

**From:** rfgraap@comcast.net  
**To:** [CCEC Mailbox](#)  
**Subject:** New rules  
**Date:** Monday, May 29, 2017 5:35:49 PM

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I support the following:

R2-20--702 Options C

R2-20-703.01

Raymond Graap  
6100 N. Zorrela Segundo  
Tucson, Az. 85718

**From:** Howard L. Johnson  
**To:** [CCEC Mailbox](#)  
**Subject:** upcoming vote on rule changes  
**Date:** Wednesday, May 24, 2017 5:13:17 PM

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Ladies and gentlemen,

On this upcoming vote, please support rule R2-20-702 Option C and the new rule R2-20-703.01.....

In advance, Thank you for voting as I have suggested.

*Sincerely,*

***Howard L. Johnson***

<http://www.youtube.com/user/hljimesa>

*Beware of false knowledge, it is more dangerous than ignorance – George Bernard Shaw*

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

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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

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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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Vice Chair: Public Banking Institute

<http://www.publicbankinginstitute.org/>

Co-Director: Arizonans for a New Economy

Website: <http://ArizonaPublicBanking.org>

Facebook: <https://www.facebook.com/ArizonaPublicBanking>

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

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**From:** Constantin Querard [mailto:[grassrootspartners@cox.net](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@azcleaselections.gov](mailto:Thomas.Collins@azcleaselections.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

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**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@azcleaselections.gov](mailto:Thomas.Collins@azcleaselections.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@azcleaselections.gov](mailto:Thomas.Collins@azcleaselections.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

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**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@azcleaselections.gov](mailto:Thomas.Collins@azcleaselections.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@azcleaselections.gov](mailto:Thomas.Collins@azcleaselections.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:** evecshapiro@gmail.com  
**To:** [CCEC Mailbox](#)  
**Subject:** rule changes  
**Date:** Tuesday, June 06, 2017 7:59:36 PM

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R2-20-702 Option C and the new rule R2-20-703.01 are worthwhile changes in the clean election law because they would clean up what has been happening with both political parties and make the system more transparent– without excessive burden on people who run clean. I support both of these proposals. Thanks, Eve Shapiro MD.