



Paul Watkins

CFPB Director of the Office of Innovation

Biography & Work Experience

Paul Watkins Received His B.A. In Political Philosophy From Hillsdale College In 2003 And His J.D. From Harvard Law School In 2006. [[Paul Watkins Resume](#), Obtained Through FOIA (CFPB-2019-0276-F)]

Dates	Position	Employer	Notes	Source
July 2018 – Present	Director of the Office of Innovation	Consumer Financial Protection Bureau		CFPB Press Release
Jan. 2015 – July 2018	Chief Counsel, Civil Litigation Division	Arizona Office of the Attorney General		Resume from FOIA
2012 – 2015	Senior Legal Counsel	Alliance Defending Freedom		Resume from FOIA
2011 – 2012	Pepperdine University School of Law	Nootbaar Research Fellow		Resume from FOIA
2008 – 2011	Securities Litigation Associate	Covington & Burling LLP		Resume from FOIA
2007 – 2008	Clerk	Judge Dennis W. Shedd, Fourth Circuit Court of Appeals		Resume from FOIA
2006 -2007	Corporate Associate	Simpson Thacher and Bartlett LLP		Resume from FOIA

CFPB Political Appointee Paul Watkins Hid His Work For An Anti-LGBTQ Hate Group—And He Could Soon Have The Authority To Exempt Industry From Crucial Anti-Discrimination Laws

Paul Watkins, The Head Of The CFPB's Office Of Innovation, Worked As An Attorney For Alliance Defending Freedom, An Anti-LGBT Hate Group That Supports Recriminalizing Homosexuality—But He's Opted To Not Acknowledge His Three Years There In His Public Biography.

Former CFPB Acting Director Mick Mulvaney Appointed Paul Watkins To Lead The Bureau's Newly Created Office Of Innovation And Cut Regulatory “Red Tape.”

In July 2018, Then-Acting Director Mick Mulvaney Appointed Paul Watkins To Lead The CFPB's New Office Of Innovation And Reduce Regulatory “Red Tape.” "Bureau of Consumer Financial Protection (Bureau) Acting Director Mick Mulvaney today announced he has selected Paul Watkins to lead the Bureau's new Office of Innovation. [...] 'I am confident that, under his leadership, the Office of Innovation will make significant progress in creating an environment where companies can advance new products and services without being unduly restricted by red tape that belongs in the 20th century.'" [[Press Release](#), Consumer Financial Protection Bureau, 07/18/18]

Paul Watkins Was Senior Legal Counsel For Alliance Defending Freedom From 2012 To 2015...

According To His Resume, Paul Watkins Was Senior Legal Counsel For Alliance Defending Freedom From 2012 To 2015. [[Paul Watkins Resume](#), Obtained Through FOIA (CFPB-2019-0276-F)]

...But He Left It Off His LinkedIn Profile, And It Was Not Included In The Bureau's Announcement Of His Hiring.

Paul Watkins Does Not List Any Employers Between 2013 and 2015 On His LinkedIn Profile. Paul Watkins' LinkedIn Profile does not list any employers between 2013 and 2015, between his time at law firm Covington & Burling and the Arizona Attorney General's Office. [[LinkedIn Profile for Paul Watkins](#), accessed 12/04/19]

Experience



Director, Office of Innovation

Consumer Financial Protection Bureau

Jul 2018 – Present · 1 yr 6 mos

Washington D.C. Metro Area

Head up the Office of Innovation at the Bureau tasked with promoting competition, innovation and consumer access within financial services.



Chief Counsel, Civil Litigation Division

Arizona Attorney General's Office

Jan 2015 – Jul 2018 · 3 yrs 7 mos

Phoenix, Arizona Area

Lead 150-person Civil Litigation Division enforcing state law related to consumer fraud, antitrust, tobacco, collections, environmental, bankruptcy, and civil rights. Civil Litigation Division also represents state agencies including Department of Financial Institutions, Insurance, Real Estate and Game & Fish.



Associate

Covington & Burling LLP

2008 – 2012 · 4 yrs

Securities litigation, general commercial litigation.

[[LinkedIn Profile for Paul Watkins](#), accessed 12/04/19]

In Announcement The Hiring Of Paul Watkins, The CFPB Made No Mention Of Watkins' Work For The Alliance Defending Freedom. "Watkins comes to the Bureau from the Arizona Office of the Attorney General, where he was in charge of the office's fintech initiatives. He managed the FinTech Regulatory Sandbox, the first state fintech sandbox in the country, which allows a company limited access to the marketplace in exchange for relaxing some regulations. Watkins was also the Chief Counsel for the Civil Litigation Division. In that role, he managed the state's litigation in areas such as consumer fraud, antitrust, and civil rights. Previously, Watkins practiced at Covington & Burling LLP in San Francisco and Simpson, Thacher & Bartlett LLP in Palo Alto, Calif. He is a graduate of Hillsdale College and Harvard Law School, and a former clerk for Judge Dennis W. Shedd on the United States Court of Appeals for the Fourth Circuit." [Press Release, "[Bureau of Consumer Financial Protection Announces Director for the Office of Innovation](#)," *Consumer Financial Protection Bureau*, 07/18/18]

Alliance Defending Freedom Is Classified As A Hate Group By The Southern Poverty Law Center For Its Extremist Homophobic Agenda.

Alliance Defending Freedom Has Been Designated A Hate Group By The Southern Poverty Law Center For Its Homophobic Agenda. Alliance Defending Freedom is an "SLPC

Designated Hate Group. [[Alliance Defending Freedom](#),” Southern Poverty Law Center, accessed 05/30/19]

- **Alliance Defending Freedom “Supported The Recriminalization Of Homosexuality In The U.S. And Criminalization Abroad” And “Claims That A ‘Homosexual Agenda’ Will Destroy Christianity And Society.”** [[Alliance Defending Freedom](#),” Southern Poverty Law Center, accessed 05/30/19]

While Paul Watkins Worked There, Alliance Defending Freedom Actively Worked To Legalize Discrimination Against LGBT Individuals And Ban Same-Sex Marriage.

While Paul Watkins Worked There, Alliance Defending Freedom Co-Wrote An Arizona Bill That Would Have Allowed Businesses To Discriminate Against LGBT Individuals.

While Paul Watkins Was At Alliance Defending Freedom, The Group Co-Wrote An Arizona Bill Allowing Businesses, Individuals, And Groups To “Use Their Religious Beliefs As A Defense In A Discrimination Lawsuit.” “The Arizona bill, which is headed to Gov. Jan Brewer’s desk for her signature, would allow people who object to same-sex marriage to use their religious beliefs as a defense in a discrimination lawsuit. [...] The Arizona bill would broaden the state’s definition of the exercise of religion to include both the practice and observance of religious beliefs. It would expand those protected under the state’s free-exercise-of-religion law to ‘any individual, association, partnership, corporation, church, religious assembly or institution or other business organization.’ The law was written by the conservative advocacy group Center for Arizona Policy and Alliance Defending Freedom, a prominent Arizona-based Christian law firm.” [Sarah Pulliam Bailey, [“Kansas, Arizona bills reflect national fight over gay rights vs. religious liberty,”](#) *The Washington Post*, 02/21/14]

- **In February 2014, Arizona Governor Jan Brewer Vetoed The Bill In Response To Public Backlash.** “Arizona Gov. Jan Brewer vetoed a bill Wednesday that would have allowed businesses that asserted their religious beliefs the right to deny service to gay and lesbian customers. The controversial measure faced a surge of opposition in recent days from large corporations and athletic organizations, including Delta Air Lines, the Super Bowl host committee and Major League Baseball.” [Catherine E. Shoichet and Halimah Abdullah, [“Arizona Gov. Jan Brewer vetoes controversial anti-gay bill, SB 1062,”](#) *CNN*, 02/26/14]
- **Paul Watkins Was Senior Legal Counsel For Alliance Defending Freedom From 2012 To 2015.** [[Paul Watkins Resume](#), Obtained Through FOIA (CFPB-2019-0276-F)]

While Paul Watkins Worked There, Alliance Defending Freedom Petitioned The Supreme Court To Hear Their Case Defending A Photographer Who Refused Service To A Lesbian Couple.

In 2014, Alliance Defending Freedom Petitioned The Supreme Court To Hear Their Case Defending A New Mexico Photographer Who Refused Service To A Lesbian Couple. “The Supreme Court declined [...] to consider whether a New Mexico photographer had a right to refuse service to a same-sex couple who wanted her to record their commitment ceremony. [...] The case at the court came from Elaine and Jonathan Huguenin, whose company, Elane Photography, refused service for the 2007 commitment ceremony of a lesbian couple, Vanessa Willock and Misti Collinsworth. [...] In their petition, the Huguenins and lawyer Jordan W. Lorence of the Alliance Defending Freedom mentioned religion frequently. But their plea did not cite constitutional protection of their right to freely exercise their religion. Instead, they relied on another part of the First Amendment: their right to free speech.” [Robert Barnes, “[Supreme Court declines case of photographer who denied service to gay couple](#),” *The Washington Post*, 04/07/14]

- **Paul Watkins Was Senior Legal Counsel For Alliance Defending Freedom From 2012 To 2015.** [[Paul Watkins Resume](#), Obtained Through FOIA (CFPB-2019-0276-F)]

While Paul Watkins Worked There, Alliance Defending Freedom Defended The State Of Arizona’s Same-Sex Marriage Ban.

While Paul Watkins Worked For Alliance Defending Freedom, The Group’s Lawyers Were Drafted By The Arizona Attorney General To Defend Its Prohibition Against Gay Marriage In A 2014 Lawsuit. “Attorneys for the state are telling a federal judge there’s a good reason Arizona won’t let gays marry: They can’t reproduce, at least not without the help of a third person. [...] While the lawsuit is against the state, the case is being defended by the Alliance Defending Freedom, a self-described ‘legal ministry’ formed by Christian leaders to advocate for religious liberty and marriage. Attorney General Tom Horne agreed to let that organization take the lead, naming their lawyers as special assistant attorneys general.” [Howard Fischer, “[Gays can’t have kids, shouldn’t be allowed to marry, Arizona attorneys argue](#),” *Arizona Capitol Times*, 07/23/14]

- **“‘Only Man-Woman Couples Are Capable Of Furthering The State’s Interest In Linking Children To Both Of Their Biological Parents,’ Argued Attorneys From The Alliance Defending Freedom. And They Said The Vast Majority Of Such Couples Produce Their Own Biological Children.”** [Howard Fischer, “[Gays can’t have kids, shouldn’t be allowed to marry, Arizona attorneys argue](#),” *Arizona Capitol Times*, 07/23/14]
- **Paul Watkins Was Senior Legal Counsel For Alliance Defending Freedom From 2012 To 2015.** [[Paul Watkins Resume](#), Obtained Through FOIA (CFPB-2019-0276-F)]

Paul Watkins, As Head Of The CFPB’s Innovation Office, Has Been Spearheading Efforts That Could Grant Industry Immunity From Anti-Discrimination Rules That Protect LGBTQ Consumers

And Could Grant Businesses Exemptions From Fair Lending Laws.

Paul Watkins Leads The CFPB's Office Of Innovation, Which Is Responsible For The Bureau's No-Action Letter And Product Sandbox Initiatives.

The CFPB's Office of Innovation Is Led By Paul Watkins, Who Was Appointed To Reduce Regulatory "Red Tape." "Bureau of Consumer Financial Protection (Bureau) Acting Director Mick Mulvaney today announced he has selected Paul Watkins to lead the Bureau's new Office of Innovation. [...] 'I am confident that, under his leadership, the Office of Innovation will make significant progress in creating an environment where companies can advance new products and services without being unduly restricted by red tape that belongs in the 20th century.'" [[Press Release](#), Consumer Financial Protection Bureau, 07/18/18]

Paul Watkins And Office Of Innovation Staff Are The Primary Contacts For The CFPB's No-Action Letter And Product Sandbox. [["Policy on No-Action Letters and the BCFP Product Sandbox,"](#) Federal Register, 12/13/18]

Paul Watkins Has Said That The No-Action Letter Policy Could Shield Companies Not Only From CFPB Enforcement Of The Equal Credit Opportunity Act (ECOA), But Also From Liability To Other Agencies And Private Lawsuits.

Paul Watkins Has Explained That The No-Action Letter Policy Could Eliminate Companies' Liability "Not Just For The Bureau But Other Agencies Or Private Litigants." Paul Watkins explained on a podcast in February 2019, "There are several statutes that identify approval authority, TILA, ECOA, and EFTA, allowing the bureau to approve practices as compliant. The difference with a no action letter is when the bureau makes that determination, then there is not liability under that statute not just for the bureau but other agencies or private litigants." [["Bonus Episode: The CFPB Innovation Director Paul Watkins,"](#) Barefoot Innovation Group, 02/04/19 (21:01)]

Paul Watkins Emphasized That Agencies Have As Much Power To Exempt Companies From Rules As They Do To Issues Those Rules In The First Place. "It does provide more of a comprehensive sandbox like safe harbor. That's a core element of the sandbox proposal. The other element, the other main element, is inherent authority that agencies have when the agencies are granted the authority to issue rules, they're also granted the authority to exempt from those rules so long as they're not conflicting with the statute that generated the rule." [["Bonus Episode: The CFPB Innovation Director Paul Watkins,"](#) Barefoot Innovation Group, 02/04/19 (21:28)]

CFPB Director Kathy Kraninger Has Said That The Bureau's Compliance Assistance Sandbox Will Give Companies A "Safe

Harbor' From Liability" To Consumer Protection Laws, Including ECOA.

According To CFPB Director Kathy Kraninger, The Compliance Assistance Sandbox (CAS) Will Allow Businesses To Test Financial Products Or Services “Where There Is Regulatory Uncertainty” Under Existing Consumer Law, Including The Equal Credit Opportunity Act (ECOA). “First is our Compliance Assistance Sandbox or CAS policy. [...] In this sandbox, the Bureau will work with companies that are testing new financial products and services while sharing data with the Bureau. Our CAS Policy enables testing of a financial product or service where there is regulatory uncertainty arising under three enumerated consumer laws – the Truth in Lending Act, the Equal Credit Opportunity Act, and the Electronic Fund Transfer Act.” [[Director Kraninger's Speech at Innovation Policies Launch Event](#), Consumer Financial Protection Bureau, 11/19/19]

Director Kraninger Said That Since ECOA And Other Statutes “Impose A Broad Range Of Complicated Restrictions Over A Wide Variety Of Consumer Financial Products Or Services,” The CAS Will Allow Businesses To “Test New Financial Products And Services” In A “Safe Harbor’ From Liability.” “These three statutes impose a broad range of complicated restrictions over a wide variety of consumer financial products or services. Many innovators therefore should be able to use our sandbox to test new financial products and services without the chilling effect of concerns about triggering supervision or enforcement or creating private liability about possible violation of these laws. To help address that problem, an approved applicant participating in the sandbox will have a ‘safe harbor’ from liability during the testing period.” [[Director Kraninger's Speech at Innovation Policies Launch Event](#), Consumer Financial Protection Bureau, 11/19/19]

The CFPB’s No-Action Letter Policy Could Grant Businesses Potentially Indefinite Exemptions From Fair Lending Laws, Safe Harbor From Federal And State Enforcement Actions, And Immunity From Private Lawsuits.

The CFPB’s No-Action Letter Proposal Issued Under Former Acting Director Mick Mulvaney Would Make “The Recipient Immune From Enforcement Actions By Any Federal Or State Authorities, As Well As From Lawsuits Brought By Private Parties.” “By operation of the applicable statutory provision(s), the recipient would have a ‘safe harbor’ from liability under the applicable statute(s) to the fullest extent permitted by these provisions as to any act done or omitted in good faith in conformity with the approval; i.e., the recipient would be immune from enforcement actions by any Federal or State authorities, as well as from lawsuits brought by private parties.” [[Policy on No-Action Letters and the BCFP Product Sandbox](#), Federal Register, 12/13/18]

The CFPB’s No-Action Letter Policy States That The Bureau Will “Not Make Supervisory Findings Or Bring A Supervisory Or Enforcement Action Against The Recipient.” “[...] the Bureau will not make supervisory findings or bring a supervisory or enforcement action against the recipient predicated on the recipient's offering or providing the described aspects of the product or service under (a) its authority to prevent unfair, deceptive, or abusive acts or

practices; or (b) any other identified statutory or regulatory authority within the Bureau's jurisdiction." [[Policy on No-Action Letters and the BCFP Product Sandbox](#)," Federal Register, 12/13/18]

The No-Action Letter Policy Would Grant Businesses Exemptions From "Fair Lending Laws That Prohibit Discrimination." "Among others, the policy would permit exemptions from provisions of the laws governing mortgages, credit cards, and other forms of lending; fair lending laws that prohibit discrimination; and the laws protecting bank accounts and electronic payments." [[Press Release](#), National Consumer Law Center, 12/11/18]

The No-Action Letter Policy Would "Effectively Grant Companies An Unlimited Enforcement Reprieve" By Eliminating The Original Policy's 3-Year Limit. "The agency also would do away with the three-year time limit for companies to be protected from potential enforcement actions when testing out products. That change would effectively grant companies an unlimited enforcement reprieve for products or services permitted through the no-action letter process." Lydia Beyoud, "[CFPB Reboots No-Action Letter Policy With New Enforcement Relief](#)," *Bloomberg*, 12/07/18]

The National Consumer Law Center Has Argued, "The default assumption will be that the letters would last indefinitely." [[Press Release](#), National Consumer Law Center, 12/11/18]

Rep. Maxine Waters (D-CA) Said The CFPB's Proposal To Loosen Its No-Action Letter Policy "Could Let Bad Actors That Abuse Consumers Off The Hook Entirely From Enforcement Action By The Agency."

Rep. Maxine Waters (D-CA) Said She Was Concerned By The CFPB's Proposal "To Significantly Loosen Its 'No-Action Letter' Policy In A Way That Could Let Bad Actors That Abuse Consumers Off The Hook Entirely From Enforcement Action By The Agency." On December 11, 2018, "following a Consumer Financial Protection Bureau (Consumer Bureau) proposal to weaken its 'no-action letter' policy and reduce enforcement, Congresswoman Maxine Waters (D-CA), Ranking Member of the Committee on Financial Services, made the following statement: 'I am very concerned by the Consumer Bureau proposal, issued in the last days of Mick Mulvaney's leadership, to significantly loosen its 'no-action letter' policy in a way that could let bad actors that abuse consumers off the hook entirely from enforcement action by the agency. This is yet another step to weaken the Consumer Bureau and curtail its enforcement tools. While it is important for our financial regulators to encourage responsible innovation, this is a deeply irresponsible overreach that instead encourages and abets consumer abuses by putting certain financial institutions in an enforcement-free-zone.'" [[Press Release](#), Rep. Maxine Waters, 12/11/18]

Under Former Director Richard Cordray The CFPB Affirmed Its Interpretation That The Equal Credit Opportunity Act Extends To And Protects LGBTQ Consumers From Discrimination.

In 2016, Then-Director Richard Cordray Asserted The CFPB's Stance That The Equal Credit Opportunity Act's (ECOA's) Protections Extend To Sexual Orientation And Gender Identity, A Position The Bureau's Website Still Maintains.

In 2016, Former CFPB Director Richard Cordray Clarified The Bureau's Stance That ECOA Protects Sexual Orientation And Gender Identity. In August 2016, Former CFPB Director Richard Cordray outlined the Bureau's view "that the Equal Credit Opportunity Act's prohibition against discrimination on the basis of 'sex' includes discrimination based on gender identity and sexual orientation [...] in the CFPB's view, current law provides strong support for that position." [John L. Cuhane, Jr., "[CFPB builds case for ECOA protection for gender identity and sexual orientation; Ballard to conduct Nov. 3 webinar](#)," Ballard Spahr LLP, 09/22/16]

The CFPB's Website Currently Says It Observes "Arguments That The Prohibition Against Sex Discrimination Also Affords Broad Protection From Discrimination Based On A Consumer's Gender Identity And Sexual Orientation." The CFPB's own website says it is illegal for a creditor to discriminate on the basis of Sex and explains, "*Currently, the law supports arguments that the prohibition against sex discrimination also affords broad protection from discrimination based on a consumer's gender identity and sexual orientation." [[What protections do I have against credit discrimination?](#)," Consumer Financial Protection Bureau, accessed 05/29/19]

Paul Watkins Worked In The Civil Rights Division Under An Attorney General Who Threatened LGBTQ Rights

As Arizona's Top Civil Rights Attorney, Paul Watkins Was Supposed To Protect Civil Rights While His Boss Threatened The Rights Of LGBT Arizonans—Sometimes In Partnership With Watkins' Former Colleagues At Alliance Defending Freedom.

While Paul Watkins Was Responsible For Upholding The Civil Rights Of All Arizonans As A Chief Counsel For The Arizona Attorney General's Civil Litigation Division, Attorney General Mark Brnovich Repeatedly Undermined LGBT Rights.

Paul Watkins Led The Arizona Attorney General's Civil Litigation Division From January 2015 To July 2018. [[Paul Watkins Resume](#), Obtained Through FOIA (CFPB-2019-0276-F)]

- **The Division of Civil Rights Directly Fell Under Watkins' Authority.** "The Civil Litigation Division consists of the Consumer Protection and Advocacy Section, Environmental Enforcement Section, Division of Civil Rights Section, and Bankruptcy Collection and Enforcement Section." ["[Annual Report 2015](#)," Office of the Arizona Attorney General, 2015]
- **Watkins' First Priority Should Have Been Civil Rights.** The "Mission" of The Civil Litigation Division is: "To enforce state law against those who violate the civil rights, or threaten the economic and environmental well-being of Arizonans." ["[Annual Report 2015](#)," Office of the Arizona Attorney General, 2015]

Paul Watkins Did Not Stand Up For The LGBTQ Community As His Boss Repeatedly Undermined Its Rights. "[Attorney General Mark Brnovich] joined the suit against the Obama administration's life-saving guidance protecting transgender students, as well as a brief to the Supreme Court of the United States in support of granting businesses a potentially sweeping license to discriminate against LGBTQ people. Brnovich also advised the Arizona Department of Child Safety to deny licenses to married same-sex couples seeking to jointly adopt or foster children." [Ilanthe Metzger, "[Human Rights Campaign Endorses January Contreras for Arizona Attorney General](#)," Human Rights Campaign, 02/23/18]

While Paul Watkins Worked For Him, Attorney General Mark Brnovich Signed An Amicus Brief In Support Of Masterpiece Cakeshop, The Business That Wanted To Discriminate Against Same-Sex Couples In The Landmark Supreme Court Case—And Was Represented By Watkins' Former Colleagues At Alliance Defending Freedom.

In September 2017, Paul Watkins' Boss, Attorney General Mark Brnovich, Signed An Amicus Brief To The Supreme Court Arguing That Masterpiece Cakeshop Can Discriminate Against LGBT Individuals. "The 'friend of the court' brief signed by House and Senate members expresses solidarity with Phillips, who said in his appeal to the Supreme Court that the Colorado's public accommodation law violates his 'sincerely held religious beliefs about marriage.' Among those signing the brief were Arizona Republican Reps. Trent Franks of Glendale, Paul Gosar of Prescott and Andy Biggs of Gilbert. Arizona Attorney General Mark Brnovich also joined a brief filed by 20 states in support of Phillips. [Adrienne St. Clair, "[Arizona lawmakers weigh in on case pitting gay rights, religious rights](#)," *Cronkite News*, 09/08/17]

- **Alliance Defending Freedom Attorneys Represented Masterpiece Cakeshop In The Landmark Case.** Alliance Defending Freedom Attorneys David A. Cortman, Rory T. Gray, Jeremy D. Tedesco, Kristen K. Waggoner, Jordan W. Lorence, J. Caleb Dalton were listed as "Counsel for Petitioners" Masterpiece Cakeshop, Ltd. And Jack C. Phillips in a Petition for a Writ of Certiorari to the Supreme Court of the United States. [[Petition](#)]

[For A Writ of Certiorari Masterpiece Cakeshop, et. al](#), Supreme Court of The United States, 07/22/16]

- **The ACLU Argued That The Case Was Really About Unconstitutionally Denying Rights “Solely To One Category Of People.”** “But a spokesman for the American Civil Liberties Union of Arizona disagreed, saying that while Phillips is free to his religious beliefs and free to oppose same-sex couples, ‘what he’s not free to do is deny a business service that he provides to everyone else solely to one category of people.’” [Adrienne St. Clair, “[Arizona lawmakers weigh in on case pitting gay rights, religious rights](#),” *Cronkite News*, 09/08/17]

While Paul Watkins Was At The Attorney General’s Office, It Joined With Alliance Defending Freedom To Fight Planned Parenthood In Court To Defend A Burdensome Abortion Restriction.

In 2015, The Arizona Attorney General’s Office Claimed That It Was Aided By Alliance Defending Freedom In A Case Against Planned Parenthood. In its 2015 Annual Report, The Arizona Attorney General’s office described its work on Planned Parenthood of Arizona et. al. v. William Humble, and claimed its Education and Health Section (EHS) “worked with the Alliance Defending Freedom (ADF) in the defense of this lawsuit.” [“[Annual Report 2015](#),” Office of the Arizona Attorney General Mark Brnovich, 2015]

Planned Parenthood Was Challenging An Arizona Law That Erected Barriers Against Medication Abortions. “Arizona passed a law in 2012, and implementing regulations in 2014, whose confusing language appears to require physicians to offer medication abortion only according to an obsolete method no longer used by the great majority of doctors. Contrary to years of evidence-based medical best practices, the law seems to require any woman obtaining a medication abortion to take three times more medication than recommended by the American Medical Association and the American College of Obstetricians and Gynecologists, and bans medication abortion altogether after seven weeks of pregnancy.” [“[Planned Parenthood Arizona v. Humble](#),” Center for Reproductive Rights, 05/24/18]

Paul Watkins Led The Arizona Attorney General’s Civil Litigation Division From January 2015 To July 2018. [[Paul Watkins Resume](#), Obtained Through FOIA (CFPB-2019-0276-F)]

While Working For The Arizona Attorney General, Paul Watkins Worked To Enforce SB 1487, A State “Blanket ‘Super-Preemption’” Law Allowing For Any State Legislator To Challenge Any Local Law—The Law Has Been Called A Threat To “Any Local Policy To Promote Health, Safety, Civil Rights, Or Workers.”

Arizona’s SB 1487 Has Been Called A Form Of “Blanket ‘Super-Preemption,’” Which Allows A “Single Legislator Can Stop The Transfer Of Local Funds By Objecting To Any Local Policy.” “As we [reported](#) on March 3, Arizona [SB 1487](#), a form of blanket ‘super-preemption,’ passed the Arizona Senate and moved to the state House of Representatives. SB 1487 has now passed out of both the House Commerce and Rules Committees, and is likely to

pass the House and be signed into law soon. This bill would withhold state revenue-sharing funds from localities that adopt any policy that ‘violate[s] state law or the state constitution.’ By notifying the state attorney general, a *single* legislator can stop the transfer of local funds by objecting to *any* local policy regardless of topic. [[“March 17, 2016 Preemption Watch Newsletter,”](#) Grassroots Change, 03/17/16]

SB 1487 Was Seen As A Threat To “Any Local Policy To Promote Health, Safety, Civil Rights, Or Workers.” “The practical impact is that any local policy to promote health, safety, civil rights, or workers is at risk.” [[“March 17, 2016 Preemption Watch Newsletter,”](#) Grassroots Change, 03/17/16]

Paul Watkins Said SB 1487 Has “No Exceptions” As A Local Law Banning Plastic Bags In Bisbee, Arizona Was Expected To Be Subject To A Challenge Under The Law. “Paul Watkins, Attorney General’s Office Chief Counsel, responded saying SB 1487 has ‘no exceptions,’ not even for ordinances placed before it took effect. Watkins’ statement also said his office would not begin a formal investigation until it received an official request that can only be made by a state legislator.” [[“It’s out of the bag,”](#) *Herald/Review*, 09/01/17]

- **In 2017, A Local Law Banning Single-Use Plastic Bags In Bisbee, Arizona Was Expected To Go Under SB 1487 Review.** “A Bisbee ordinance may be on the State Legislature’s radar and public servants are placing the issue on next week’s city council agenda. This is in light of an Aug. 17 ruling by the Arizona Supreme Court regarding Tucson’s confiscated weapons law and how it violates Senate Bill 1487. Bisbee, one of 19 chartered cities, adopted Ordinance 0-13-14 in September 2013 to ban single-use plastic bags under former Mayor Adriana Badal and former City Attorney John MacKinnon.” [[“It’s out of the bag,”](#) *Herald/Review*, 09/01/17]

Paul Watkins “Urged” The Arizona Supreme Court To Favor A Challenge Against A Local Gun Law In Tucson, Arizona Allowing For The Destruction Of Seized Firearms. “Deputy Attorney General Paul Watkins urged the court to find that regulating firearms is not at all local, especially because it involves the police. ‘When police powers are involved, the issue is a matter of statewide concern, as the court has said in numerous cases,’ Watkins said. “This is an inherent aspect of state sovereignty, and it’s particularly clear in this ordinance.” [Bob Christie, [“Arizona Supreme Court considering laws penalizing cities,”](#) *Associated Press*, 02/28/17]

- **In February 2017, The Arizona Supreme Court Considered An SB 1487 Challenge To A Local Gun Law In Tucson.** “Arizona Supreme Court justices on Tuesday sharply questioned an attorney for the city of Tucson over his contention that a state law requiring it to sell guns seized by its police department doesn’t apply there. [...] Tuesday’s court hearing is the first test of a 2016 law that allows a single lawmaker to trigger an investigation by the attorney general into whether a city or county has a law on its books conflicting with state law. Senate Bill 1487 requires the withholding of state shared revenue from cities that refuse to rescind those ordinances.” [Bob Christie, [“Arizona Supreme Court considering laws penalizing cities,”](#) *Associated Press*, 02/28/17]
- **Tucson Had A Policy Of Destroying Seized Firearms.** “Arizona Attorney General Mark Brnovich determined in November that Tucson’s gun destruction policy may violate a 2013 state law requiring the weapons be sold. He’s asking the high court to make the

final determination. [...] Rep. Mark Finchem, R-Oro Valley, filed a complaint in October against the practice of destroying guns, saying charter city status doesn't give Tucson a free pass. City records show that the Tucson Police Department has destroyed 4,820 guns since the beginning of 2013." [Bob Christie, "[Arizona Supreme Court considering laws penalizing cities](#)," *Associated Press*, 02/28/17]

Paul Watkins Prepared The SB 2487 Investigative Report Evaluating The Tucson Gun Law. "The SB1487 investigative report prepared by Paul Watkins, Chief of the Civil Litigation Division of the Arizona Attorney General Office, concluded that under Arizona law the 'ordinance may violate state law.'" ["[AZ AG: Tucson May Have Violated Law By Destroying Guns](#)," *Arizona Daily Independent News Network*, 11/15/16]

Paul Watkins' Graduated From A Far-Right College Known For Its Hostility To Diversity

Paul Watkins Attended Hillsdale College, A Far-Right School That Is Consistently Ranked Among The Least LGBT-Friendly Campuses In The Country And Rejects All Federal Funds To Avoid Complying With Diversity And Anti-Discrimination Rules.

Paul Watkins Was A Valedictorian At Hillsdale College, Which The Princeton Review "Consistently Ranks" Among The Least LGBT-Friendly Schools.

Paul Watkins Was A Valedictorian At Hillsdale College In 2003, When He Graduated With A B.A. In Political Philosophy. [[Paul Watkins Resume](#), Obtained Through FOIA (CFPB-2019-0276-F)]

- **Hillsdale College Describes Itself As A "Nonsectarian Christian" School.** "Hillsdale, a private college of 1,400 students in southern Michigan that describes itself as 'nonsectarian Christian' and dedicated to 'civil and religious liberty,' is scarcely known in many circles. But among erudite conservatives — think progeny of William F. Buckley Jr. — it is considered a hidden gem." [Erik Eckholm, "[In Hillsdale College, a 'Shining City on a Hill' for Conservatives](#)," *The New York Times*, 02/01/17]

The Princeton Review "Consistently Ranks Hillsdale Among The 20 Least L.G.B.T.Q.-Friendly Campuses," Where "Openly Gay Or Lesbian Students Are A Rarity" And Are Not Represented By An LGBTQ Organization. "In this isolated location, students like to form clubs, on everything from politics to cigar smoking to highland dancing. One that does not exist at Hillsdale College is an L.G.B.T.Q. organization. Openly gay or lesbian students are a rarity, and The Princeton Review consistently ranks Hillsdale among the 20 least L.G.B.T.Q.-friendly

campuses.” [Erik Eckholm, “[In Hillsdale College, a ‘Shining City on a Hill’ for Conservatives](#),” *The New York Times*, 02/01/17]

Hillsdale College Does Not Allow Its Students To Accept Federal Funds So It Can Remain “‘Unfettered’” From Requirements On Sex Discrimination And Diversity.

Hillsdale College Does Not Accept “Any Federal Or State Funds So As To Be ‘Unfettered’ By Government Mandates,” Including “Title IX Guidelines On Sex Discrimination And The Handling Of Sexual Assault Cases” And Required “Reporting On Student Race And Ethnicity.” “Conservatives are also entranced by Hillsdale’s decision to forgo any federal or state funds so as to be ‘unfettered’ by government mandates. In 1984, in *Grove City College v. Bell*, the Supreme Court ruled that even Pell grants for needy students or G.I. Bill money for veterans subjects a college to federal regulations, and so Hillsdale students are not allowed to accept such funds (most receive institutional grants). As a result, the college does not follow Title IX guidelines on sex discrimination and the handling of sexual assault cases and it has refused to engage in the otherwise required reporting on student race and ethnicity, let alone develop an affirmative action plan. Not surprisingly, the school’s ‘race blind’ admissions policy results in an overwhelmingly white student body.” [Erik Eckholm, “[In Hillsdale College, a ‘Shining City on a Hill’ for Conservatives](#),” *The New York Times*, 02/01/17]

Hillsdale College’s Official Catalog Has Described “‘Social Justice’ And ‘Multicultural Diversity’” As A “‘Dehumanizing, Discriminatory Trend.’”

Hillsdale’s Official Catalog Condemns The “Dehumanizing, Discriminatory Trend Of So-Called ‘Social Justice’ And ‘Multicultural Diversity.’” “From the official catalog: ‘The college values the merit of each unique individual, rather than succumbing to the dehumanizing, discriminatory trend of so-called ‘social justice’ and ‘multicultural diversity.’” [Erik Eckholm, “[In Hillsdale College, a ‘Shining City on a Hill’ for Conservatives](#),” *The New York Times*, 02/01/17]