

From: ralph atchue
To: [CCEC Mailbox](#)
Subject: Pending Clean Election Rule Changes
Date: Monday, April 24, 2017 1:48:17 PM

Clean Elections Commission

I am seriously considering running for the AZ State Senate in LD11. It is my intention to run under the existing Clean Elections provisions and rules. It is my sincere belief that the election process and public perception of that process is best served and enhanced via Clean Elections.

After reviewing the proposed rule changes, however, I am deeply concerned. I am an advocate of increased transparency in the election and political processes. However, I find that much of the proposed rule changes in both options A and B, would create an unfair disadvantage for Clean Election candidates. The enactment of rule changes in either option A or B would have a negative impact on my decision to run for office

It is my hope that the Clean Elections Commissions continues to find ways to strengthen this important election process so that the voters of Arizona will gain confidence in our electoral process.

Ralph Atchue
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From: Brandon Dwyer
To: [CCEC Mailbox](#)
Subject: Comment on proposed rules changes R2-20-702(B)
Date: Tuesday, April 04, 2017 5:45:50 AM

Good day.

My name is Brandon Dwyer. I was a clean elections candidate for the 2016 election cycle and am currently thinking about running as a clean candidate again in 2018.

R2-20-702(B) Option A.

I would not run as a clean elections candidate again. Chances are I wouldn't run in 2018 if this option passed.

R2-20-702(B) Option B.

I used my normal campaign funds to purchase access to the voter file. I would have trouble running as a clean elections candidate again. More likely I wouldn't run in 2018 if this option passed.

R2-20-702(B) Option C. Sets out some great starting ground rules. If these rules were in place before the 2016 campaign it would have made life easier. I only have objections with one section.

R2-20-702(B) Option C Section F. *The Commission shall also be provided with documentation from the mail house, printer or other original source showing the number of mailers printed and the number of households to which a mailer was sent. Failure to provide this information within seven days after a mailer has been mailed may be considered as evidence the mailer was not for direct campaign purposes.*

This sets an undo burden on the printing house. It has also been my experience that print shops typically do not respond in a timely manner if at all. Many times I had to physically show up to their place of business to get a response or solve a problem. The candidate should submit the final invoices to the clean elections commission within seven business days. This extra burden will cause some print shops to turn away candidates.

Getting a print shop to do anything in a timely manor let alone extra uncompensated paperwork will lead to multiple violations from multiple campaigns.

Thanks for listening

Brandon Dwyer

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Educate your children to self-control, to the habit of holding passion and prejudice and evil tendencies subject to an upright and reasoning will, and you have done much to abolish misery from their future and crimes from society.

Benjamin Franklin

From: Phil Lopes
To: [CCEC Mailbox](#)
Subject: Vote on proposed rule changes
Date: Wednesday, May 31, 2017 9:18:17 AM

I strongly support option C and the new rule regarding campaign consultants. Options A and B would do damage to the process.

Thanks for the opportunity to comment.

Phil Lopes

From: Pamela Powers Hannley
To: [CCEC Mailbox](#)
Cc: [Pamela Powers Hannley](#); [Pamela Powers](#)
Subject: comment on proposed CCEC rule changes
Date: Monday, June 19, 2017 5:27:37 PM

Greetings, everyone,

As a Clean Elections candidate and a current member of the Arizona House of Representatives, I would like to comment on the proposed rule changes which will be voted on at the 6/22 meeting.

First of all, thank you so much for tackling this topic. I don't like what happened in 2016 regarding transferring all or most Clean Elections funds from certain candidates to political parties or consultants, and I welcome reform by the commission.

I prefer R2-20-702(B) Option C plus the new rule R2-20-703.01 Campaign Consultants. These two rules together tackle the entire problem because it addresses parties and consultants. My only concern about Option C is item e because of the added complexity and short time frame. I understand the intent of C:e, but perhaps there is a simpler way to gain that information. Please - yes on these two.

R2-20-702(B) Option A would be very bad for Clean Elections candidates because it would preclude us from buying legitimate services from a political party. Under Option A, Democratic candidates would not have access to the Democratic Party's VAN database for targeting mailings, phone banking and walks or for voter contact data-gathering. Option A would force Clean Elections candidates to run without that valuable information or to buy it from national vendors, which could be expensive and of variable quality. Option A also doesn't address funds transferred to consultants. No on Option A.

R2-20-702(B) Option B allows candidates to buy lists from political parties but not other services like renting the predictive dialer. Option B also doesn't address funds transferred to consultants. No on Option B.

Thanks for the opportunity to comment. I believe that Clean Elections should be strengthened and expanded-- not diminished.

Rep. Pamela Powers Hannley

Pamela Powers Hannley, MPH

Representative, Arizona House, LD9

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Co-Director: Arizonans for a New Economy

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Twitter: @p2hannley @AZProgressives @AZPublicBank

From: [Thomas Collins](#)
To: [Alec Shaffer](#)
Subject: FW: Rule Proposals for Commission Meeting 2/23
Date: Monday, June 19, 2017 3:22:09 PM

From: Constantin Querard [mailto:grassrootspartners@cox.net]
Sent: Tuesday, February 28, 2017 9:50 AM
To: Thomas Collins
Subject: Re: Rule Proposals for Commission Meeting 2/23

And the breakdown of costs is parties only as well?

On 2/28/17, 9:43 AM, "Thomas Collins" <Thomas.Collins@azcleanelections.gov> wrote:

No mark up for parties. Correct.

From: [Thomas Collins](#)
To: [Alec Shaffer](#)
Subject: FW: Rule Proposals for Commission Meeting 2/23
Date: Monday, June 19, 2017 3:22:03 PM

From: Constantin Querard [mailto:grassrootspartners@cox.net]
Sent: Tuesday, February 28, 2017 10:02 AM
To: Thomas Collins
Subject: Re: Rule Proposals for Commission Meeting 2/23

Okay. Well to the degree you are requiring parties to provide goods/services at cost, you need to know their costs... That doesn't extend to private contractors/vendors, and they're going to object to what are essentially their trade secrets (how they do their business) being subjected to FOIA requests by their competition. Since CCEC isn't requiring private vendors to provide anything at cost, I don't think you or the general public needs to know their internal accounting.

That'll be my comment... Feel free to share...

On 2/28/17, 9:55 AM, "Thomas Collins" <Thomas.Collins@azcleanelections.gov> wrote:

We wrote it to have itemization on both. But obviously we expect and invite comment to the contrary.

From: Constantin Querard [mailto:grassrootspartners@cox.net]
Sent: Tuesday, February 28, 2017 9:50 AM
To: Thomas Collins
Subject: Re: Rule Proposals for Commission Meeting 2/23

And the breakdown of costs is parties only as well?

On 2/28/17, 9:43 AM, "Thomas Collins" <Thomas.Collins@azcleanelections.gov> wrote:
No mark up for parties. Correct.

From: [Thomas Collins](#)
To: [Alec Shaffer](#)
Subject: FW: Rule Proposals for Commission Meeting 2/23
Date: Monday, June 19, 2017 3:22:18 PM

From: Constantin Querard [mailto:grassrootspartners@cox.net]
Sent: Tuesday, February 28, 2017 9:06 AM
To: Thomas Collins
Subject: Re: Rule Proposals for Commission Meeting 2/23

I reread Option C and think I made a mistake. Does it only apply to expenditures made through political parties (as opposed to actual consultants/vendors)?

If so, then the disclosure you're asking for would allow you to ensure there is no markup and that's okay.

When I read it the first time I thought all of the disclosure regarding profit margins etc would apply to all vendors and that would really interfere with private businesses, but since parties aren't for-profit ventures, it is probably fine. And you could include additional messaging like radio/TV/online in that case...

CQ

On 2/22/17, 2:42 PM, "Thomas Collins" <Thomas.Collins@azcleanelections.gov> wrote:

Are you ok with me sharing some of these thoughts with the commission on both 702 and 703.01?

From: Constantin Querard [mailto:grassrootspartners@cox.net]
Sent: Tuesday, February 21, 2017 11:07 PM
To: Thomas Collins
Subject: Re: Rule Proposals for Commission Meeting 2/23

I forgot to mention 703.01

Ugh...

So much more paperwork and hassle... Why is it the business of any of my clients who my other clients are? And why would government feel it has a compelling interest in inserting itself into a private contract and forcing that disclosure? Same goes for requiring everyone to disclose their profit margins for each client and for each job? That's nobody's business and I've been making that argument since 2004. That starts getting into trade secrets and how I literally do business. Why would that sort of information be subject to a FOIA request by my competition?

And we're in trouble if we forget to send you a copy of something we're mailing? Bad idea, but why exclude autodialers, TV and Radio ads, online buys, etc? I'm not sure what problem this is supposed to fix, but it just sets up a whole new bunch of stuff you can get in trouble for, and eventually running Clean isn't worth the risk...

Sorry if I sound too harsh. I know you're working hard on this stuff and the effort is appreciated. Its tricky trying to craft a solution to the problem...

CQ

On 2/20/17, 5:02 PM, "Thomas Collins" <Thomas.Collins@azcleanelections.gov> wrote:
All,

Attached please find draft rules that will be presented to the Commission at its meeting Thursday. The meeting thursday is to open the public comment period if the Commission votes to do so. Proposals are, of course, subject to change.

Let me know if you have questions.

Thanks, Tom

From: Barbara Warren
To: [CCEC Mailbox](#)
Subject: Comments on new proposed rules
Date: Saturday, June 03, 2017 9:39:44 PM

I would like to emphasize that Clean Elections are essential to fair and non-corrupt elections of our State government representatives, senators, corporation commissioners. and others. This process reduces or eliminates the forces of dark money and corruption in our States elections. I strongly support clean elections.

I also stronlgy support ONLY Option C of the proposed revisions, although Section F seems unnecessarily cumbersome and restrictive. Option C would otherwise bring greater transparency to the clean elections process. I do not support Option A or Option B.

Thank you

Barbara H. Warren, MD
LD9
Tucson, Arizona