11 personal account to the campaign account, she then 12 started asking for more information. 13 Well, then it was no longer the five random 14 audit. It became almost a -- I won't say a full audit, 15 but it was -- it came pretty close to what was being 16 asked in the full audit. My question to that 17 individual, because she was the one that did the full 18 audit, was why couldn't we use some of what was 19 initially asked for in the random audit to take place 20 of what was being asked in the full audit because of 21 the situation where -- where I was spending most of the 22 day was at work. 23 And so I was taking these receipts to work 24 to try to get these put together as quickly as possible 25 for the auditing firm. And so because it was in a</p>

<p>11:07:09-11:08:46 Page 26</p> <p>1 school when I was moved over the Christmas holidays not 2 only once but twice, somewhere along the way these 3 receipts and information got lost. And so why I say I 4 could easily go back and get verification that these 5 funds were not spent the way that I'm being accused of 6 spending them, if given the time to do so. 7 I'll give you a perfect example. I spent 8 over \$6,000 just with one business and Families to 9 Arizona, which is in my district. They did all my 10 printing of materials, all my campaign fund. 11 Individuals that worked for me, because the district is 12 so large, I had little groups of individuals that I 13 paid. All I would have to do is get ahold of them, go 14 out, have them, you know, re-sign, get it notarized or 15 whatever I had to do, fill out an affidavit for the 16 payment that I paid to those individuals. 17 So I can account for those, but I was 18 needing more time to do so. I'm a school teacher and 19 it's really difficult for me. Basically the only time 20 that I have to be able to do this would be on the 21 weekends. And so I can, if the Commission would -- the 22 commissioners would allow for me to go back and get 23 those receipts, get ahold of those individuals that 24 volunteered and worked for my campaign, I can do that. 25 If I have to go business to business, then I will do</p>	<p>11:10:19-11:11:46 Page 28</p> <p>1 don't -- I didn't know these individuals from 2 beforehand, but they work with activist groups in, say, 3 Yuma or Somerton area. And I didn't know them. I got 4 to know them through the campaign season. They worked 5 that one day or that one weekend and then I never saw 6 them again. So that's what my challenge is of trying 7 to locate these individuals. 8 Now, when I was served that compliance 9 order, I believe I -- I don't know if it was 10 days or 10 14 days. I don't have the document in front me to 11 provide all that information. After I wasn't able to 12 get all the information that was needed, all of the 13 receipts, I didn't know what the -- what the next 14 step -- I'll be very honest with you. I don't know 15 what the steps are with the Commission's desire as to 16 what happens next. So, basically, I have been on a -- 17 just waiting to see what it is that the Commission 18 would like in order to proceed. 19 COMMISSIONER KIMBLE: Well, Mr. Rubalcava, 20 did you call anyone at the Commission or contact anyone 21 and asked them what the next steps were? 22 MR. RUBALCAVA: I did not, and part of the 23 reason why is because it was made very clear that the 24 Commission could not provide any kind of -- I did 25 exchange a few emails, and it was very clear to me --</p>
<p>11:08:50-11:10:18 Page 27</p> <p>1 that, but I can account for those -- those funds that 2 were spent. 3 To go beyond that and ask for me to repay 4 the full amount and then plus what was given to me by 5 individuals as -- what they call seed money, to include 6 that money on top of it I think is really, in my 7 opinion, unfair. 8 COMMISSIONER KIMBLE: Mr. Chairman, this is 9 Mark Kimble. 10 CHAIRMAN TITLA: Okay. Commissioner 11 Kimble. 12 COMMISSIONER KIMBLE: Mr. Rubalcava, as to 13 your -- your response for more time, I note in the 14 report that we have that an order of compliance was 15 served on you on June 23rd and you've done nothing 16 since then. That's two months from tomorrow -- two 17 months ago tomorrow. 18 Have you, in the past two months since you 19 got this order, done anything to get any of these 20 documents that you say you can get? 21 MR. RUBALCAVA: Commissioner, I have -- 22 thank you for the question. I have gotten ahold of the 23 individuals. A lot of them have moved. You know, I'm 24 trying to relocate their numbers. These are 25 volunteers. A lot of the volunteers showed up. I</p>	<p>11:11:51-11:13:09 Page 29</p> <p>1 one of them being from Mr. Collins that -- and it was 2 just a simple question. I don't remember what the 3 question was, but it -- he did provide an answer, but 4 he also did make it very clear that he could not 5 provide any kind of legal advice. 6 At that point, I wasn't asking for legal 7 advice, but if it was taken as I was asking for legal 8 advice -- I basically then said, okay, well, I'm not 9 going to -- that was my thought process that I wasn't 10 going to be able to get any questions really answered 11 without it being considered legal advice. 12 CHAIRMAN TITLA: Okay. Any further 13 questions for the gentleman? 14 COMMISSIONER CHAN: Mr. Chairman -- 15 COMMISSIONER PATON: I do. 16 COMMISSIONER CHAN: Oh, is that Mr. Kimble 17 or -- 18 COMMISSIONER PATON: This is Galen Paton. 19 I was just going to ask, if possible, is it -- you 20 know, I'm not sure exactly your procedures as to where 21 we're going from this. 22 MR. COLLINS: Sure. 23 COMMISSIONER PATON: But it would seem to 24 me that -- could he submit these receipts? For 25 instance, with the printer for \$6,000? I would think</p>

<p>11:13:15-11:14:44 Page 30</p> <p>1 he Chan email him that -- those receipts if he spent 2 that money. I'm sure the guy has it in his -- in his 3 accounting. And, I mean, I would want him to be able 4 to prove that he spent the money on legitimate items, 5 and I -- that's kind of where I stand, but I don't know 6 the time frame of which you gave him a timed response. 7 Could you speak to that, Tom? 8 MR. COLLINS: So -- yes. Mr. Chairman, 9 Commissioner Paton, after the Commission found reason 10 to believe violations may have occurred, the Commission 11 served an order of compliance on Mr. Rubalcava as 12 outlined in -- as Mr. -- as Commissioner Kimble noted. 13 We have not heard from him since then. I do recall an 14 email from him, and I did respond saying we can't 15 provide legal advice. I don't have that email in front 16 of me or the context, but here's what I would -- if I 17 could integrate both my rebuttal and an answer to your 18 question because they go together. 19 Just to look at a few things that we're 20 talking about here, Mr. Rubalcava doesn't indicate -- 21 didn't indicate having mileage reported on his campaign 22 finance report and never were provided mileage logs. 23 He did not provide documents other than bank accounts, 24 and he didn't raise the issues that he's raising today 25 before in this matter. In fact, he came in front of</p>	<p>11:16:11-11:17:44 Page 32</p> <p>1 subsequent to this that Mr. Rubalcava wants to provide, 2 by all means he's free to provide it. We have an 3 ongoing investigation into the remaining issues in the 4 matter. There is also a conciliation process that's 5 mandated in our rules and in statutes, and that is all 6 available to him. 7 It is important that this order be entered 8 today in order that when we do this, Mr. Rubalcava 9 understands that the time for extensions and the time 10 for dissembling is over and the Fund's integrity takes 11 precedence over Mr. Rubalcava's ever-shifting stories 12 of why he can't identify the documents that he seems to 13 think he's had after going on a year. 14 In answer to Mr. -- to Commissioner Chan's 15 commission earlier, we think that it's important to get 16 this resolved by this order being initiated now for a 17 number of reasons that we can get into, but the least 18 of which is this order is the thing that has brought 19 Mr. Rubalcava back to the Commission to talk to us and 20 we think that is very important. And so we think that 21 it is appropriate to authorize the order -- the revised 22 proposed order today. As the order itself says, it 23 will be effective upon my signature and we will issue 24 it to him according to the Commission rules. 25 In addition to providing information,</p>
<p>11:14:47-11:16:07 Page 31</p> <p>1 the Commission and essentially stipulated that 2 everything that the auditors had found was correct. 3 He has had since November -- that was when 4 he was first selected for a random audit -- and his 5 bank accounts do not support the campaign finance 6 reports which is the ultimate reflection in the -- in 7 the audit reports. We are only asking for the amount 8 of Clean Elections Fund to be repaid. The amount of 9 money we calculated does not include seed money. It 10 only includes the amount of money he received in 11 both -- as for Clean Elections, in Clean Elections 12 funding. 13 He's required to keep from the beginning 14 the paperwork necessary to support his documentation 15 throughout the process and to support his campaign 16 finance report. So I agree in principle -- maybe not in 17 principle, but in part with Commissioner Paton that if 18 that were produced, the Commission might -- we might as 19 staff subsequently come back to the Commission and say 20 we need to revise this order, but we granted extensions 21 throughout the full audit and we still were provided no 22 documents. 23 And so our position is quite firm. This 24 order ought to be entered today in order to ensure the 25 integrity of the Fund. If there's other information</p>	<p>11:17:46-11:18:57 Page 33</p> <p>1 Mr. Rubalcava has an -- and in an opportunity to 2 conciliate, Mr. Rubalcava also has appellate rights. 3 So this is not the beginning nor the end of 4 Mr. Rubalcava's opportunities. This is a place marker 5 to show that the -- that the Fund's integrity has to 6 take precedence, and we -- we believe that none of the 7 information you've received today changes that 8 recommendation or alters it in any material way and we 9 would ask that you approve the revised proposed order 10 for my signature. 11 MS. GALVIN: Members of the -- 12 CHAIRMAN TITLA: Any further comments, 13 action by the Commission? 14 MS. GALVIN: Members of the Commission, 15 this is Jeanne Galvin. 16 COMMISSIONER KIMBLE: Mr. Chairman, this is 17 Mark Kimble. 18 CHAIRMAN TITLA: Okay. Commissioner 19 Kimble. 20 COMMISSIONER KIMBLE: I would just say one 21 thing and that -- it's important to remember this is 22 not our money. This is public money, and we are 23 charged with making sure it is spent in an appropriate 24 way in accordance with the statutes and rules. And I 25 think it's incumbent upon us to move forward on this</p>


<p>11:19:00-11:20:36 Page 34</p> <p>1 now and -- and safeguard the public's funds that have 2 not been accounted for, funds that Mr. Rubalcava 3 started receiving about a year ago or if not more than 4 that. 5 And while I can understand that he's been 6 busy and has other obligations, I don't know that that 7 mitigates the fact that there's public money that 8 cannot be accounted for. And I think that the 9 Commission's staff has done everything over many months 10 to try to reach some accommodation and try to get some 11 response from Mr. Rubalcava with no -- with no action 12 whatsoever. And I am very supportive of moving forward 13 now with the order that we have in our latest email 14 this morning. 15 MS. GALVIN: Members of the commission, 16 this is Jeanne Galvin, Assistant Attorney General. I'm 17 assigned to you today to provide you independent legal 18 advice, and I would urge you to turn to page 2 of the 19 revised -- revised proposed order. And paragraph 20 Number 2 says the Commission orders Respondent to repay 21 the sum immediately, but pursuant to your rules, he has 22 30 days to repay that sum. So I would just ask that if 23 you do approve this repayment order that that be 24 amended to ensure and properly reflect your procedures 25 that he has 30 days within which to repay the sum that</p>	<p>11:21:27-11:22:35 Page 36</p> <p>1 be done in this? 2 MR. COLLINS: Mr. Chairman, I just want to 3 make sure that we will -- we will get from the 4 revision -- I mean, I don't disagree with the revision. 5 I just want to make sure that it's noted that we 6 have -- do we have it? 7 MS. GALVIN: Yes. If I may, I think the 8 motion was to accept that revision, not to approve the 9 entire proposed revised order. 10 MR. COLLINS: Okay. So an additional 11 motion is necessary now on the revised -- 12 MS. GALVIN: -- proposed order as amended. 13 MR. COLLINS: So, Commissioners -- well, 14 I'll let Jeanne. 15 MS. GALVIN: So that the last motion that 16 was made was to accept an amendment to Number 2 to 17 reflect that the payment is due and owing within 30 18 days from the date of the order. Now, if the 19 Commission is so inclined, we would require a second 20 motion to approve the proposed repayment order as 21 amended. 22 COMMISSIONER CHAN: I would move to approve 23 the proposed revised order as amended. 24 CHAIRMAN TITLA: Motion by Commissioner 25 Chan.</p>
<p>11:20:40-11:21:25 Page 35</p> <p>1 is owing. 2 CHAIRMAN TITLA: Any comments by the 3 Commission? Any action? 4 COMMISSIONER CHAN: Thanks, Jeanne. 5 Mr. Chairman, I would so move that that be 6 amended just to reflect -- more accurately reflect the 7 terminology in our rules that it's 30 days instead of 8 immediately. 9 CHAIRMAN TITLA: Okay. We have a motion by 10 Commissioner Chan. 11 Is there a second? 12 COMMISSIONER MEYER: This is Commissioner 13 Meyer. I second that motion. 14 CHAIRMAN TITLA: Commissioner Meyer second. 15 Any discussion on the motion? 16 (No response.) 17 CHAIRMAN TITLA: If not, all in favor say 18 aye. 19 (Chorus of ayes.) 20 CHAIRMAN TITLA: Opposed? 21 (No response.) 22 CHAIRMAN TITLA: Abstain? 23 (No response.) 24 CHAIRMAN TITLA: The motion is carried. 25 Tom, is there anything else that needs to</p>	<p>11:22:35-11:23:12 Page 37</p> <p>1 Second? 2 COMMISSIONER MEYER: Commissioner Meyer. I 3 second. 4 CHAIRMAN TITLA: Commissioner Meyer seconds 5 the motion. 6 All in favor say aye. 7 (Chorus of ayes.) 8 CHAIRMAN TITLA: Opposed? 9 (No response.) 10 CHAIRMAN TITLA: Abstain? 11 (No response.) 12 CHAIRMAN TITLA: The motion is carried. 13 Is there anything else we need to do, Tom, 14 on this item? 15 MR. COLLINS: Mr. Chairman, I do not 16 believe so. We have public comment, but it doesn't 17 look like there's anybody here from the public who 18 wants to comment. 19 Dustin, do you want to comment? 20 MR. GARDINER: No. 21 CHAIRMAN TITLA: Okay. 22 MR. COLLINS: And so we're at a motion to 23 adjourn. 24 CHAIRMAN TITLA: Okay. Is there a motion 25 to adjourn?</p>

11:23:14-11:23:33

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1 COMMISSIONER MEYER: This is Commissioner
2 Meyer. I move that we adjourn the meeting.
3 CHAIRMAN TITLA: Okay. A motion by
4 Commissioner Meyer.
5 Second?
6 COMMISSIONER CHAN: Second.
7 CHAIRMAN TITLA: Commissioner Chan seconds.
8 All in favor say aye.
9 (Chorus of ayes.)
10 CHAIRMAN TITLA: Opposed?
11 (No response.)
12 CHAIRMAN TITLA: Abstain?
13 (No response.)
14 CHAIRMAN TITLA: We are adjourned at 11:22
15 a.m.
16 (Whereupon, the proceedings concluded at
17 11:23 a.m.)
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1 STATE OF ARIZONA)
2 COUNTY OF MARICOPA)
3 BE IT KNOWN the foregoing proceedings were
4 taken by me; that I was then and there a Certified
5 Reporter of the State of Arizona, and by virtue thereof
6 authorized to administer an oath; that the proceedings
7 were taken down by me in shorthand and thereafter
8 transcribed into typewriting under my direction; that
9 the foregoing pages are a full, true, and accurate
10 transcript of all proceedings and testimony had and
11 adduced upon the taking of said proceedings, all done to
12 the best of my skill and ability.
13 I FURTHER CERTIFY that I am in no way
14 related to nor employed by any of the parties thereto
15 nor am I in any way interested in the outcome hereof.
16 DATED at Phoenix, Arizona, this 22nd day of
17 August, 2017.
18 
19 LILIA MONARREZ, RPR, CR #50699
20
21
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23
24
25

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