

**OUR VOICE OUR VOTE
2022 ARIZONA FIREWALL POLICY**

TO: Staff and Consultants

FROM: Our Voice Our Vote

RE: Firewall Policy for Arizona Elections

Our Voice Our Vote (“OVOV”) will have certain personnel involved in the creation, production, and distribution of independent expenditures expressly advocating for or against candidates in Arizona during the 2022 election cycle. To comply with campaign finance law, we must structure our operations so that we may maintain the absolute independence of these communications from the candidate or party committee who may benefit from them. Thus, we have imposed a firewall between (i) employees and consultants who are involved in the creation, production, and distribution of independent expenditure communications (“*independent-side personnel*”) and (ii) candidates, party committees, and agents thereof, and OVOV personnel working closely with them (“*coordinated-side personnel*”). The policy below explains how the firewall will operate (“*firewall policy*”).

This policy is in effect upon receipt by OVOV staff and consultants and shall remain in effect until the polls close on Election Day 2022 or until otherwise instructed. This policy applies during business hours and during off-hours; inside and outside the office; and to all forms of communications, including in-person meetings, telephone calls, emails, and other oral, written, and electronic mediums.

ELIGIBILITY

The following persons are ineligible to be independent-side personnel:

- Employees, officers, or paid consultants for any campaign or party committee in Arizona (“campaign”);
- Other persons acting as agents on behalf of the campaign;
- Persons who are or have been authorized to raise or spend funds on behalf of the campaign in the 2022 election cycle.

OVOV INDEPENDENT-SIDE PERSONNEL

- Sena Mohammed
- Karen Hernandez
- Patricia Arangio
- Roy Tatem Jr

OVOV COORDINATED-SIDE PERSONNEL

- Reginald Bolding
- Cymone Bolding

GUIDELINES FOR INDEPENDENT-SIDE AND COORDINATED-SIDE PERSONNEL

Only independent-side personnel are permitted to partake in the creation, production, and distribution of independent expenditure communications or in strategic discussions regarding such communications. Coordinated-side personnel are barred from partaking in these activities. As part of the firewall, independent-side personnel may **not**:

- Create, produce, or distribute an independent expenditure communication at the request or suggestion of, in concert with, with the cooperation or consultation of coordinated-side personnel, with the assent of coordinated-side personnel, or pursuant to a general or particular understanding with coordinated-side personnel;
- Receive nonpublic strategic information from coordinated-side personnel regarding the nonpublic plans, projects, activities, or needs (such as a campaign's polling data or research) of a candidate or party committee; or
- Allow coordinated-side personnel to participate in the creation, production, or distribution of independent expenditure communications, or in strategic discussions regarding such communications, including but not limited to discussions regarding the content, timing, location, mode, intended audience, frequency, place, nature, or volume of such communications.

As part of the firewall, coordinated-side personnel may **not**:

- Request or suggest that independent-side personnel create, produce, or distribute an independent expenditure communication;
- Provide nonpublic strategic information to independent-side personnel regarding nonpublic plans, projects, activities, or needs (such as a campaign's polling data or research) of a candidate or party committee; or
- Participate in the creation, production, or distribution of independent expenditure communications, or in strategic discussions regarding such communications, including but not limited to discussions regarding the content, timing, location, mode, intended audience, frequency, place, nature, or volume of such communications.

STEPS THAT OVOV IS TAKING TO IMPLEMENT FIREWALL

OVOV will take the following steps to implement this firewall policy:

- Distribute the firewall policy to affected personnel;
- Instruct independent-side personnel not to attend staff meetings, or portions thereof, where the nonpublic plans, projects, activities, or needs of candidates or party committees are discussed;
- Disallow access by independent-side personnel to electronic file folders designated for coordinated-side personnel, and vice versa;
- Exclude coordinated-side personnel from discussions involving political expenditures by independent-side personnel, and vice versa; and
- Make available OVOV counsel—Roy Herrera and Daniel Arellano—to answer any questions.

GUIDELINES FOR CONSULTING FIRMS

OVOV's strategic campaign consultants are responsible for implementing this firewall policy for any election where services are provided to OVOV and/or any other organization that sponsors independent expenditure communications. As part of that implementation, consultants will:

- Take the same steps, or equivalent steps, that OVOV takes to implement its firewall policy; *and*
- Provide OVOV with a written list describing which firm personnel will be coordinated-side and independent-side personnel. Any person performing services for a candidate or party committee may not serve as independent-side personnel.

QUESTIONS

Should you have any questions about whether a particular interaction is permissible or engage in or observe any conduct inconsistent with this policy, please contact Roy Herrera or Daniel Arellano at 602-567-4820.

Updated June 14, 2022

~~June 14, 2021~~