

Alec Shaffer

From: Alice <alice@karlandalice.name>
Sent: Saturday, November 11, 2017 7:39 AM
To: 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.